CITY OF SOUTH PASADENA
CITY COUNCIL

AGENDA

SPECIAL MEETING
CLOSED SESSION

TUESDAY, MAY 30, 2023
6:00 P.M.

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

NOTICE ON PUBLIC PARTICIPATION & ACCESSIBILITY

The South Pasadena City Council Meeting will be conducted in-person from the Amedee O. "Dick" Richards, Jr. Council Chambers, located at 1424 Mission Street, South Pasadena, CA 91030. Pursuant to Assembly Bill 361 Government Code Section 54953, subdivision (e)(3), the City Council may conduct its meetings remotely and may be held via video conference.

Public Comment regarding items on the Closed Session Meeting agenda will be taken at the beginning of the meeting. The public will be released from the meeting so that the City Council may convene Closed Session discussion of items allowed under the Government Code. Any reportable action taken in Closed Session will be reported by the City Attorney during the next Open Session meeting. A separate Zoom link will be provided for the Open Session for the public to attend.

Public participation may be made as follows:

- In-Person – Council Chambers, 1424 Mission Street, South Pasadena, CA 91030
- Live Broadcast via the City website – http://www.spectrumstream.com/streaming/south_pasadena/live.cfm
- Via Zoom – Meeting **ID**: **226 442 7248**
- Written Public Comment – written comment must be submitted by 12:00 p.m. the day of the meeting by emailing to ccpubliccomment@southpasadenaca.gov.
- Via Phone – +1-669-900-6833 and entering the Zoom Meeting ID listed above.

Meeting may be viewed at:

1. Go to the Zoom website, https://zoom.us/join and enter the Zoom Meeting information; or
2. Click on the following unique Zoom meeting link: https://us06web.zoom.us/j/2264427248?pwd=aEFuSGszQ2I5WjJkemloTms0RTlVUT09; or
3. By calling: +1-669-900-6833 and entering the Zoom Meeting ID listed above; and viewing the meeting via http://www.spectrumstream.com/streaming/south_pasadena/live.cfm

CALL TO ORDER:	Mayor	Jon Primuth
ROLL CALL:	Mayor	Jon Primuth
	Mayor Pro Tem	Evelyn G. Zneimer
	Councilmember	Jack Donovan
	Councilmember	Michael A. Cacciotti
	Councilmember	Janet Braun

PUBLIC COMMENT

CLOSED SESSION AGENDA ITEMS

A. **PUBLIC EMPLOYMENT**
Government Code Section 54957(b)(1)

Title: City Attorney

B. **REAL PROPERTY NEGOTIATIONS**
(Government Code Section 54956.8)

1. Property Address: 920 Lohman Lane
   Agency Negotiator: Arminé Chaparyan, City Manager
   Negotiating Party: John Letts, iTennis
   Under Negotiation: Price and Terms

CERTIFICATION OF POSTING

*I declare under penalty of perjury that I posted this notice of agenda for the meeting to be held on **May 30, 2023**, on the bulletin board in the courtyard of City Hall located at 1414 Mission Street, South Pasadena, CA 91030, and on the City website as required by law, on the date listed below.*

05/25/2023	/S/
Date	Mark Perez, Deputy City Clerk

CITY OF SOUTH PASADENA
CITY COUNCIL

AGENDA

SPECIAL MEETING
TUESDAY, MAY 30, 2023, AT 7:00 P.M.

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

South Pasadena City Council Statement of Civility

As your elected 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.

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- Via Zoom – **Webinar ID: 825 9999 2830**
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CALL TO ORDER:	Mayor	Jon Primuth
ROLL CALL:	Mayor	Jon Primuth
	Mayor Pro Tem	Evelyn G. Zneimer
	Councilmember	Jack Donovan
	Councilmember	Michael A. Cacciotti
	Councilmember	Janet Braun
PLEDGE OF ALLEGIANCE:	Councilmember	Evelyn G. Zneimer

PUBLIC COMMENT GUIDELINES

The City Council welcomes public input. Members of the public may comment on a non-agenda subject under the jurisdiction of the City Council or on an agenda item. Members of the public will have three minutes to address the City Council, however, the Mayor and City Council may adjust the time allotted, as needed.

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 to the City website for public viewing under Additional Documents. When submitting a public comment, please make sure to include the following:
1) Name (optional), and
2) Agenda item you are submitting public comment on.
3) Submit by no later than 12:00 p.m., on the day of the City Council meeting. Correspondence received after this time will be distributed the following business day.

PLEASE NOTE: The Mayor may exercise the Chair's discretion, subject to the approval of the majority of the City Council, to adjust public comment time limit to less than three minutes, as needed.

Pursuant to State law, the City Council may not discuss or take action on issues not on the meeting agenda, except that members of the City Council 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.

CLOSED SESSION ANNOUNCEMENTS

1. CLOSED SESSION ANNOUNCEMENTS

PUBLIC COMMENT

2. PUBLIC COMMENT

Public Comment will be limited to three minutes per speaker for the agendized items only.

ACTION/DISCUSSION

3. ADOPT PROPOSED 6TH CYCLE (2021-2029) HOUSING ELEMENT AND APPROVE RELATED ENVIRONMENTAL ASSESSMENT

RESOLUTION

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA, REGARDING 1) APPROVAL OF THE ENVIRONMENTAL ASSESSMENT; AND 2) ADOPTION OF THE 2021-2029 GENERAL PLAN HOUSING ELEMENT (SIXTH CYCLE, FIFTH DRAFT) UPDATE OF THE SOUTH PASADENA GENERAL PLAN, CONSISTENT WITH THE STATUTORY REQUIREMENT OF CALIFORNIA HOUSING ELEMENT LAW.

Recommendation

It is recommended that the City Council adopt a resolution approving the Proposed 6th Cycle (2021-2029) Housing Element and approve the related Environmental Assessment.

4. REVIEW OF THE DRAFT PROPOSED FISCAL YEAR 2023-2024 BUDGET

Recommendation
It is recommended that the City Council review the Draft Proposed Fiscal Year 2023-2024 Budget.

ADJOURNMENT

FOR YOUR INFORMATION

FUTURE CITY COUNCIL MEETINGS

June 7, 2023	Regular City Council Meeting	7:00 P.M.
June 21, 2023	Regular City Council Meeting	7:00 P.M.
July 19, 2023	Regular City Council Meeting	7:00 P.M.

PUBLIC ACCESS TO AGENDA DOCUMENTS AND BROADCASTING OF MEETINGS
City Council meeting agenda packets, any agenda related documents, and additional documents are available online for public viewing on the City's website:
www.southpasadenaca.gov/CityCouncilMeetings2023

Regular meetings are live streamed via the internet at:
http://www.spectrumstream.com/streaming/south_pasadena/live.cfm

AGENDA NOTIFICATION SUBSCRIPTION
If you wish to receive an agenda email notification please contact the City Clerk's Division via email at CityClerk@southpasadenaca.gov or call (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 or cityclerk@southpasadenaca.gov. 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).

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05/25/2023 /S/
Date Mark Perez, Deputy City Clerk

City Council Agenda Report

ITEM NO. 3

DATE: May 30, 2023

FROM: Arminé Chaparyan, City Manager

PREPARED BY: Angelica Frausto-Lupo, Community Development Director
Alison Becker, AICP Deputy Community Development Director

SUBJECT: **Adopt Proposed 6th Cycle (2021-2029) Housing Element and Approve related Environmental Assessment**

Recommendation

It is recommended that the City Council adopt a resolution approving the Proposed 6th Cycle (2021-2029) Housing Element and approve the related Environmental Assessment.

Executive Summary

The Housing Element is one of several State-required 'elements' or chapters that comprise the City's General Plan which includes goals, policies, and programs to meet the existing and projected housing needs for the community and is required to be updated on an eight-year cycle. Over the last three years, the City has been working towards obtaining a certified housing element. On May 16, 2023, the City received notice from the State Department of Housing and Community Development (HCD) that we met all statutory requirements of the State Housing Element Law. The Planning Commission held a Special Meeting on Wednesday, May 17, and passed a resolution recommending the City Council to adopt the proposed 6th Cycle (2021-2029) Housing Element and approve the related Environmental Assessment.

Background

State Housing Element Law

The Housing Element is one of nine required elements in the City's General Plan. The Housing Element details the plans and policies the City has to meet its housing needs. The Housing Element must be updated on an eight-year cycle as part of the State's Regional Housing Needs Allocation (RHNA) process. Currently, the RHNA process is in its sixth cycle. That process starts with the California Department of Housing and Community Development (HCD) determining the existing and projected need for housing for each region of the state. South Pasadena is located in the Southern California Association of Government (SCAG) region.

SCAG's 6th Cycle RHNA Allocation Plan was finalized on July 1, 2021. This plan identified a housing need in South Pasadena of 2,067 homes, comprised of 757 very-low, 398 low, 334 moderate, and 578 above moderate income homes.

In addition to planning for the identified housing need, there are a number of other statutory requirements that must be included in the Housing Element. These requirements include:

- Analysis of past performance towards meeting housing needs
- Analysis of population, employment, and household characteristics
- Identification of disproportionate segregation of populations by income or status
- Identification of constraints on housing development

Sixth cycle Housing Elements for the SCAG region had a statutory deadline to be adopted by October 15, 2021. However, most cities in the SCAG region did not have adopted housing elements that complied with State Housing Law by that date.
There were a number of changes incorporated into State Housing Law between the 5th and 6th RHNA cycles. Most notably, the calculation to determine the existing and projected need for housing changed dramatically. During the 5th cycle, South Pasadena's housing needs were determined to be 63 new homes, including 17 very-low, 10 low, 11 moderate, and 25 above-moderate income homes. The City's 6th cycle housing needs increased by 3200% over the 5th cycle housing needs. This type of increase was typical throughout the SCAG region. Many cities found it difficult to identify sufficient land to accommodate this increase in housing needs.

In addition, State Housing Law was modified to require that Housing Elements incorporate additional information regarding Affirmatively Furthering Fair Housing (AFFH). Cities must identify past practices that contributed to the segregation of protected classes through housing policy which led to concentrated areas of wealth. Furthermore, when cities identify these past practices and concentrated areas of wealth, the Housing Element must include policies that affirmatively work towards reversing the harmful effects of the identified past practices.

<u>South Pasadena 6th Cycle Housing Element</u>
Preparation of the 6th Cycle Housing Element began in January 2019. The Planning Commission held its first study session on the Housing Element at a special meeting on Wednesday, May 26, 2021, which included a progress report regarding the preparation of the Housing Element for consistency with the City's RHNA. The first public review draft of the Housing Element was released on October 12, 2021 for a public comment and was subsequently submitted to HCD for review on October 22, 2021.

HCD reviewed the Housing Element and provided the City with a response letter on December 21, 2021 that identified revisions needed to comply with State Housing Law. This began a series of review and revision cycles between HCD and the City. Critical dates during this process include:

- October 22, 2021 - Submitted First Draft Housing Element to HCD for review;
- December 21, 2021 - Received HCD response letter on First Draft Housing Element;
- May 11, 2022 - Submitted Second Draft Housing Element to HCD for review;
- July 8, 2022 - Received HCD response letter on Second Draft Housing Element;
- September 15, 2022 - Submitted Third Draft Housing Element to HCD for review;
- October 28, 2022 - Received HCD response letter on Third Draft Housing Element;
- December 12, 2022 - Submitted Fourth Draft Housing Element to HCD for review;
- January 27, 2023 - Received HCD response letter on Fourth Draft Housing Element; and
- March 24, 2023 - Submitted Fifth Draft Housing Element to HCD for review.
- April 24, 2023 - City Staff met with HCD on 5th Draft. Consequently, City rescinded and re-submitted on May 5th.

During this process, on April 12, 2022, the City of South Pasadena was sued by Californians for Homeownership, Inc. for non-compliance with State Housing Law because the City did not have an adopted housing element. On August 15, 2022, the City entered into a Settlement Agreement with Californians for Homeownership, Inc. to resolve the lawsuit that committed the City to a number of actions, including:

- Removal of certain parcels as identified housing sites within the Housing Element;
- Addition of a program within the Housing Element to issue a request for proposal for city-owned housing sites identified in the Housing Element no later than January 1, 2028;
- Provide specific information for sites identified to meet the City's housing needs as required by State Housing Law; and
- Addition of a program in the Housing Element for the City to seek, through voter approval, the removal of the City's existing 45-foot height limit for at least any parcel identified in the Housing Element for which the base density is anticipated to exceed 50 dwelling units per acre.

Additionally, the Settlement Agreement committed the City to adopting a Housing Element certified by HCD no later than May 31, 2023.

The Draft 2021-2029 Housing Element meets all statutory requirements for housing elements identified in State Housing Law. The Housing Element is organized into several sections, including:

- Housing Needs Assessment: The Housing Needs Assessment summarizes data regarding the population and housing needs of South Pasadena.
- Fair Housing Assessment: The Fair Housing Assessment includes an assessment of fair housing issues, including past practices by the City that have exacerbated unfair housing conditions, analysis of access to opportunities and disproportionate housing needs and displacement risks for South Pasadena residents.
- Housing Constraints: The section on Housing Constraints identifies constraints on the development of housing. This includes market, environmental, and

government constraints.

- Housing Development Resources: The section on Housing Development Resources identifies resources the City has to meet its housing needs. These resources include land, funding, and governmental resources that can be used to encourage the development of housing.
- Review of Past Performance: The Review of Past Performance evaluates the City's performance in meeting the goals and housing objectives identified in the City's fifth cycle housing element, as required by State Housing Law.
- Housing Plan & Quantified Objectives: The Housing Plan & Quantified Objectives includes all of the goals and policies to meet the City's identified housing needs.

The Housing Element identifies six housing goals and 47 programs to meet the City's housing needs. The six goals are:

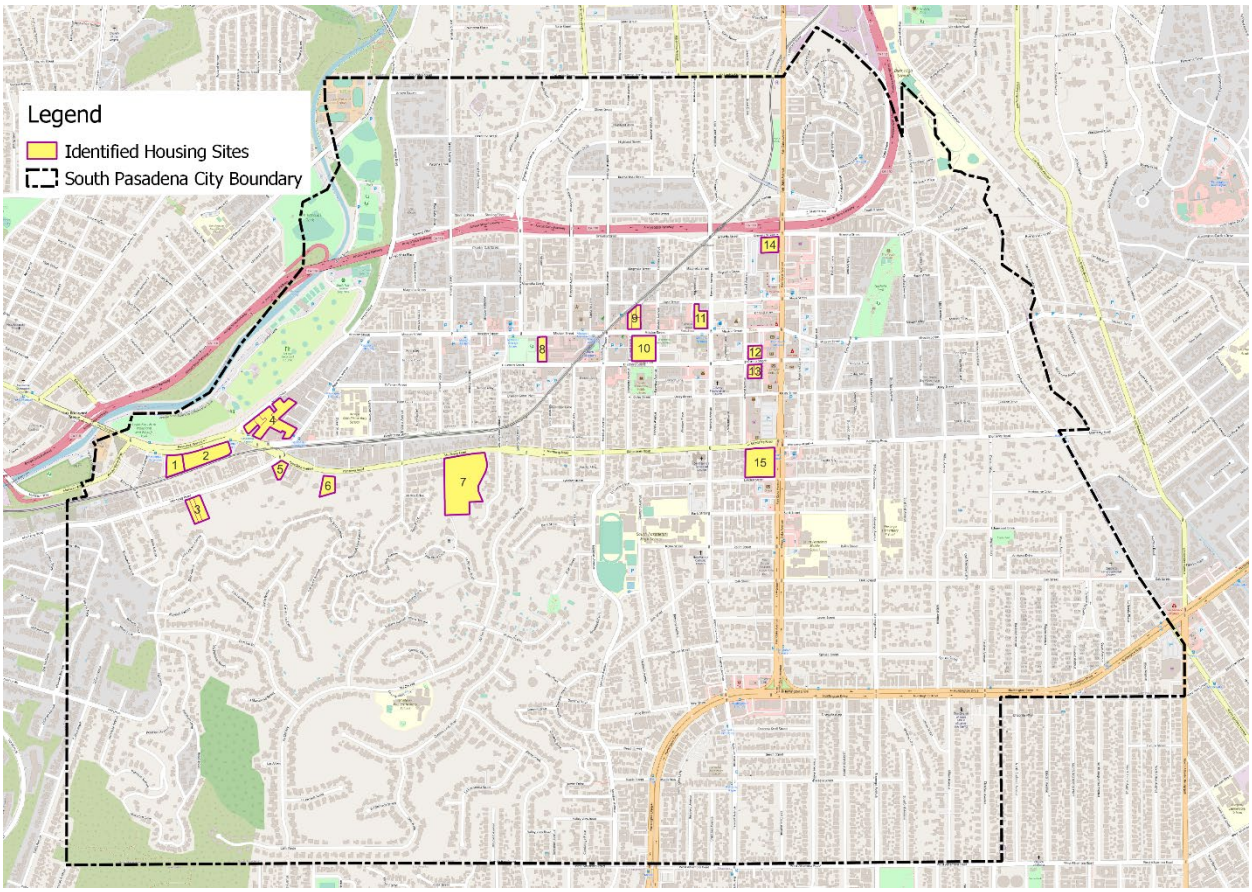
1. Conserve the existing housing stock and maintain standards of livability;
2. Encourage and assist in the provision of Affordable Housing;
3. Provide opportunities to increase housing production;
4. Comply with State Housing Laws;
5. Promote fair housing while acknowledging the consequences of past discriminatory housing practices; and,
6. Expand and strengthen tenant protections for South Pasadena's existing renters.

Some of the key programs created in the Housing Element to meet these goals include:

- Use public lands to produce affordable housing;
- Revise the City's existing Inclusionary Housing Ordinance to ensure it is not a constraint on development;
- Seek the repeal of the City's existing 45-foot height limit at least for parcels identified in the Housing Element with a base density of 50 dwelling units per acre or more;
- Adopt mixed-use development standards that enable the development of residential uses at the densities identified in the Housing Element;
- Facilitate and monitor ADU production;
- Create a Missing Middle housing program near high quality transit corridors that allows for the creation of duplexes, triplexes, four-plexes, and cottage courts;
- Change commercial zoning designations for the Downtown area, Ostrich Farm, and Huntington Drive corridor to allow for residential and mixed-use development at densities up to 70 or 110 dwelling units per acre, depending on the area; and
- Consider a right to return policy and relocation assistance program for residents of rental properties that are being redeveloped.

The Housing Element includes a number of policies to meet the City's housing needs identified through the RHNA process. The Housing Element identifies specific sites that can accommodate housing development, identifies policies to create higher density mixed-use areas along major arterial roadways, and increases the maximum density of the Medium and High Density Residential zones.

The Housing Element identifies fifteen (15) properties to accommodate a portion of the City's housing needs. These properties are detailed in Appendix A of the Housing Element and are shown in the map below.

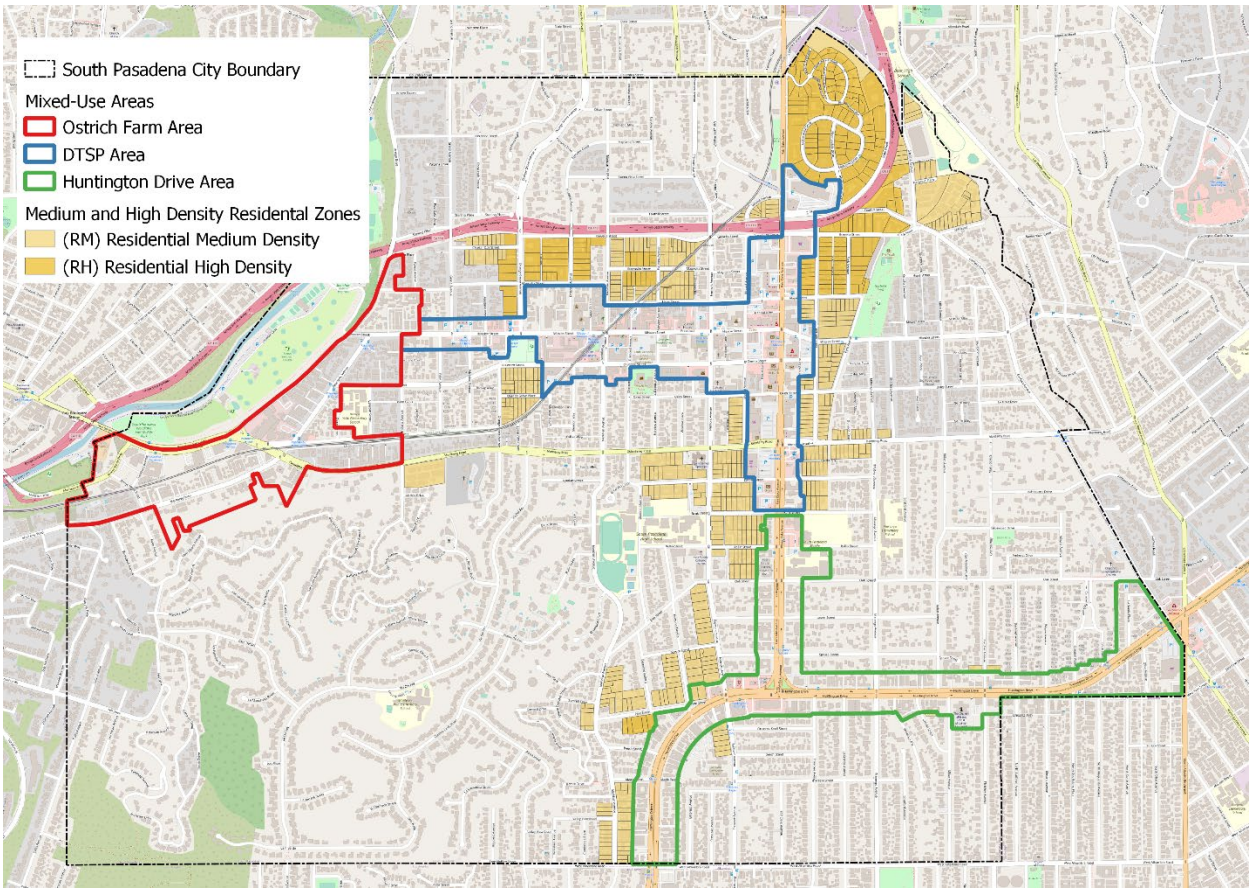


In addition, the Housing Element identifies additional areas of the City where rezoning is required to accommodate the remaining housing needs that could not be accommodated on the identified sites. These rezoned areas do not specify specific sites that will accommodate the remaining housing needs, but instead are areas where additional housing needs may be met. While the Housing Element does not identify specific parcels in these areas that will be redeveloped during the current RHNA cycle, it is anticipated that some percentage of the parcels in these areas will be redeveloped. The likelihood of redevelopment of each parcel is based on a combination of factors, including historic status, proximity to transit, existing uses, proposed density, and environmental constraints.

The Housing Element also sets a policy to increase the zoning capacity of the residential properties in the Medium and High Density Residential Zones. The Medium Density Residential zone will increase the maximum of 30 du/ac and the High Density Residential zone will increase the maximum density of 45 du/ac.

These proposed zone changes will come before the Planning Commission and the City Council for consideration within 120 days of adoption of the Housing Element. It is anticipated that this implementation will include a General Plan Update, a new Downtown Specific Plan, and a zoning text amendment. These implementing documents will include additional details regarding the related development standards and objective design criteria.

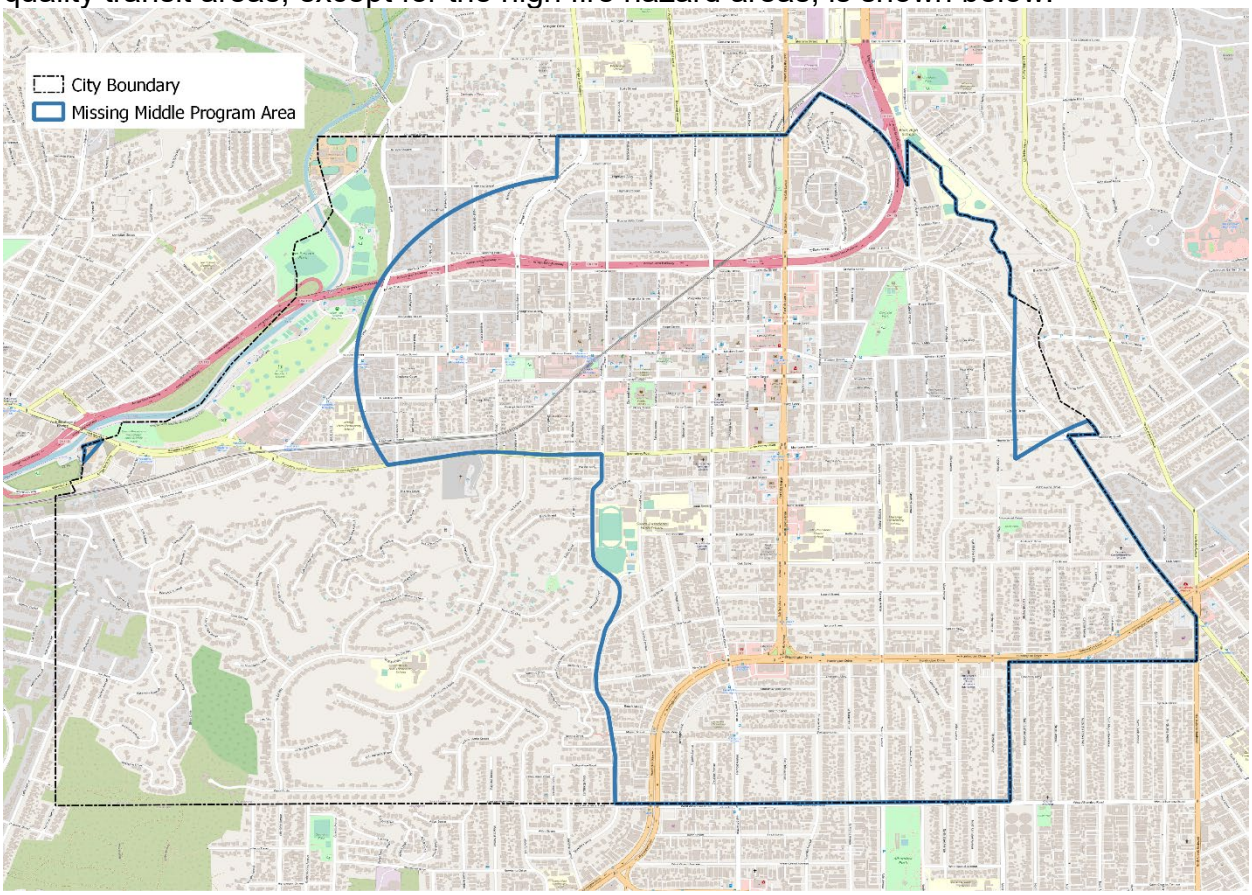
A map showing all of the areas slated for re-zoning is below.



In addition to these programs to meet the City's RNHA goals, there are numerous policies intended to fulfill the City's AFFH requirements, including the Missing Middle housing program and additional tenant protections.

The Missing Middle housing program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts. The baseline density for this program will be 15 du/acre in the Residential Estate (RE) and Residential Low Density (RS) zones. Staff will present a specific proposal

at a future date for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. A map of the high-quality transit areas, except for the high fire hazard areas, is shown below.



The Housing Element also includes renter protections to ensure that existing tenants are not displaced by the zoning changes necessary to meet the City's RHNA goals. These tenant protections include consideration of numerous policies, including a rental registry, right to return, relocation assistance, and rent stabilization. The details of these policies will be developed through 2023 and early 2024 and be presented to City Council for consideration once the details have been identified.

In order to comply with the Court Order, the City must adopt this certified 2021-2029 Housing Element no later than May 31, 2023.

Analysis

In order to achieve the endorsement of HCD reviewers, minor modifications were made through a re-submission process during the 5th Draft review cycle in late April 2023. These changes included a commitment to consult with the local development community as part of Program 2.i and Program 2.m; a commitment to create objective design standards that include a Floor Area Ratio that facilitates maximum allowable densities in the downtown specific plan zones as a part of Program 3.b; and more a detailed description for the

Missing Middle housing program that included density, location and timing benchmarks as a part of Program 3.m.

Environmental Analysis
Pursuant to Government Code section 65759, agencies subject to a court order to bring their general plan or relevant mandatory elements into compliance are required to prepare an Initial Study and, if warranted, an Environmental Assessment. The California Environmental Quality Act (CEQA) commencing with Public Resources Code section 21000 is inapplicable. (Government Code Section 65759(a)). An Initial Study in conformity with 14 CCR 15080(c) and an Environmental Assessment in conformity with 14 CCR 15140, et seq., were prepared for this project. The Environmental Assessment is presented here for evaluation by the City Council. The Environmental Assessment identifies seven significant and unavoidable impacts, as well as thirteen impacts that can be mitigated to less than significant.

Public Noticing
A notification of this hearing was published on May 19, 2023 in the South Pasadena Review. The public was also made aware that this item was to be considered this evening by virtue of its inclusion on the legally publicly noticed agenda, posting of the same agenda and reports on the City's website.

Fiscal Impact
There are no costs associated with the adoption of the 6th Cycle (2021-2029) Housing.

Key Performance Indicators and Strategic Plan
This item aligns with Strategic Plan priority 5, Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs.

Commission Review and Recommendation
The City Planning Commission considered and recommended approval (3-0) of the draft 6th Cycle (2021-2029) Housing Element and companion Environmental Assessment at a special meeting on May 17, 2023. The Commission specifically recommended that each program ("project") in the Housing Element be subject to environment review.

Attachments
1. Draft Resolution
    a. 2021-2029 Housing Element
    b. Initial Study
    c. Environmental Assessment
2. Planning Commission Resolution No. 23-04
3. 2021-2029 Housing Element Redlined

ATTACHMENT 1

City Council Resolution

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RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA REGARDING 1) APPROVAL OF THE ENVIRONMENTAL ASSESSMENT; AND 2) ADOPTION OF THE 2021-2029 GENERAL PLAN HOUSING ELEMENT (SIXTH CYCLE, FIFTH DRAFT) UPDATE OF THE SOUTH PASADENA GENERAL PLAN, CONSISTENT WITH THE STATUTORY REQUIREMENT OF CALIFORNIA HOUSING ELEMENT LAW.

WHEREAS, Government Code § 65580, et seq., requires the City of South Pasadena to periodically prepare and update its Housing Element in its General Plan. A city's housing element establishes goals, policies, and programs to accommodate the maintenance and expansion of the city's housing supply; and

WHEREAS, the 2021-2029 General Plan Housing Element Update ("the 2021-2029 Housing Element") has been prepared for the City of South Pasadena based on input from the City Council, Planning Commission, the California Department of Housing and Community Development (HCD), and public comments, and is incorporated herein by reference as Exhibit A; and

WHEREAS, the City of South Pasadena's 2021-2029 Housing Element includes updated data in compliance with state housing laws and a variety of programs and strategies to address citywide housing needs and priorities; and

WHEREAS, a draft 2021-2029 Housing Element was released for 60-day public review on October 12, 2021, and was submitted to HCD on October 22, 2021. A response letter was received from HCD on December 21, 2021; and

WHEREAS, on April 12, 2022, the City of South Pasadena was sued by Californians for Homeownership for non-compliance with State Housing Law for failing to have adopted a compliant Housing Element by October 15, 2021 (*Californians For Homeownership v. City of South Pasadena*, LASC Case Nos. 22STCP01388 & 22STCP01161); and

WHEREAS, on May 11, 2022, the City submitted a Second Draft 2021-2029 Housing Element to HCD for review; and

WHEREAS, on July 8, 2022, HCD provided a response letter on Second Draft 2021-2029 Housing Element; and

WHEREAS, on August 15, 2022, the City entered into a Settlement Agreement with Californians for Homeownership to resolve the lawsuit that committed the City to a number of actions, including: removal of certain parcels as identified housing sites; addition of a program to issue a request for proposal for city-owned housing sites no later than January 1, 2028; provide specific information for sites identified to meet the

City's housing needs; and addition of a program to seek, through voter approval, the removal of the City's existing 45-foot height limit for at least any parcel identified in the Housing Element for which the base density is anticipated to exceed 50 dwelling units per acre; and

WHEREAS, on August 19, 2022, the Settlement Agreement was adopted as the Court's Order and committed the City to adopting a housing element certified by or eligible for certification by HCD no later than May 31, 2023; and

WHEREAS, on September 15, 2022, the City submitted a Third Draft 2021-2029 Housing Element to HCD for review. On October 28, 2022, the City received a response letter on the Third Draft 2021-2029 Housing Element from HCD. On December 12, 2022, the City submitted a Fourth Draft 2021-2029 Housing Element to HCD for review. On January 27, 2023, the City received a response letter on Fourth Draft 2021-2029 Housing Element from HCD. On March 24, 2023, the City submitted a Fifth Draft 2021-2029 Housing Element to HCD for review. On April 28, 2023, based on recommendations in a status conference with HCD reviewers, the City made minor text edits and a program revision and rereleased the Fifth Draft 2021-2029 Housing Element for a seven-day comment period through May 5, 2023 (Exhibit A); and

WHEREAS, the City Council has reviewed the Fifth Draft 2021-2029 Housing Element for consistency with the City's General Plan and Municipal Code, and programs have been identified to address any required changes to the General Plan and Municipal Code to ensure consistency, as necessary; and

WHEREAS, pursuant to Government Code Section 65759(a), the California Environmental Quality Act (CEQA) commencing with Public Resources Code section 21000 does not apply to any action necessary to bring a general plan or relevant mandatory element of the plan into compliance with any court order; and

WHEREAS, pursuant to Government Code section 65759, agencies subject to a court order to bring their general plan or relevant mandatory elements into compliance are required to prepare an Initial Study Initial Study in conformity with 14 CCR 15080(c) to determine the environmental effects of the proposed action necessary to comply with the court order, and, if warranted due based on such Initial Study, prepare an Environmental Assessment in conformity with 14 CCR 15140, et seq., within the timelines under the court order; and

WHEREAS, an Initial Study in conformity with 14 CCR 15080(c) and an Environmental Assessment in conformity with 14 CCR 15140, et seq., were prepared for this project. The Initial Study and Environmental Assessment are incorporated by reference as Exhibit B; and

WHEREAS, the Environmental Assessment was presented for evaluation by the City Council, identifying seven significant and unavoidable impacts, as well as thirteen impacts that can be mitigated to less than significant; and

WHEREAS, based on the analysis presented in the Environmental Assessment, and as more thoroughly described therein, implementation of the proposed Project would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures: Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation; Cumulative Air Quality Impacts); Greenhouse Gas Emissions (GHG Emissions); Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and, Population and Housing (Population Growth). Table ES-1 therein presents a summary of significant environmental impacts identified in Sections 3.1 through 3.16 of the Environmental Assessment; Mitigation Measures (MMs) that reduce any significant impacts; and the level of significance of each impact after mitigation. Significant irreversible environmental changes and growth-inducing impacts are addressed in Section 5.0, Other CEQA Considerations of the Environmental Assessment; and

WHEREAS, pursuant to Government Code Section 65759(a), no further action is required regarding such findings; and

WHEREAS, the adoption of the Fifth Draft 2021-2029 Housing Element would supersede and replace the existing 2013-2021 Housing Element of the General Plan; and

WHEREAS, on May 30, 2023, the City Council held a duly noticed public hearing, at which time it considered all material and evidence, whether written or oral; and

WHEREAS, all legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA, DOES RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. The above recitals are hereby declared to be true and correct.

SECTION 2. Based upon substantial evidence presented to this Council during the public hearing, including public testimony and written and oral staff reports, and the environmental documentation, the City Council finds:

A. All necessary public hearings and opportunities for public testimony and comment have been conducted in compliance with applicable law;

B. That the Fifth Draft 2021-2029 Housing Element addresses all of the requirements as set forth in Government Code §§ 65302 and 65580, et seq.; and

C. That the Fifth Draft 2021-2029 Housing Element is compatible with, consistent with and integrated with all other elements of the City's General Plan.

SECTION 3. Based upon the foregoing, the City Council:

A. Approves the Initial Study and Environmental Assessment for the Fifth Draft 2021-2029 Housing Element as an adequate description of the impacts of the Project in conformity with 14 CCR 15080(c) and 14 CCR 15140, et seq.,

B. Adopts the Fifth Draft 2021-2029 Housing Element, with any revisions necessary to obtain certification from HCD, as the 2021-2029 Housing Element Update to the General Plan; and

C. Repeals the 2013-2021 Housing Element.

SECTION 4. This Resolution shall take effect immediately upon its adoption.

SECTION 5. The City Clerk of the City of South Pasadena shall certify to the passage and adoption of this resolution and its approval by the City Council and shall cause the same to be listed in the records of the City.

PASSED, APPROVED AND ADOPTED on this 30th day of May, 2023.

_____
Jon Primuth, Mayor

ATTEST:

_____
Mark Perez, Deputy City Clerk

APPROVED AS TO FORM:

_____
Andrew L. Jared, City Attorney

I HEREBY CERTIFY the foregoing Resolution No. _____was duly adopted by the City Council of the City of South Pasadena, California, at a special meeting held on the 30th day of May, 2023, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAINED:

_____
Mark Perez, Deputy City Clerk

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ATTACHMENT 1 a

2021-2029 Housing Element

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City of SOUTH PASADENA

CITY OF SOUTH PASADENA

2021-2029 GENERAL PLAN HOUSING ELEMENT

Revised FIFTH Draft
May 2023

Acknowledgements

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Jack Donovan, Councilmember (District 2)
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TABLE OF CONTENTS

6.1 EXECUTIVE SUMMARY 1

6.2 INTRODUCTION 34
- 6.2.1 OVERVIEW 34
- 6.2.2 PURPOSE AND AUTHORITY OF THE HOUSING ELEMENT 34
- 6.2.3 AUTHORITY AND SCOPE OF THE HOUSING ELEMENT 36
- 6.2.4 PUBLIC PARTICIPATION 37
- 6.2.5 CALIFORNIA ENVIRONMENTAL QUALITY ACT 39
- 6.2.6 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS 39

6.3 HOUSING NEEDS ASSESSMENT 40
- 6.3.1 COMMUNITY PROFILE 40
- 6.3.2 EMPLOYMENT TRENDS 43
- 6.3.3 HOUSEHOLD CHARACTERISTICS 45
- 6.3.4 REGIONAL HOUSING NEEDS ASSESSMENT 50
- 6.3.5 EXTREMELY LOW-INCOME HOUSEHOLDS 51
- 6.3.6 SPECIAL-NEEDS GROUPS 53
- 6.3.7 HOUSING PROFILE 64
- 6.3.8 SUMMARY OF HOUSING NEEDS 72

6.4 FAIR HOUSING ASSESSMENT 74
- 6.4.1 OUTREACH 74
- 6.4.2 ASSESSMENT OF FAIR HOUSING ISSUES (AFFIRMATIVELY FURTHERING FAIR HOUSING) 79
- 6.4.3 PATTERNS OF INTEGRATION AND SEGREGATION 81
- 6.4.4 ACCESS TO OPPORTUNITY 90
- 6.4.5 DISPROPORTIONATE HOUSING NEED AND DISPLACEMENT RISK 95
- 6.4.6 SOUTH PASADENA HISTORY 101
- 6.4.7 ENFORCEMENT OF FAIR HOUSING AND OUTREACH CAPACITY 107
- 6.4.8 ANALYSIS OF SITES INVENTORY FOR FAIR HOUSING 110
- 6.4.9 CONTRIBUTING FACTORS TO FAIR HOUSING ISSUES 125

6.5 HOUSING CONSTRAINTS 128
- 6.5.1 MARKET CONSTRAINTS 128
- 6.5.2 GOVERNMENTAL CONSTRAINTS 130
- 6.5.3 ENVIRONMENTAL CONSTRAINTS 151

6.6 HOUSING DEVELOPMENT RESOURCES 154
- 6.6.1 ZONING CODE RESOURCES 154
- 6.6.2 LAND RESOURCES 168
- 6.6.3 FINANCIAL RESOURCES 235
- 6.6.4 OPPORTUNITIES FOR ENERGY CONSERVATION 237

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE 239
6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES 253
6.8.1 GOALS, POLICIES, AND PROGRAMS 253
6.8.2 SUMMARY OF QUANTIFIED OBJECTIVES 286

APPENDICES

Appendix A – Sites Exhibits
Appendix B – Public Participation Summary
Appendix C – Letter to Property Owners
Appendix D – Qualified Entries
Appendix E – Accessory Dwelling Unit Projection Methodology
Appendix F – Realistic Capacity Analysis

TABLES

Table VI-1 QUANTIFIED HOUSING IMPLEMENTATION SUMMARY 4
Table VI-2 SUMMARY OF HOUSING PROGRAMS FOR THE 2021-2029 HOUSING ELEMENT 5
Table VI-3 HISTORIC POPULATION ESTIMATES AND FUTURE PROJECTION 1970 – 2045 41
Table VI-4 POPULATION CHARACTERISTICS 42
Table VI-5 RACE AND ETHNICITY CHARACTERISTICS 43
Table VI-6 2019 OCCUPATIONS EMPLOYED PERSONS 16 YEARS OF AGE AND OVER 44
Table VI-7 2045 EMPLOYMENT PROJECTIONS SOUTH PASADENA AND LOS ANGELES COUNTY 44
Table VI-8 PERSONS PER HOUSEHOLD – 2019 45
Table VI-9 AVERAGE HOUSEHOLD SIZE 46
Table VI-10 TENURE BY HOUSEHOLD SIZE 46
Table VI-11 PERSONS PER ROOM 47
Table VI-12 2018 HOUSEHOLD INCOME BY TENURE 48
Table VI-13 HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER 49
Table VI-14 2020 INCOME LIMITS, LOS ANGELES COUNTY (4-PERSON HOUSEHOLD) 50
Table VI-15 SOUTH PASADENA REGIONAL HOUSING NEEDS ASSESSMENT 2021-2029 51
Table VI-16 HOUSEHOLDS WITH SPECIAL HOUSING NEEDS 53
Table VI-17 DISABILITIES BY TYPE AND AGE OF RESIDENT 54
Table VI-18 EMPLOYMENT AMONG POPULATION WITH DISABILITY 55
Table VI-19 PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE 56
Table VI-20 HOUSING UNIT TENURE BY AGE OF HEAD HOUSEHOLDER 57
Table VI-21 FAMILY HOUSEHOLD COMPOSITION 60
Table VI-22 HOUSING UNITS BY OCCUPANCY STATUS 65

Table VI-23 HISTORIC HOUSING TRENDS: 1980-2019 65
Table VI-24 HOUSING UNITS BY TYPE AND OCCUPANCY STATUS 66
Table VI-25 OCCUPIED HOUSING UNITS BY AGE OF HOUSING STOCK – AS OF 2018 67
Table VI-26 HOUSING CONDITION SURVEY SUMMARY 2022 68
Table VI-27 RESIDENTIAL RENTAL PRICES 69
Table VI-28 HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018 OWNER-OCCUPIED HOUSING UNITS 70
Table VI-29 HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2016 RENTER-OCCUPIED HOUSING UNITS 71
Table VI-30 AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS 71
Table VI-31 SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS 72
Table VI-32A HRC DISCRIMINATION INQUIRIES AND CASES 109
Table VI-32B DISTRIBUTION OF RHNA CAPACITY BY CENSUS TRACT 114
Table VI-33 FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES 126
Table VI-34 GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES 131
Table VI-35 RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT 132
Table VI-36 MULTI-FAMILY COMMON OPEN SPACE 135
Table VI-37 RESIDENTIAL PARKING REQUIREMENTS 137
Table VI-38 2022 PLANNING FEE AND IMPACT FEE SCHEDULE 139
Table VI-39 ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING* 141
Table VI-40 ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS 146
Table VI-41 TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES 150
Table VI-42 COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040) 161
Table VI-43 INCLUSIONARY HOUSING REQUIREMENT OPTIONS 166
Table VI-44 VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE 172
Table VI-45 REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA 175
Table VI-46 ACCESSORY DWELLING UNIT PROJECTION 176
Table VI-47 POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION 178
Table VI-48 REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA 181
Table VI-49 REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION 183
Table VI-50 SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA [1] 187
Table VI-51 DOWNTOWN SPECIFIC PLAN REZONING CAPACITY ANALYSIS[1] 189
Table VI-52 COMPARISON OF SITE CAPACITY AND RHNA 234
Table VI-53 FINANCIAL HOUSING RESOURCES 235
Table VI-54 COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED 239
Table VI-55 2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE 242
Table VI-56 QUANTIFIED HOUSING IMPLEMENTATION SUMMARY 287

FIGURES

Figure VI-1 POPULATION GROWTH TRENDS: SOUTH PASADENA AND SCAG* REGION 41
Figure VI-2 2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA 61
Figure VI-2 (continued) 2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA 62
Figure VI-3 MEDIAN HOME SALES PRICE FOR EXISTING HOMES 69
Figure VI-4 TCAC/HCD OPPORTUNITY AREAS 82
84
Figure VI-6 LOCAL POVERTY RATES 2015–2019 84
Figure VI-5 LOCAL POVERTY RATES 2010–2014 84
Figure VI-7 REGIONAL POVERTY RATES 2015–2019 84
Figure VI-8 REGIONAL MEDIAN INCOME 2015–2019 85
Figure VI-9 LOCAL MEDIAN INCOME 2015–2019 86
87
Figure VI-11 REGIONAL ETHNIC PREDOMINANCE 87
Figure VI-10 REGIONAL DIVERSITY INDEX 2018 87
Figure VI-12 REGIONAL CHANGE IN DIVERSITY INDEX 2010-2018 87
Figure VI-13 PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING ALONE 88
Figure VI-14 REGIONAL PERCENT OF POPULATION LIVING WITH A DISABILITY 89
Figure VI-15 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA ELEMENTARY SCHOOLS 90
Figure VI-16 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA MIDDLE SCHOOL 91
Figure VI-17 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA HIGH SCHOOL 91
Figure VI-18 REGIONAL JOBS PROXIMITY INDEX 93
Figure VI-19 LOCAL HOUSING OVERCROWDING 96
Figure VI-21 CHANGE IN RENTER OVERPAYMENT OVER A FIVE-YEAR PERIOD 97
Figure VI-20 LOCAL OVERPAYMENT BY RENTERS 97
Figure VI-22 LOCAL OVERPAYMENT BY OWNERS 97
Figure VI-23 CHANGE IN OWNER OVERPAYMENT OVER A FIVE-YEAR PERIOD 97
Figure VI-24 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY POVERTY RATES 117
Figure VI-25 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RACIAL IDENTIFICATION 118
Figure VI-26 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY DISABILITY RATE 119
Figure VI-27 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH JOB PROXIMITY INDEX SCORE 120
Figure VI-28 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CALENVIROSCREEN PERCENTILE 121
Figure VI-29 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF HOMEOWNER OVERPAYMENT 122
Figure VI-30 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF RENTER OVERPAYMENT 123

Figure VI-31 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY RATE OF OVERCROWDING.....124
Figure VI-32 HIGHER DENSITY PRECENT PROJECTS WITHIN 45 FOOT-BUILDINGS 144

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City of South Pasadena
2021-2029 HOUSING ELEMENT

6.1 EXECUTIVE SUMMARY

A New Approach to Increased and Inclusive Housing Production

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

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

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

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

New State Housing Legislation

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

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

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

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

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

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

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

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

The Public Outreach Process

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

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

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

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

Quantified Objectives

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

Table VI-1
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

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

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

Summary of the Housing Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit localized in the areas of increased density to stated density goals..If the height limit is replaced, the new limit will be no less than 84 feetto achieve the densities identified in the DTSP... In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; the City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.	may be an impediment to development.			measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code. If the ballot measure is not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre
Goal 3.0 Provide opportunities to increase housing production Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.				
Program 3.a - Rezone and Redesignate Sites to Meet RHNA Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 15-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the increase in permitted density along the City's arterial corridors either through inclusing within the DTSP or through a zoning overlay district. Allowable densities within these areas will be	Rezone sufficient sites to accomodate the City's RNHA targets.	General Fund	Community Development Department	General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
70 du/ac, except for the Fair Oaks zone within the DTSP, which will be 110 du/ac.. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.				
Program 3.b - Mixed-Use Developments and Adaptive Re-Use As part of the rezoning and adoption of the DTSP through Program 3.a, the City will create development standards that encourage the development of high density residential uses. It is anticipated that the base density of the DTSP zones will be either 70 or 110 du/ac, depending on the zone. Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards: • Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building. • Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone. • Minimum unit size: 450 square feet. • Required parking: o No required parking for parcels within ½ mile of a high quality transit stop; o One space per studio or one-bedroom unit; o 1.5 spaces per two-bedroom or larger unit; o Development incentive of 0.5 spaces for deed restricted affordable housing units. • Private open space: 50 square feet minimum for Liner and Flex Building typologies. These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include: • Reduced private open space requirements;	Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.	General Fund	Community Development Department	Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website to include revised process for streamlined processing of planned development permits for mixed-use and Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by November 2023. Update handout materials by November 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually (see Program 2.a.) Within 120 days after the enactment of a ballot measure repealing or replacing the height

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
• Reduced public open space requirements; • Reduced parking requirements; • Expedited processing. The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate. ▪				limit, the City will revise the development standards contained in the DTSP and zoning code accordingly. Fee study if needed by December 2025.
Program 3.c – Replacement of Lost Units from Residential Demolitions In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. Currently, existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. This requirement applies to: ▪ Non-vacant sites ▪ Vacant sites with previous residential uses that have been vacated or demolished.	Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.	General Fund	Community Development Department	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Program 3.d – Enable Parcel Assemblage To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.	Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.	General Fund (legislative efforts); Grant funding (implementation)	City Manager's Office; Community Development Department	Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and review annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
				legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Program 3.e – Develop an Electronic Permitting System Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.	All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.	General Fund and grants	Community Development Department	Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.
Program 3.f – Allow and Facilitate ADUs The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring its ADU ordinance into compliance with State law. The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time. As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners: • Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets; • Make brochures available at community center and libraries, and at "ADU Community Open House";	Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 420 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).	General Fund; SCAG grant	Community Development Department	Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and and update ADU Amnesty information and incentives based on any state law changes. Review the effectiveness of the ADU regulations every two years starting in December2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
• Create short promotional videos or flyers and brochures (digital and print) by January 2024; • Distribute at least annually though social media promotions, direct mailings to property owners, with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k). This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include: ▪ Online application process with staff intake for quality control ▪ Maintain and amend materials for better applicant guidance, as needed ▪ Provide consistent staff training and support ▪ Look for all opportunities to provide certainty earlier in the process ▪ Reduce the number of steps and shorten timeframes, and Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.				

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

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

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

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

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

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

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

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

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

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

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

6.2 INTRODUCTION

6.2.1 Overview

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

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

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

6.2.2 Purpose and Authority of the Housing Element

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

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

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

Housing Needs Assessment (Section 6.3)

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

Fair Housing Assessment (6.4)

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

Analysis of Constraints on Housing (6.5)

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

Site Inventory and Analysis (Section 6.6)

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

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

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

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

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

Housing Programs (Housing Plan) (Section 6.8)

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

Quantified Objectives

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

6.2.3 Authority and Scope of the Housing Element

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

6.2.4 Public Participation

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

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

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

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

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

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

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

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

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

Developer Forum, August 15, 2022 (Workshop 6)

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

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

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

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

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

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

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

6.2.5 California Environmental Quality Act

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

6.2.6 Relationship to Other General Plan Elements

The City of South Pasadena General Plan consists of seven elements: (1) Land Use & Community Design; (2) Circulation & Accessibility; (3) Economic Development & Revitalization Element; (4) Historic Preservation; (5) Open Space & Resource Conservation; (6) Housing; and (7) Safety & Noise. The Housing Element builds upon the other General Plan elements and is consistent with the policies and goals set forth by the entire General Plan. The City is currently partway through a comprehensive update to its General Plan. All of the other elements of the General Plan are currently being updated for consistency with recent updates to state law, including those related to environmental justice, a new General Plan requirement since the City last conducted a comprehensive General Plan Update. South Pasadena does not need to conduct an analysis in response to Senate Bill (SB) 244 because the City's sphere of influence is coterminous with the City limit, so no residential communities exist within the sphere of influence. In addition, the City will review for and confirm internal consistency as part of its annual general plan implementation report required under Government Code section 65400.

6.3 HOUSING NEEDS ASSESSMENT

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

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

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

6.3.1 Community Profile

The characteristics of a city's population are important factors affecting the housing market in the community. Issues such as population growth, age, race, ethnicity, and employment all help determine the city's housing needs. Table VI-3 compares the population estimates of the City of South Pasadena and Los Angeles County from 1970 to 2019 and shows the projected increase in population growth by 2045. The 1970, 1980, 1990, 2000, and 2010 figures are provided by the U.S. Census and the 2019 figures are an estimate provided by the California DOF. The 2045 figure comes from SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City's population increased between 1970 and 2019 by 14.2 percent with an average annual growth of 0.2 percent. In 2019, the City's population was 26,245. The City's population has represented a small percentage of the County's population at an average of 3 percent since 1970. Since 2010, however, the City's share of the County's population has substantially decreased, indicating that South Pasadena has grown at a slower rate than many other jurisdictions in the County. From the high-level regional perspective provided by SCAG in its local housing data profile for South Pasadena, the city experienced continuous population growth through from 2000 to 2015, increasing by an average of 2.3 percent every five years across this 15-year period, until the population declined slightly by approximately 2.2 percent from 2015 to 2020. The six-county jurisdictional area of SCAG

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

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

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

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

YEAR	CITY OF SOUTH PASADENA			LOS ANGELES COUNTY	
	POPULATION	PERCENTAGE OF COUNTY	AVERAGE ANNUAL GROWTH	POPULATION	AVERAGE ANNUAL GROWTH
1970	22,979	3%		7,041,980	
1980	22,681	3%	-0.1%	7,477,421	0.6%
1990	23,936	3%	.06%	8,832,500	1.8%
2000	24,292	3%	0.2%	9,519,338	0.8%
2010	25,619	3%	0.5%	9,818,605	0.3%
2019	26,245	0.3%	0.3%	10,253,716	0.5%
Average	--	3%	0.2%	--	0.8%
2045	27,200	0.2%	--	11,673,600	--

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

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

Table VI-4
POPULATION CHARACTERISTICS

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

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

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

Table VI-5
RACE AND ETHNICITY CHARACTERISTICS

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

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

6.3.2 Employment Trends

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

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

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

Source: 2015-2019 ACS DP03: Selected Economic Characteristics

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

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

Source: 2020 SCAG RTP/SCS

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

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

6.3.3 Household Characteristics

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

Household Composition and Size

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

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

Table VI-8
PERSONS PER HOUSEHOLD – 2019

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

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

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

Table VI-9
AVERAGE HOUSEHOLD SIZE

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

Source: California DOF (2007, 2012, 2019)

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

Overcrowding

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

Table VI-10
TENURE BY HOUSEHOLD SIZE

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

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

Table VI-11 identifies the number of persons per room by owner and rental units. Approximately 97 percent of all occupied units had one or less than one person per room in 2018. As a whole, South Pasadena had a relatively low rate of overcrowding in 2018 with approximately 2 percent of all households considered overcrowded, and only 1 percent considered severely overcrowded. Of the renter-occupied units, 213 units (about 4 percent) were overcrowded, and 66 (about 1 percent) were severely overcrowded. Of the owner-occupied units, 42 units (less than 1 percent) were overcrowded,

and 18 units were severely overcrowded. Given such low percentages, it is evident that overcrowding is not a significant housing problem in South Pasadena.

Table VI-11
PERSONS PER ROOM

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

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

Household Income and Income Distribution

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

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

Table VI-12
2018 HOUSEHOLD INCOME BY TENURE

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

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

Table VI-13
HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER

INCOME	AGE OF HOUSEHOLDER									
	BELOW 25 YEARS		25 TO 44 YEARS		45 TO 64 YEARS		65 YEARS AND ABOVE		TOTAL	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Less than $10,000	15	15%	173	5%	109	3%	141	7%	438	4%
$10,000 to $19,999	4	4%	90	3%	131	3%	217	10%	442	5%
$20,000 to $24,999	-	0%	33	1%	66	2%	28	1%	127	1%
$25,000 to $34,999	-	0%	128	4%	105	3%	232	11%	465	5%
$35,000 to $44,999	-	0%	98	3%	139	3%	173	8%	410	4%
$45,000 to $59,999	32	33%	221	6%	232	6%	134	6%	619	6%
$60,000 to $74,999	-	0%	353	10%	256	6%	185	9%	794	8%
$75,000 to $99,999	-	0%	489	14%	682	17%	211	10%	1,382	14%
$100,000 to $124,999	-	0%	361	10%	342	8%	229	11%	932	9%
$125,000 to $149,999	45	46%	344	10%	338	8%	114	5%	841	9%
$150,000 to $199,999	1	1%	359	10%	482	12%	194	9%	1,036	11%
$200,000 or more	-	0%	817	24%	1,209	30%	309	14%	2,335	24%
Total Households*	97	100%	3,466	100%	4,091	100%	2,167	100%	9,821	100%

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

Support for Lower Income Households

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

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

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

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

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

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

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

6.3.4 Regional Housing Needs Assessment

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

SCAG's RHNA development process extended over more than a year and a half, beginning with hearings on proposed methodology in Summer 2019. The proposed methodology was discussed in an extensive public review process before receiving approval from HCD and adoption by the SCAG Regional Council on March 4, 2020. SCAG issued the draft RHNA allocation on September 3, 2020, with South Pasadena receiving 2,062 units (in addition to the existing 10,678 housing units in the city). The City of South Pasadena filed an appeal based on strong evidence that the number was not realistic given certain characteristics of the local geography and development patterns. However, the appeal was rejected, along with the vast majority of appeals filed by other cities in the SCAG region. A few other appeals were approved, resulting in a reallocation of units to other jurisdictions within the region. Through that process, five additional units were reallocated to South Pasadena, with a final allocation of 2,067 units (see Table VI-15 below) in the Final RHNA that SCAG adopted on March 3, 2021.

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

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

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

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

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

Source: SCAG RHNA, Adopted March 3, 2021

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

6.3.5 Extremely Low-Income Households

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

For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of 757 very low-income units (378 units) represents the additional housing needed to be provided for extremely low-income households. Some extremely low-income households could include household members with mental, physical or developmental disabilities, and special needs. A single senior citizen on a limited amount of fixed income, such as SSI, could also be considered extremely low income. As detailed earlier in this chapter, a greater percentage of extremely low-income households in the city are renter households. Extremely low income households are second only to very low income households in terms of paying more than 30 percent of monthly income towards housing. To address the needs of extremely low-income households with mental, physical, or developmental disabilities, the Housing Element includes a program for providing for housing types for this special-needs group

(see Program 2.h) in addition to other programs that would also address extremely low-income households (Programs 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance, Program 2.f - Offer Services to People without Housing, Program 2.g – Expand Senior Housing, Program 2.j – General Plan Affordable Housing Overlay, Program 2.k – Affordable Housing Overlay Zone, Program 3.f – Allow and Facilitate ADUs and the other ADU-related programs, Program 4.a – Land Use Controls – Emergency Shelters, Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers, Program 4.d – ADA Accessibility Standards, Program 4.e – Universal Design, and Program 5.a - Fair Housing Education, Outreach, and Services)

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

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

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

6.3.6 Special-Needs Groups

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

Table VI-16
HOUSEHOLDS WITH SPECIAL HOUSING NEEDS

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

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

Persons with Disabilities

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

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

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

Table VI-17
DISABILITIES BY TYPE AND AGE OF RESIDENT

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

Source: 2015-2019 ACS: S1810 Disability Characteristics.

Table VI-18
EMPLOYMENT AMONG POPULATION WITH DISABILITY

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

Source: ACS, 2015-2019: S1810 Disability Characteristics

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

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

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

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

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

Persons with Developmental Disabilities

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

Table VI-19
PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE

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

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

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

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

Senior Households

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

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

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

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

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

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

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

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

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

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

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

Farmworkers

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

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

Large Households

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

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

Single-Parent Households

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

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

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

Table VI-21
FAMILY HOUSEHOLD COMPOSITION

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

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

Unhoused (Homeless) Persons

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

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

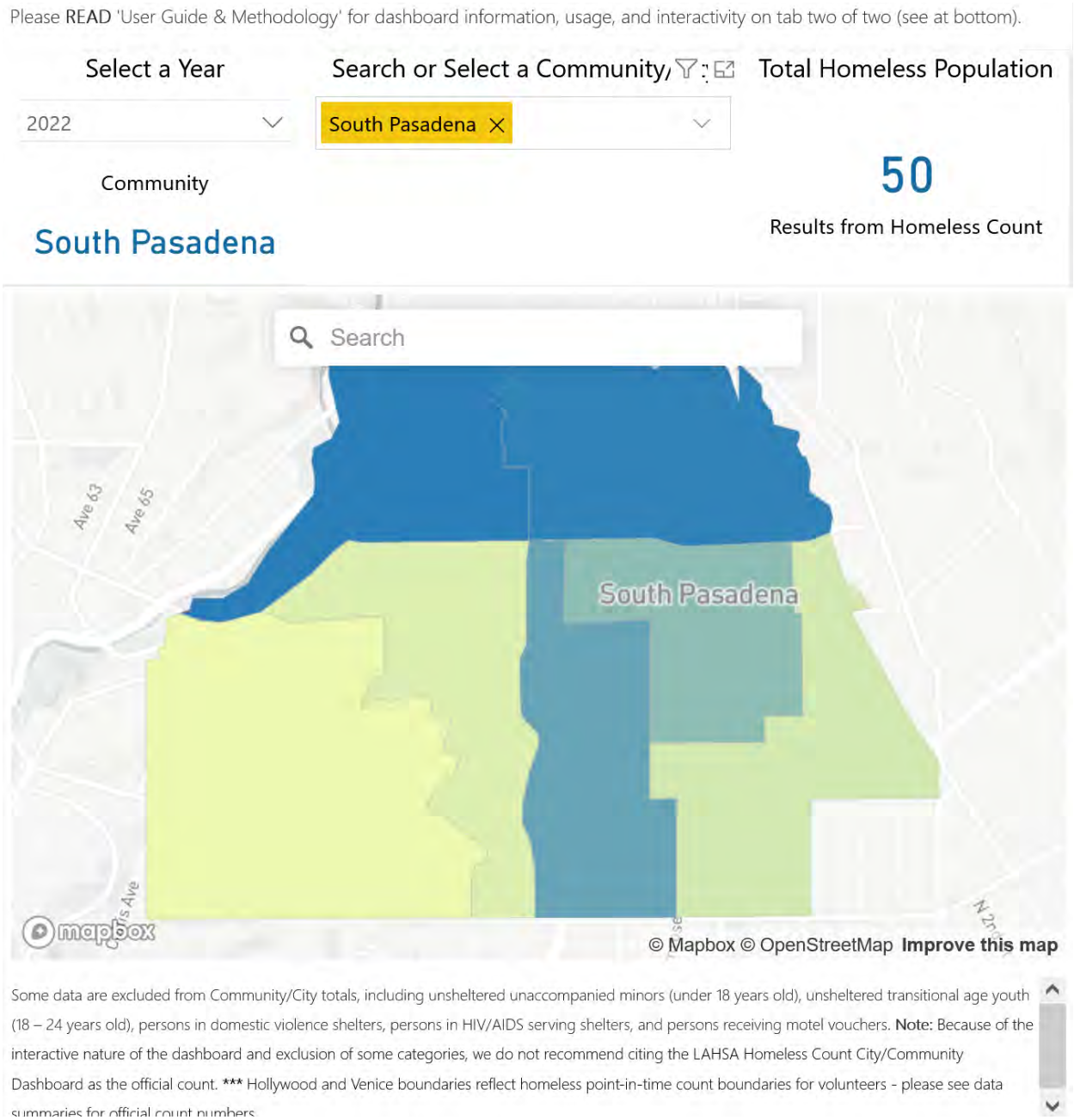
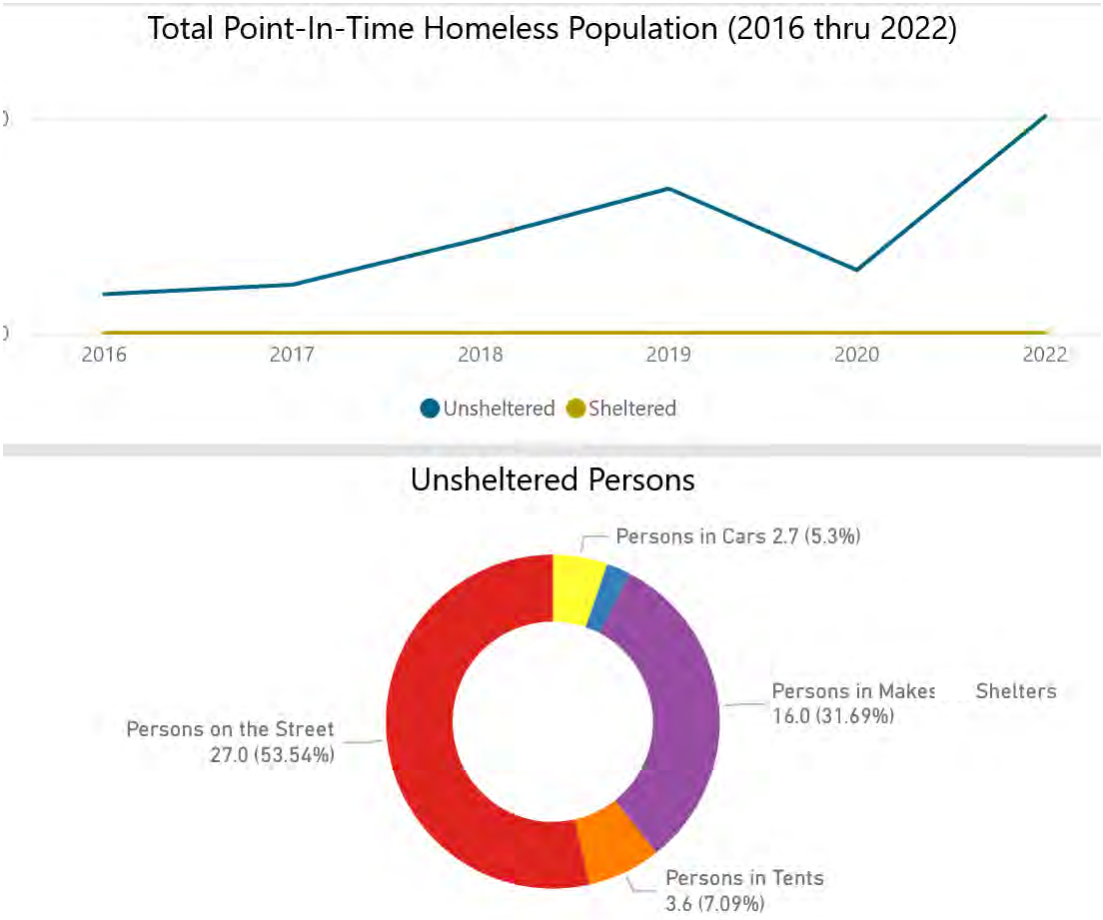


Figure VI-2 (continued)
2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA



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

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

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

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

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

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

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

6.3.7 Housing Profile

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

Number of Housing Units

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

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

Table VI-22
HOUSING UNITS BY OCCUPANCY STATUS

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

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

Housing Growth

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

Table VI-23
HISTORIC HOUSING TRENDS: 1980-2019

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

Source: California DOF, 2019, 2020

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

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

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

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

Housing Type and Tenure

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

Table VI-24
HOUSING UNITS BY TYPE AND OCCUPANCY STATUS

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

Source: California DOF, 2019

Age and Condition of Housing Stock

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

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

As illustrated in Table VI-25, approximately 45.9 percent of the city's occupied housing units were built prior to 1949. Since the last housing element, 315 housing units from this era (about 6 percent)

have been demolished. Today, nearly 94 percent of the occupied housing stock is over 30 years old, indicating likely rehabilitation needs.

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

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

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

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

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

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

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

The City has authority to enforce Code violations on residential properties exhibiting characteristics of blight. In the past, enforcement has mostly proceeded based on receiving a complaint. Property owners are first informed to bring the property into compliance with city codes, with additional steps

and citations issued if necessary to achieve compliance. Where homeowners are eligible, the City strives to identify programs and to assist lower-income and elderly homeowners to access them.

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

Table VI-26
HOUSING CONDITION SURVEY SUMMARY 2022

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

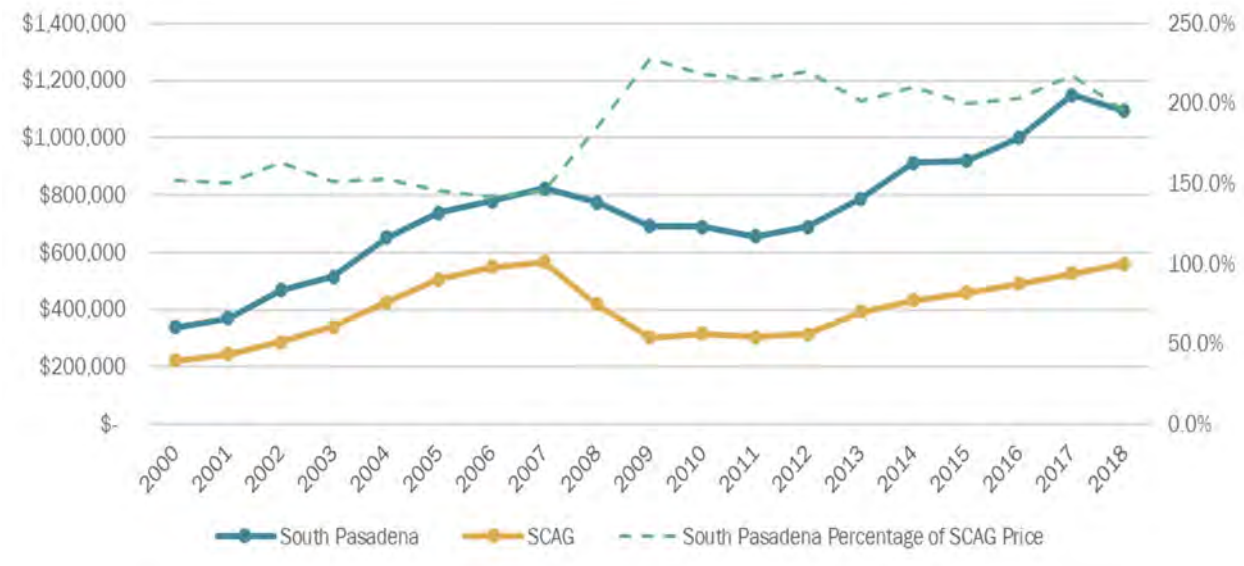
Source: City of South Pasadena Community Development Department, 2022

Home Prices

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

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

Figure VI-3
MEDIAN HOME SALES PRICE FOR EXISTING HOMES



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

Rental Rates

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

Table VI-27
RESIDENTIAL RENTAL PRICES

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

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

Housing Costs and Affordability

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

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

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

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

Source: 2014-2018 CHAS, 2020 HCD Income Limits

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

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

Source: 2014-2018 CHAS, 2020 HCD Income Limits

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

Table VI-30
AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS

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

Source: 2020 HCD Income Limits
Notes: Calculated using Chase Bank Mortgage Calculator (https://www.chase.com/personal/mortgage/calculators-resources/affordability-calculator). Assumes monthly expenses total $500, a down payment of 10% (or 20% for moderate income households), a 4.5% interest rate, property taxes/fees of 2%, and property insurance of 1%.

Assisted Housing at Risk of Conversion

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

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

6.3.8 Summary of Housing Needs

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

Table VI-31
SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS

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

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

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

Households Overpaying for Housing – Approximately 36 percent of all households in South Pasadena spend 30 percent or more of their income on housing. Of these overpaying households, 36 percent were owners. Renter-households have the highest incidence of overpayment, with 64 percent spending more than 30 percent of their household income for housing. Of these, 86 percent of renters earning 80 percent or less of the County median income are paying more than 30 percent of their incomes for housing costs. More than 72 percent of low-income households who own their homes overpay for housing.

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

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

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

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

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

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

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

6.4 FAIR HOUSING ASSESSMENT

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

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

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

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

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

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

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

6.4.1 Outreach

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

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

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

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

Workshops

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

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

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

- Provide housing for everyone citywide and ensure that pockets of poverty are not sustained or created;
- Facilitate design flexibility for low-income housing;
- Promote different types of housing for families;
- Consider the benefits of siting housing in proximity to public transit, High Quality Transit Area, along the Huntington Drive/Fair Oaks/ Mission District/L-Line (formerly the Gold Line) Station corridors, Downtown, and the Vons Center, such as walkability and proximity to amenities and resources;
- Identify housing sites that are dispersed throughout the City and not concentrated in certain areas; include single family neighborhoods and lower density multi-family;
- Initiate more proactive code enforcement;
- Address the limited rental housing availability and affordability issues;
- Address the demand for more permanent supportive housing as well as housing designed for specific populations.

- Implement more tenant protections; and
- Recognize and condemn previous race-based exclusionary practices of redlining and other racist practices that were prevalent in South Pasadena.

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

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

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

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

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

Community Surveys

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

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

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

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

Public Hearings

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Outreach Summary

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

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

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

One major discussion topic revolved around transit accessibility, which is an important fair housing indicator. Participants supported the strategy for increasing housing opportunities along major transportation corridors and in the vicinity of the L-Line (formerly the Gold Line) station. General concern about traffic impacts and parking associated with increased density, and impacts on the historic district, countered comments acknowledging that lower-income residents may have a greater dependence on public transit which should be taken into account for site identification.

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

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

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

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

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

Unless otherwise noted, the following maps and analysis rely on data provided at the Census-tract level by various state and federal agencies, including the California Tax Credit Allocation Committee and Department of Housing and Community Development[2]; 2010 Census[3]; 2006-2010[4], 2010-2014[5], and 2015-2019[6] American Community Surveys; Esri's 2018 Updated Demographic estimates[7]; California School Campus Database (CSCD)[8]; 2014 Longitudinal Employer-Household Dynamics (LEHD)[9]; and the California Health and Human Services Agency[10]. All data presented in the maps included in this assessment was collected through the AFFH Data Viewer mapping tool, a tool developed and approved by HCD for use in assessment of fair housing analyses as the most current and accurate data available[11]. The tract level was selected because geospatial and demographic data were most consistently available at this scale for South Pasadena, and the scale remained detailed enough to allow for neighborhood-level consideration of fair housing issues. This approach was developed in consultation with HCD and in conjunction with efforts to develop standardized state-wide datasets for fair housing analyses.

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[2] California Tax Credit Allocation Committee and Housing and Community Development Department. *2020 TCAC/HCD Opportunity Map*, 2020. https://belonging.berkeley.edu/tcac-opportunity-map-2020

[3] U.S. Census Bureau. *2010 Decennial Census*. 2020. https://hudgis-hud.opendata.arcgis.com/

[4] U.S. Census Bureau. *2006-2010 American Community Survey*. 2010. https://hudgis-hud.opendata.arcgis.com/

[5] U.S. Census Bureau. *2010-2014 American Community Survey*. 2014. https://hudgis-hud.opendata.arcgis.com/

[6] U.S. Census Bureau. *2015-2019 American Community Survey*. 2019. https://hudgis-hud.opendata.arcgis.com/

[7] Esri. *Methodology Statement: 2018/2023 Esri US Updated Demographics*. July 2018. https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2018-2023_Esri_US_Demographic_Updates.pdf

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

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

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

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

6.4.3 Patterns of Integration and Segregation

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

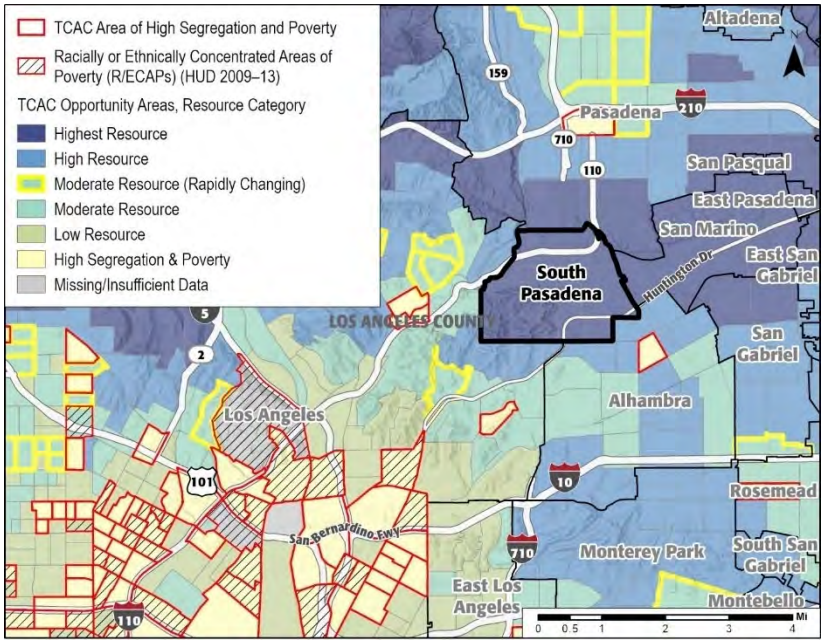
Areas of High Segregation and Poverty

Figure VI-4 also shows that South Pasadena does not include any federally designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)[13] or TCAC-designated Areas of High Segregation and Poverty. However, there are some TCAC Areas of High Segregation and Poverty located in relatively close proximity to South Pasadena, and numerous Areas of High Segregation and Poverty as well as R/ECAPs located further to the south and west in the City of Los Angeles. As shown in Figures VI-5 through VI-7, the City of South Pasadena has relatively low rates of poverty, especially when compared to the surrounding region. Areas with higher rates of poverty surrounding South Pasadena include the City of Los Angeles to the south and west; Pasadena to the north; Glendale to the northwest; and Alhambra, San Gabriel, and Rosemead to the south and east. San Marino to the east has poverty rates that are roughly equivalent to or lower than South Pasadena.

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

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

Figure VI-4
TCAC/HCD OPPORTUNITY AREAS



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

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

These patterns of high median income throughout the city run counter to many areas in Los Angeles County, particularly those south of South Pasadena. As shown in Figure VI-7, poverty rates increase significantly immediately adjacent to South Pasadena in neighborhoods within the City of Los Angeles. In the SCAG region, most concentrations of affluence are located in coastal communities while inland suburban communities typically have a lower median income. South Pasadena does not follow this trend. Therefore, while not by definition an RCAA, the concentration of affluence may be a result of exclusion of lower-income households due to the available housing types, housing costs, or other factors. An analysis of historic policies that may have contributed to existing patterns of affluence is discussed further in Section 6.4.6 South Pasadena History. To ensure that there are

housing opportunities for all current and prospective residents, regardless of income, the City will undertake the following programs as part of this Housing Element:

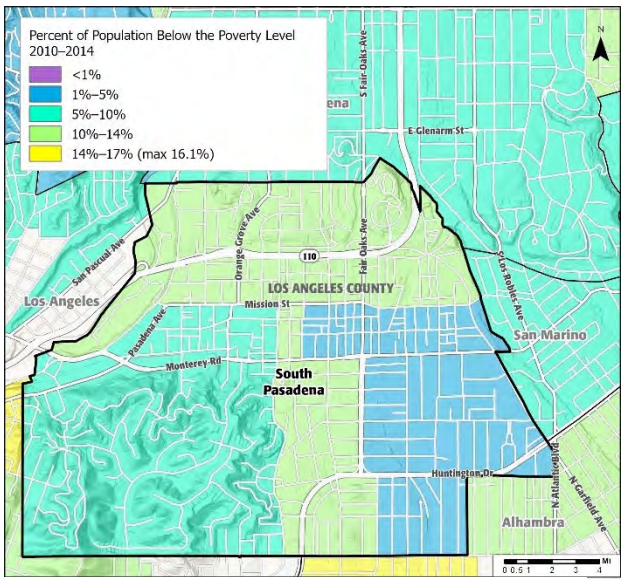
- **Program 1.b.** Purchase surplus properties and support affordable housing developers to create new and rehabilitated deed-restricted, affordable housing units, using any profit from the proceeds of historic properties to generate additional affordable housing.
- **Program 2.b.** Increase funding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

Poverty Rates

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

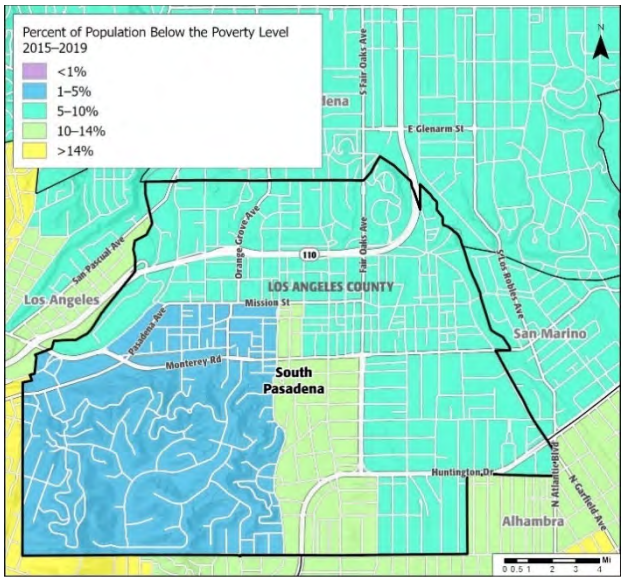
The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less than 5 percent in neighborhoods immediately to west with larger homes on larger lots and hillsides. Figures VI-5 and VI-6 show that these patterns have generally been stable over recent years with no dramatic changes evident in the geographic data available for the period from 2010–2014 to the current 2015–2019 dataset. Although some areas of the City saw increased poverty rates, other areas saw their poverty rates fall, and all changes were within the range of 1–10 percent. Additionally, it should be noted that there may be some areas of relatively higher poverty rates along the eastern and northern boundary of South Pasadena, including areas of multifamily homes in the vicinity of Raymond Hill. These patterns would be consistent with the concentration of potentially more affordable multifamily housing units and larger apartment complexes in the central and northeastern portions of the City, with less affordable single-family and larger-lot homes predominating in other areas.

Figure VI-5
LOCAL POVERTY RATES 2010–2014



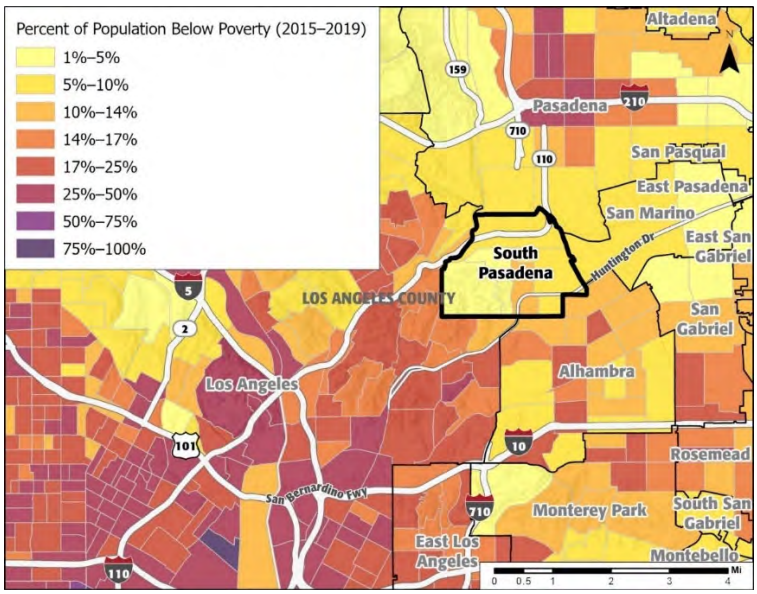
Source: U.S. Census Bureau, 2010-2014 American Community Survey[7]

Figure VI-6
LOCAL POVERTY RATES 2015–2019



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

Figure VI-7
REGIONAL POVERTY RATES 2015–2019

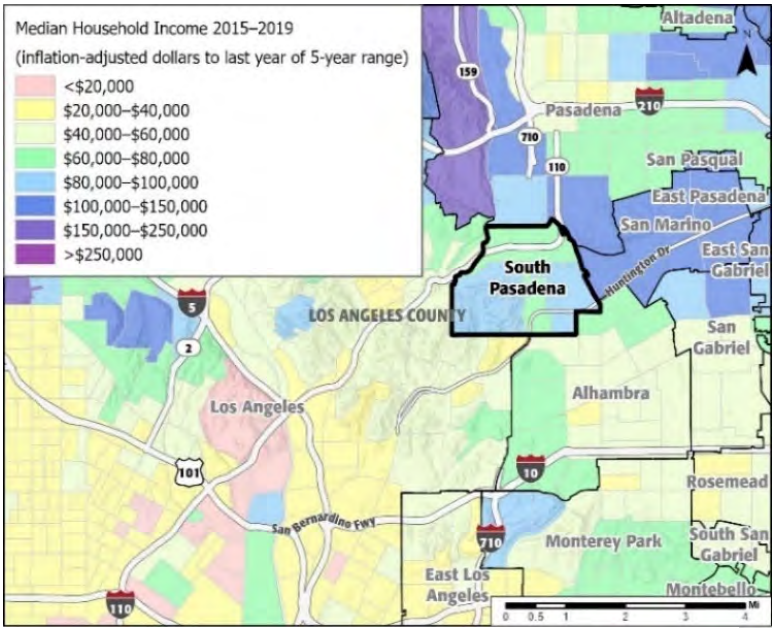


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

South Pasadena Household Income and Affordability as a Fair Housing Consideration

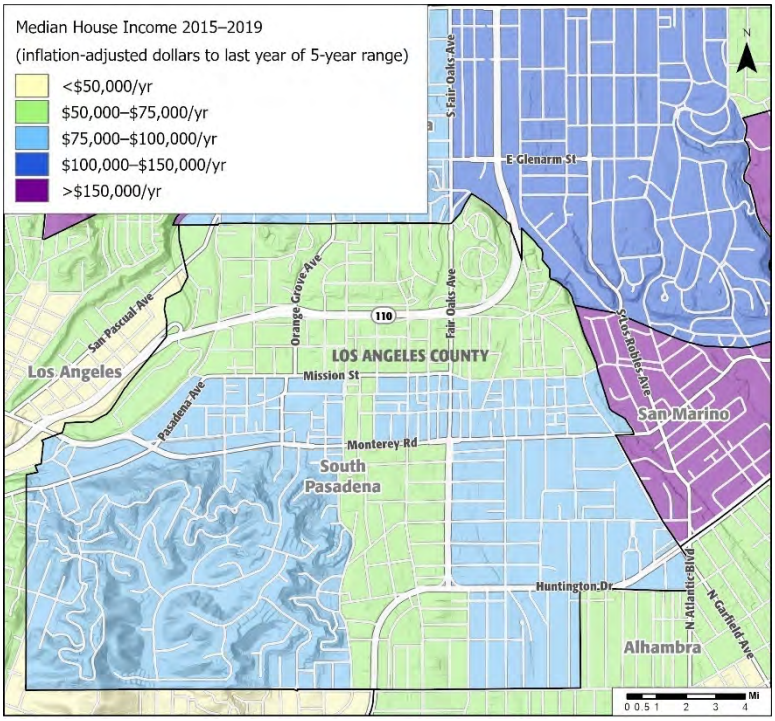
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes are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

Figure VI-8
REGIONAL MEDIAN INCOME 2015–2019



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

Figure VI-9
LOCAL MEDIAN INCOME 2015–2019

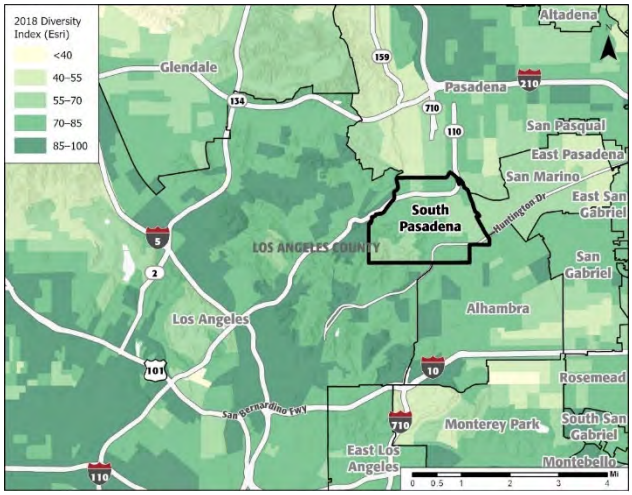


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Ethnic Diversity

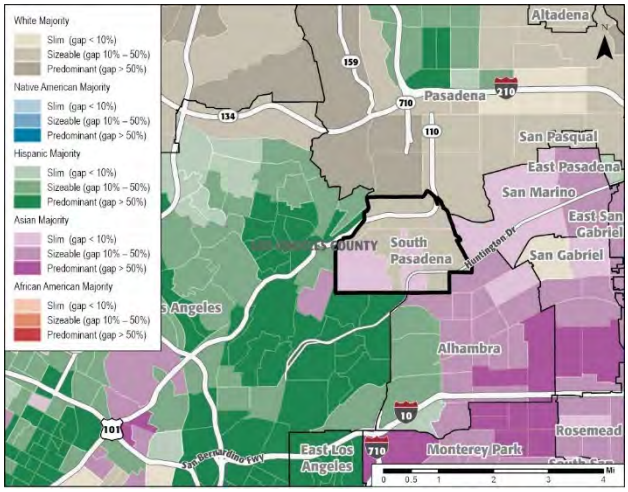
With respect to ethnic diversity, as shown in Figure VI-10, most areas of South Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the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

Figure VI-10
REGIONAL DIVERSITY INDEX 2018



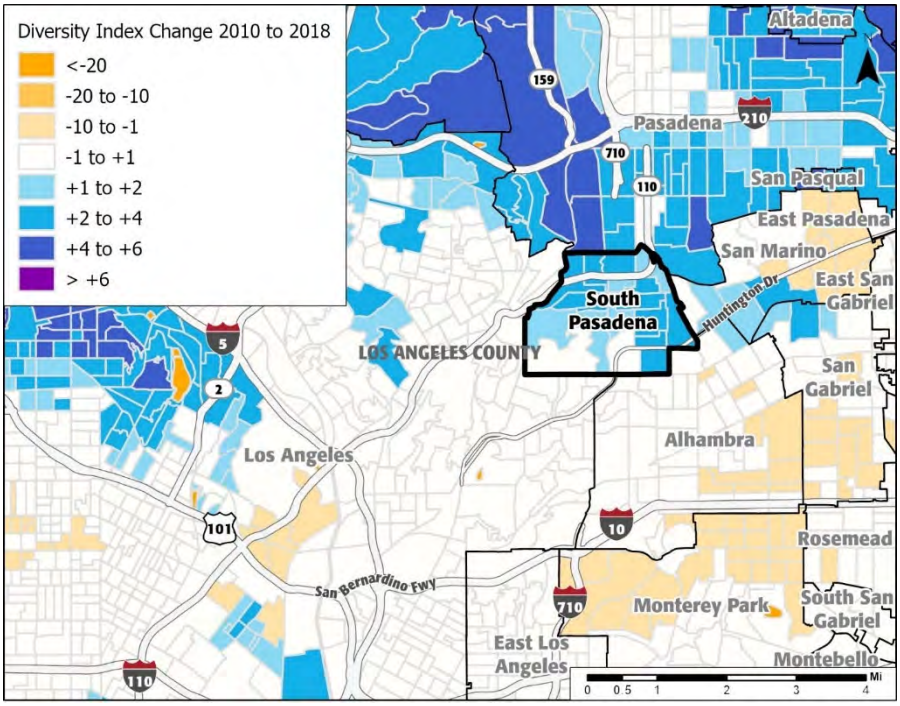
Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Figure VI-11
REGIONAL ETHNIC PREDOMINANCE



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

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

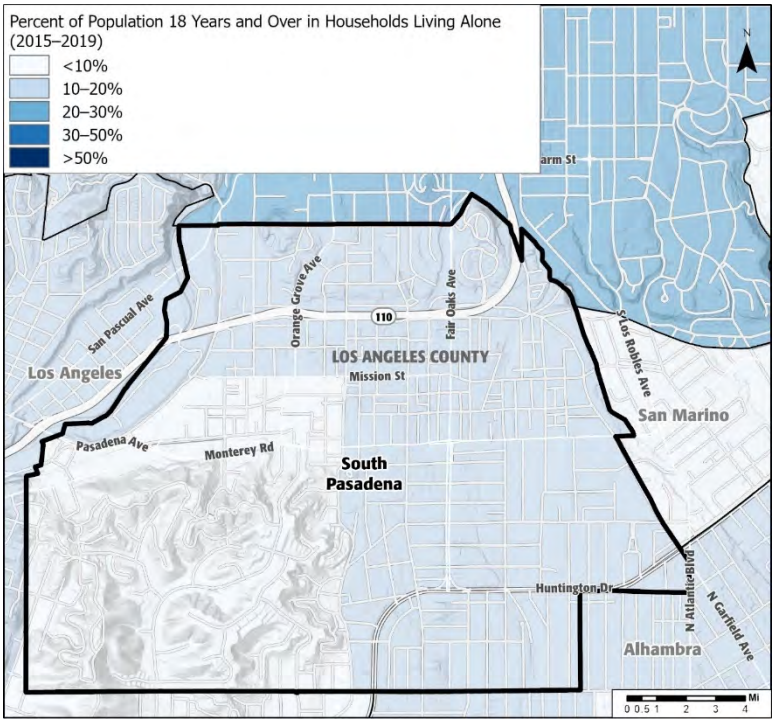


Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Single-Person Household Distribution

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

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

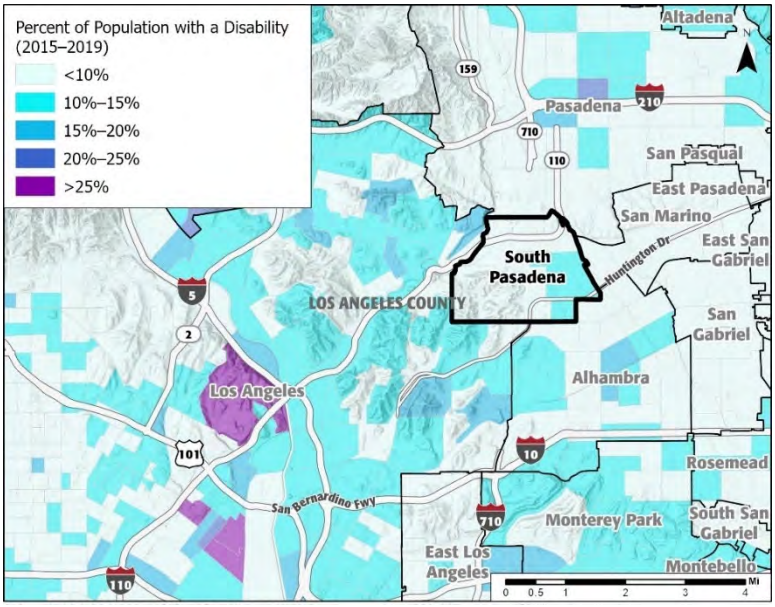


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Persons Living with Disabilities

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

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



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

Fair Housing for Seniors

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

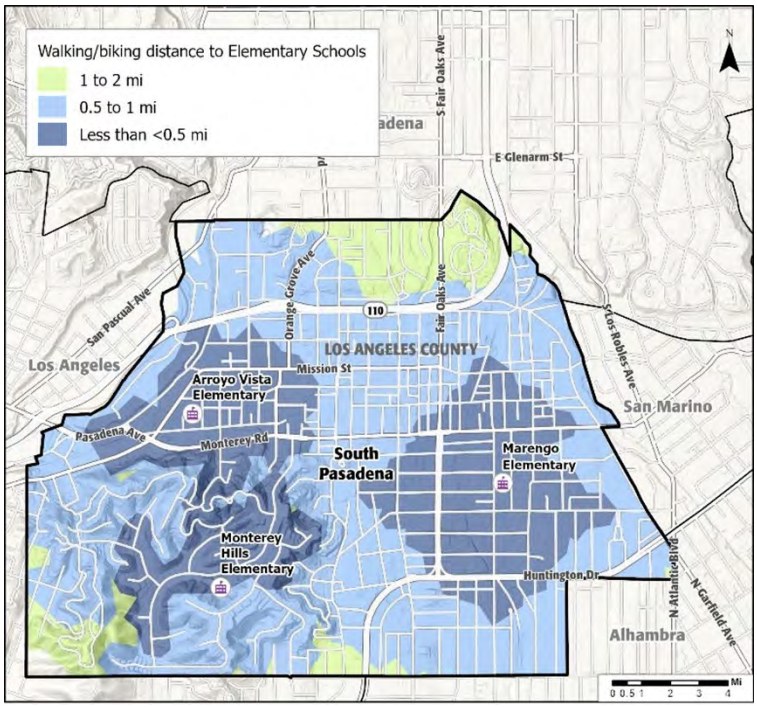
in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.4 Access to Opportunity

Education Resources

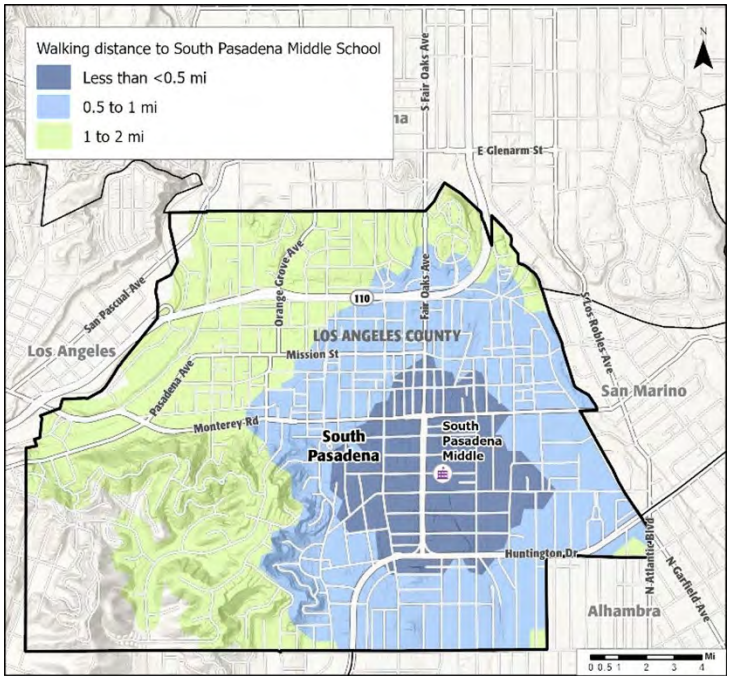
In a statewide review of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, all of South Pasadena's public schools, including all of its elementary schools as well as its middle and high school, are ranked in the 95th percentile or higher.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

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



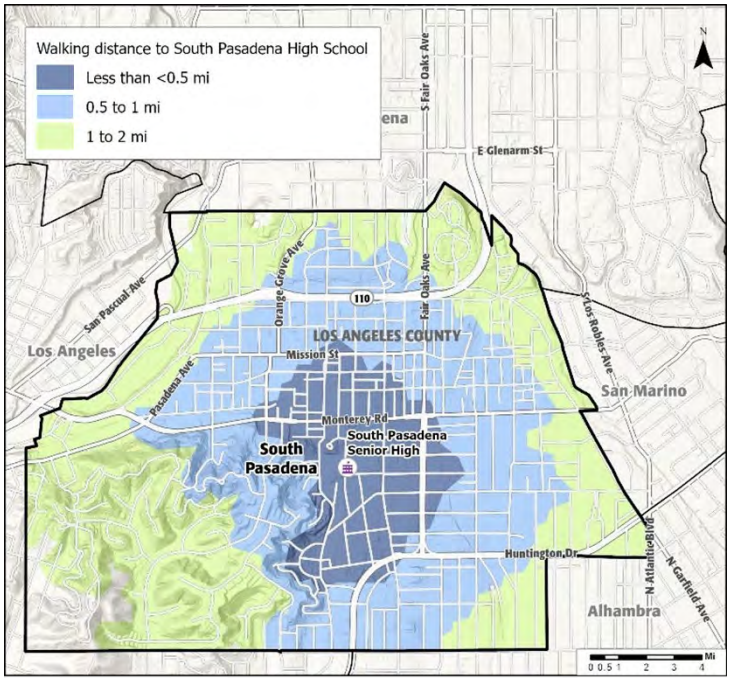
Source: GreenInfo Network, California School Campus Database, 2021[10]

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



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

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



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

Public Transportation Resources

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

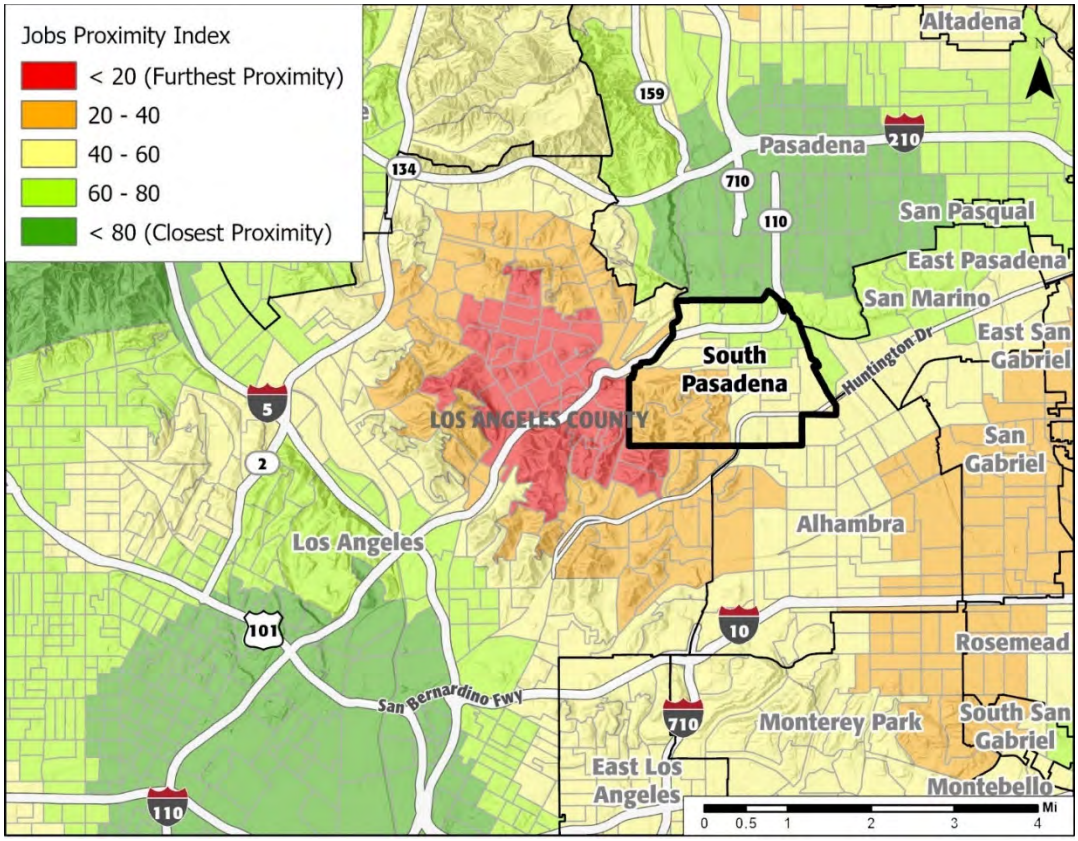
With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station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

Employment Proximity

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

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

Figure VI-18
REGIONAL JOBS PROXIMITY INDEX



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

Environmental Health

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

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

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

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

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

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

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

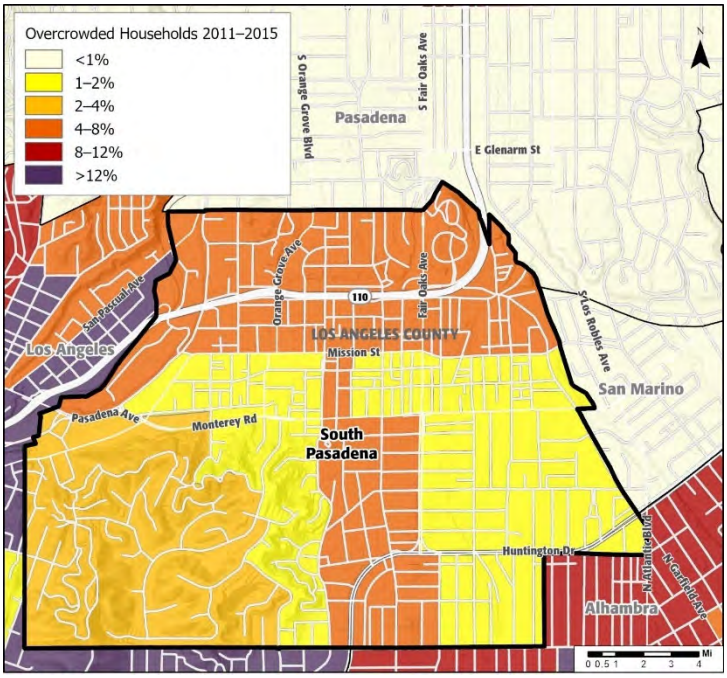
In order to address the potential for any negative living conditions and fair housing concerns that may continue to result from environmental hazards and pollutants, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino (Program 1.e). The City will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

6.4.5 Disproportionate Housing Need and Displacement Risk

Overcrowding as a Fair Housing Issue

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

Figure VI-19
LOCAL HOUSING OVERCROWDING



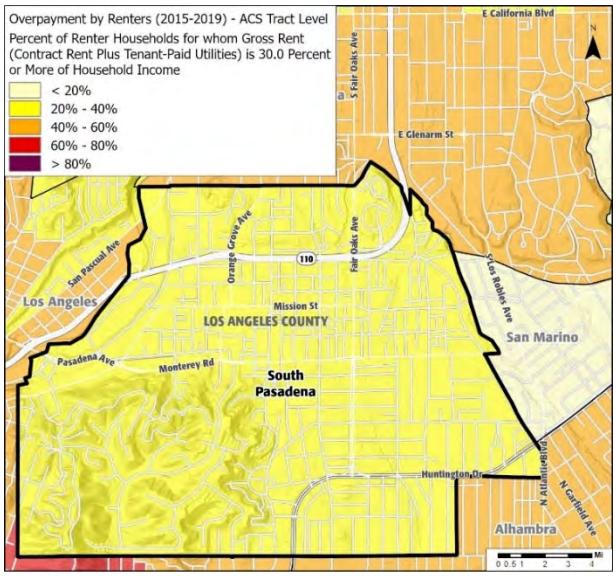
Source: California Health & Human Services Agency, 2020[12]

Overpayment for Housing as a Fair Housing Issue

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

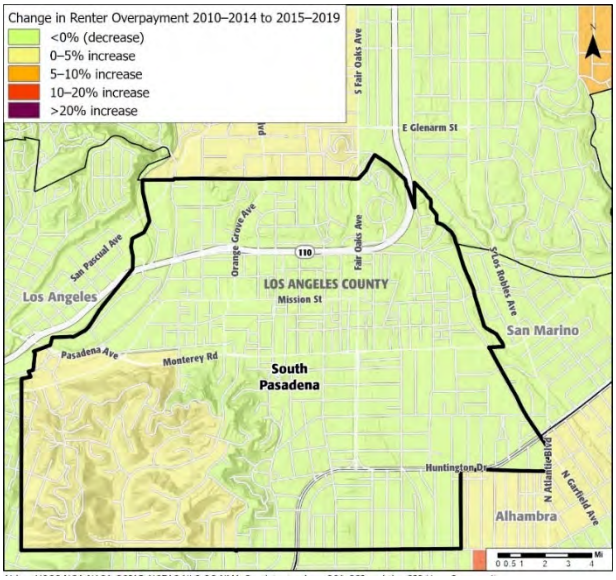
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-20). As shown in Figures VI-20 through VI-23, overpayment for housing has increased in two areas of the city, in the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

Figure VI-20
LOCAL OVERPAYMENT BY RENTERS



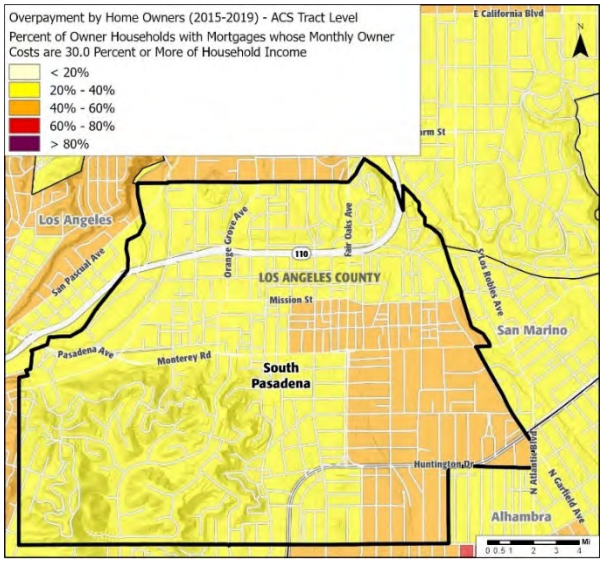
Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

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



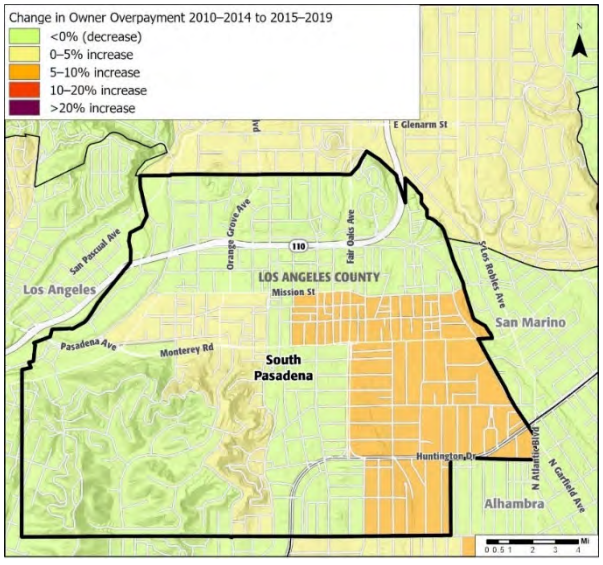
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Figure VI-22
LOCAL OVERPAYMENT BY OWNERS



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

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



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

Housing Stock Concerns for Fair Housing

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

Homelessness

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

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

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

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

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

Gentrification and Displacement Risk

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

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

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

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

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

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

6.4.6 South Pasadena History

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

Historic Land Development Patterns

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

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

Mid-20h Century Racial Exclusion

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

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

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

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

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

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

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

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

The 1963 General Plan

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

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

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

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

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

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

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

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

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

More Recent Exclusion

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

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

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

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

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

Investment Patterns

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

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

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

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

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

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

Land Use and Zoning Practices

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

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

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

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

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

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

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

6.4.7 Enforcement of Fair Housing and Outreach Capacity

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

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

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

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

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

Table VI-32A
HRC DISCRIMINATION INQUIRIES AND CASES

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

Source: Housing Rights Center, 2016-2021

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

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

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

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

6.4.8 Analysis of Sites Inventory for Fair Housing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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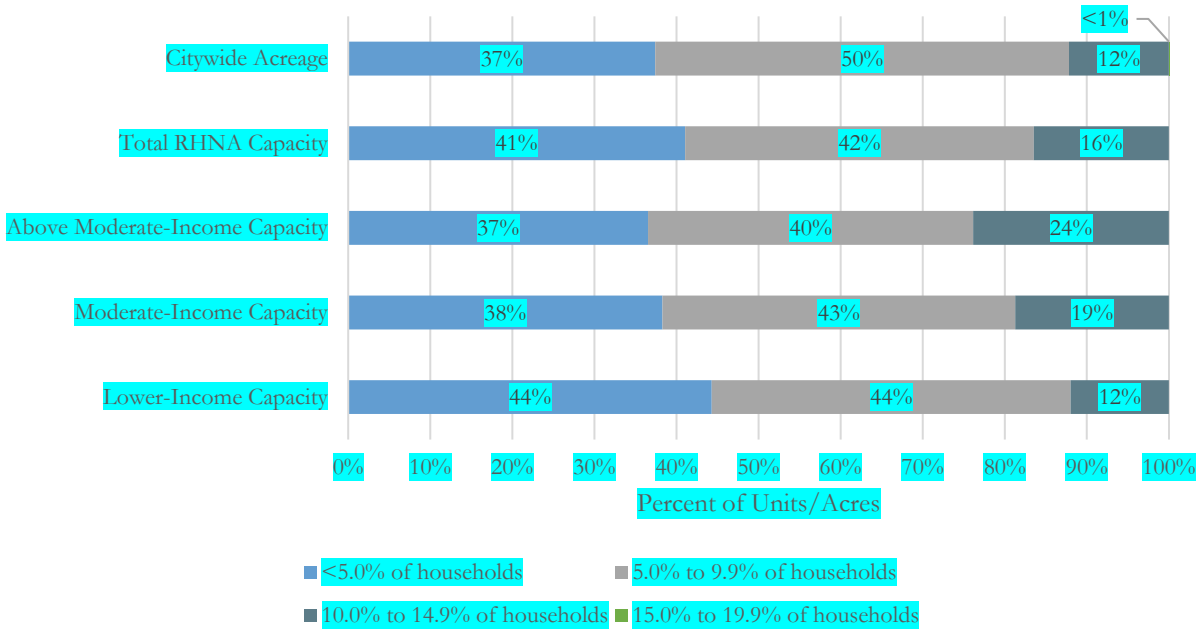
Potential Effects on Patterns of Integration and Segregation

Income

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

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

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



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

Note: There are no areas in the City of South Pasadena in which more than 16.5 percent of households are below the poverty line.

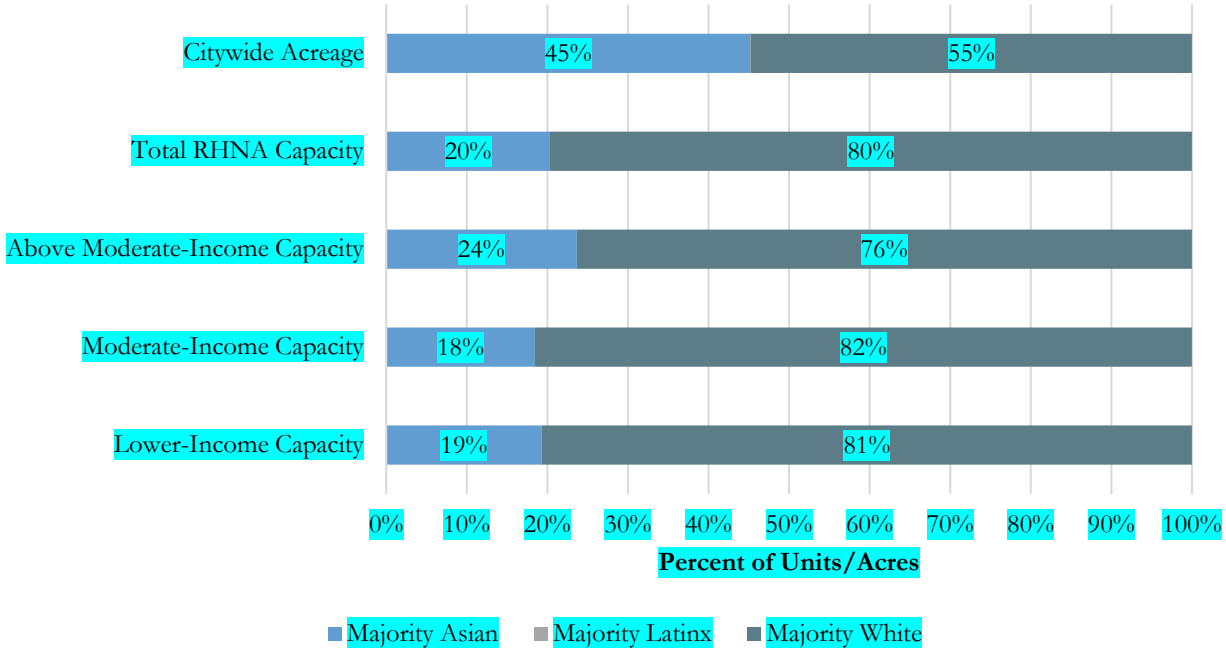
As shown in Figure A-1.e in Appendix A, southwest South Pasadena is dominated by single-family homes and most sites are in the RS zone. While many of these sites have been identified to meet the above moderate-income RHNA, the City has included Program 3.f to facilitate production of ADU resources in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

Race and Ethnicity

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

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

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



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

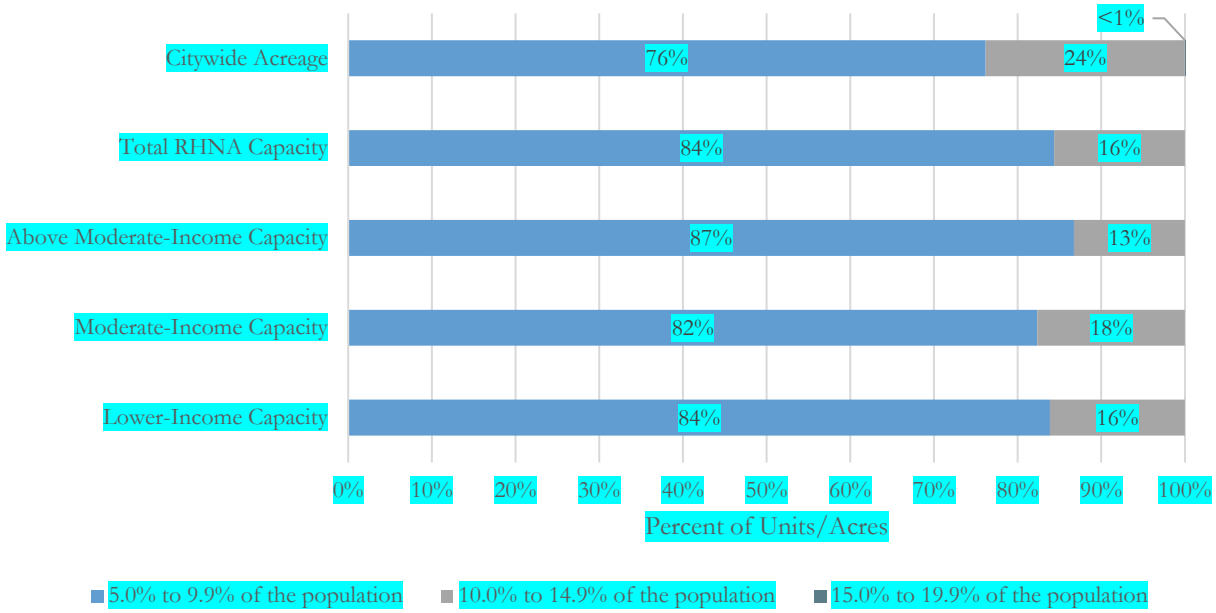
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

Disability

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

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

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



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

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

Potential Effects on Access to Opportunity

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

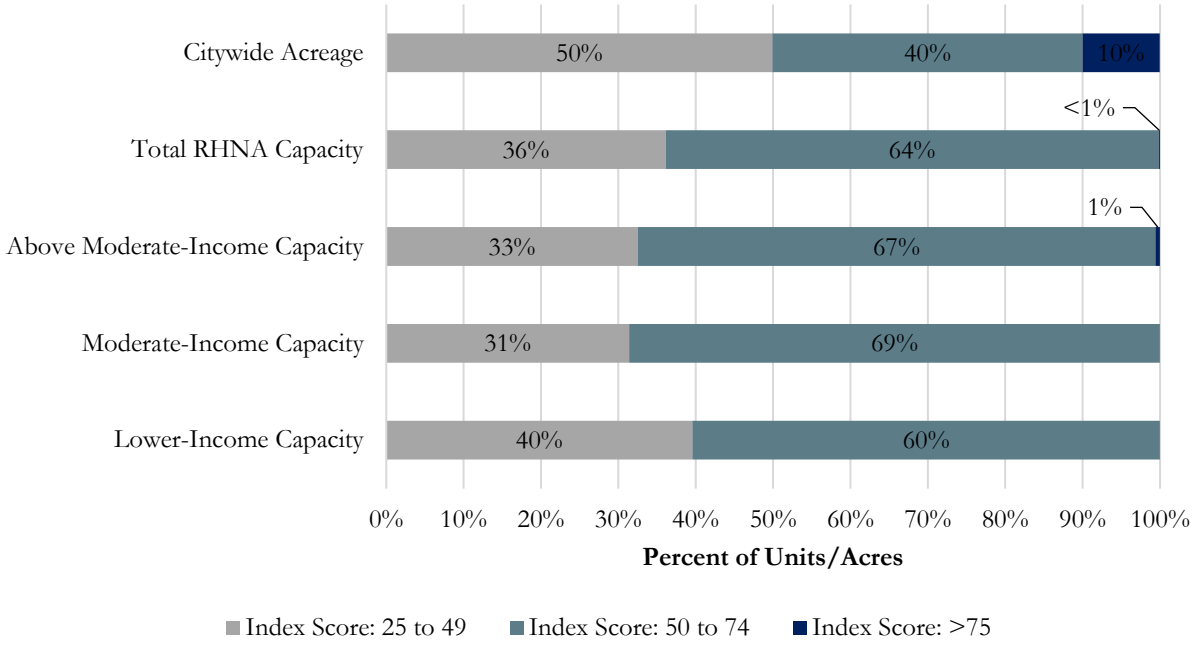
Jobs and Transit Proximity

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

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

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

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



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

Educational Opportunities

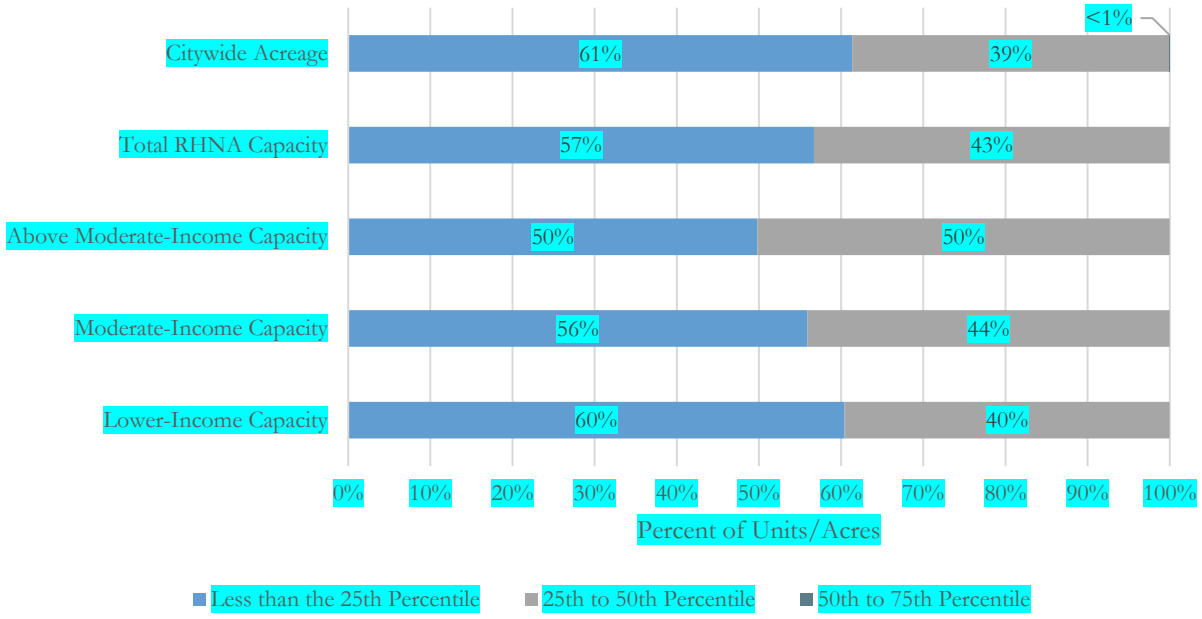
As discussed in Section 6.4.4 (Access to Opportunity), all public schools in the City of South Pasadena score in the 95th percentile or higher compared to the rest of the state. Additionally, Figures VI-15 through VI-17 demonstrate that nearly all parcels in the city are located within a mile of an elementary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

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

Environmental Health

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

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



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

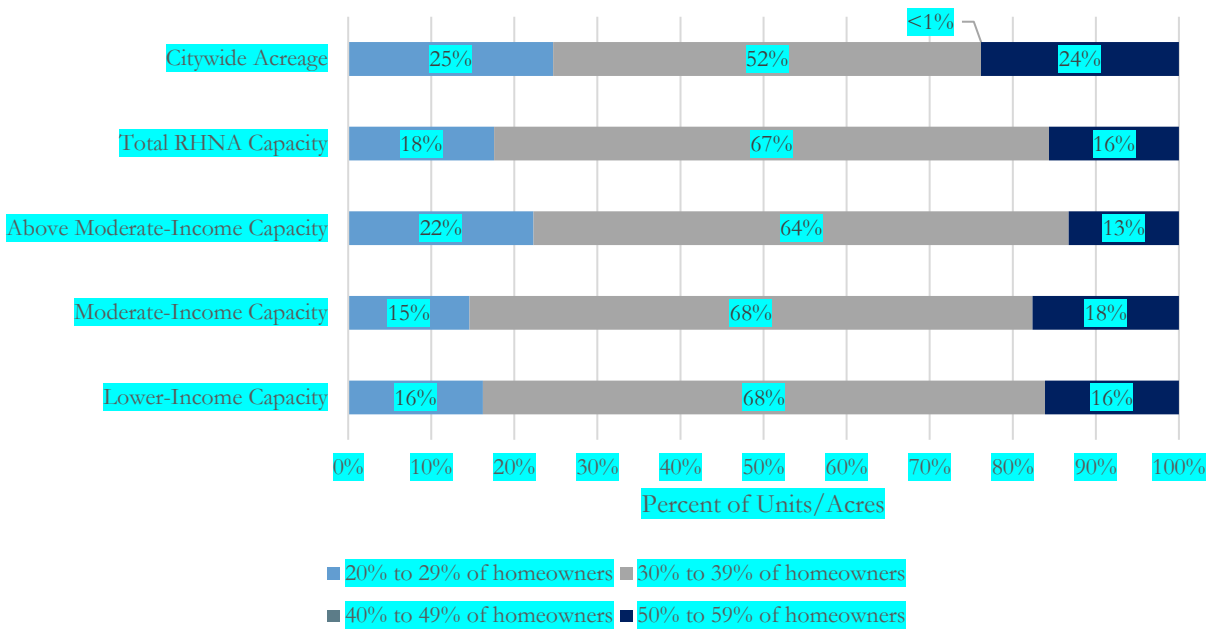
Note: There are no areas in the City of South Pasadena that score above the 34th percentile.

Potential Effects on Disproportionate Housing Need

Overpayment

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

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

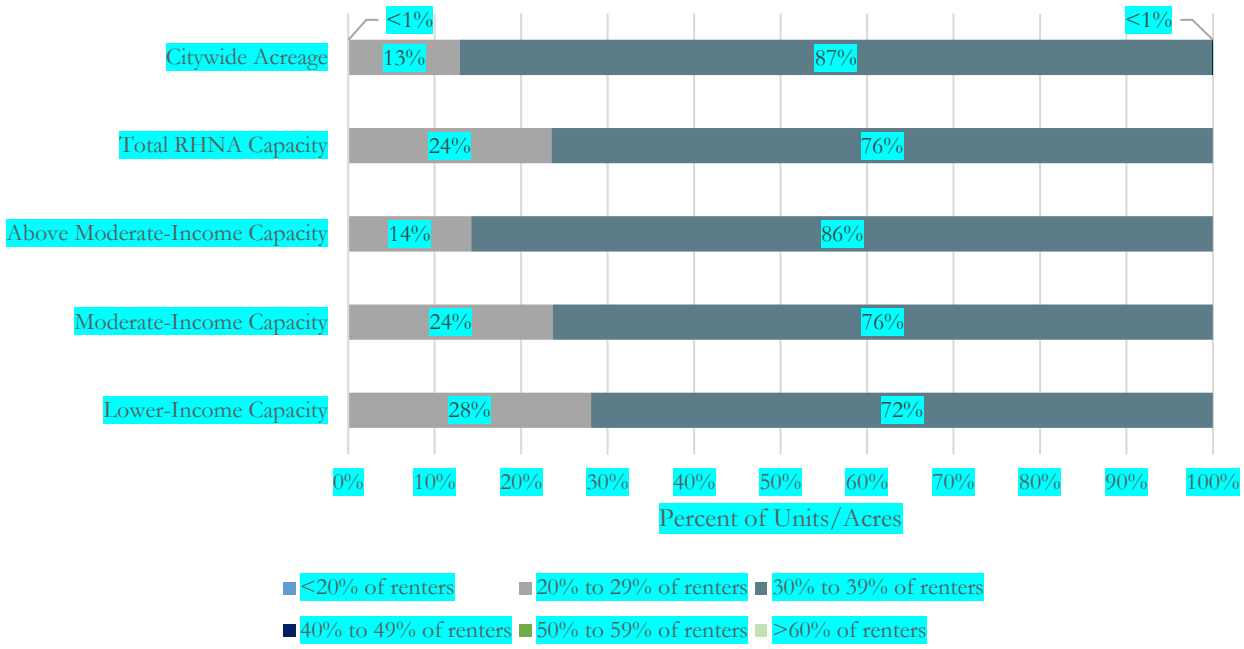


Source: 2015-2019 ACS; City of South Pasadena, 2022

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

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

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



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

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

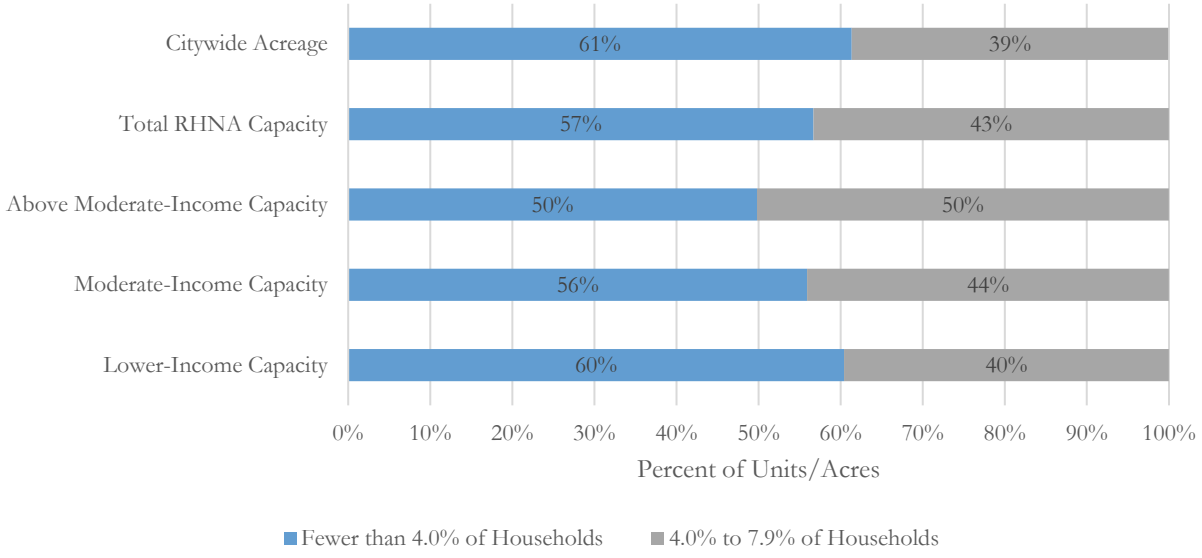
Typically, above-moderate income ownership units are unaffordable to lower- and moderate-income households in South Pasadena, although inclusionary units in ownership projects may offer those opportunities for moderate-income households in the coming years. Sites for new units have been identified across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

Overcrowding

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

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

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



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

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

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

6.4.9 Contributing Factors to Fair Housing Issues

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

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

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

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

Table VI-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

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

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Potential housing discrimination against protected classes	**Existing racially restrictive covenants, though not enforced** **Historic discriminatory practices** Lack of education and mediation services for renters, buyers, property owners, and real estate professionals	Program 4.d - ADA Accessibility Standards ***Program 5.a - Fair Housing Education, Outreach, and Services*** ***Program 5.c - Removal of Racially Restrictive Covenants from Property Deeds Citywide***

6.5 HOUSING CONSTRAINTS

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

6.5.1 Market Constraints

Construction Costs

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

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

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

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

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

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

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

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

Land Costs

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

Mortgage Financing

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

6.5.2 Governmental Constraints

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

General Plan Land Use Element and the Mission Street Specific Plan

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

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

Table VI-34
GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES

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

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

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

Residential Zoning Regulations

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

Table VI-35
RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT

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

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

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

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

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

Multi-Family Open Space Requirements

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

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

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

Table VI-36
MULTI-FAMILY COMMON OPEN SPACE

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

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

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

2. Allowed uses. Required common open space:

    a. Shall be available for passive and active outdoor recreational purposes for the enjoyment of all residents of each multi-family project; and

    b. Shall not include driveways, setbacks, public or private streets, or utility easements where the ground surface cannot be used appropriately for open space, parking spaces, or other areas primarily designed for other operational functions.

3. Maintenance and control of common open space. Required common open space shall be controlled and permanently maintained by the owner of the property or by a homeowners' association. Provisions for control and maintenance shall be included in any property covenants of common interest developments.

4. Surfacing. Open space areas shall be surfaced with any practical combination of lawn, paving, decking, concrete, or other serviceable material.

5. Landscaping. The applicant shall submit a landscape plan for approval. Landscape design, installation, and maintenance shall comply with Division 36.330 (Landscaping Standards).

6. Slope. Required open space areas shall not exceed a slope of 10 percent."

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

Residential Parking Requirements

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

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

Table VI-37
RESIDENTIAL PARKING REQUIREMENTS

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

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

Cumulative Impacts of Development Standards

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

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

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

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

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

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

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

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

Building Codes and Enforcement

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

Development and Planning Fees

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

Table VI-38
2022 PLANNING FEE AND IMPACT FEE SCHEDULE

PLANNING APPLICATION	FEE
Variance	$3,701.00 (first); $2,611.00 (each additional)
Conditional Use Permit; with first variance	$3,925.00; $5,048.00
Administrative Use Permit	$1,745.00
Temporary Use Permit (non-profit)	$258.00
Temporary Use Permit	$517.00
Tentative Parcel Map	$4,164.00
Tentative Tract Map	$11,291.00
Lot Line Adjustment/Parcel Merger/Certificate of Compliance	$ 2,244.00
Hillside Development Review; with variance	$2,224.00; $3,365.00
General Plan Amendment	$22,433.00
Vacation-Easements, Alley's, Streets	$1,978.00
Zone Clearance	$70.00
Cultural Heritage Commission-Landmark Review	$1,683.00
Cultural Heritage Certificate of Appropriateness for Additions/ Alterations	$1,683.00 (single-family); $3,365.00 to $10,095.00 (multifamily (3-8 to 100+ units))
Categorical Exemption	$158.00
Initial Study	$5,608.00

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

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

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

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

Typical Residential Project Fee Estimate

Table VI-39 includes an estimate for the development costs of single-family and multifamily housing scenarios in South Pasadena. The estimated totals assume one 1,200-square-foot single-family home or an 86-unit multifamily complex. To develop the single-family home, it would cost approximately $32,293 in fees. To develop an 86-unit multifamily complex consisting of 87,328 square feet of general living area, it would cost approximately $714,000 total in fees ($8,302 for each unit). In terms of total cost (i.e., fees, construction, and land costs), it would cost $330,495 per single-family unit and $548,449 per multifamily unit. The proportion of the fees to the total development cost of the multifamily scenario is less than 2 percent and would make up approximately 10 percent of the total development cost for the single-family scenario.

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

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

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

Regulations Impacting Housing Supply

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

City Height Limit Initiative

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

The early 1980s was a time of recession and the State was cutting back on services. The City's finances were in bad shape. It seems that the mini-malls that lined the street were seen as eyesores and some were vacant, and the Council favored their replacement with higher quality development. Projects were being approved in compliance with the Zoning Code. Developer interest went away after the initiative. There is now a Bristol Farms on the Twin Towers site surrounded by a surface parking lot and some other, smaller retail buildings. The arguments in the paper at the time did not include any that related to residential/fair housing concerns.

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

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

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

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

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

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

The City also analyzed the impact of the 45 foot height limitation on unit sizes and examined the development standards (besides height) that would be needed to achieve high quality design while achieving densities of 70 or 80 units to the acre. Two actual projects, one in Santa Monica (100%

affordable) and one in Hercules (market rate) in northern California were modeled for this analysis (see Figure VI-32). Both projects include a range of bedroom types. The Hercules project that was built at 76 units per acre average had an average unit size of 825 square feet. At 80 units per acre, the Santa Monica project had a smaller average unit size (732 square feet) although it included units with up to three bedrooms. Both projects achieved a level of design that avoided boxy massing that would not be compatible with South Pasadena's urban form. The analysis confirms that the densities and heights proposed in the sites inventory, to be implemented through rezoning, are reasonable and feasible.

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

76* du/ac Hercules, CA

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

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

ACHIEVABLE HOUSING DENSITIES IN A THREE-STORY BUILDING

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

80 du/ac Los Flores, Santa Monica

Source: PlaceWorks, 2020

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

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

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

Local Review and Permit Procedures

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

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

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

Table VI-40
ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS

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

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

Permit Processing

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

Discretionary Design Review: Efforts to Streamline

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

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

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

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

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

The sites with lower income RHNA assigned to them in Appendix A will all allow multifamily residential development without discretionary review once the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted. This will address constraints associated with discretionary review currently required in the city. As part of the zoning work called for in Program 3.n in Chapter 6.8, the City will evaluate whether any of the above findings is subjective and a constraint to development of additional multifamily housing in the City on the sites identified in this Housing Element. Revisions will be made to the City's zoning regulations to address these constraints

as part of implementation of Program 3.n. The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review hearing and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the project type. This makes it possible for housing projects to be approved at one public hearing unless the project is continued for revisions or appealed. The exception is for properties deemed historically or culturally significant, which require design review by the CHC followed by the Planning Commission. The intent is to expedite most housing applications through an easier permit process.

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

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

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

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

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

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

To further streamline the permitting process, the City will adopt objective development and design standards (Program 3.b), with assistance from a SCAG REAP-funded program in which South Pasadena is participating. To align with the State's needs and goals for housing production, objective residential development and design standards will be updated to be simpler to understand and easier to implement, resulting in faster processing timelines. The objective development and design standards will include easy-to-read development and design regulations through measurable requirements, simple tables, and diagrams, and they'll require no personal or subjective judgement to determine if the standards have been met, allowing for a straightforward administrative process. This project was kicked off in March 2022, and public outreach was conducted from July 2022 to January 2023 to provide information about multi-unit and mixed-use objective standards and streamlined

permitting processes to accelerate housing production. The project will culminate with the City's adoption of objective development and design standards within 120 days of adoption of a compliant Housing Element.

Application Processing Times

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

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

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

Table VI-41
TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES

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

Source: South Pasadena Community Development Department, 2022

* Depending on entitlement and significance of impact

City Staff Assistance in the Permit Process

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

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

Permits to Encourage Development of Affordable Residential Projects

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

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

6.5.3 Environmental Constraints

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

Topography

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

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

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

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

Slope Stability

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

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series

of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only known active faults of local significance actually located in South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along any of these faults has the potential to generate surface ruptures that would affect structures within the city.

Flooding

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

Fire Hazards

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

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

Open Space

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

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

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

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

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

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

Multifamily Residential Districts

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

Mixed-Use Zoning Code Provisions

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

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

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

Mixed-Use Development Regulations in the CG Zoning District

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

Mixed-Use Development Regulations in the MSSP Zoning District

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

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

Accessory Dwelling Units

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

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

Manufactured Homes

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

housing are the same as those established for conventionally constructed housing, suitable opportunities are provided in the residential zoning districts for development of this housing type.

Housing for Persons with Disabilities

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

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

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

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.
>
> 2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.
>
> 3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

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

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

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.
- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

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

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

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

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

Emergency Shelters

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

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

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

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

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

A. Special design standards:

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

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

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

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

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

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

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

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

B. Management and operations standards:

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

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

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

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

e) Loitering is prohibited.

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

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

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

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

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

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

Transitional and Supportive Housing

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

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

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

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

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

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

Single-Room Occupancy

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

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

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

An SRO unit is generally between 200 and 350 square feet in size. These units provide a valuable source of housing for lower-income individuals and can serve as an entry point into the housing market for people transitioning into permanent housing. Some of the Code standards required for SROs include that they may not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school and must be developed on a minimum lot size of 10,000 square feet with a maximum density of one unit per 1,600 square feet of gross floor area. The specific standards also include requirements for establishes setbacks, parking, common area open

space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Community Development Director prior to occupancy and operations.

Zoning Provisions to Encourage Affordable Housing

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

a. Planned Development Permit

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

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

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

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

4. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the use.

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

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

1. Appropriate City building permits are required prior to construction.
2. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.
3. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.
4. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.
5. A demolition permit is required for any existing buildings to be demolished.
6. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.
7. Where required, CAL-OSHA permits must be obtained.
8. Compliance with all State of California disability access regulations for accessibility and adaptability is required.
9. Plan check for electrical, mechanical, plumbing, and sewer is required.
10. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.
11. A soils report is required.
12. A grading and drainage plan approved by the City is required prior to issuance of the building permit.
13. Structural and energy calculations are required to be provided.
14. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.
15. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.
16. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

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

b. Affordable Housing Incentives

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

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

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

c. Inclusionary Housing Ordinance

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

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

The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics

and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).

Inclusionary Requirements

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

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

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

Table VI-43
INCLUSIONARY HOUSING REQUIREMENT OPTIONS

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

Source: City of South Pasadena, 2021; SPMC 36.375.050

Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to

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

In-Lieu Fee Option

The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. The in-lieu fee study was completed and resulted in various fee options. On March 16, 2022, the fee options were taken to City Council for review and to provide direction. On March 18, 2022, the Planning Commission reviewed and provided comments on the study and the Council's direction from the March 16th City Council meeting. The Commission's comments will be incorporated into the staff report for Council's public hearing to adopt a fee resolution tentatively scheduled for May 18, 2022. The City Council shall establish the fee by resolution, then it will adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.

Alternatives to Building Inclusionary Units On-Site

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

Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing

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

The City has conducted a financial feasibility analysis of the inclusionary regulations including analysis of the ordinance with the adopted 20 percent threshold and an alternative 15 percent threshold. The analysis indicated that new market-rate projects are likely to be financially feasible while providing 20

percent of units at affordable rents or sale prices if the developer utilizes California's State Density Bonus law to increase the number of allowed market-rate units. However, without the use of the Density Bonus concession, it is not likely that market-rate projects would be financially feasible under the City's existing requirements. The City then conducted subsequent analysis to change the required number of affordable dwelling units to 15 percent of the base number of dwelling units. A range of for-sale and rental housing prototypes representative of likely new development in the City were reviewed to assess whether each prototype would be able to achieve standard development return metrics with the inclusion of required affordable units. Under a requirement to provide 15 percent of for-sale units at prices affordable to moderate-income households, townhome projects are likely to be financially feasible without any development incentives. In addition, under a requirement to provide 15 percent of rental units at rents affordable to low-income households, multifamily rental projects are likely to be financially feasible without any development incentives. Under a requirement to provide 15 percent of rental units at rents affordable to very-low income households, projects developed at 70 units per acre are likely to be financially feasible without any development incentives. Based on this analysis, the City is proposing to revise the regulations with a 15 percent threshold (See Program 2.m).

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

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

6.6.2 Land Resources

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

Availability of Sites for Housing

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. Opportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), and Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily

residential, which would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.

- Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; sites are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

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

Sites Inventory

Table VI-44 describes the vacant sites remaining in the City that can accommodate residential development. All these sites are suitable for development of moderate and above-moderate residential development. One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so it is included in Table VI-50, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).

In determining the realistic unit capacity for sites listed in Table VI-44 that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. Table VI-45 presents recent projects in medium and lower density areas of the City that support the 80 percent assumption. All of the projects exceeded 80% of allowed unit capacity. It should also be noted that 90 percent of the sites in Table VI-45 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption of SB 9, which allows duplex development on single-family parcels statewide.

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

"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households.

Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Suitability of Non-Vacant Sites

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

Under the current zoning code, South Pasadena has received multiple development applications for residential development of non-vacant sites. A couple of recent examples are included as identified sites in Appendix A, including the Carrow's Site (Site 11 in Appendix A), which was approved by the Planning Commission on April 18, 2022, and the School District Site (Site 10 in Appendix A), which was approved by the Planning Commission on September 13, 2022. In addition to these sites, two additional mixed-use projects have been approved on sites with existing uses. The Mission Bell project, approved in 2020, consists of 36 residential units and approximately 7,400 square feet of commercial space. The Seven Patios, approved in 2021, consists of 57 residential units and approximately 6,100 square feet of commercial space. Development applications for these two projects were submitted prior to the City's adoption of its Inclusionary Housing Ordinance, and therefore do not include any affordable units so are not included in the list of identified sites in Appendix A.

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

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Table VI-44
VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
End of Rollin St.	91030	5314026050	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
La Portada St. at Via del Rey	91030	5314025021	AM	RS	N/A	1 unit per parcel	0.75	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa St.	91030	5311009056	AM	RS	N/A	1 unit per parcel	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009057	AM	RS	N/A	1 unit per parcel	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009058	AM	RS	N/A	1 unit per parcel	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Cielo at Santa Teresa	91030	5311009055	AM	RS	N/A	1 unit per parcel	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015034[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015033[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010030[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010029[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave at Blair Ave.	91030	5311010028[3]	Estate & Very Low Density Residential	RS	N/A	3.5	2.37	Vacant	YES - Current	Privately Owned	Available	0	0	6	6
Bank St. at Meridian Ave.	91030	5314020007	Estate & Very Low Density Residential	RS	N/A	3.5	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032044	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308019034	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031001	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308023015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310022006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017021	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017020	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023008	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Brunswick Ave.	91030	5311015016	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023019	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022003	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308022042	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Short Way St. at Oak Hill Ave.	91030	5312031029	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave at Oak Crest Ave.	91030	5314010005	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026010	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308024017	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023007	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022002	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Mountain View Ave. at Alta Vista Ave.	91030	5314010024	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308021012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009032	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	State-Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hanscom Dr. at Peterson Ave.	91030	5308032012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311008033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015006	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308024033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310034030	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Hill Dr.	91030	5308002070	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026011	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Warwick Ave.	91030	5311006013	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Alta Vista Ave.	91030	5314008014	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Blair Ave. at Saint Albans Ave.	91030	5311017058	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camden Ave. at Camden Parkway	91030	5321011013	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Saint Albans Ave.	91030	5311006900	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015005	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5314006020	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031041	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Monterey Rd.	91030	5311007019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Cambridge Pl. at Valley View Rd.	91030	5310018025	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Brunswick Ave. at Kolle Ave.	91030	5311006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031040	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5311014048	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Ave.	91030	5308031039	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Collis Ave.	91030	5312017025	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave. at Indiana Ave.	91030	5314007017	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Bank St.	91030	5314019023	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031042	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave. at Blair Ave.	91030	5311008039	Low Density Residential	RS	N/A	6	0.21	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Sol at Las Palmitas St.	91030	5308002072	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014042	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Warwick Pl. at South Ln.	91030	5311006028	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Rollin St. at Meridian Ave.	91030	5314017027	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	State-Owned	Available	0	0	2	2
Alta Vista Cir. at Indiana Ave.	91030	5314006005	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Ave. at Pinecrest Dr.	91030	5311006057	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024034	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014043	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Braewood Ct.	91030	5314016077	Low Density Residential	RS	N/A	6	0.28	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308020027	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Alta Vista Cir. at Alta Vista Ave.	91030	5314005045	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2

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

Source: City of South Pasadena, 2021

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

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

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

Note 4: There are no known environmental constraints.

Table VI-45
REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA

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

Source: City of South Pasadena, 2022

Accessory Dwelling Unit Potential

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

- 2017 – 1 ADU received a building permit
- 2018 – 4 ADUs received building permits
- 2019 – 7 ADUs received building permits
- 2020 – 8 ADUs received building permits
- 2021 – 19 ADUs received building permits
- 2022 (through August 31) – 38 ADUs receiving building permits

The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City issued 9 building permits for ADUs in the second half of 2021 and 28 building permits for ADUs through December 31, 2021. (see Table VI-46). The City's projection for permit issuances starting at the beginning of 2022 through the end of the projection period is provided in Table VI-46. (See also Appendix E for more detailed analysis). The projection assumes that ADU permits will increase at a similar rate to the increase from 2017 through 2022, as shown above, through the first half of and in 2023 because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. This supports the conservative assumptions in Table VI-46 and the more vigorous assumptions in Table VI-47.

Table VI-46
ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING PERMITS	ADU BUILDING PERMITS
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29
2023	55	39
2024	55	39
2025	65	39
2026	68	39
2027	68	39
2028	68	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	470	320[1]

[1] In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts, see Appendix E for a more detailed analysis of ADU projections.

As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between January 1, 2022, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-52 provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. A survey of studio and one-bedroom rentals available in South Pasadena in August 2022 was conducted online. The average price for this type of unit was a 1 bedroom for $2,500/month. The lowest rental price was $1,995. The other three listings were higher. However, these listings only include those ADU units that are being rented at market prices, and do not include ADU units that are being rented to friends and family through private placements, which have been shown to often be at below-market rents that would be affordable to lower-income households. These rental listings reflect a point-in-time and are considered supplemental to the SCAG affordability analysis which was based on a much larger data set. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-47. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-47
POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING APPLICATIONS	ADU BUILDING PERMITS ISSUED	NOTES
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of application for the remainder of 2022.
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits. Assumption of 10% increase in applications and 75% moving forward to building permits. Assumption of strady application rate, no increase.
2024	60	45	
2025	66	50	
2026	72	54	
2027	72	54	
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022 – October 15, 2029	**560**	**403**	

To provide additional context, this projection scenario forecasts that less than 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU.

Market Trends

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance updates and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.

Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-48 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior

Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.

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Table VI-48
REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-50 (AND SITE ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Buildout starting in Summer 2021 and concluding in Fall 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail)	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.45 FAR	Odd-shaped sites near transit: North side of Mission (, , 12) Site 14, combined with adjacent lots Other sites near rail transit: City Yard (8); Fremont/Mission (12), Arco (8) *These sites are similar in size and proximity to transit; identified for rezoning to produce more units than example project.*
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	Entitled in 2021	MSSP	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units on above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.48 FAR	School Site -11 (historic resource); Carrows site (11); Parking Lot sites -12, 13 (rectangular; several parcels combined) *These sites are similar in size to the Mission Bell project, with structures on a portion of the lot that could be incorporated into a larger project or demolished; identified for rezoning at higher densities to produce more units than example project.*
Eight Twenty 820 Mission St.	5315-017-094, 5315-017-082, 5315-017-067, 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses	38	20	109% of allowed FAR (Allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Parking Lot sites -12 and 13 (rectangular; several parcels combined) *Like the example project, these properties are owned by parties interested in consolidating to build a larger multi-family project (some are City-owned); identified for rezoning to produce more units than example project.*
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in Spring 2020	CO	Commercial retail with underutilized parking lot	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (Allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (16, 17, 20, 21, 22) Monterey Road Site (3) *These sites are similar in size and have owner interest in developing a residential project that would include on-site affordable housing and receive a density bonus. One site is in consideration for affordable housing overlay zone for higher density.*
Mission Meridian Village Meridian Ave and Mission St	5315021001, 5315021079, 5315021047	1.6	Built in 2005	MSSP	Lower density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes: three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 10) Vacant Site/Ostrich Farm (1) Tyco Site (4) School District Site (10) *These are larger sites, in mixed-use areas, with potential for a project with multiple structures including affordable housing per the IHO; identified for rezoning to produce more units than example project.*

Source: PlaceWorks and City of South Pasadena, 2022

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Regional Examples of Small Site Development

Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Strong potential was determined from a combination of property owner interest and common ownership. All small sites made up of more than one parcel have common ownership except Site 12 which has one parcel owned by the City and one parcel owned by a private owner. The changes in zoning that will affect market conditions and will encourage redevelopment with housing are called for in Program 3.n and will include adoption of the Downtown Specific Plan. Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-49 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. In addition, the City expects more projects to come forward once the zoning and General Plan changes are adopted. The City has also included Program 3.d to encourage and facilitate parcel assemblage and work with developers and property owners who are interested in lot consolidation.

Table VI-49
REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION

ADDRESS/ PROJECT NAME	JURISDICTION	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY
Stanford Pasadena, 150 S. Oak Knoll	Pasadena	0.23	preliminary entitled 2017	Rental	19	83
Stanford Pasadena, 139 S. Oak Knoll	Pasadena	0.20	preliminary entitled 2017	Rental	16	80
233 Hudson	Pasadena	0.37	entitled 2018	Condo, 5,729 SF of retail/office	42	114
Pico Eleven, 1112 Pico Blvd	Santa Monica	0.44	finished 2018	Condo	32	73
1819 Pico	Santa Monica	0.49	preliminary entitled 2020	Condo, 4,174 SF of retail/office	48	98
3223 Wilshire	Santa Monica	0.45	constructed 2020	Rental, 5,418 SF of retail/office	53	118
2225 Broadway	Santa Monica	0.22	constructed 2020	Rental, 2,751 SF of retail/office	15	68
1450 Cloverfield	Santa Monica	0.45	constructed 2020	Rental, 8,385 SF of retail/office	34	76

Source: PlaceWorks, 2021

Sites to Address the Lower-Income RHNA

To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-50). As with the one vacant site, all of these sites would either be affected by proposed changes to their General Plan Land Use designation or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites to address the lower-income RHNA that are in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-50. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished; and Programs 2.j and 2.k address the Affordable Housing Overlay.

In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-50 about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C. The City followed up again with owners in the table who hadn't responded to the earlier rounds of outreach both via letter and phone calls in late 2021 and early 2022, yielding multiple additional responses. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, including the inclusionary housing ordinance, and suggests the property owner consider affordable housing. In addition to sites owned by the City, staff has solicited interest from property owners of approximately 16 properties on the inventory, as noted in Appendix A. Some of these have pending applications for projects that include residential units (also noted in Appendix A). In other cases, property owners or their representatives have had meetings with City staff to plan for applications following the City's adoption of the General Plan, DTSP and zoning code amendments.

Because projects on all of the sites included in Table VI-50 are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 60 percent of the units were assumed to address the lower-income RHNA and 40 percent are assumed for moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus for projects on these sites supports the realistic capacity assumptions. Three of the sites included in Table VI-50 are proposed to receive the Affordable Housing Overlay (Sites 3, 6, and 7). Two of those sites are already designated and zoned for residential development (Sites 3 and 6).

Site 7, the Methodist Church Site is designated and zoned as Community Facilities. Part of the more than 6-acre site is already developed with non-residential community facility uses. Based on discussions with the owners about their interest in developing unused portions of the site for multifamily housing, the likelihood of development of undeveloped portions of the site with higher density residential has been established. In addition, all sites included in Table VI-48 are examples of multifamily projects developed on sites designated to allow non-residential development.

The zoning amendments with development standards to implement the application of the Affordable Housing Overlay to this site along with Sites 3 and 6 will ensure allowed heights and other development standards to accommodate feasible development of projects with at least 30 dwelling units per acre (see Programs 2.j and 2.k). The unit assumptions on three of those sites (3, 6, and 7) are lower than 95 percent of the maximum allowed units under the proposed density and are based on discussions with property owners about expected numbers of units they would propose on those sites. Additional analysis of densities that are feasible within the City height limits is provided in Section 6.5.2 under Regulations Impacting Housing Supply. Additional detail on why 95 percent is a realistic capacity for these sites is provided in Appendix F.

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Table VI-50
SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA [1]

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
3	181, 185 and 187 Monterey Rd.	91030	5311015035	0	0	8	8	Shortfall of Sites	0.34	Medium Density Residential	RM	Medium-Density Residential with AH Overlay	RM with AH Overlay	30	Non-Vacant
		91030	5311010001	0	0	0	0	Shortfall of Sites	0.33	Medium Density Residential	RM			30	Non-Vacant
		91030	5311010002	0	0	0	0	Shortfall of Sites	0.59	Medium Density Residential	RM			30	Non-Vacant
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012040	0	0	7	7	Shortfall of Sites	0.94	Estate & Very Low Density Residential	RE	Estate & Very Low Density Residential with AH Overlay	RE with AH Overlay	30	Vacant
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	30	0	0	30	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with AH Overlay	CF with AH Overlay	30	Non-Vacant
8	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	42	0	0	42	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant[3]
9	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
10	Mission St. and Fairview Ave.	91030	5315008047*	0	19	89	108	Shortfall of Sites	1.90	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
11	Mission St. and Fremont Ave.	91030	5315009051	5	0	45	50	Shortfall of Sites	0.81	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
12	El Centro St. and Mound Ave.	91030	5315003044*	13	6	2	21	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	7	2	2	11	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003903	10	0	0	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	70	Non-Vacant
		91030	5315003904	8	0	0	8	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	7	0	0	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	11	0	0	11	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
14	Fair Oaks Ave. and Grevelia St.	91030	5315001070	46	23	23	92	Shortfall of Sites	0.85	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	110	Non-Vacant
15	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	110	55	55	220	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	110	Non-Vacant
	TOTAL			**592**	**205**	**286**	**1,083**		**24.89**						

Source: City of South Pasadena, 2021

* Included in prior Housing Element sites inventory

[1] See Appendix A for any identified environmental constraints that will be mitigated prior to residential development occurring.

[2]See Appendix A for site-by-site description of how redevelopment is likely in the planning period for each of these sites.

3 Site 8 has an underground gasoline tank and filling station on the site that will be removed and the City will remediate any soil contamination found on the site prior to development for residential uses. See Appendix A Site 8 for further discussion.

Table VI-51
DOWNTOWN SPECIFIC PLAN REZONING CAPACITY ANALYSIS

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5310019001	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310019002	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310019003	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019004	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019005	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019006	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019009	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5310019010	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5310019021	Medium Density Residential	RM	0.33	8	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310020010	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310020011	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310020012	Medium Density Residential	RM	0.21	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033001	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033002	Medium Density Residential	RM	0.13	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5310033008	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033019	Medium Density Residential	RM	0.52	22	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5310033021	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310033901	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5311001008	Ostrich Farm Mixed-Use	RM	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311001018	Ostrich Farm Mixed-Use	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5311001020	Ostrich Farm Mixed-Use	RM	0.56	1	70	19	10	10	39	5%	100%	100%	100%	100%	400%	100%	5%	0.975	0.488	0.488	1.950
5311001038	Ostrich Farm Mixed-Use	CG	0.72	1	70	25	12	12	49	5%	100%	100%	100%	100%	400%	100%	5%	1.225	0.613	0.613	2.450
5311001041	Ostrich Farm Mixed-Use	CG	0.59	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5311002047	Community Facilities	CF	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5311002050	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5311002051	High Density Residential	RH	0.30	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	20%	2.000	1.000	1.000	4.000
5311002056	Medium Density Residential	RM	0.35	2	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311002057	Medium Density Residential	RM	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311002059	High Density Residential	RH	1.86	0	70	65	33	33	131	5%	100%	100%	100%	100%	400%	100%	5%	3.275	1.638	1.638	6.550
5311002122	Medium Density Residential	RM	0.53	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5311002138	Ostrich Farm Mixed-Use	BP	0.75	1	70	26	13	13	52	5%	100%	50%	100%	100%	400%	100%	3%	0.650	0.325	0.325	1.300
5311002139	Ostrich Farm Mixed-Use	BP	1.06	1	70	37	18	18	73	5%	100%	50%	50%	100%	400%	100%	1%	0.456	0.228	0.228	0.913
5311002900	Medium Density Residential	RM	0.06	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311003026	High Density Residential	RH	0.02	0	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5311003027	High Density Residential	RH	0.37	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5311003028	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5311003029	High Density Residential	RH	0.03	0	45	1	0	0	1	5%	100%	100%	100%	100%	100%	100%	5%	0.025	0.013	0.013	0.050
5311003030	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311003031	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003032	High Density Residential	RH	0.02	0	45	1	0	0	1	5%	100%	100%	100%	100%	100%	100%	5%	0.025	0.013	0.013	0.050
5311003033	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5311003034	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311003035	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003036	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003037	High Density Residential	RH	0.49	0	70	17	9	9	35	5%	100%	100%	100%	100%	400%	100%	5%	0.875	0.438	0.438	1.750
5311003038	High Density Residential	RH	0.32	0	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311003039	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311003040	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311003043	Ostrich Farm Mixed-Use	BP	2.33	1	70	81	41	41	163	5%	50%	50%	50%	100%	400%	100%	3%	2.038	1.019	1.019	4.075
5311004011	Ostrich Farm Mixed-Use	BP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5311004012	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311004013	Ostrich Farm Mixed-Use	BP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5311004014	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311004015	Ostrich Farm Mixed-Use	BP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311004018	High Density Residential	RH	0.51	0	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5311004019	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5311004020	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5311004023	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311004026	High Density Residential	RH	0.77	0	70	27	14	14	55	5%	100%	100%	100%	100%	400%	100%	5%	1.375	0.688	0.688	2.750
5311004027	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311004030	High Density Residential	RH	0.45	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5311004044	Ostrich Farm Mixed-Use	CG	0.36	1	70	12	6	6	24	5%	100%	100%	50%	100%	400%	100%	3%	0.300	0.150	0.150	0.600
5311010006	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311010007	Medium Density Residential	RM	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311010008	Medium Density Residential	RM	0.65	1	70	22	11	11	44	5%	100%	100%	100%	100%	400%	100%	5%	1.100	0.550	0.550	2.200
5311010009	Medium Density Residential	RM	0.26	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311010010	Medium Density Residential	RM	0.34	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311010011	Medium Density Residential	RM	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311010012	Medium Density Residential	RM	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311010015	Medium Density Residential	RM	0.40	1	70	13	7	7	27	5%	100%	100%	100%	100%	400%	100%	5%	0.675	0.338	0.338	1.350
5311010016	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5311010022	Medium Density Residential	RM	0.70	1	70	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5311010052	Medium Density Residential	RM	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5311012004	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	50%	100%	100%	100%	400%	100%	3%	0.150	0.075	0.075	0.300
5311012018	Medium Density Residential	RM	0.84	1	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5311012020	Medium Density Residential	RM	1.60	1	70	56	28	28	112	5%	100%	100%	100%	100%	400%	100%	5%	2.800	1.400	1.400	5.600
5311015028	Medium Density Residential	RM	0.76	1	70	26	13	13	52	5%	100%	100%	100%	100%	400%	100%	5%	1.300	0.650	0.650	2.600
5311015029	Medium Density Residential	RM	0.69	1	70	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5311015030	Medium Density Residential	RM	0.30	4	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5311015048	Medium Density Residential	RM	1.10	1	70	38	19	19	76	5%	100%	100%	100%	100%	400%	100%	5%	1.900	0.950	0.950	3.800
5312001903	High Density Residential	RH	0.58	0	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5312002002	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5312002003	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5312002004	High Density Residential	RH	0.13	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5312002005	High Density Residential	RH	0.03	0	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5312002006	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5312002007	High Density Residential	RH	0.10	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5312002008	High Density Residential	RH	0.04	0	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5312002009	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5312002023	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5312002025	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313003039	Medium Density Residential	RM	0.19	5	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313003040	Medium Density Residential	RM	0.26	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313003041	Medium Density Residential	RM	0.34	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313003042	Medium Density Residential	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313003045	Medium Density Residential	RM	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313004018	Medium Density Residential	RM	0.55	24	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5313004026	Downtown Specific Plan	CG	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004030	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004031	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313004032	Medium Density Residential	RM	0.21	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004033	Medium Density Residential	RM	0.20	8	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5313004034	Medium Density Residential	RM	0.20	8	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5313004035	Medium Density Residential	RM	0.63	26	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5313004036	Medium Density Residential	RM	0.59	10	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313004037	Medium Density Residential	RM	0.18	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004038	Medium Density Residential	RM	0.17	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004039	Medium Density Residential	RM	0.15	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004040	Medium Density Residential	RM	0.14	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004041	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004042	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004043	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004044	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004045	Medium Density Residential	RM	0.17	5	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004046	Medium Density Residential	RM	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313004047	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313004048	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004049	Medium Density Residential	RM	0.18	6	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004050	Medium Density Residential	RM	0.29	8	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313004051	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004052	Medium Density Residential	RM	0.19	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004053	Medium Density Residential	RM	0.22	3	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004054	Downtown Specific Plan	CG	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313004055	Downtown Specific Plan	CG	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5313005023	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5313005024	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005025	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005026	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005027	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005028	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005029	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5313005030	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5313005033	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5313005034	High Density Residential	RH	0.42	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5313005035	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005036	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005037	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005038	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005039	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005040	Medium Density Residential	RM	0.60	1	30	0	0	17	17	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.275	1.275
5313005041	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005042	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005054	High Density Residential	RH	0.43	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5313005059	High Density Residential	RH	0.50	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	150%	8%	0.863	0.431	0.431	1.725
5313005081	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	150%	8%	0.713	0.356	0.356	1.425
5313006024	Downtown Specific Plan	MSSP	0.44	1	70	15	7	7	29	5%	100%	100%	100%	100%	400%	150%	8%	1.088	0.544	0.544	2.175
5313006025	Downtown Specific Plan	MSSP	0.50	1	70	17	9	9	35	5%	100%	100%	100%	50%	400%	150%	4%	0.656	0.328	0.328	1.313
5313006038	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313006039	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313006040	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5313006042	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006043	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006044	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006052	High Density Residential	RH	0.49	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	150%	8%	0.863	0.431	0.431	1.725
5313006053	High Density Residential	RH	0.67	0	45	15	7	7	29	5%	100%	100%	100%	100%	100%	150%	8%	1.088	0.544	0.544	2.175

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313006054	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5313007040	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007041	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007042	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007043	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007044	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007045	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007054	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007057	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	50%	400%	150%	4%	0.375	0.188	0.188	0.750
5313007067	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5313007068	Downtown Specific Plan	MSSP	0.81	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5313008013	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313008014	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313008015	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5313008016	Downtown Specific Plan	MSSP	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5313008026	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313008027	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5313008028	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5313008029	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5313009008	Medium Density Residential	RM	0.14	4	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313009009	Medium Density Residential	RM	0.31	4	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313009010	Medium Density Residential	RM	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5313009011	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009012	Medium Density Residential	RM	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5313009013	Medium Density Residential	RM	0.13	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313009014	Medium Density Residential	RM	0.19	4	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009015	Medium Density Residential	RM	0.47	8	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313009016	Medium Density Residential	RM	0.02	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	100%	5%	0	0	0	0
5313009017	Medium Density Residential	RM	0.17	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313009018	Medium Density Residential	RM	0.52	20	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313009019	Medium Density Residential	RM	0.18	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009020	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	50%	100%	100%	100%	400%	100%	3%	0.150	0.075	0.075	0.300
5313009021	Medium Density Residential	RM	0.20	4	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313009022	Medium Density Residential	RM	0.35	9	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313009023	Medium Density Residential	RM	0.17	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009024	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009026	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009027	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009028	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009029	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009030	Medium Density Residential	RM	0.17	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009031	Medium Density Residential	RM	0.23	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009032	Medium Density Residential	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009034	Medium Density Residential	RM	0.76	1	70	26	13	13	52	5%	100%	100%	100%	100%	400%	100%	5%	1.300	0.650	0.650	2.600
5313010021	High Density Residential	RH	0.85	0	70	30	15	15	60	5%	100%	100%	100%	100%	400%	100%	5%	1.500	0.750	0.750	3.000
5313010047	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	20%	2.000	1.000	1.000	4.000
5313010048	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313010049	High Density Residential	RH	0.14	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	20%	1.100	0.550	0.550	2.200
5313010050	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5313010051	High Density Residential	RH	0.36	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5313010052	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313010053	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313010054	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5313010055	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010056	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313010057	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010058	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313010059	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313010060	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313010061	High Density Residential	RH	0.14	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010062	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313010063	High Density Residential	RH	0.37	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5313010064	High Density Residential	RH	0.33	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313010065	High Density Residential	RH	0.65	0	70	23	11	11	45	5%	100%	100%	100%	100%	400%	100%	5%	1.125	0.563	0.563	2.250
5313010068	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313011001	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	100%	5%	0.675	0.338	0.338	1.350
5313011004	High Density Residential	RH	0.47	0	70	17	8	8	33	5%	100%	100%	100%	100%	400%	100%	5%	0.825	0.413	0.413	1.650

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313011006	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5313011008	Ostrich Farm Mixed-Use	BP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313011011	Ostrich Farm Mixed-Use	BP	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313011014	Ostrich Farm Mixed-Use	BP	0.60	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5313011016	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313012001	Medium Density Residential	RM	0.18	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012002	Medium Density Residential	RM	0.16	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313012003	Medium Density Residential	RM	0.40	4	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313012004	Medium Density Residential	RM	0.39	9	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313012005	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012006	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012007	Medium Density Residential	CG	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012008	Transitional Mixed-Use	CG	0.23	3	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313012009	Transitional Mixed-Use	CG	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313012010	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012011	Medium Density Residential	RM	0.25	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313012012	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5313012013	Medium Density Residential	RM	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5313012014	Medium Density Residential	RM	0.10	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5313012015	Medium Density Residential	RM	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012016	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313012017	Medium Density Residential	RM	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012018	Medium Density Residential	RM	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012019	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012020	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012021	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313017009	High Density Residential	RH	0.08	0	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5313017010	High Density Residential	RH	0.60	0	70	21	11	11	43	5%	100%	100%	100%	100%	400%	100%	5%	1.075	0.538	0.538	2.150
5313017011	High Density Residential	RH	0.34	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313017013	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017014	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313017017	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313017019	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313017020	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017021	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017022	High Density Residential	RH	0.43	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	100%	5%	0.775	0.388	0.388	1.550
5313017023	High Density Residential	RH	0.43	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	100%	5%	0.775	0.388	0.388	1.550
5313017024	High Density Residential	RH	0.47	0	70	17	8	8	33	5%	100%	100%	100%	100%	400%	100%	5%	0.825	0.413	0.413	1.650
5313017025	High Density Residential	RH	0.45	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313017026	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313017027	High Density Residential	RH	0.11	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313017028	High Density Residential	RH	0.39	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5313017031	High Density Residential	RH	0.26	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313017038	High Density Residential	RH	0.82	0	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5313017063	High Density Residential	RH	0.30	0	70	10	5	5	20	5%	100%	100%	50%	100%	400%	100%	3%	0.250	0.125	0.125	0.500
5313017067	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017802	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313017902	High Density Residential	RH	0.11	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5314003039	Medium Density Residential	RM	3.02	1	30	0	0	90	90	5%	100%	100%	100%	100%	100%	150%	8%	0	0	6.750	6.750
5315001035	Transitional Mixed-Use	CO	0.19	4	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001036	Transitional Mixed-Use	CO	0.19	3	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315001037	Transitional Mixed-Use	CO	0.23	8	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315001038	Transitional Mixed-Use	CO	0.23	3	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315001042	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315001043	Transitional Mixed-Use	CO	0.17	7	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315001045	Transitional Mixed-Use	CO	0.25	8	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001047	Transitional Mixed-Use	CO	0.24	10	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315001048	Transitional Mixed-Use	CO	0.24	6	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001072	Downtown Specific Plan	CO	2.62	0	110	144	72	72	288	5%	100%	50%	100%	100%	400%	150%	4%	5.400	2.700	2.700	10.800
5315001073	Transitional Mixed-Use	CO	0.24	1	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315002013	Transitional Mixed-Use	CO	0.24	9	45	1	0	0	1	5%	100%	100%	100%	100%	100%	150%	8%	0.038	0.019	0.019	0.075
5315002014	Transitional Mixed-Use	CO	0.24	6	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315002019	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315002021	Transitional Mixed-Use	CO	0.23	4	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315002023	Transitional Mixed-Use	CO	0.15	3	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315002024	Transitional Mixed-Use	CO	0.08	2	45	1	0	0	1	5%	100%	100%	100%	100%	100%	150%	8%	0.038	0.019	0.019	0.075
5315002030	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	100%	100%	50%	400%	150%	4%	0.525	0.263	0.263	1.050
5315002034	Downtown Specific Plan	CG	0.24	0	110	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5315002035	Downtown Specific Plan	CG	0.29	0	110	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400

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5315002036	Downtown Specific Plan	CG	0.32	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315002037	Downtown Specific Plan	CG	0.03	0	110	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315002038	Downtown Specific Plan	CG	0.13	0	110	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5315002039	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315002040	Downtown Specific Plan	CG	0.32	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315002041	Downtown Specific Plan	CG	0.12	0	110	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315002049	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315002055	Downtown Specific Plan	CG	1.00	0	110	55	27	27	109	5%	100%	100%	100%	100%	400%	150%	8%	4.088	2.044	2.044	8.175
5315002061	Downtown Specific Plan	RM	0.23	0	110	13	6	6	25	5%	100%	100%	100%	100%	400%	150%	8%	0.938	0.469	0.469	1.875
5315002062	Downtown Specific Plan	RM	0.23	0	110	13	6	6	25	5%	100%	100%	100%	100%	400%	150%	8%	0.938	0.469	0.469	1.875
5315002063	Downtown Specific Plan	RM	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315002064	Downtown Specific Plan	RM	0.15	0	110	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315002065	Downtown Specific Plan	RM	0.11	0	110	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315002074	Downtown Specific Plan	CG	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315002901	Downtown Specific Plan	CG	0.47	0	110	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5315002902	Downtown Specific Plan	CF	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315002905	Downtown Specific Plan	CF	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315002907	Downtown Specific Plan	CF	0.00	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5315002911	Downtown Specific Plan	CF	0.97	1	70	34	17	17	68	5%	100%	100%	100%	100%	400%	150%	8%	2.550	1.275	1.275	5.100
5315002912	Downtown Specific Plan	CF	0.24	1	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5315003023	Downtown Specific Plan	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315003025	Downtown Specific Plan	CG	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003026	Downtown Specific Plan	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315003028	Downtown Specific Plan	CG	0.48	1	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5315003029	Downtown Specific Plan	CG	0.04	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315003030	Downtown Specific Plan	CG	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003031	Downtown Specific Plan	CF	1.78	1	70	62	31	31	124	5%	100%	100%	100%	100%	400%	150%	8%	4.650	2.325	2.325	9.300
5315003032	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315003033	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315003034	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315003039	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003040	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315003041	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003042	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003043	Downtown Specific Plan	CG	0.34	0	110	19	9	9	37	5%	50%	100%	100%	100%	400%	150%	4%	0.694	0.347	0.347	1.388
5315003044	Downtown Specific Plan	CG	0.37	0	110	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5315003046	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003047	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315003048	Downtown Specific Plan	CG	0.13	0	110	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5315003049	Downtown Specific Plan	CG	0.08	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315003050	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315003054	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003055	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003056	Downtown Specific Plan	CG	0.09	0	110	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003057	Downtown Specific Plan	CG	0.37	0	110	21	10	10	41	5%	100%	100%	100%	100%	400%	150%	8%	1.538	0.769	0.769	3.075
5315003058	Downtown Specific Plan	CG	0.49	0	110	27	14	14	55	5%	100%	50%	100%	100%	400%	150%	4%	1.031	0.516	0.516	2.063
5315003059	Downtown Specific Plan	CG	0.50	1	70	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315003065	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	50%	100%	100%	400%	150%	4%	0.525	0.263	0.263	1.050
5315003083	Downtown Specific Plan	CG	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315003803	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315003901	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315004027	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	100%	5%	0.175	0.088	0.088	0.350
5315004028	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004029	Transitional Mixed-Use	CO	0.18	12	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004030	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004031	Transitional Mixed-Use	CO	0.18	4	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315004032	Transitional Mixed-Use	CO	0.18	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315004034	Transitional Mixed-Use	CO	0.18	5	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315004035	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004037	Transitional Mixed-Use	CO	0.18	12	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004038	Medium Density Residential	RM	0.19	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004039	Medium Density Residential	RM	0.18	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004041	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004042	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315004043	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004044	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004045	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004046	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315004047	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004066	Downtown Specific Plan	CG	0.36	0	110	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5315004083	Downtown Specific Plan	CG	1.06	0	110	58	29	29	116	5%	100%	100%	100%	100%	400%	150%	8%	4.350	2.175	2.175	8.700
5315004084	Downtown Specific Plan	CG	1.88	0	110	103	52	52	207	5%	100%	100%	100%	100%	400%	150%	8%	7.763	3.881	3.881	15.525
5315004085	Downtown Specific Plan	CG	0.66	0	110	36	18	18	72	5%	100%	100%	100%	100%	400%	150%	8%	2.700	1.350	1.350	5.400

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315004087	Medium Density Residential	RM	0.36	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5315005062	Transitional Mixed-Use	CO	0.16	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315005063	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315005065	Transitional Mixed-Use	CO	0.16	5	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315005066	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315006014	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	50%	100%	100%	100%	400%	150%	4%	0.394	0.197	0.197	0.788
5315006017	Downtown Specific Plan	MSSP	0.51	1	70	17	9	9	35	5%	50%	100%	100%	100%	400%	150%	4%	0.656	0.328	0.328	1.313
5315007030	Downtown Specific Plan	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315007055	Downtown Specific Plan	RM	0.91	1	70	31	16	16	63	5%	100%	100%	100%	100%	400%	150%	8%	2.363	1.181	1.181	4.725
5315007900	Downtown Specific Plan	CF	0.79	1	70	27	14	14	55	5%	100%	100%	100%	100%	400%	150%	8%	2.063	1.031	1.031	4.125
5315008023	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	50%	50%	100%	100%	400%	150%	2%	0.047	0.023	0.023	0.094
5315008025	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	50%	100%	100%	100%	400%	150%	4%	0.019	0.009	0.009	0.038
5315008032	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315008033	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008034	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008035	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008036	Downtown Specific Plan	MSSP	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315008037	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008038	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008039	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008040	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008041	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008042	Downtown Specific Plan	MSSP	0.45	1	70	15	8	8	31	5%	100%	100%	100%	50%	400%	150%	4%	0.581	0.291	0.291	1.163
5315008043	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008044	Downtown Specific Plan	MSSP	0.67	1	70	23	12	12	47	5%	100%	100%	100%	100%	400%	150%	8%	1.763	0.881	0.881	3.525
5315008045	Downtown Specific Plan	MSSP	0.53	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	150%	8%	1.350	0.675	0.675	2.700
5315008046	Downtown Specific Plan	MSSP	0.80	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5315009022	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315009023	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315009024	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315009025	Downtown Specific Plan	MSSP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315009026	Downtown Specific Plan	MSSP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315009027	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315009028	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315009029	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315009030	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315009031	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009032	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315009033	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009034	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009035	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315009036	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009037	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009038	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009039	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009046	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315009047	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315009050	Downtown Specific Plan	MSSP	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315010019	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315010020	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315010021	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010022	Medium Density Residential	RM	0.19	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315010023	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010025	Medium Density Residential	RM	0.23	3	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010026	Transitional Mixed-Use	CO	0.19	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010028	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010029	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010030	Transitional Mixed-Use	CO	0.17	5	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315010031	Transitional Mixed-Use	CO	0.21	3	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010032	Medium Density Residential	RM	0.23	9	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010033	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315010035	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010036	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010037	Medium Density Residential	RM	0.16	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010038	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315010039	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010040	Medium Density Residential	RM	0.27	7	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010041	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010043	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011027	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315011028	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315011030	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315011031	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011033	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011034	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011035	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011037	Medium Density Residential	RM	0.03	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315011038	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011039	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011044	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011045	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315011052	Medium Density Residential	RM	0.64	1	30	0	0	18	18	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.350	1.350
5315011067	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315011068	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011903	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011904	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012016	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012017	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012019	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012020	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315012022	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012023	High Density Residential	RH	0.08	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315012024	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315012025	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315012028	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012029	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012030	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012031	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

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5315012032	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012033	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012034	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012035	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315012038	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315012048	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012049	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012050	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315012903	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012904	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315013019	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315013020	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013021	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013022	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013023	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315013024	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.075	0.075
5315013025	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013026	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013027	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013028	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013029	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013030	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013033	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013034	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013035	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013037	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013038	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013039	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013040	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013041	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

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5315013042	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013043	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315013046	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013903	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315013904	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013906	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013907	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315014021	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014022	Downtown Specific Plan	MSSP	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014023	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014024	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014025	Downtown Specific Plan	MSSP	0.04	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315014027	Downtown Specific Plan	MSSP	0.06	1	70	2	1	1	4	5%	50%	100%	100%	100%	400%	150%	4%	0.075	0.038	0.038	0.150
5315014028	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315014029	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	50%	50%	100%	100%	400%	150%	2%	0.113	0.056	0.056	0.225
5315014035	Downtown Specific Plan	MSSP	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315014039	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014040	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315014041	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014042	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014043	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	50%	100%	100%	100%	400%	150%	4%	0.169	0.084	0.084	0.338
5315014049	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	50%	100%	100%	100%	400%	150%	4%	0.019	0.009	0.009	0.038
5315014051	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	100%	50%	50%	100%	400%	150%	2%	0.197	0.098	0.098	0.394
5315015015	Downtown Specific Plan	MSSP	0.13	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315015017	Downtown Specific Plan	MSSP	0.23	1	70	8	4	4	16	5%	50%	100%	100%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5315015047	Downtown Specific Plan	MSSP	0.37	1	70	13	6	6	25	5%	50%	100%	50%	100%	400%	150%	2%	0.234	0.117	0.117	0.469
5315016001	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016002	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016003	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315016004	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016005	High Density Residential	RH	0.34	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	150%	8%	0.600	0.300	0.300	1.200
5315016006	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315016010	High Density Residential	RH	0.28	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315016019	High Density Residential	RH	0.37	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	150%	8%	0.600	0.300	0.300	1.200
5315016022	High Density Residential	RH	0.72	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	150%	8%	1.200	0.600	0.600	2.400
5315016023	High Density Residential	RH	0.64	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	150%	8%	1.050	0.525	0.525	2.100

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315016024	High Density Residential	RH	0.32	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	150%	8%	0.563	0.281	0.281	1.125
5315016025	High Density Residential	RH	0.42	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5315016026	High Density Residential	RH	0.12	0	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315016027	High Density Residential	RH	0.11	0	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315016028	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016029	High Density Residential	RH	0.83	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	150%	8%	1.388	0.694	0.694	2.775
5315016031	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016032	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016033	High Density Residential	RH	0.69	0	45	15	8	8	31	5%	100%	100%	100%	100%	100%	150%	8%	1.163	0.581	0.581	2.325
5315016035	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016047	High Density Residential	RH	0.28	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315016900	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	150%	8%	0.638	0.319	0.319	1.275
5315017001	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315017002	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017003	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017004	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017007	Downtown Specific Plan	MSSP	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315017025	Downtown Specific Plan	MSSP	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5315017026	Downtown Specific Plan	MSSP	0.99	1	70	34	17	17	68	5%	100%	100%	100%	100%	400%	150%	8%	2.550	1.275	1.275	5.100
5315017027	Downtown Specific Plan	MSSP	0.46	1	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5315017028	Downtown Specific Plan	MSSP	0.63	26	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315017029	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315017031	Downtown Specific Plan	MSSP	0.56	19	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315017033	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315017034	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017035	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315017036	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017037	Downtown Specific Plan	MSSP	0.25	6	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315017039	Downtown Specific Plan	MSSP	0.24	12	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315017040	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315017043	Downtown Specific Plan	MSSP	0.20	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5315017044	Downtown Specific Plan	MSSP	0.47	16	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017045	Downtown Specific Plan	MSSP	0.44	1	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5315017047	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017064	Downtown Specific Plan	MSSP	0.29	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315017088	Downtown Specific Plan	MSSP	0.26	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315017099	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315017100	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525

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5315017101	Downtown Specific Plan	MSSP	0.91	1	70	31	16	16	63	5%	100%	100%	50%	100%	400%	150%	4%	1.181	0.591	0.591	2.363
5315018060	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315018061	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315018062	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018063	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315018064	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5315018065	Medium Density Residential	RM	0.26	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.525	0.525
5315018066	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315018067	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315018068	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018070	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018071	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018072	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315018073	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315018074	Medium Density Residential	RM	0.05	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315019026	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019027	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019028	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019029	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019030	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019031	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019033	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019034	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019035	Medium Density Residential	RM	0.05	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315019036	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315019037	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5315019038	Medium Density Residential	RM	0.05	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315019039	Medium Density Residential	RM	0.05	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315019040	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315019041	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019042	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019043	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019044	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019045	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019046	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019047	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315019048	Downtown Specific Plan	MSSP	1.25	1	70	43	22	22	87	5%	100%	100%	100%	100%	400%	150%	8%	3.263	1.631	1.631	6.525
5315019049	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315020004	Downtown Specific Plan	MSSP	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315020006	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315020008	Downtown Specific Plan	MSSP	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315020009	Downtown Specific Plan	MSSP	0.27	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315020010	Downtown Specific Plan	MSSP	0.27	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315020013	Downtown Specific Plan	MSSP	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315020014	Downtown Specific Plan	MSSP	1.14	1	70	40	20	20	80	5%	50%	100%	100%	100%	400%	150%	4%	1.500	0.750	0.750	3.000
5315020016	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	50%	100%	100%	100%	400%	150%	4%	0.375	0.188	0.188	0.750
5315020017	Downtown Specific Plan	MSSP	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315020903	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	50%	100%	100%	100%	400%	150%	4%	0.094	0.047	0.047	0.188
5315021008	Downtown Specific Plan	MSSP	0.57	1	70	19	10	10	39	5%	100%	100%	50%	100%	400%	150%	4%	0.731	0.366	0.366	1.463
5315021031	Downtown Specific Plan	MSSP	0.45	1	70	15	8	8	31	5%	100%	100%	50%	100%	400%	150%	4%	0.581	0.291	0.291	1.163
5315021051	Downtown Specific Plan	MSSP	0.65	1	70	22	11	11	44	5%	100%	100%	50%	100%	400%	150%	4%	0.825	0.413	0.413	1.650
5317019001	Medium Density Residential	RM	0.23	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5317019002	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5317019003	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019004	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019005	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019008	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5317019009	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5317019010	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075

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5317019011	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5317019012	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5317019013	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5317019014	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5317020015	High Density Residential	RH	0.30	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317020016	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317020017	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317020018	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317020019	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317020020	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317020022	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020023	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020024	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020025	High Density Residential	RH	0.70	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	100%	5%	0.800	0.400	0.400	1.600
5317020026	High Density Residential	RH	0.84	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	100%	5%	0.925	0.463	0.463	1.850
5317020028	High Density Residential	RH	0.56	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5317020029	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317020030	High Density Residential	RH	0.54	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317020031	Downtown Specific Plan	CG	4.44	1	70	155	77	77	309	5%	100%	100%	100%	100%	400%	100%	5%	7.725	3.863	3.863	15.450
5317020032	Downtown Specific Plan	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5317020047	High Density Residential	RH	0.63	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	100%	5%	0.700	0.350	0.350	1.400
5317021001	High Density Residential	RH	0.40	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5317021002	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021003	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021004	High Density Residential	RH	0.20	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317021007	High Density Residential	RH	0.47	0	45	11	5	5	21	5%	100%	100%	100%	100%	100%	100%	5%	0.525	0.263	0.263	1.050
5317021014	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021018	High Density Residential	RH	0.76	0	45	17	9	9	35	5%	100%	100%	100%	100%	100%	100%	5%	0.875	0.438	0.438	1.750
5317021019	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021020	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021023	High Density Residential	RH	0.94	0	45	21	11	11	43	5%	100%	100%	100%	100%	100%	100%	5%	1.075	0.538	0.538	2.150
5317021025	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021026	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021027	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021028	High Density Residential	RH	0.33	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317021029	High Density Residential	RH	0.40	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5317021030	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021031	High Density Residential	RH	0.33	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317021032	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317021033	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021034	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021036	High Density Residential	RH	0.61	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	100%	5%	0.700	0.350	0.350	1.400
5317021037	High Density Residential	RH	1.11	0	45	25	13	13	51	5%	100%	100%	100%	100%	100%	100%	5%	1.275	0.638	0.638	2.550
5317021038	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022001	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317022004	High Density Residential	RH	0.15	0	45	3	2	2	7	5%	100%	100%	50%	100%	100%	100%	3%	0.088	0.044	0.044	0.175
5317022006	High Density Residential	RH	0.96	0	45	22	11	11	44	5%	100%	100%	100%	100%	100%	100%	5%	1.100	0.550	0.550	2.200
5317022007	High Density Residential	RH	0.32	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317022008	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022009	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317022010	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317022011	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022012	High Density Residential	RH	0.66	0	45	15	7	7	29	5%	100%	100%	100%	100%	100%	100%	5%	0.725	0.363	0.363	1.450
5317023001	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	50%	100%	100%	100%	100%	100%	3%	0.163	0.081	0.081	0.325
5317023002	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317023003	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317023004	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317023005	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317023006	High Density Residential	RH	0.54	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317023009	High Density Residential	RH	0.69	0	45	15	8	8	31	5%	100%	100%	100%	100%	100%	100%	5%	0.775	0.388	0.388	1.550
5317023010	High Density Residential	RH	0.85	0	45	19	10	10	39	5%	100%	100%	100%	100%	100%	100%	5%	0.975	0.488	0.488	1.950
5317024001	High Density Residential	RH	0.07	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	100%	5%	0.100	0.050	0.050	0.200
5317024002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317024003	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024004	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024005	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024006	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317024007	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317025001	High Density Residential	RH	0.33	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5317025003	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317025004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317025005	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317025006	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317025901	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5317026001	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317026002	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317026003	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027001	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027003	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027005	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027006	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027007	High Density Residential	RH	0.20	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027008	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027009	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027010	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028001	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317028002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028003	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317028004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028005	High Density Residential	RH	0.29	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028006	High Density Residential	RH	0.31	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317028007	High Density Residential	RH	0.29	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028008	High Density Residential	RH	0.31	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317028015	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028016	High Density Residential	RH	2.01	0	45	45	23	23	91	5%	100%	100%	100%	100%	100%	100%	5%	2.275	1.138	1.138	4.550
5317028270	Medium Density Residential	RM	2.73	1	30	0	0	81	81	5%	100%	100%	100%	100%	100%	100%	5%	0	0	4.050	4.050
5318001001	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318001002	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318001003	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318001004	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318001005	Medium Density Residential	RM	0.21	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318001011	Medium Density Residential	RH	0.97	42	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318002018	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	50%	100%	100%	100%	100%	100%	3%	0.150	0.075	0.075	0.300
5318002020	High Density Residential	RH	1.80	0	45	40	20	20	80	5%	100%	100%	100%	100%	100%	100%	5%	2.000	1.000	1.000	4.000
5318002028	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318003001	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5318003002	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600

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5318003004	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318003005	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318003006	High Density Residential	RH	0.48	0	45	11	5	5	21	5%	100%	100%	100%	100%	100%	100%	5%	0.525	0.263	0.263	1.050
5318003007	High Density Residential	RH	0.49	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	100%	5%	0.575	0.288	0.288	1.150
5318003008	High Density Residential	RH	0.88	0	45	20	10	10	40	5%	100%	100%	100%	100%	100%	100%	5%	1.000	0.500	0.500	2.000
5318003009	High Density Residential	RH	0.82	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	100%	5%	0.925	0.463	0.463	1.850
5318003011	High Density Residential	RH	0.38	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5318003801	High Density Residential	RH	0.08	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	100%	5%	0.100	0.050	0.050	0.200
5318004012	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004015	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004016	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004017	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004018	High Density Residential	RH	0.34	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5318004019	Downtown Specific Plan	CG	0.50	0	110	28	14	14	56	5%	100%	100%	100%	100%	400%	150%	8%	2.100	1.050	1.050	4.200
5318004020	Downtown Specific Plan	CG	0.21	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5318004021	Downtown Specific Plan	CG	0.31	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5318004022	Downtown Specific Plan	CG	0.35	0	110	19	10	10	39	5%	100%	100%	100%	50%	400%	150%	4%	0.731	0.366	0.366	1.463
5318004023	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	100%	5%	0.475	0.238	0.238	0.950
5318004024	Downtown Specific Plan	CG	2.00	0	110	110	55	55	220	5%	100%	100%	100%	100%	400%	100%	5%	5.500	2.750	2.750	11.000
5318005001	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005002	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005007	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005008	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005009	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5318005010	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005011	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005012	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005013	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005014	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005015	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005016	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005017	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005018	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005019	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005020	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005021	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005022	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005023	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5318005024	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005025	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005026	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005027	High Density Residential	RH	0.73	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	100%	5%	0.800	0.400	0.400	1.600
5318005030	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005031	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005034	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005035	High Density Residential	RH	0.57	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5318005036	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005038	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005072	High Density Residential	RH	0.56	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5318005088	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5318006016	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318006017	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318013025	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013026	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013027	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013028	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013029	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013030	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013031	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318013032	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013033	Medium Density Residential	RM	0.25	13	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318013034	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318013035	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013036	Medium Density Residential	RM	0.18	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013048	Medium Density Residential	RM	0.10	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013049	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013050	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013051	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013052	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100

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5318013053	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013054	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013055	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318014001	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014002	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5318014003	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5318014008	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014009	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	50%	100%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5318014011	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318014012	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014013	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014014	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014016	Downtown Specific Plan	RM	0.08	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5318014018	Downtown Specific Plan	CG	0.15	0	110	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5318014019	Downtown Specific Plan	RM	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318014020	Downtown Specific Plan	CG	0.25	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5318014022	Medium Density Residential	RM	0.29	3	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5318014023	Medium Density Residential	RM	0.23	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014026	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014027	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014028	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014029	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014030	Medium Density Residential	RM	0.15	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014031	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014032	Medium Density Residential	RM	0.18	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014033	Medium Density Residential	RM	0.30	7	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318014034	Medium Density Residential	RM	0.24	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014035	Medium Density Residential	RM	0.28	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.350	0.350
5318014042	Medium Density Residential	RM	1.16	1	30	0	0	34	34	5%	100%	100%	100%	100%	100%	100%	5%	0	0	1.700	1.700
5318014086	Medium Density Residential	RM	0.32	1	30	0	0	9	9	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.450	0.450

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5318014094	Medium Density Residential	RM	0.28	2	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5318014095	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014096	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015001	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5318015002	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015003	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5318015004	Downtown Specific Plan	CG	0.27	0	110	15	7	7	29	5%	100%	100%	100%	100%	400%	150%	8%	1.088	0.544	0.544	2.175
5318015005	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015006	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5318015007	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5318015008	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5318015009	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5318015010	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015011	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015013	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015017	Downtown Specific Plan	CG	0.62	0	110	34	17	17	68	5%	100%	100%	100%	100%	400%	100%	5%	1.700	0.850	0.850	3.400
5318015018	Medium Density Residential	RM	0.30	4	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318015019	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015020	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015023	Medium Density Residential	RM	0.24	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318015024	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015025	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015026	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015027	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015028	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015029	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015030	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015031	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015033	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015034	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5318015035	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318015036	Downtown Specific Plan	CG	0.85	0	110	47	23	23	93	5%	100%	100%	100%	100%	400%	150%	8%	3.488	1.744	1.744	6.975
5318015037	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015038	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016019	Downtown Specific Plan	CG	0.26	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5318016021	Downtown Specific Plan	CG	0.01	0	110	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5318016022	Downtown Specific Plan	CG	0.01	0	110	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5318016023	Downtown Specific Plan	CG	0.43	0	110	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5318016024	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5318016025	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5318016026	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5318016027	Downtown Specific Plan	CG	0.35	0	110	19	10	10	39	5%	100%	100%	100%	100%	400%	150%	8%	1.463	0.731	0.731	2.925
5318016028	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016029	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016030	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016031	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016032	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016033	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016034	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016035	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016036	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016037	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016038	Downtown Specific Plan	CG	0.08	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318016039	Downtown Specific Plan	CG	0.08	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318018001	Medium Density Residential	RM	0.36	8	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319002004	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319002005	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002006	Medium Density Residential	RM	0.21	9	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002008	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319002017	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002018	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300

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5319002019	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319002020	Medium Density Residential	RM	0.15	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002021	Medium Density Residential	RM	0.23	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319002026	Medium Density Residential	RM	0.14	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002027	Medium Density Residential	RM	0.14	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002028	Medium Density Residential	RM	0.18	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002032	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002033	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319003001	Medium Density Residential	RM	0.24	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319003002	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003003	Medium Density Residential	RM	0.22	3	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319003005	Medium Density Residential	RM	0.22	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319003006	Medium Density Residential	RM	0.19	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003015	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319003018	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319003019	Medium Density Residential	RM	0.22	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319003020	Medium Density Residential	RM	0.22	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319003022	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003023	Medium Density Residential	RM	0.15	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319003030	Medium Density Residential	RM	0.19	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003032	Downtown Specific Plan	CG	0.89	0	110	49	24	24	97	5%	100%	100%	100%	100%	400%	150%	8%	3.638	1.819	1.819	7.275
5319003045	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.225	0.225
5319004001	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004003	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004004	Medium Density Residential	RM	0.15	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319004005	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004006	Medium Density Residential	RM	0.21	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004007	Medium Density Residential	RM	0.40	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0

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5319004008	Medium Density Residential	RM	0.20	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004009	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319004010	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004011	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004014	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319004016	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004017	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004019	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004020	Transitional Mixed-Use	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319004021	Transitional Mixed-Use	RH	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319004022	Transitional Mixed-Use	RH	0.19	5	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319004023	Medium Density Residential	RM	0.13	3	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004024	Medium Density Residential	RM	0.19	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319004025	Medium Density Residential	RM	0.23	7	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004035	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319004036	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319004037	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319005001	Medium Density Residential	RM	0.29	8	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319005008	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.113	0.113
5319005009	Medium Density Residential	RM	0.30	8	30	0	0	1	1	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.038	0.038
5319005010	Medium Density Residential	RM	0.30	4	30	0	0	5	5	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.188	0.188
5319005015	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319005017	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319005018	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319005019	Medium Density Residential	RM	0.24	6	30	0	0	1	1	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.038	0.038
5319005021	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319005022	High Density Residential	RH	0.32	0	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5319005023	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5319005024	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319005025	High Density Residential	RH	0.12	0	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5319005027	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300

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5319006005	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319006025	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319006027	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5319006034	High Density Residential	RH	0.44	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5319007001	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5319007043	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319007048	High Density Residential	RH	0.75	0	70	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5319008001	Mixed-Use Centers	CG	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319008002	Mixed-Use Centers	CG	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319008005	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008006	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008007	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008008	Mixed-Use Centers	CG	0.29	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319008009	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319008018	High Density Residential	RH	0.50	0	70	18	9	9	36	5%	100%	100%	100%	100%	400%	150%	8%	1.350	0.675	0.675	2.700
5319008039	Mixed-Use Centers	CG	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319009003	Mixed-Use Centers	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319009004	Mixed-Use Centers	CG	0.20	1	70	7	3	3	13	5%	100%	50%	100%	100%	400%	150%	4%	0.244	0.122	0.122	0.488
5319009005	Mixed-Use Centers	CG	0.20	1	70	7	3	3	13	5%	100%	50%	100%	100%	400%	150%	4%	0.244	0.122	0.122	0.488
5319009013	Mixed-Use Centers	CG	0.46	12	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319009014	Mixed-Use Centers	CG	0.42	14	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319009015	Mixed-Use Centers	CG	0.21	4	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319009016	Mixed-Use Centers	CG	0.21	4	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319009033	Mixed-Use Centers	CG	0.28	1	70	9	5	5	19	5%	100%	50%	100%	100%	400%	150%	4%	0.356	0.178	0.178	0.713
5319009036	Mixed-Use Centers	CG	0.69	1	70	24	12	12	48	5%	100%	50%	100%	100%	400%	150%	4%	0.900	0.450	0.450	1.800
5319009037	Mixed-Use Centers	CG	1.23	1	70	42	21	21	84	5%	100%	100%	100%	100%	400%	150%	8%	3.150	1.575	1.575	6.300
5319017011	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319017013	Medium Density Residential	RM	0.26	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319017014	Medium Density Residential	RM	0.26	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319017018	Medium Density Residential	RM	0.25	1	30	0	0	7	7	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.263	0.263
5319018001	High Density Residential	RH	0.33	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319018002	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319018004	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018005	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018006	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018011	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319018012	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018013	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018015	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018016	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319018017	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319018018	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319018019	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018020	High Density Residential	RH	0.56	0	70	19	10	10	39	5%	100%	100%	100%	100%	400%	150%	8%	1.463	0.731	0.731	2.925
5319018022	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319018029	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319019001	Mixed-Use Centers	CG	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319019002	Mixed-Use Centers	CG	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319019005	Mixed-Use Centers	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319019007	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019008	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019009	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019013	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019014	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019015	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019016	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019019	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019021	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019024	Mixed-Use Centers	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319019025	Mixed-Use Centers	CG	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5319019027	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319019040	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319019056	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019061	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	50%	100%	400%	150%	4%	0.281	0.141	0.141	0.563
5319019064	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5319020003	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020004	Medium Density Residential	RM	0.21	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319020005	Medium Density Residential	RM	0.21	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020006	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020007	Medium Density Residential	RM	0.21	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020008	Medium Density Residential	RM	0.53	8	30	0	0	8	8	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.600	0.600
5319020011	Mixed-Use Centers	CG	0.21	1	70	7	3	3	13	5%	100%	100%	50%	100%	400%	150%	4%	0.244	0.122	0.122	0.488

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5319020012	Medium Density Residential	RM	0.39	12	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319020013	Medium Density Residential	RM	0.39	6	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5319020016	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319020017	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020018	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319020019	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020025	Medium Density Residential	RM	0.33	14	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020026	Mixed-Use Centers	CG	0.37	1	70	12	6	6	24	5%	100%	100%	50%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5319020046	Medium Density Residential	RM	0.42	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319020056	Medium Density Residential	RM	0.38	16	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020061	Medium Density Residential	RM	0.44	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319021001	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021002	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021003	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021004	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319021005	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319021006	Medium Density Residential	RM	0.32	2	30	0	0	8	8	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.600	0.600
5319021007	Medium Density Residential	RM	0.28	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021008	Medium Density Residential	RM	0.26	10	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021011	Medium Density Residential	RM	0.39	17	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021012	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021013	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021014	Medium Density Residential	RM	0.39	17	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021025	Medium Density Residential	RM	0.39	1	30	0	0	11	11	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.825	0.825
5319023001	Medium Density Residential	RM	0.37	6	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319023004	Medium Density Residential	RM	0.43	8	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319023006	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319023007	Medium Density Residential	RM	0.26	6	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150

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5319023008	Medium Density Residential	RM	0.21	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023026	Medium Density Residential	RM	0.43	18	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023027	Medium Density Residential	RM	0.57	25	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023043	Medium Density Residential	RM	0.42	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319027011	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319027013	Medium Density Residential	RM	0.38	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5319027016	Medium Density Residential	RM	0.11	4	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319027017	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319027021	Medium Density Residential	RM	0.29	10	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319027022	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319027907	Medium Density Residential	RM	0.33	10	30	0	0	0	0	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0	0
5319028012	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319028024	Medium Density Residential	RM	0.38	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5319032012	Medium Density Residential	RM	0.52	1	30	0	0	15	15	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.125	1.125
5319032014	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319032015	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319032017	Medium Density Residential	RM	0.56	1	30	0	0	16	16	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.200	1.200
5319033001	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319033002	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319033006	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319033016	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319033017	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319033018	Medium Density Residential	RM	0.25	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033019	Medium Density Residential	RM	0.43	7	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319033024	Medium Density Residential	RM	0.47	13	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319033025	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033026	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033027	Medium Density Residential	RM	0.24	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319034006	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319034007	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319035001	Transitional Mixed-Use	CO	0.58	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5319035002	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319035003	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319035005	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319035006	Transitional Mixed-Use	CO	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319035012	High Density Residential	RH	0.26	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5319035013	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5319035014	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319035015	High Density Residential	RH	0.03	0	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5319035016	Transitional Mixed-Use	CO	0.17	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319035036	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	150%	8%	0.713	0.356	0.356	1.425
5319035045	High Density Residential	RH	0.55	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5319036016	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036017	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036018	High Density Residential	RH	0.19	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036019	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036021	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319037001	High Density Residential	RH	0.58	0	70	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5319037002	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319037003	High Density Residential	RH	0.24	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5319037004	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037005	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037006	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037007	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037008	Medium Density Residential	RM	0.41	8	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319037009	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037010	Medium Density Residential	RM	0.35	11	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319037011	Medium Density Residential	RM	0.37	9	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037012	Medium Density Residential	RM	0.16	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037013	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319037014	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319037015	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319038001	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319038008	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319038009	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5319038010	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319038011	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319038012	Medium Density Residential	RM	0.20	7	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5319038013	Medium Density Residential	RM	0.20	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319038014	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319038017	Medium Density Residential	RM	0.41	1	30	0	0	11	11	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.825	0.825
5319038018	High Density Residential	RH	0.44	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5319038019	Medium Density Residential	RM	0.60	26	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319038020	High Density Residential	RH	0.74	0	70	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5319038022	High Density Residential	RH	0.24	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319038028	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5320001004	Downtown Specific Plan	CG	0.12	0	110	7	3	3	13	5%	100%	100%	100%	50%	400%	150%	4%	0.244	0.122	0.122	0.488
5320001012	Medium Density Residential	RM	0.18	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5320001014	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5320001015	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5320001016	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5320001021	Downtown Specific Plan	CG	0.36	0	110	20	10	10	40	5%	100%	100%	100%	50%	400%	150%	4%	0.750	0.375	0.375	1.500
5320001024	Downtown Specific Plan	CG	0.68	0	110	37	19	19	75	5%	100%	100%	100%	50%	400%	150%	4%	1.406	0.703	0.703	2.813
5320002008	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5320002010	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5320002022	Medium Density Residential	RM	0.23	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5320003001	Downtown Specific Plan	CG	0.39	0	110	22	11	11	44	5%	100%	100%	100%	100%	400%	150%	8%	1.650	0.825	0.825	3.300
5320003003	Downtown Specific Plan	CG	0.20	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320003005	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	100%	100%	50%	400%	150%	4%	0.450	0.225	0.225	0.900
5320003006	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5320003007	Downtown Specific Plan	CG	0.25	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320003008	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5320003011	Medium Density Residential	RM	0.15	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320003015	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320005023	Transitional Mixed-Use	CG	0.81	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5320005903	Transitional Mixed-Use	CG	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320005904	Transitional Mixed-Use	CG	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320005905	Transitional Mixed-Use	CG	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5320006901	Community Facilities	CF	4.06	0	70	142	71	71	284	5%	100%	100%	100%	100%	400%	150%	8%	10.650	5.325	5.325	21.300
5320007019	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320007020	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320007021	High Density Residential	RH	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320007022	High Density Residential	RH	0.81	0	70	29	14	14	57	5%	100%	100%	100%	100%	400%	150%	8%	2.138	1.069	1.069	4.275
5320008024	High Density Residential	RH	0.80	0	70	28	14	14	56	5%	100%	100%	100%	100%	400%	150%	8%	2.100	1.050	1.050	4.200
5320008025	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320008026	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009004	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5320009005	High Density Residential	RH	0.54	0	70	19	9	9	37	5%	100%	100%	100%	100%	400%	150%	8%	1.388	0.694	0.694	2.775
5320009006	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320009008	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009010	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009015	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009017	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009022	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320009024	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320009025	High Density Residential	CG	0.33	0	70	12	6	6	24	5%	100%	50%	100%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5320009028	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009031	Mixed-Use Centers	CG	0.81	1	70	28	14	14	56	5%	100%	50%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5320010001	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5320010002	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5320010003	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320010005	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320011001	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320011002	High Density Residential	RH	0.13	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320011003	High Density Residential	RH	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320011004	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320017015	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320018001	Medium Density Residential	RM	0.25	8	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320018003	Medium Density Residential	RM	0.28	11	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320018004	Medium Density Residential	RM	0.36	8	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320018006	Medium Density Residential	RM	0.16	6	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5320018007	Medium Density Residential	RM	0.02	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5320018014	Medium Density Residential	RM	0.01	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5320018024	Medium Density Residential	RM	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320018026	Medium Density Residential	RM	0.24	1	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5320020001	Medium Density Residential	RM	0.43	8	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5320020003	Medium Density Residential	RM	0.17	7	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5320020004	Medium Density Residential	RM	0.17	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320020005	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320020006	Medium Density Residential	RM	0.30	5	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320021003	Medium Density Residential	RM	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320021004	Medium Density Residential	RM	0.21	5	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320021007	Medium Density Residential	RM	0.40	12	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320021009	Medium Density Residential	RM	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320021014	Medium Density Residential	RM	0.28	11	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320021020	Medium Density Residential	RM	0.14	4	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5320021021	Medium Density Residential	RM	0.22	6	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320021023	Medium Density Residential	RM	0.38	14	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320021024	Medium Density Residential	RM	0.20	12	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320021025	Medium Density Residential	RM	0.20	12	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320031011	Mixed-Use Centers	CG	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5320031012	Medium Density Residential	RM	0.33	2	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320031013	Medium Density Residential	RM	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320031014	Medium Density Residential	RM	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320031015	Medium Density Residential	RM	0.33	10	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320031022	Transitional Mixed-Use	CG	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320032003	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5320032039	Community Facilities	CF	2.47	0	70	87	43	43	173	5%	100%	100%	100%	100%	400%	150%	8%	6.488	3.244	3.244	12.975
5321007013	Medium Density Residential	RM	0.27	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5321007014	Transitional Mixed-Use	CG	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321007018	Medium Density Residential	RM	0.84	1	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5321008016	Medium Density Residential	RM	0.24	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321008017	Medium Density Residential	RM	0.26	6	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321008049	Medium Density Residential	RM	0.52	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5321011006	Medium Density Residential	RM	0.34	6	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5321011007	Medium Density Residential	RM	0.22	5	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321011008	Medium Density Residential	RM	0.49	12	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5321012008	Medium Density Residential	RM	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5321012017	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321012018	Medium Density Residential	RM	0.27	8	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321013001	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013002	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013003	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013004	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013005	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013006	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013007	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013008	Community Facilities	CF	0.72	0	70	25	13	13	51	5%	100%	100%	100%	100%	400%	100%	5%	1.275	0.638	0.638	2.550
5321013009	Medium Density Residential	RM	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321013010	Medium Density Residential	RM	0.08	0	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5321014001	Medium Density Residential	RM	0.01	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	100%	5%	0	0	0	0
5321014002	Medium Density Residential	RM	0.14	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5321014003	Medium Density Residential	RM	0.14	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014004	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014005	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014006	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014007	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014012	Medium Density Residential	RM	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321014017	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321014018	Medium Density Residential	RM	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5321015004	Medium Density Residential	CG	0.13	5	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321015005	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015006	Medium Density Residential	RM	0.13	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5321015007	Medium Density Residential	RM	0.23	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015008	Medium Density Residential	RM	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015009	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321015010	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015011	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015012	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321015013	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015014	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015015	Transitional Mixed-Use	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015016	Mixed-Use Centers	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015017	Mixed-Use Centers	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015018	Mixed-Use Centers	RM	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015020	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	50%	100%	400%	100%	3%	0.288	0.144	0.144	0.575
5321015021	Medium Density Residential	CG	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321017002	Transitional Mixed-Use	CG	0.32	8	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5321017003	Medium Density Residential	RM	0.27	8	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321017004	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321017006	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017008	Medium Density Residential	RM	0.16	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017009	Medium Density Residential	RM	0.37	10	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321017010	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321017011	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321017012	Transitional Mixed-Use	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017013	Medium Density Residential	RM	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321017900	Medium Density Residential	RM	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018001	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018002	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018003	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321018004	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018005	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018006	Medium Density Residential	RM	0.39	10	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5321018007	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321018008	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018009	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018010	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018011	Medium Density Residential	RM	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321018012	Medium Density Residential	RM	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321018013	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018014	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018015	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018016	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018017	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018020	Medium Density Residential	RM	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321018025	Medium Density Residential	RM	0.06	2	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5321018026	Medium Density Residential	RM	0.06	2	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5321019003	Mixed-Use Centers	CG	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019004	Mixed-Use Centers	CG	0.38	1	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5321019009	Mixed-Use Centers	CG	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019012	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019013	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019014	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019015	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321019016	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019017	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019018	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019019	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019020	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321019021	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019022	Mixed-Use Centers	CG	2.92	1	70	102	51	51	204	5%	100%	100%	100%	100%	400%	100%	5%	5.100	2.550	2.550	10.200
5321019023	Mixed-Use Centers	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5321038016	Mixed-Use Centers	CG	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5321038017	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5324012901	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5324018003	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5324018004	Medium Density Residential	RM	0.25	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5324018012	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324018013	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018014	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018016	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018017	Medium Density Residential	RM	0.44	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.600	0.600
5324018018	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324019009	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5324019010	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5324019011	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019012	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019013	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019014	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324019015	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324019016	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5324019017	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019018	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density > 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5324019019	Medium Density Residential	RM	0.36	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.500	0.500
5324019023	Medium Density Residential	RM	0.59	1	30	0	0	17	17	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.850	0.850
5324019024	Medium Density Residential	RM	0.51	1	30	0	0	14	14	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.700	0.700
5324019025	Medium Density Residential	RM	0.25	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.350	0.350
5324019029	Medium Density Residential	RM	3.53	1	30	0	0	105	105	5%	100%	100%	100%	100%	100%	100%	5%	0	0	5.250	5.250
5324019078	Medium Density Residential	RM	2.71	1	30	0	0	80	80	5%	100%	100%	100%	100%	100%	100%	5%	0	0	4.000	4.000
			371.32	**2,244**		**8,905**	**4,463**	**6,224**	**19,592**									**533**	**266**	**379**	**1,178**

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Additional Capacity Through Rezoning

As discussed throughout the Housing Element, the City is in the process of drafting the DTSP and making other zone changes to accommodate additional residential capacity throughout the city. The City is required to adopt the new Specific Plan and other zone changes as part of Programs 3.a, 3.b and 3.n. Table VI-51, above, lists the parcels located within the Downtown Specific Plan, as well as the High Density and Medium Density Residential zones, which are not otherwise included in the site specific analysis as part of Table VI-50.

As part of the required rezoning, the City will increase the zoning capacity of Medium Density residential zones to 30 du/ac and of High Density residential zones to 45 du/ac. This increased capacity is sufficient to induce redevelopment of some portion of both of these zones at a high enough density to ensure the provision of housing affordable to lower income households.

Within the Downtown Specific Plan, it is anticipated that there will be two zones: the Mission Street Zone and the Fair Oaks Avenue Zone, the Huntington Avenue Zone, and the Ostrich Farm Zone.

Within the Mission Street Zone, it is anticipated that the maximum Floor Area Ratio will be 7.0, with an additional intensity bonus of up to a FAR of 7.5 available through community benefit incentives. The maximum building height for this zone is anticipated to be 84 feet and seven stories, once the citywide height limit is repealed or replaced in this area.

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

In addition, the area around Huntington Avenue and the Ostrich Farm will also be made into mixed-use zones either through inclusion into the Downtown Specific Plan or through a mixed-use overlay. The development standards in these mixed-use areas will mirror the standards of the Mission Street zone withing the DTSP.

The City understands not all of these sites will redevelop in the planning . It is anticipated that each parcel has a base likelihood to be redeveloped of 5%, with that likelihood being adjusted based on specific factors related to each parcel listed below.

- **Historic or Historic District:** Site that are historic or located in a historic district are anticipated to be half as likely to be developed than non-historic sites. Properties that are historic or are located in a historic district are required to be reviewed by the City's Cultural Heritage Commission and are required to fulfill certain requirements as described in Section 6.5.2, *Governmental Constraints*, of the Housing Element. Because of these added constraints, historic properties are given a 50% development capacity adjustment.

- **Commercial Lot Utilization:** Many of the sites in the Downtown Specific Plan are currently being used as commercial properties. However, there are a wide range of intensity of uses within the area, with the existing uses being more economically viable the greater the intensity

of use. Therefore, existing commercial uses at an intensity with a Floor Area Ratio of 2.0 or greater has been given a 50% development capacity adjustment.

- **Recent Construction:** The vast majority of buildings within the Downtown Specific Plan Area are older than 20 years. It is anticipated that buildings constructed within the past 20 years are less likely to be redeveloped during the planning period. Buildings built within the past 20 years have been given a 50% development capacity adjustment.

- **Environmental Constraints:** While the environmental condition of each site is not known, it is possible to anticipate that some sites will have environmental constraints that will require remediation based on the site's current or historic uses. Sites with known current and historic uses that are likely to require environmental remediation, such as gas stations and automotive service uses, have been given a 50% development capacity adjustment.

- **Proximity to Transit:** The Downtown Specific Plan area is well served by transit. Sites that are located within ½ mile of a Major Transit Stop, as defined by Public Resource Code Section 21064.3, have been given a 150% development capacity adjustment. Projects on these sites will not be required to provide on-site parking once Program 3.b is implemented.

- **Density ≥ 50 du/ac**: It is anticipated that sites with a higher allowed intensity will be more likely to be redeveloped due to the higher potential return on investment by the property owners and developers of these sites. Therefore, sites with a residential zoning capacity of 50 du/ac or more are given a 400% development capacity adjustment.

Availability of Infrastructure

Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Assessment being prepared for the Housing Element and the Environmental Impact Report being prepared for the General Plan and Downtown Specific Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.

Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-52. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-52
COMPARISON OF SITE CAPACITY AND RHNA

INCOME GROUP	TOTAL RHNA	UNITS APPROVED SINCE 6/30/21	ADUS WITH APPROVED BUILDING PERMITS SINCE 6/30/21	PROJECTED ACCESSORY DWELLING UNITS	UNITS ON VACANT AND NON-VACANT SITES WITH SUITABLE ZONING (TABLE VI-44)	UNITS ON VACANT SITES NEEDING ZONING CHANGES (SITE 1 TABLE IV-50)	UNITS ON NON-VACANT SITES NEEDING ZONING CHANGES (TABLE IV-44 AND 50)	UNITS DUE TO REZONING (TABLE VI-51)	TOTAL CAPACITY	SURPLUS RHNA	SURPLUS RHNA PERCENT
Extremely Low	757	0	1	45	0	70	522	533	1,332	177	15%
Very Low		0	1	27							
Low	398	0	3	130							
Moderate	334	0	1	6	0	0	205	266	478	144	43%
Above Moderate	578	9	22	89	109	0	286	379	894	316	55%
TOTAL	**2,067**	**9**	**29**	**297**	**109**	**70**	**1,083**	**1,178**	**2,775**	**708**	**34%**

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

6.6.3 Financial Resources

A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-53 describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to the City on a competitive basis for a variety of housing and community development activities. City competes for funds through the State's application process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Federal Emergency Shelter Grants	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	New Construction Rehabilitation Homeless Assistance Public Services
Home Investment Partnership Program (HOME)	Grants available to the City on a competitive basis for a variety of housing activities. City competes for funds through the State's application process.	Homebuyer Assistance Rehabilitation New Construction Rental Assistance
Housing Choice Voucher Program (Section 8)	Assistance program that provides direct funding for rental subsidies for very low-income families.	Rental Assistance
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	New Construction
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	Rehabilitation
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.	Homeless Assistance New Construction
Housing Opportunities for Persons with AIDS (HOPWA)	The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.	Rental assistance
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	Homebuyer assistance Rehabilitation New construction Rental assistance
2. State Programs		
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and non-entitlement jurisdictions, and competitive grants to non-entitlement jurisdictions.	Predevelopment Development Acquisition Rehabilitation Preservation Matching Funds Homelessness Assistance Accessibility Modifications Homeownership Assistance Fiscal Incentives

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Local Early Action Planning (LEAP) Grants	The Local Action Planning Grants (LEAP), provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that: Accelerate housing production Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.	Housing element updates Updates to zoning, plans or procedures to increase/accelerate housing production Pre-approved architectural and site plans Establishing State-defined Pro-housing policies See complete list in program materials
SB 2 Technical Assistance Grants	Financial and technical assistance to local governments to update planning documents and zoning ordinances to streamline housing production, including but not limited to general plans, community plans, specific plans, implementation of sustainable communities strategies, and local coastal programs.	Technical assistance Planning document updates
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	Homebuyer Assistance
Building Equity and Growth in Neighborhoods (BEGIN)	A state-funded program administered by HCD which provides low- and moderate-income households up to $30,000 for a down payment.	Homebuyer Assistance
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	Homebuyer Assistance Rehabilitation
Single Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	Homebuyer Assistance
Housing and Disability Advocacy Program (HDAP)	Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.	Rental assistance
No Place Like Home	Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.	New construction
Mental Health Services Act (MHSA)	Funding through MHSA of 2004 available to counties to spend toward mental health services.	New construction Special needs programs
Homeless Emergency Aid Program (HEAP)	A block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California.	Identified homelessness needs Capital improvements related to homelessness Rental assistance
California Emergency Solutions and Housing (CESH)	Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.	Homelessness service system administration New construction Rental assistance
Low-Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	New Construction
3. Private Resources/Financing Programs/Regional Programs		
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multifamily rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Federal National Mortgage Association (Fannie Mae)	Fixed-rate mortgages issued by private mortgage insurers. Mortgages which fund the purchase and rehabilitation of a home. Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance Rehabilitation
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. City provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	Homebuyer Assistance
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	New Construction Homebuyer Assistance Rehabilitation Housing Supportive Services
San Gabriel Valley Regional Housing Trust	A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects.	New Construction

6.6.4 Opportunities for Energy Conservation

Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.

Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use, which translates to a reduction in energy use. In 2020, the Council adopted a Climate Action Plan (CAP) as a long-range planning document that guides the City towards a target of carbon neutrality by 2045, which aligns with the State's overall climate goals. The Housing Plan also includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.

As part of the City's commitment to protecting the environment and building resiliency, South Pasadena chose to utilize Clean Power Alliance as the City's residential electricity provider in February 2019, and commercial electricity provider in May 2019. The City selected 100% Green Power as the default option for residential customers, which provides 100% renewable energy through South

California Edison's (SCE) electrical infrastructure. In 2021, 95% of residents subscribed to the 100% Green Power option.

The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-54
COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED

INCOME LEVEL	RHNA ALLOCATION	UNITS PERMITTED 2013-2020	REMAINING ALLOCATION
Very Low	17	1	16
Low	10	3	7
Moderate	11	1	10
Above Moderate	25	113	-
Total	**63**	**118**	**33**

Source: City of South Pasadena Annual Progress Reports, HCD, 2021

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

    - Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.
- Seniors:
    - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.
- Unhoused Persons:
    - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.

- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
- The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.

Table VI-55 describes the City's progress in implementing the 2014-2021 Housing Element programs.

Table VI-55
2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Energy Efficiency Program This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program. **Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.	The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements. For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in more enforcement of housing maintenance and support for displaced tenants. The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.	Amend and continue with current energy-related program.
Planning Assistance and Permit Processing The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.	The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight Year Objective: Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period.		
Housing Development Program This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications. **Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate-income housing units during the 2014-2021 planning period.	No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full-service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.	Amend substantially to reflect current City efforts and continue.
CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners. **Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.	The City continues to provide information about CalHome and conducts outreach through its contracted housing rights and tenant protection agency. They serve as the main source of this type of information and support for South Pasadena residents.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Section 8 Rental Assistance The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons. **Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.	Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/ The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program. HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.	Continue.
Housing Acquisition and Rehabilitation A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing. **Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).	Amend to address accomplishments and continue.
Density Bonus for Affordable Housing The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households.	The Senior Housing project at 625 Fair Oaks was approved in 2020 and received a 35-percent density bonus. It will have 86 units with 13 units reserved for low-income households. The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction with adoption of an inclusionary housing ordinance, the City	Amend to address updates to state law and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist with development of 21 lower income units and 5 moderate income units.	incorporated streamlined approval for waivers in conjunction with the density bonus for projects that include on-site inclusionary housing. City staff regularly provides assistance to applicants considering proposing projects using the density bonus.	
Homeless Services The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena. **Eight-year Objective**: The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.	The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region. In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents. Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Senior Housing The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors. **Eight-year Objective**: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing apartment buildings as affordable senior housing whenever possible.	The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.	Continue.
Vacant Sites The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels. **Eight-year Objective:** Continue to maintain an inventory of vacant and underdeveloped sites for development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate-income housing units.	No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.	Amend and continue.
Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. **Eight-year Objective:** Continue to promote the development of housing units above ground floor commercial uses on vacant properties located	The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market-rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs is also located in a mixed-use district. A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been included in the draft programs section to further facilitate housing in the mixed-use areas.	Amend and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.		
Residential Second Units The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts. **Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.	The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2021 addressed issues that had added complexity to ADU approval in order to further facilitate ADU production. Although the 5th Cycle objective for residential second units was low, ADUs have become a much more significant component of the housing strategy over the past eight years. In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. Following the City's adoption of a new ADU ordinance in mid-2021, the number of building permits for ADUs increased substantially to 32 building permits in 2021. At the close of this housing element period, a second Code revision (Phase 2 for historic properties) was adopted in order to better facilitate ADUs on those properties, which is expected to further increase the applications and issuance of building permits for ADUs.	Amend and continue.
Land Use Controls 1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit. **Eight-year Objective:** The City will adopt an amendment to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use	Objective 1: Ordinance 2253 amended the Zoning Code to remove the conditional-use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. Objective 2: The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum	Objective 1. Delete. Objective 2. Amend and continue. Objective 3. Amend to reflect accomplishments and continue. Objective 4. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months. 2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300 foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population. **Eight Year Objective**: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds. 3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. **Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. 4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area, establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for	number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P-permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law. Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements. Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.	Objective 5. Amend to address completed portions of the program and continue. Objective 6. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
review by the Director of Planning and Building prior to occupancy and operations. **Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types. 5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements. **Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. 6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations. **Eight-year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code. 7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.		

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.		
Provision of Technical Assistance to Developers of Affordable Housing The City's Planning & Building Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. **Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process. The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications are submitted with all requirements to streamline the approval process. The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding. ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Fair Housing Program The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs. **Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing for persons with disabilities, on a case by case basis, in order to promote equal access to housing.	The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation. The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know-your-rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.	Amend and continue.
Promote Energy Conservation The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents. **Eight-year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building design guidelines and development standards, including the use of solar	Policies are being developed as part of the General Plan Update, currently underway.	Combine with Energy-Efficiency Program and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates, and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.		

6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES

This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.

6.8.1 Goals, Policies, and Programs

The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:

- Conserving the existing supply of affordable housing;
- Assisting in the provision of housing;
- Providing adequate sites to achieve a variety and diversity of housing;
- Removing governmental constraints as necessary; and
- Promoting equal housing opportunity.

The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. Furthermore, South Pasadena's housing plan includes a sixth goal aimed at ensuring housing stability and affordability for renters, who make up more than half of South Pasadena's population. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: Community Development Department, Public Works Department

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b – Convert Caltrans Homes to Affordable Housing

The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties.

The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB 381 that respond to the cost constraints of particular properties.

SB 381 allows the City to sell identified historic homes at fair market value, but requires that the City use the proceeds from the sale to provide three affordable units for each home sold at fair market value. Additionally, if the City purchases non-historic surplus properties from Caltrans, SB 381 provides the City the option to sell the properties to moderate or lower income households, or rent the properties to lower income households.

Additionally, the City may consider the construction of additional units, either as ADUs or Missing Middle housing, on certain parcels to provide additional lower income units if feasible. These

additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Eight-year Objective: Acquire and convert unoccupied, Caltrans-owned properties that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Maximize the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.

Funding Source: General Fund; HRE; public (federal, state, regional) grants, loans, and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)

Responsible Agency: Caltrans; Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State ;target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions in the Southwest Monterey Hills neighborhood and other neighborhoods with the oldest housing stock identified in the 2022 survey (Table VI-26), or as subsequently identified, to reduce displacement risk of tenants living in currently substandard housing.

The City will continue to monitor opportunities and pursue funds annually, as available, through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies.

To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge.

Eight-year Objective: Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.

Funding Source: HOME, PHLA, program fees collected by covered rental property owners, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Propose Rental Housing Inspection Program to City Council by October 2024.

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that the City has not been tracking any affordable housing units with deed-restrictions and/or subsidized funding. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The

City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually, or by request, with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino to bring the CalEnviroScreen percentile score below the 70th percentile impaired drinking water. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel particulate matter exposure which is concentrated in the northern portion of South Pasadena north of Mission Street, and groundwater contamination which is isolated in the southeastern portion of the City south of Mission Street and east of Meridian Avenue to reduce the impact of these in areas with the highest scores to below the CalEnviroScreen 50th percentile.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate in identified areas to bring the CalEnviroScreen percentile impaired drinking water score below the 70th percentile; and groundwater and diesel particulate matter scores in identified areas below the 50th percentile.

Funding Source: General Fund

Responsible Agency: Public Works Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the City's contracted housing rights and tenant protection agency.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Expand housing mobility opportunities by encouraging construction of affordable units in higher-income residential areas, as well as on sites with developer interest including higher density residential, mixed-use sites within the Downtown Specific Plan and other mixed-use areas, and non-residential sites with redevelopment potential on underutilized commercial properties. Accomplish this by facilitating expedited review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

Program 2.b – Affordable Housing Production

The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.

Eight-year Objective: Fund and build 400 affordable units, at least 200 on sites with the highest access to resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and 200 affordable units on residentially zoned sites in higher-income neighborhoods to facilitate housing mobility in mixed-income neighborhoods, and limit potential for concentrating affordable housing in areas identified with higher rates of renter households and incidence of poverty.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the City's contracted housing rights and tenant protection agency.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households in the areas with higher rates of homeowner overpayment and poverty and neighborhoods with a high proportion of renter households to facilitate housing mobility for a minimum of 50 low-income and 50 very low-income households to receive assistance during the 2021-2029 planning period. The status of availability of funding will be posted on the City's website and updated as funding becomes available.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; City's contracted housing rights and tenant protection agency

Timeframe: Ongoing as NOFAs are released for CalHome; City's contracted housing rights and tenant protection agency will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract with a housing rights and tenant protection agency to provide a biannual educational workshop, beginning in 2023, for rental property landlords, property managers, and other rental housing providers on the benefits of making their units available to HCV holders. Prioritize outreach efforts to property owners and landlords with multifamily and single family rental units in higher-income residential neighborhoods to reduce existing concentrations of HCV renter households in the Fremont Avenue/Huntington Avenue/Meridian Avenue and Mission Street neighborhoods and maximize housing mobility opportunities in higher income neighborhoods, with the objective of at least 40 housing providers committing to pricing one or more of their units to be eligible to accept HCV holders.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing.

Program 2.f - Offer Services to People without Housing

The City will continue its participation in the regional mobile outreach program administered by San Gabriel Valley Council of Governments (SGVCOG). As part of this program, an outreach team spends three hours per week in South Pasadena to provide referrals and support to unhoused individuals. In addition, the South Pasadena Police Department will continue to perform its own outreach to unhoused individuals in South Pasadena, referring them to 211 for resources and services and providing its remaining emergency motel vouchers that were purchased with the City's formerly allocated Measure H funds.

SGV CARE

The City of South Pasadena is participating in San Gabriel Valley Crisis Assistance Response and Engagement Program (SGV CARE) with Arcadia and San Marino. Launched in August 2022 by the SGVCOG and Los Angeles Centers for Alcohol and Drug Abuse (L.A. CADA), SGV CARE is the first multi-city regional effort to provide alternative mobile responses to 9-1-1 calls for people experiencing mental or behavioral health emergencies, including those who are unhoused. The SGV CARE response team is composed of a Licensed Clinical Social Worker, an Emergency Medical Technician, and a Substance Use Disorder Counselor, and it commits to a 30-minute maximum response time to non-violent, non-medical emergency service calls with a focus on serving a variety of needs related to mental and behavioral health and/or homelessness. The pilot phase of this program, also known as the Homeless, Mental Health and Crisis Response Pilot Program, entails a co-response with law enforcement and expires May 31, 2023.

SGV CARE's approach alleviates the burden on law enforcement, while ensuring that communities members experiencing a mental or behavioral health crisis and/or homelessness receive safe and

effective crisis intervention and de-escalation services; emotional support and counseling; mental health assessments; safety planning with referrals to local resources; and, if needed, transportation to a treatment facility or service provider. In SGV CARE's first quarter of operation, the average response was 10 minutes, and 64% of those served were unhoused individuals.

Recognizing that crises do not end after a response call, a critical component of SGV CARE is following up with each client and connecting them to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. L.A. CADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it is well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances.

With the technical assistance of the Harvard Kennedy School Government Performance Lab, staff from SGV CARE cohort cities, SGVCOG, and L.A. CADA have been collecting and evaluating data and participating in regular implementation meetings to develop key performance metrics and improve the continued operation of SGV CARE beyond May 2023. The pilot program is fully funded by the Los Angeles County Board of Supervisors' Measure H funds, and the permanent SGV CARE program has thus far secured $850,000 in funding from State Senator Portatino's office and $1.5 million in federal funding.

SVG CARE is an integral part of the City's adopted 2021-2026 Strategic Plan and commitment to affordable housing and helping persons of all income levels with housing options. The 2021-2026 Strategic Plan approved by Council on May 18, 2022 includes six key goals, including Goal 5: Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs. Additionally, item 5e, Homeless Initiatives, identifies several tasks including the City to continue working with the SGVCOG on region-wide solutions; participate in mental health/crisis intervention program (mobile crisis response program); and expand working relationships with community partners such as Union Station Homeless Services to help the unhoused.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department, Community Development Department

Timeframe: Coordinate a meeting with neighboring jurisdictions by December 2023 to identify strategies and translate materials on homeless services to Spanish by March 2024.

SGV CARE pilot program was launched in July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Permanent SGV CARE program to begin June 2023.

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.

Funding Source: General Fund, grants, and developer public funding sources

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special Needs Housing

City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, State No Place Like Home Funds (administered by LACDA), and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December 2023; Train staff to process reasonable accommodations by December 2023; Seek funding opportunities beginning in 2023 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act within 120 days after the adoption of the Housing Element.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. Due to economic conditions, the Council has directed an amendment to revise the requirement (See Program 2m). The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. The City will encourage projects that meet this threshold to locate within higher-income neighborhoods and neighborhoods with lower proportions of rental households to facilitate income integration and housing mobility opportunities for lower-income and renter households, and reduce further concentration of affordable units in identified areas of lower-incomes, higher diversity index scores, and larger proportions of renter households. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units. Additionally, the City shall review the effectiveness of the Inclusionary Housing regulations and if revisions are deemed necessary, they will be made when such needs are identified. The review will include consultation with the local development community and shall utilize constraints on development as criteria, including housing costs and timing, and will ensure revisions do not act as a constraint on development.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: No later than June 30, 2025, review effectiveness of the Inclusionary Housing ordinance at producing affordable housing units and its impacts on the viability of housing production. Make adjustments as necessary to the Inclusionary Housing Ordinance based on the review findings no later than December 31, 2025.

Program 2.j – General Plan Affordable Housing Overlay

The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites, outside of the Downtown and Mixed-Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30

dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility and income-integration opportunities to high resourced areas.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.

Program 2.k – Affordable Housing Overlay Zone

The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Facilitate develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility and income-integration opportunities to high resourced areas.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning to include overlay by October 15, 2024.

Program 2.l – Facilitate Affordable Housing on City-Owned Property.

The City will utilize identified City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. The City will sell such parcels to developers building affordable housing or otherwise ensure the development of housing on such sites. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the City will initiate the Surplus Lands Act (SLA) process to pursue affordable housing projects in the city. The City will require an affordability covenant recorded against the land stipulating a specified percent of the total units developed will be affordable to lower-income households, in accordance with State law. The City will comply with State law to implement the SLA process as follows:

- The City will declare land "surplus" in accordance with the definition listed in Government Code, Section 54221, subdivision (b)(1).

- The City will prepare and issue a Notice of Availability (NOA) to the required parties and provide 60 days to receive responses from interested parties.

- The City will negotiate in good faith with any respondents for at least 90 days, prioritizing affordable housing uses in the order provided in Government Code section 54227.

- The City will send the proposed disposition to the State for review.

- The City will address any State findings, as needed.

- Upon final State approval, the City will execute a sale or lease of the land and record an affordability covenant.

The first RFP will be issued by March 31,2024, in order to begin construction within two years and complete within the housing element cycle period. Three other RFPs on three additional inventory sites will be issued by 2026, with the goal of the City disposing of all identified and applicable surplus sites. Projects under this program will be expedited in compliance with the SB 35 streamlined ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives, as applicable.

The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are listed below in addition to the sites discussed in the next paragraph:

- Site 8: Public works yard site
- Site 13: City-Owned Parking Lot site (City owns three of the four parcels)

There are no existing uses on these sites that impede additional development and there are no known conditions that preclude development in the planning period. The City is already coordinating with the owner of the other parcel on Site 13. Site 8 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 12 in Table VI-50 and will coordinate with the owner of the other parcel on Site 12 to encourage development of housing on that site.

Additionally, the City will commit to monitoring the continued progress of developing the city-owned sites every other year and will identify alternative sites within 6 months if necessary if sites will not be developed during the planning period.

Eight-year Objective: Sale of all City-owned surplus properties identified appropriate for housing**.** Issuance of RFPs on four projects and issuance of building permits for at least two projects, for a total of at least 40 ELI, VLI and LI units, 18 moderate income units, and 11 above moderate income units.

Funding Source: General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Create City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP by 2024 and remaining three RFPs in 2026. Building Permit issuance for first project by 2025; two additional building permits issued by 2029.

Bi-annually, review progress towards developing city-owned sites and identify alternative sites within 6 months if sites will not be developed within the planning period.

Program 2.m – Update Inclusionary Housing Regulations.

In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20% of base units to 15% of base units. Additionally, an exemption to the Ordinance will be added for projects with less than 10 units. Other provisions of the ordinance will also be reviewed, in consultation with the local development community, in the revision process including but not limited to in-lieu fees, cost of a comparable unit and how the inclusionary regulations relate to state density bonus law and other City development standards.

As part of Program 2.i., the effectiveness of the Inclusionary Housing Ordinance will be reviewed in 2025 and additional changes will be made to the Ordinance if it is determined that it is an impediment to housing development.

Eight-year Objective: Approve 137 inclusionary units during the planning period (15% inclusionary requirements on the moderate- and above moderate RHNA allocation of 912 units).

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Adopt updates to the Inclusionary Housing Ordinance within 120 days of Housing Element adoption.

Program 2.n – Citywide Height Limit Ballot Initiative

Consistent with requirements under state law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45 feet as to at least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit. If the height limit is replaced, the new limit will be no less than 84 feet to achieve the densities identified in the DTSP. In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.

Eight-year Objective: Facilitate proposed densities on residential sites in the Housing Element where the height limit may be an impediment to development.

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Place measure on ballot by December 31, 2024. Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code. If the ballot measure is not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre.

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs

Allocation (RHNA) once their General Plan land use and zoning is amended. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 15-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the expansion of mixed-use areas along the City's arterial corridors either through inclusion within the DTSP or through a zoning overlay district. Allowable densities withing these mixed-use areas will be 70 du/ac, expect for the Fair Oaks zone within the DTSP, which will be 110 du/ac. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.

Eight-year Objective: Rezone sufficient sites to accommodate the City's RHNA targets.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

As part of the rezoning and adoption of the DTSP done as part of Program 3.a, the City will create development standards that encourage the development of high-density residential uses. It is anticipated that the base density of the DTSP zones will be either 70 or 110 du/ac, depending on the zone.

Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards:

- Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building.
- Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone.
- Minimum unit size: 450 square feet.
- Required parking:
    - No required parking for parcels within ½ mile of a high quality transit stop;
    - One space per studio or one-bedroom unit;
    - 1.5 spaces per two-bedroom or larger unit;
    - Development incentive of 0.5 spaces for deed restricted affordable housing units.
- Private open space: 50 square feet minimum for Liner and Flex Building typologies.

These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. . Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code accordingly.

Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include:

- Reduced private open space requirements;
- Reduced public open space requirements;
- Reduced parking requirements;
- Expedited processing.

The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate.

Eight-year Objective: Target production of 400 lower-income housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website to include revised process for streamlined processing of planned development permits for mixed-use and Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by November 2023. Update handout materials by November 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually (see Program 2.a.) Analyze and consider a fee reduction or waiver at the mid-point review if necessary.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring its ADU ordinance into compliance with State law.

The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.

As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners:

- Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets;
- Make brochures available at community center and libraries, and at "ADU Community Open House";
- Create short promotional videos or flyers and brochures (digital and print) by January 2024;
- Distribute at least annually though social media promotions, direct mailings to property owners; with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k).

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Online application process with staff intake for quality control
- Maintain and amend materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce the number of steps and shorten timeframes, and

- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADUs, anticipated to be between 297 and 383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and include ADU Amnesty information and incentives. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and

actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.

Eight-year Objective: Identify sufficient land for rezoning, or other strategies, to accommodate the unmet lower-income RHNA that was projected to be met by ADUs.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs including rezoning are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Provide assistance to homeowners to convert 50 identified existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach. Identify neighborhoods with relatively high proportions of unpermitted ADUs by July 2024 to target outreach. Determine incentives for legalizing ADUs with deed-restricting commitment by January 2024. Update brochures with legalization process information and incentives in concert with ADU Ordinance update timeframe.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU

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

Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.

- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.
- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the development process of 297 ADUs through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.

Funding Source: General Fund, grant funding

Responsible Agency: Community Development Department

Timeframe: Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.1 – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: The Housing Division was included in the 2022-2023 budget and new staff was hired by November 2022. Planning unit is operating with 5 FTE and recruiting for one additional person.

Program 3.m – Implement SB 9 and SB 10

The City intends to promote the housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resources. This will include the development of streamlined processes for SB9 and an SB10 implementation program with pre-approved building typologies.

Specifically, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts.

The baseline density for this program will be 15 du/acre in the RE and RS zones. Staff shall present a specific proposal to the City Council for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. The missing middle housing program proposal will include:

- Zoning Code Text Amendment to establish a Missing Middle housing program.
- Appropriate development standards to facilitate program density including but not limited to: identifying lot size requirements, reducing setbacks, increasing FAR and evaluating minimum unit size requirements.
- A simple waiver system to ensure development standards do not preclude the density of 15 du/acre.
- An exhibit or definition to clearly demarcate the area that is subject to the ordinance.

By December 2027, the City will analyze whether it is on track to meet the eight-year objective for the Missing Middle housing program. If, at that point, the City is not on track to meet the eight-year objective, it will increase the allowable maximum density for this program. **Eight-year Objective:** Facilitate the development of at least 50 units with the SB10 Missing Middle housing program over the reporting period.

Funding Source: General Fund; SCAG REAP 2.0 Grant **Responsible Agency:** Community Development Department

Timeframe: The City will work with a technical consultant to develop objective design standards or building typologies related to this program and prepare and present the necessary implementation policy and zoning amendments to effectuate the program within 24 months of the adoption of the Housing Element.

By December 2027, analyze Missing Middle housing program and make modifications as necessary.

Program 3.n – Zoning Changes

This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review. In addition, comparable Zoning Code revisions outside of the DTSP area

will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.

Eight-year Objective: Update zoning to facilitate the needed housing units.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning will occur within 120 days after adoption of a compliant Housing Element.

Program 3.0 – No Net Loss

The City will evaluate the sites inventory identifying the zoning, size, and number of vacant and underutilized parcels suitable for residential development for each income category. If the sites inventory indicates a shortage of available sites to accommodate the remaining RHNA for an income category, the City shall rezone sufficient sites with appropriate densities to accommodate its remaining RHNA for each income category.

Eight-year Objective: n/a

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: No later than December 31, 2024 and December 31, 2026, the City shall evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites.

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))

Eight-year Objective: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law in regard to parking and distance between shelters and to establish a higher, economically feasible maximum number of beds permitted in any one emergency shelter and accommodate the increased homeless population documented in the 2022 Point in Time count.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code within 120 days after adoption of the Housing Element.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals for a minimum of 207 accessible units over the 2021 – 2029 planning period.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member in areas with access to transit, commercial services, and amenities to improve mobility opportunities.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design. Within the Downtown Specific Plan and mixed-use zones, target development of 300 new homes incorporating universal design.

Responsible Agency: Community Development Department

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives with completion by July 2025; ongoing application and enforcement of accessibility requirements; ongoing education efforts and information added to ADA requirements on City website.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete by June 2024.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the City's contracted housing rights and tenant protection agency to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the City's contracted housing rights and tenant protection agency at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual

orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide fair housing education, outreach, mediation, and referral services through the Housing Division and a contracted fair housing and landlord-tenant legal organization and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. Distribute informational materials to community organizations and neighborhood gathering spots in areas with higher rates of protected groups, particularly in the South Pasadena Southwest neighborhoods with higher rates of disabled persons; the South Pasadena North/Garfield Park areas with a higher proportion of seniors with disabilities and renter populations; and the South Pasadena Southeast neighborhoods with higher rates of poverty, renter households and lower incomes. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year Objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022 by providing assistance or referrals to 40 residents, or as needed; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with the City's contracted housing rights and tenant protection agency staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Funding Source: General fund, State, and federal funds

Responsible Agency: Community Development Department, federal and State agencies

Timeframe: Ongoing; Meet annually with the City's contracted fair housing and landlord-tenant legal organization, beginning in 2023, to assess patterns of fair housing issues, and plan and target outreach,

education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements, when a state license is a requirement for the residential care facility.

Eight-year Objective: Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: First zoning text amendment within 120 days after adoption of a compliant housing element. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide

In the 1940's, covenants that restricted the sale of property to white people only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms,

website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Eight-year Objective: Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.

Responsible Agency: Community Development Department; Los Angeles County Recorder

Funding Source: General Fund; grants if offered through a State or County program

Timeframe: Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2023; encouragement of removal from private properties: ongoing.

GOAL 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters

South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

Program 6.a – Rent Registry

Staff will research, develop, and propose to City Council a local rent registry program. A rent registry program would require owners of certain, to-be-determined, rental property types (those with a minimum number of units, for instance) to register their units and pay a per-unit registration fee on an annual basis. Staff envision the rent registry serving initially as a database that the City would use to collect and track rental data on units, including affordable units, and to disseminate information to property owners about tenant protections. However, the utility of the rent registry could be expanded over time to incorporate additional monitoring, compliance, and enforcement activities as new

programs are established and linked to it. Staff will draw from thorough analysis to develop the details of the program, which will be subject to the approval of City Council.

Eight-year Objective: City will have a comprehensive online database of all affordable and market-rate rental housing units in South Pasadena subject to the registration requirement with a user interface and fee payment system for rental property owners. The registry will be updated annually and serve as a streamlined platform for Community Development staff to track the City's rental housing inventory and provide information to rental housing property owners. City will decide whether to link this registry to the administration of other activities and programs.

Funding Source: General fund (staff time for development and administration); registration fees from property owners

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Propose policy to City Council by February 2024. Complete development of rent registry by 2025. Begin implementation of rent registry by 2026.

Program 6.b – Right to Return Policy

Local and regional housing and tenants' groups have raised concerns about the displacement of tenants in South Pasadena, and across Los Angeles County, due to renovation work initiated by the landlord. To address these concerns, staff will research, develop, and propose to City Council a policy that establishes a tenant's legal right to return to a property at a comparable rent after eviction and/or relocation due to substantial remodel or other just cause reasons. The details of such a policy will be informed by rigorous research of local examples, community input, and careful legal analysis.

Eight-year Objective: In qualifying circumstances, all tenants who are temporarily displaced from their units due to construction work and wish to return upon completion will be able to do so under the law. Thus, this policy will stem permanent the permanent displacement of renters from South Pasadena due to just cause no-fault evictions and/or relocation for certain reasons.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council as part of a broader tenant protections ordinance by December 2023.

Program 6.c – Relocation Assistance

In 2019 and 2021, in response to the COVID-19 pandemic, City Council passed two urgency just cause ordinances that require the landlord to pay relocation assistance to the tenant when evicting the tenant for a just cause no-fault reason. Beyond South Pasadena, cities across Los Angeles County have their own relocation assistance requirements for just cause evictions, which commonly require the landlord to pay at least 2.5 times the Fair Market Rent or current rent in addition to an allowance for moving expenses. Some cities, like Los Angeles and Pasadena, also have requirements for the landlord to pay temporary relocation assistance to a tenant when certain types of work require the tenant to temporarily vacate the unit. Staff will review the urgency just cause ordinances, perform more thorough research and analysis, and draft and propose to City Council a new permanent ordinance

with permanent and temporary relocation assistance requirements for just cause no-fault evictions and temporary relocation for certain reasons.

Eight-year Objective: South Pasadena renters will have local tenant protections that reduce the financial burden placed on tenants when they are (temporarily or permanently) displaced from their homes for legally permitted reason and instead place financial obligations onto the property owners.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program); property owners

Timeframe: Propose policy to City Council by December 2023.

Program 6.d – Rent Stabilization

Staff will research, develop, and propose to City Council a rent stabilization policy to protect South Pasadena's renters of certain properties from excessive rent increases that undermine housing affordability and stability. A local rent stabilization program would establish a lower cap on rent increases than that set in the Tenant Protection Act pursuant to AB 1482 to the extent permitted by the Costa-Hawkins Rental Housing Act, which prohibits cities from applying rent stabilization to certain properties, including single-family homes, condos, and properties built after 1995.

Eight-year Objective: Reduce high rent burdens and forced moves among South Pasadena's renters due to excess rent increases and, in turn, increase their financial security and housing stability.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council by December 2023.

6.8.2 Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-56.

Table VI-56
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED[1]	REHABILITATED[1]
Extremely Low/Very Low Income	757	7	8
Low Income	398	24	8
Moderate Income	334	4	9
Above Moderate	578	6	10
Total	2,067	41	35

1. Note that no housing units have been identified as at risk of conversion to market rate in South Pasadena within 10 years of the beginning of the 6th-cycle planning period, however there are preservation and rehabilitation needs in the community, therefore units have been included in both columns. The number of units is based the quantified objectives in Program 1.c, 2.c, and 2.d.

Appendix A:
Sites Exhibits

Maps and Exhibits - 2021-2029 Housing Element

- Citywide Maps of Sites in the Land Inventory
- Overview Maps of Sites to Address the Lower-Income RHNA or with Pending or Approved Applications
- Detailed Exhibits for Sites to Address the Lower-Income RHNA or with Pending or Approved Applications
- Additional Sites Map within the Downtown Specific Plan Boundary

Figure A-1.a. Citywide Sites Inventory Map (1)

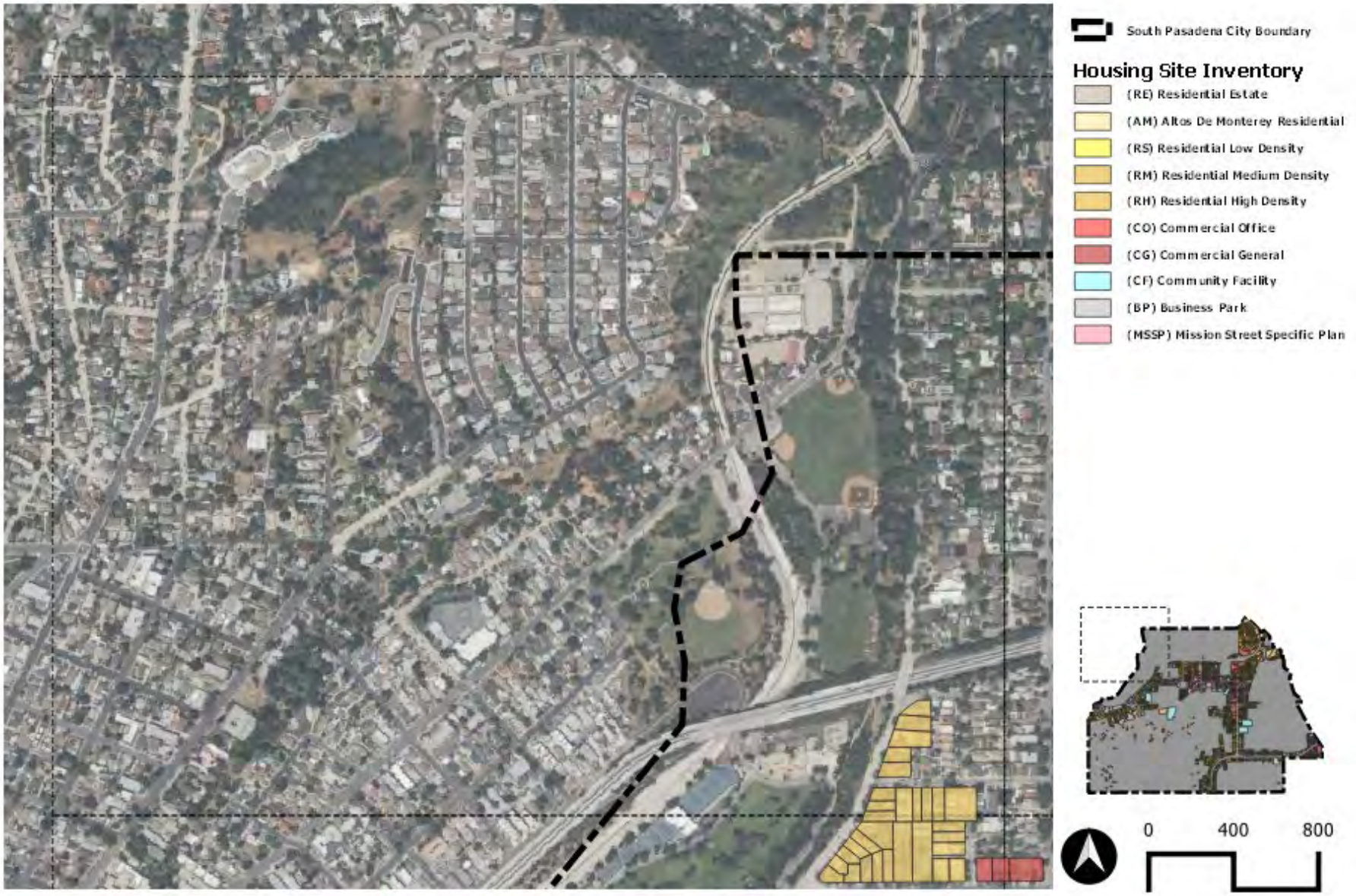


Figure A-1.b. Citywide Sites Inventory Map (2)

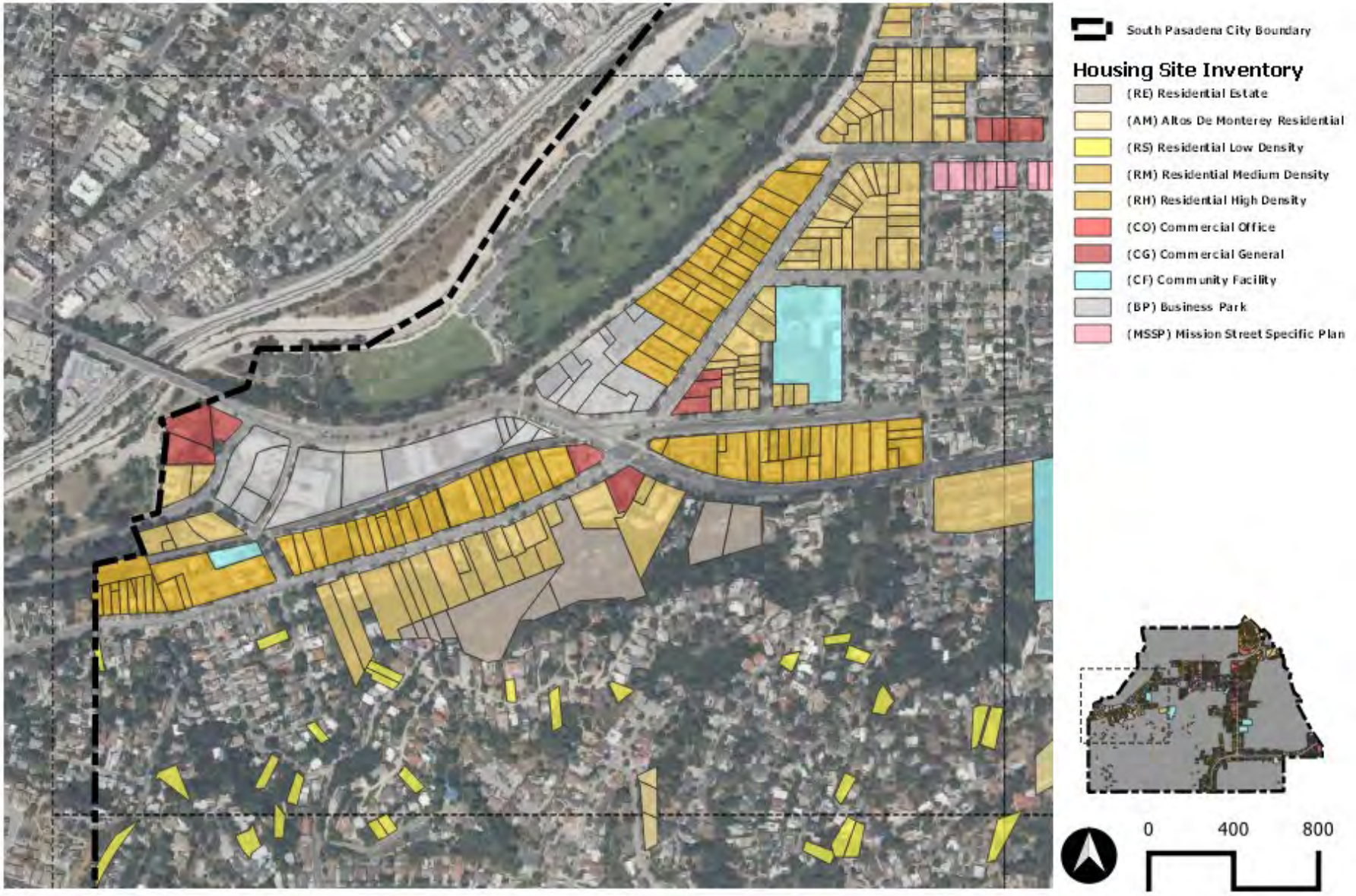


Figure A-1.c. Citywide Sites Inventory Map (3)

Figure A-1.d. Citywide Sites Inventory Map (4)

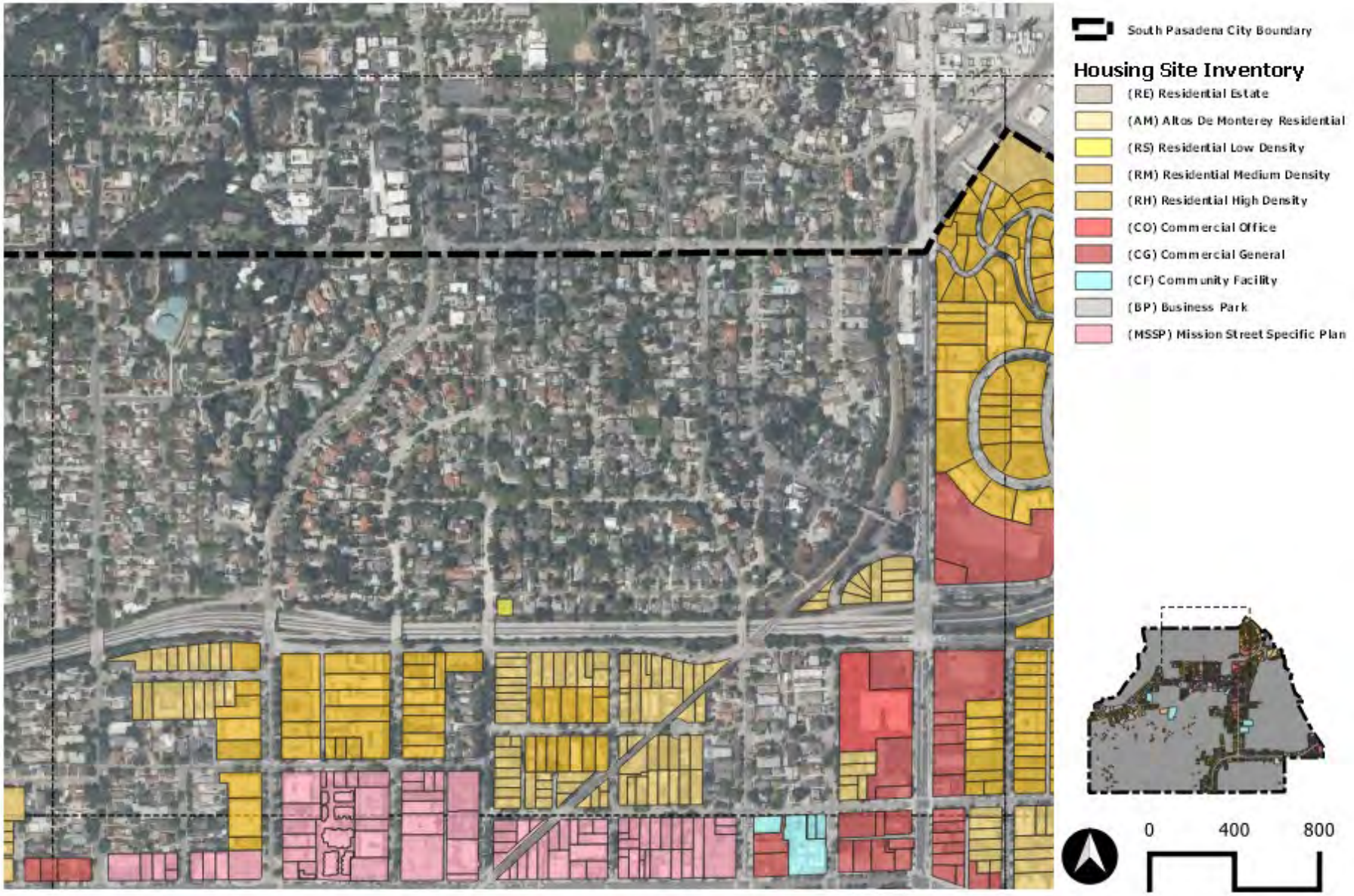


Figure A-1.e. Citywide Sites Inventory Map (5)

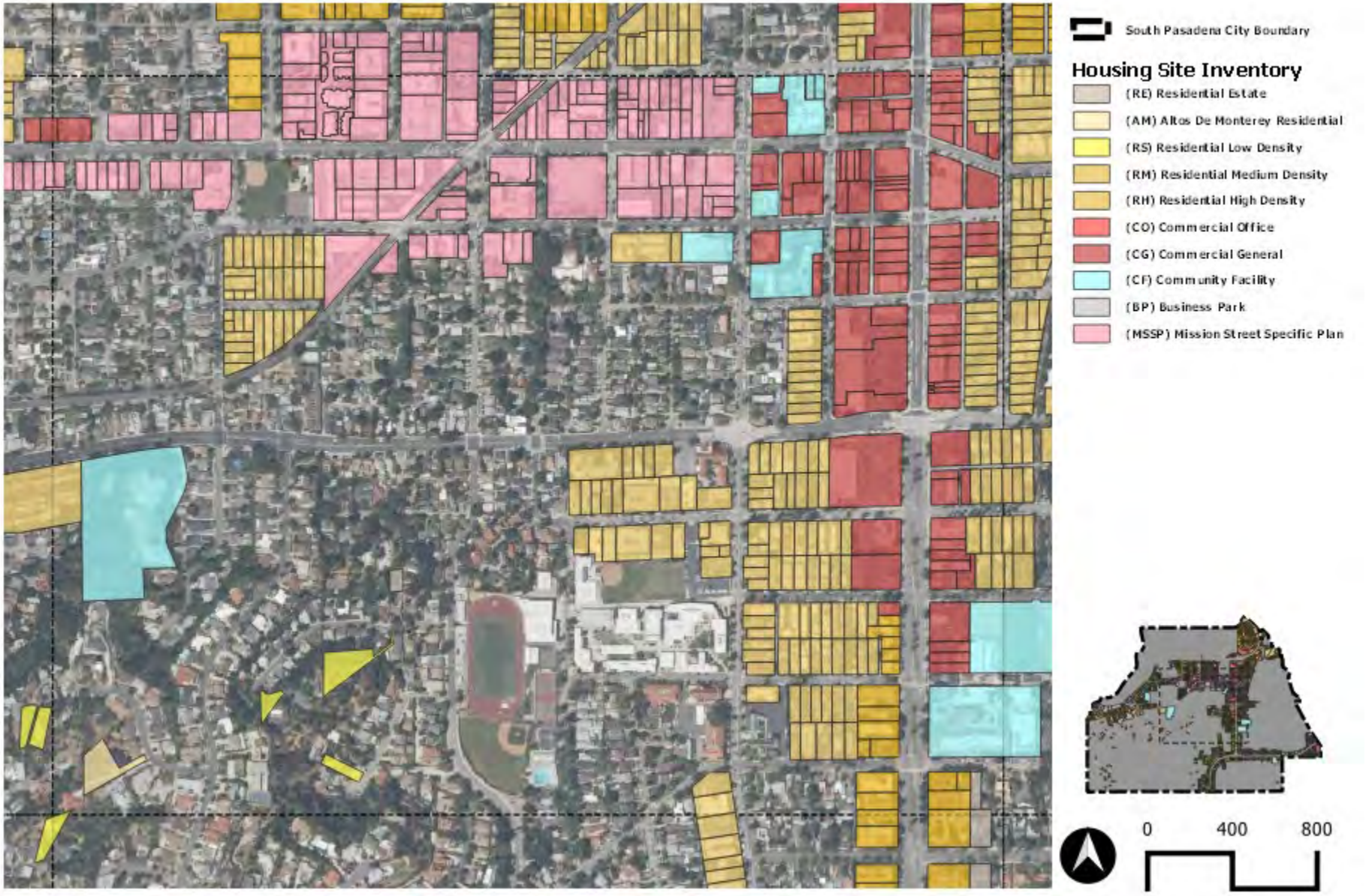


Figure A-1.f. Citywide Sites Inventory Map (6)

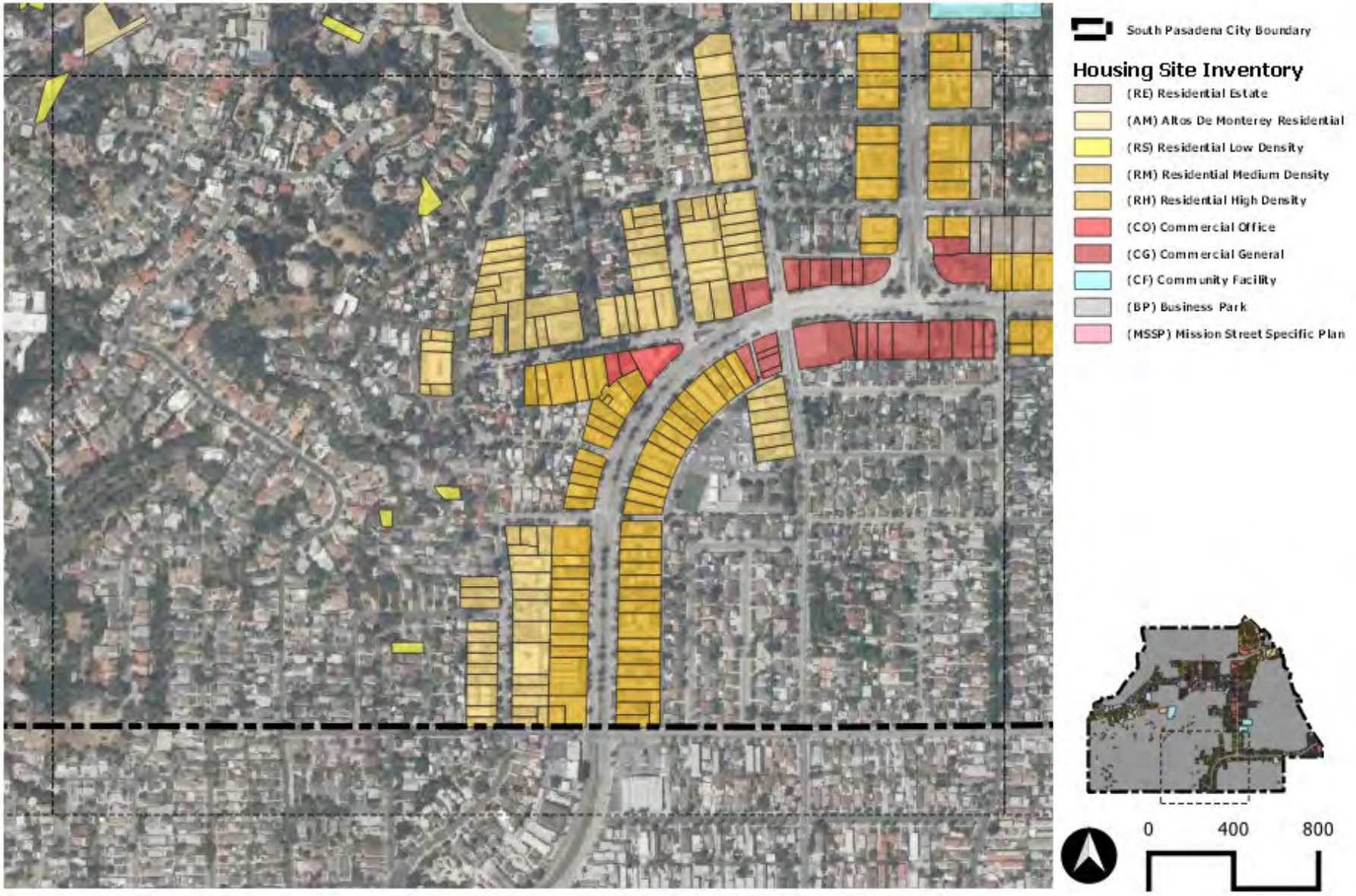


Figure A-1.g. Citywide Sites Inventory Map (7)

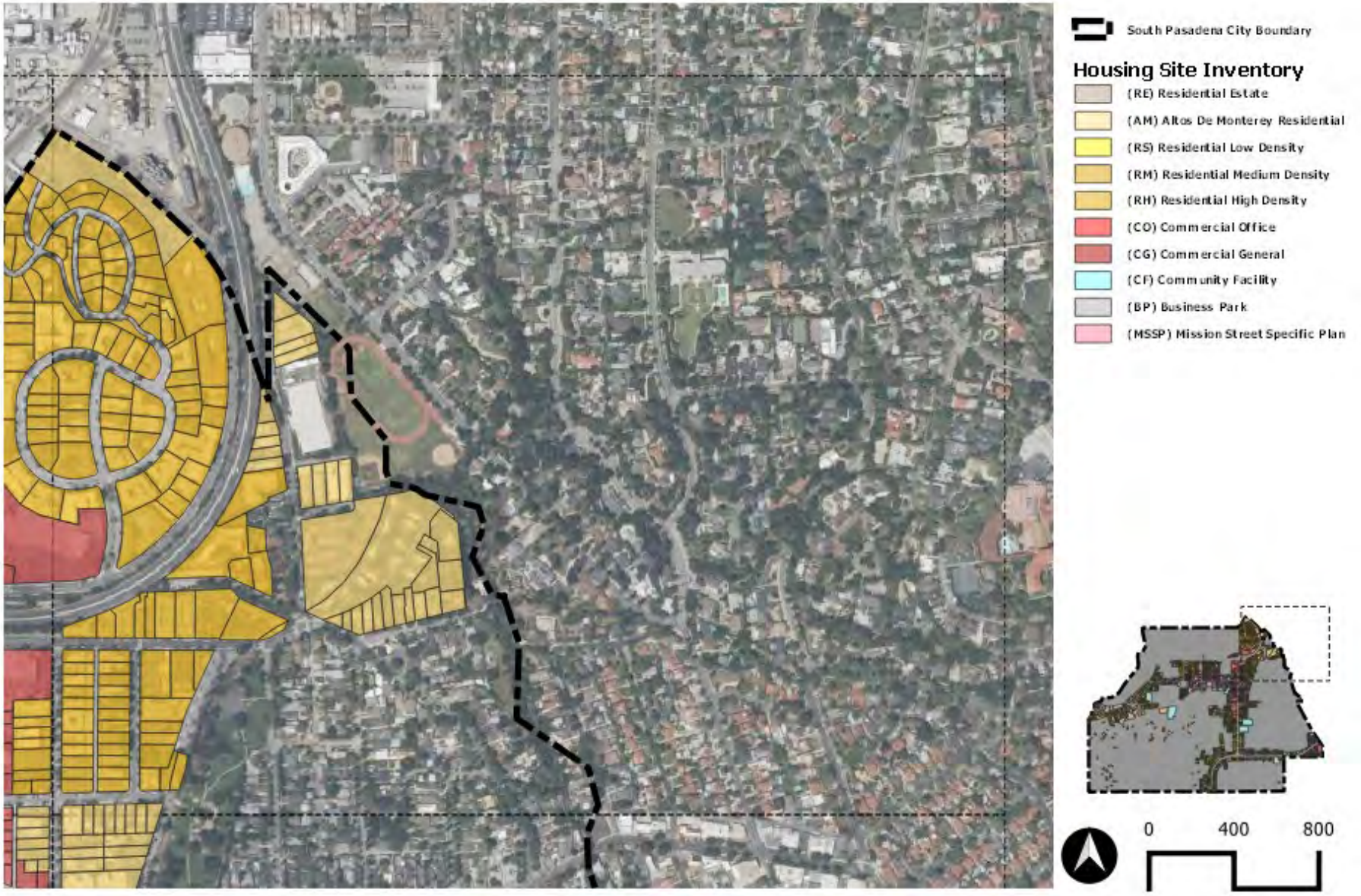


Figure A-1.h. Citywide Sites Inventory Map (8)

Figure A-1.i. Citywide Sites Inventory Map (9)

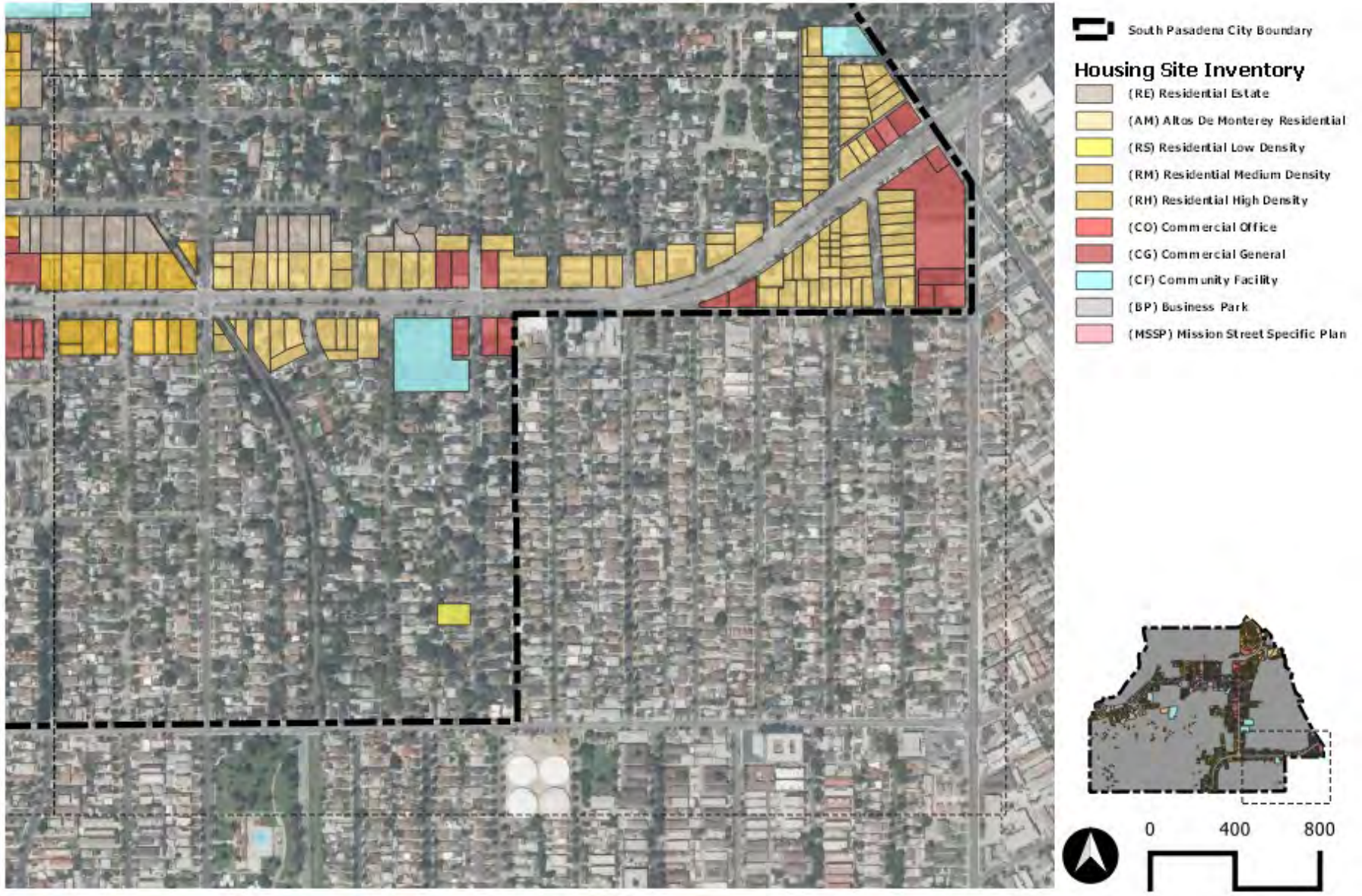


Figure A-2.a Maps of Sites to Address the Lower-Income RHNA Inventory (1) or with Pending or Approved Applications

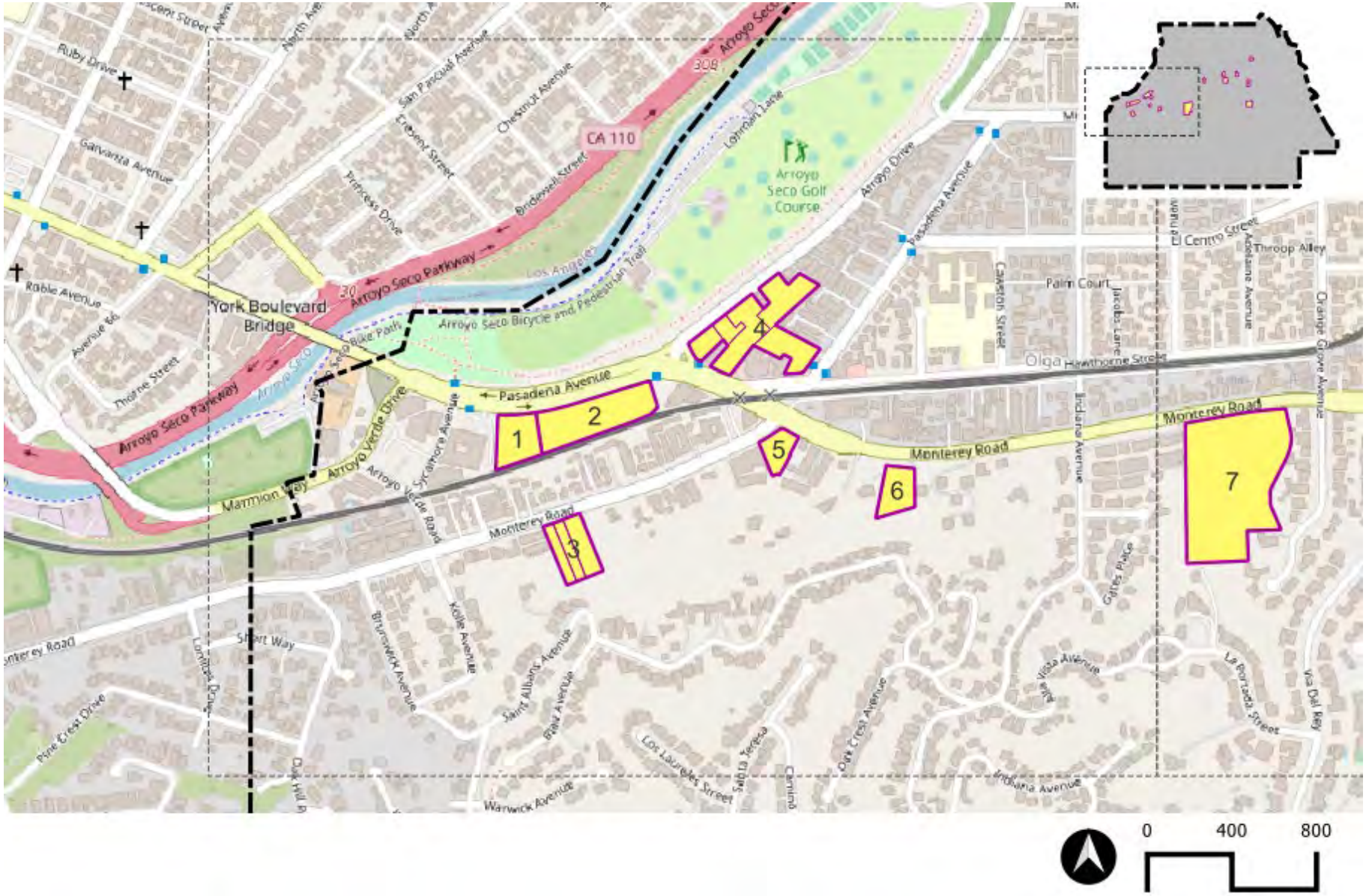


Figure A-2.b Maps of Sites to Address the Lower-Income RHNA Inventory (2) or with Pending or Approved Applications

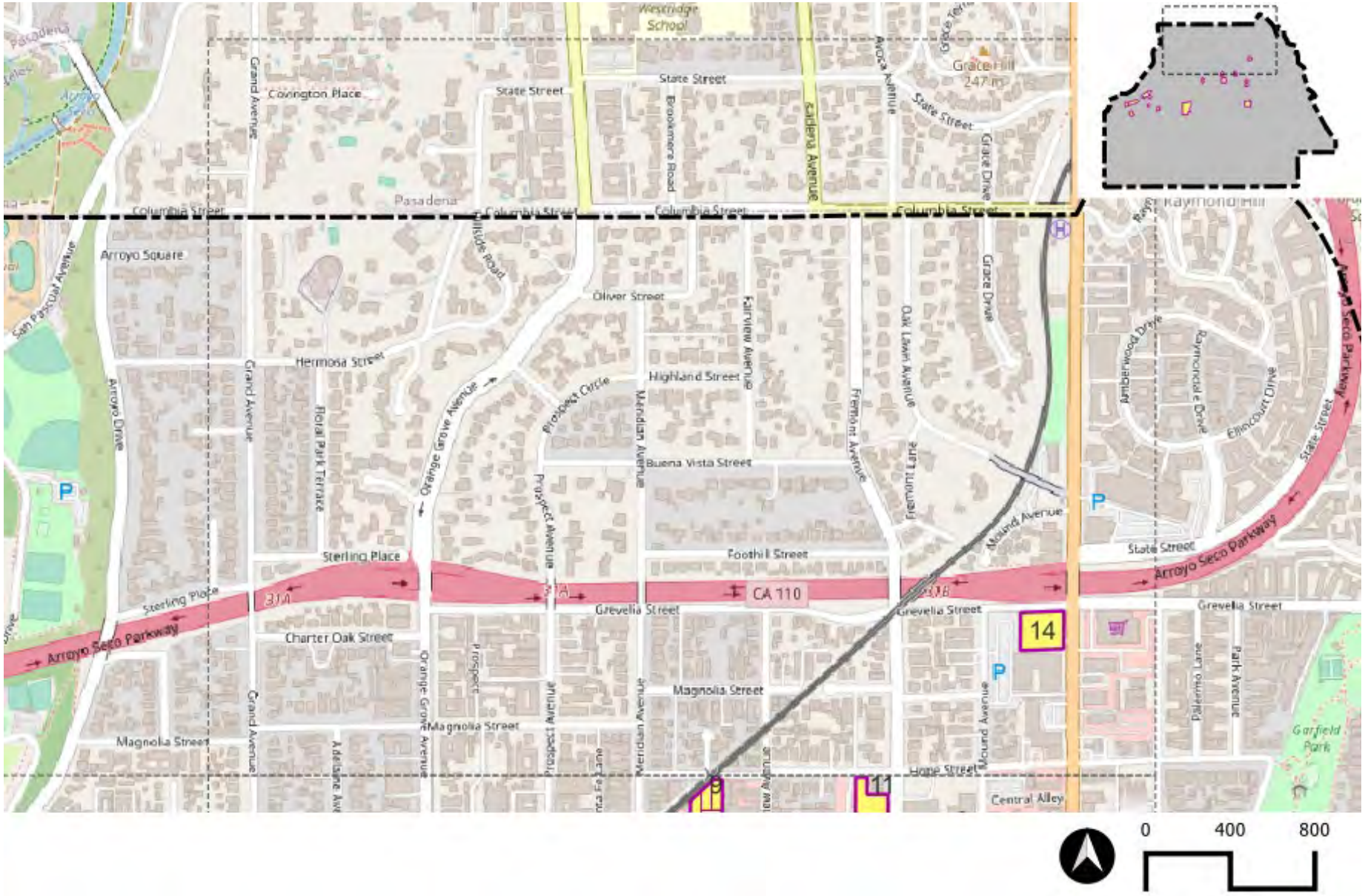


Figure A-2.c Maps of Sites to Address the Lower-Income RHNA Inventory (3) or with Pending or Approved Applications

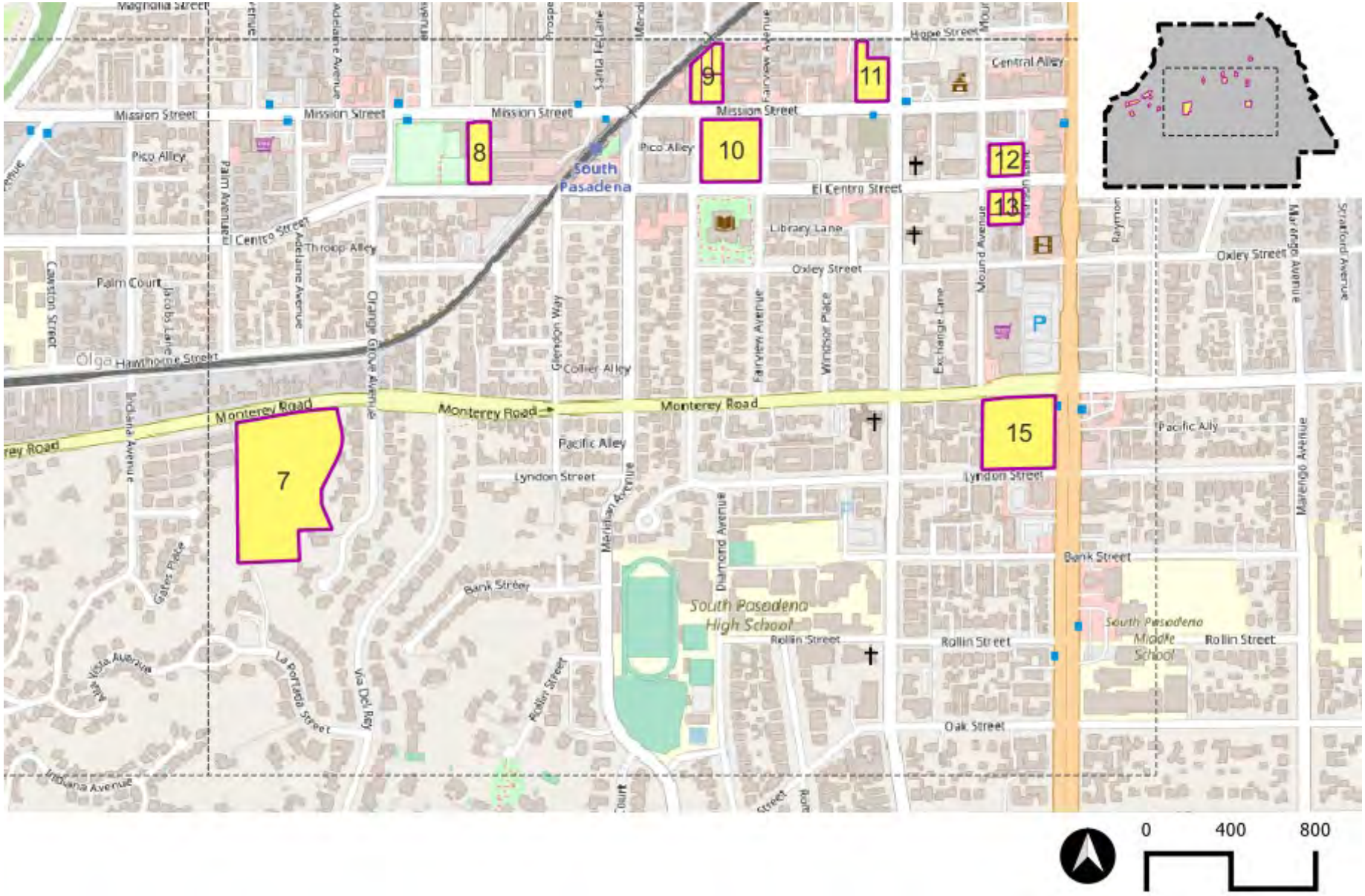


Figure A-3.a Map of Additional Sites to Accommodate Lower Income RHNA

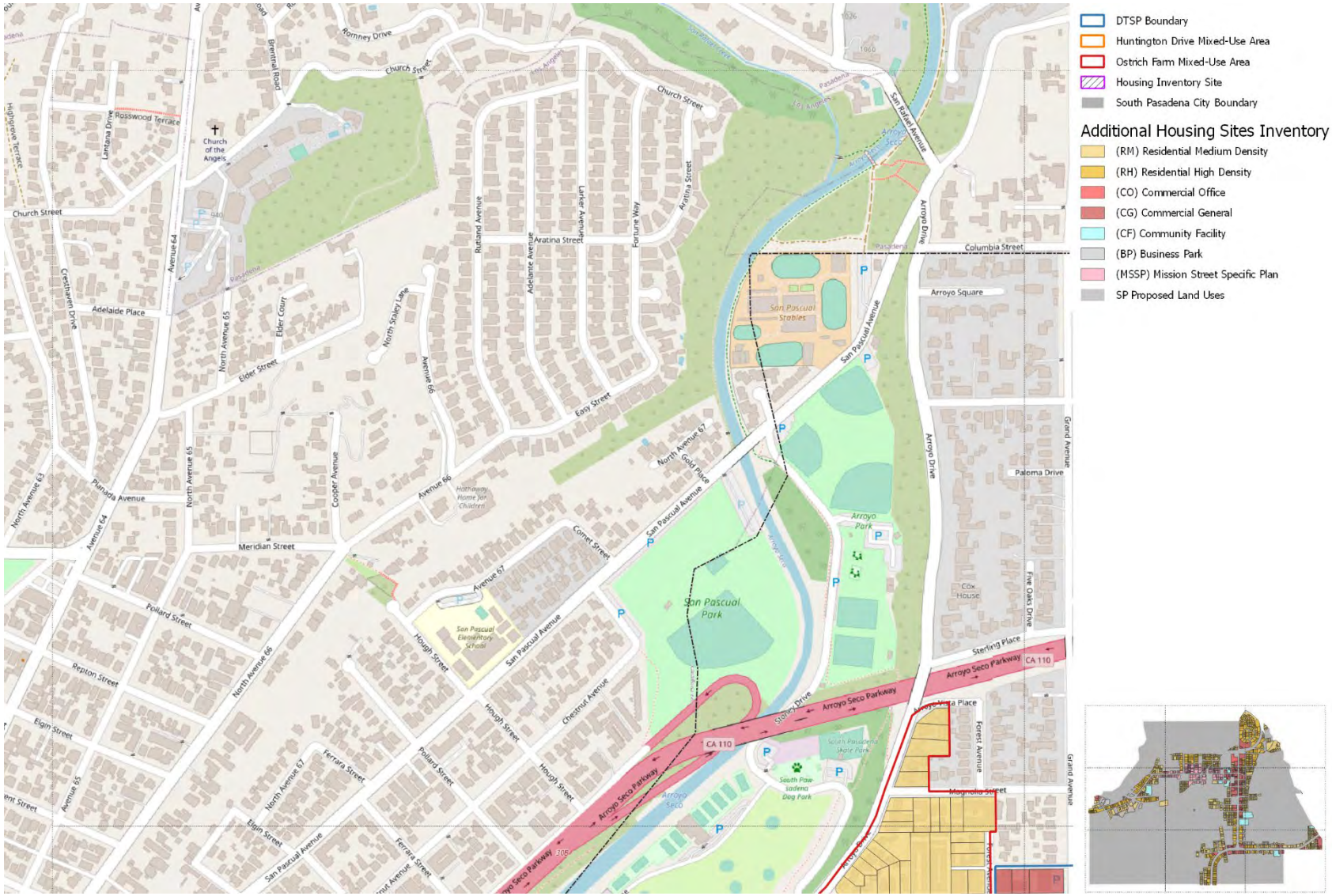


Figure A-3.b Map of Additional Sites to Accommodate Lower Income RHNA

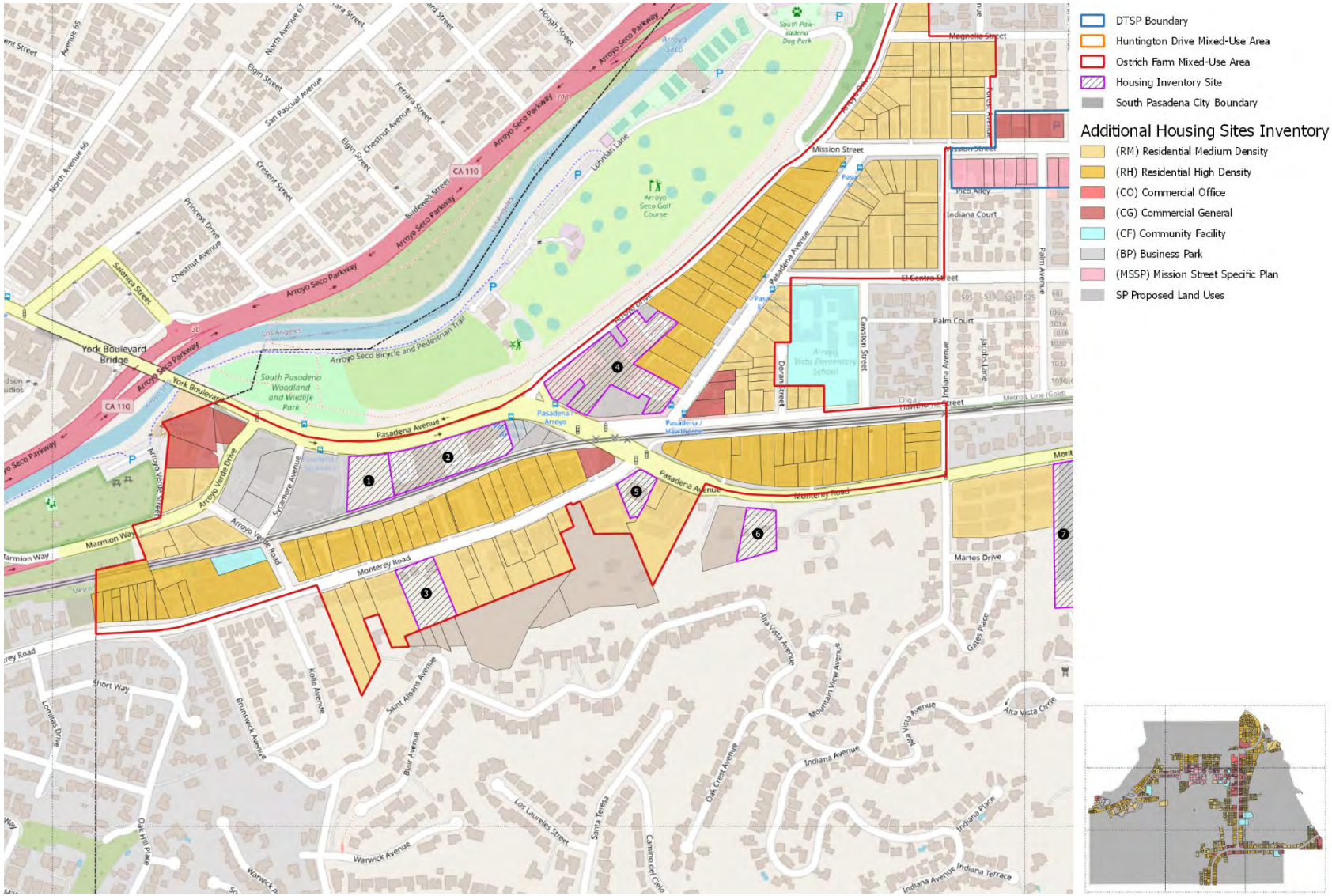


Figure A-3.c Map of Additional Sites to Accommodate Lower Income RHNA

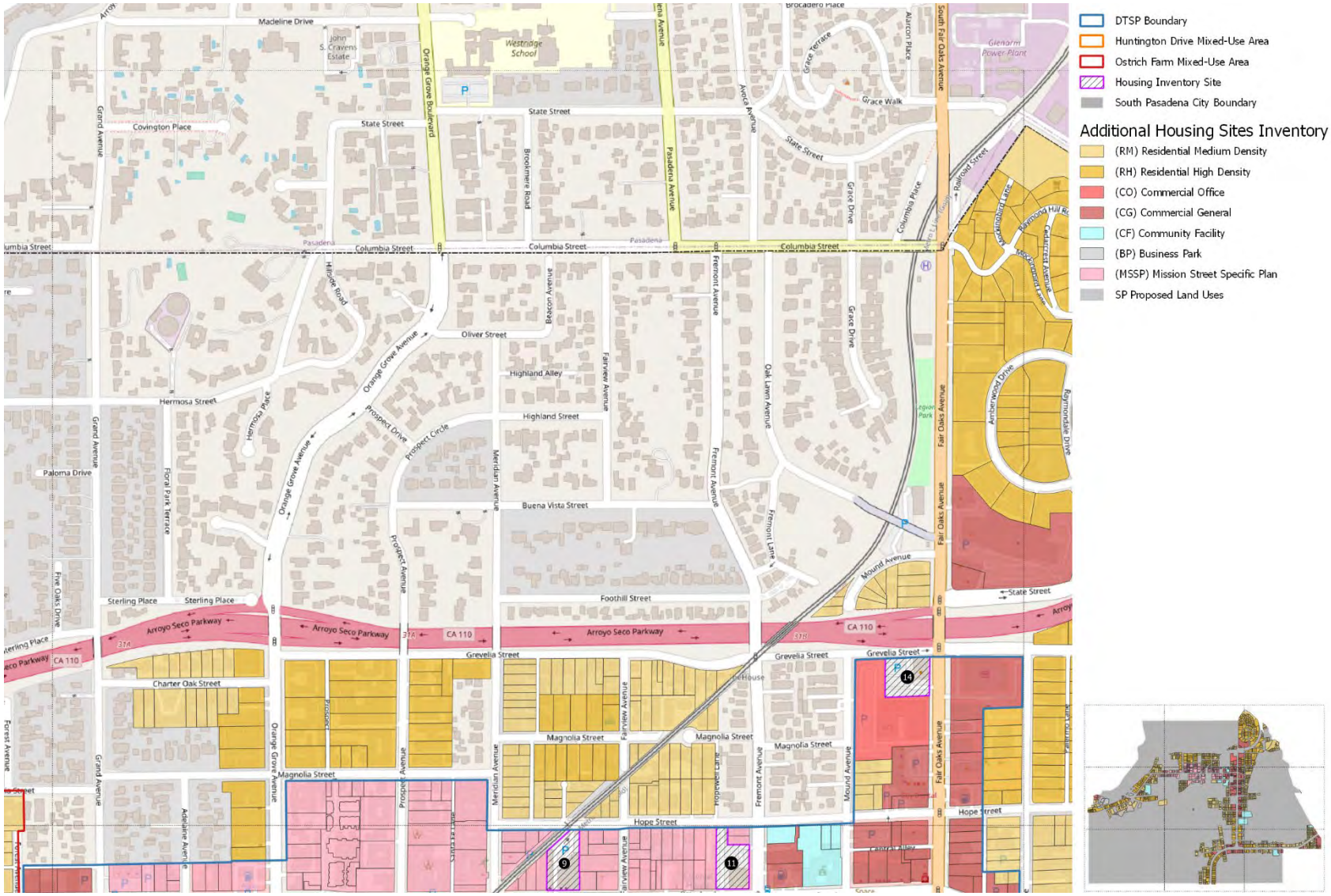


Figure A-3.d Map of Additional Sites to Accommodate Lower Income RHNA

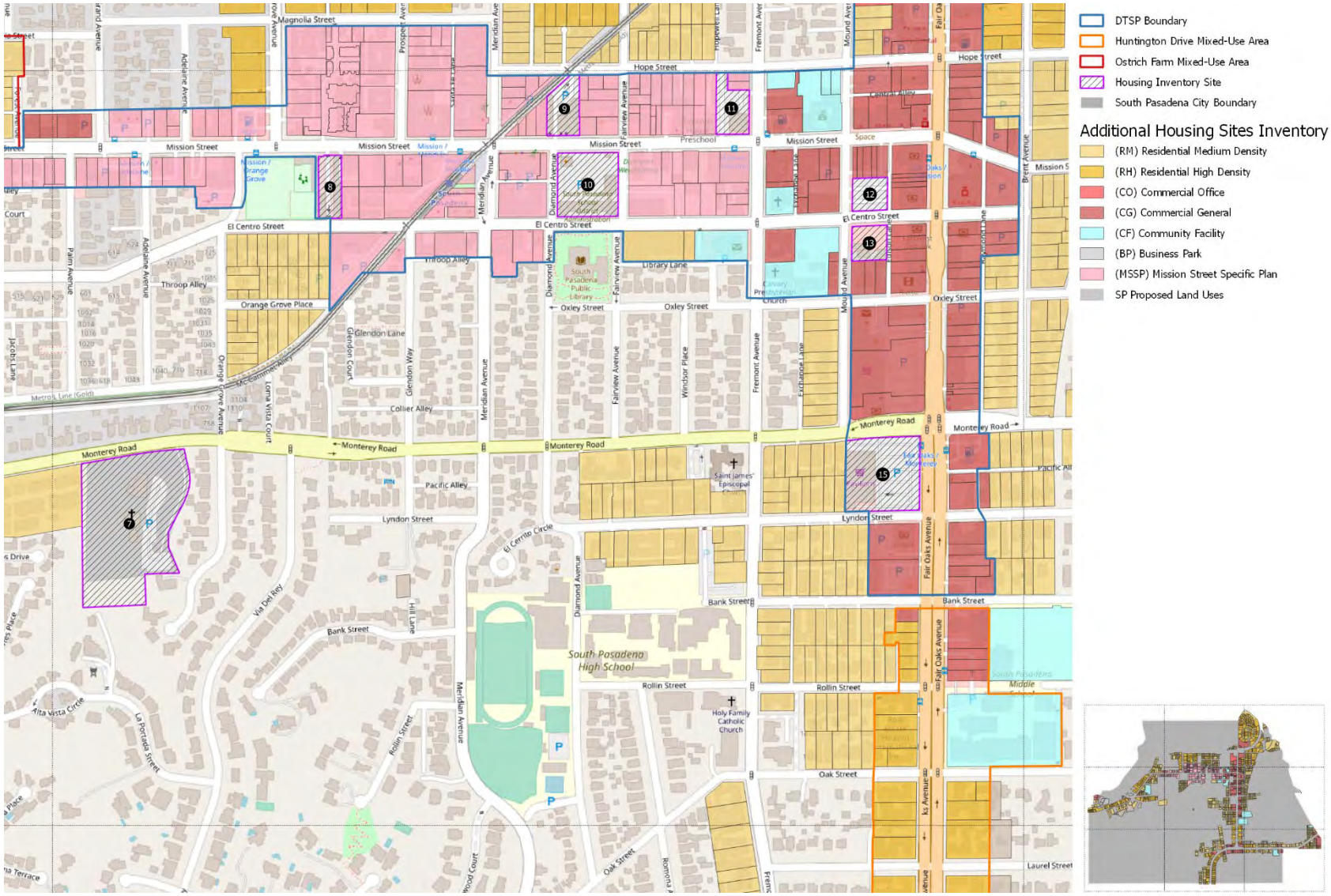


Figure A-3.e Map of Additional Sites to Accommodate Lower Income RHNA

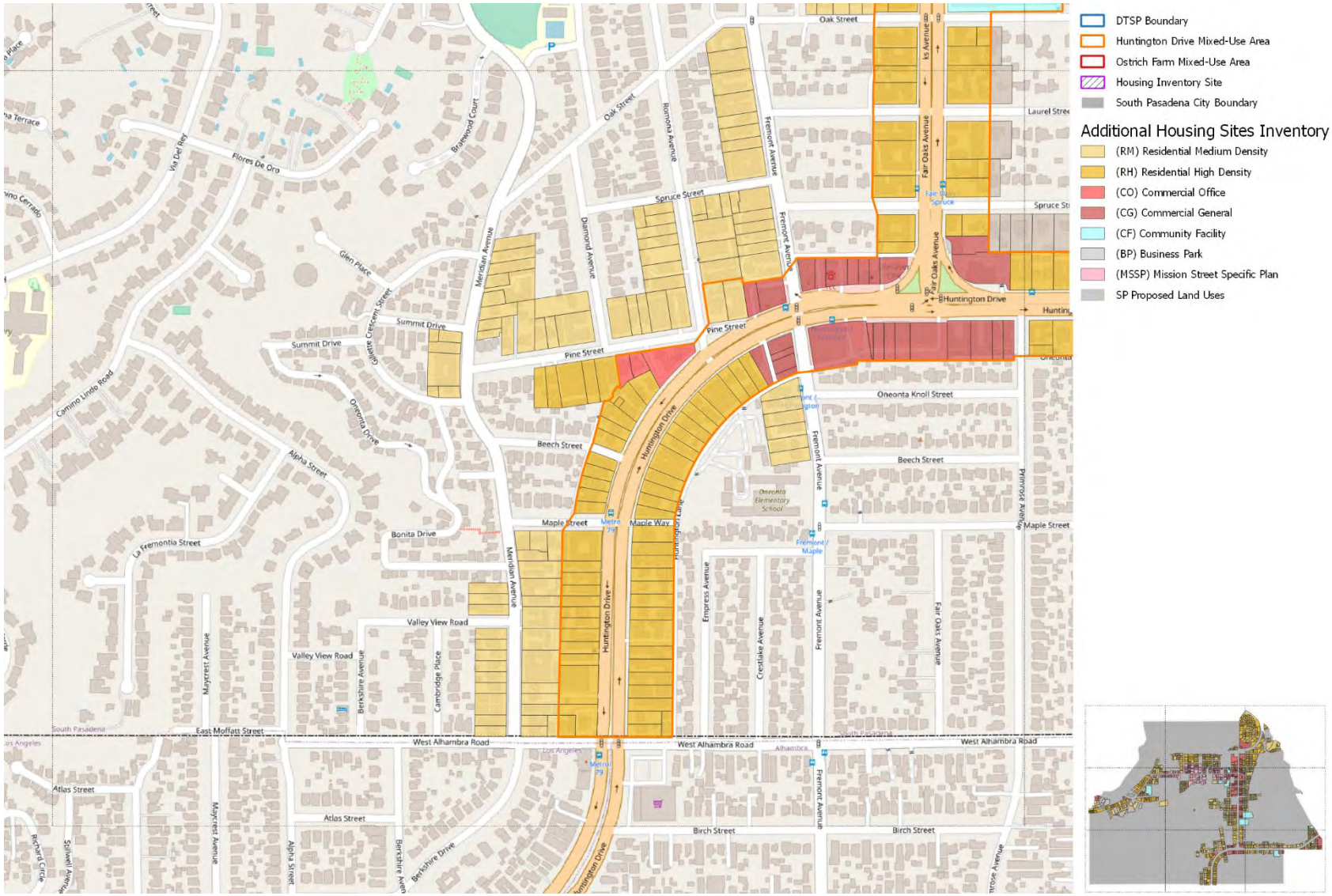


Figure A-3.f Map of Additional Sites to Accommodate Lower Income RHNA

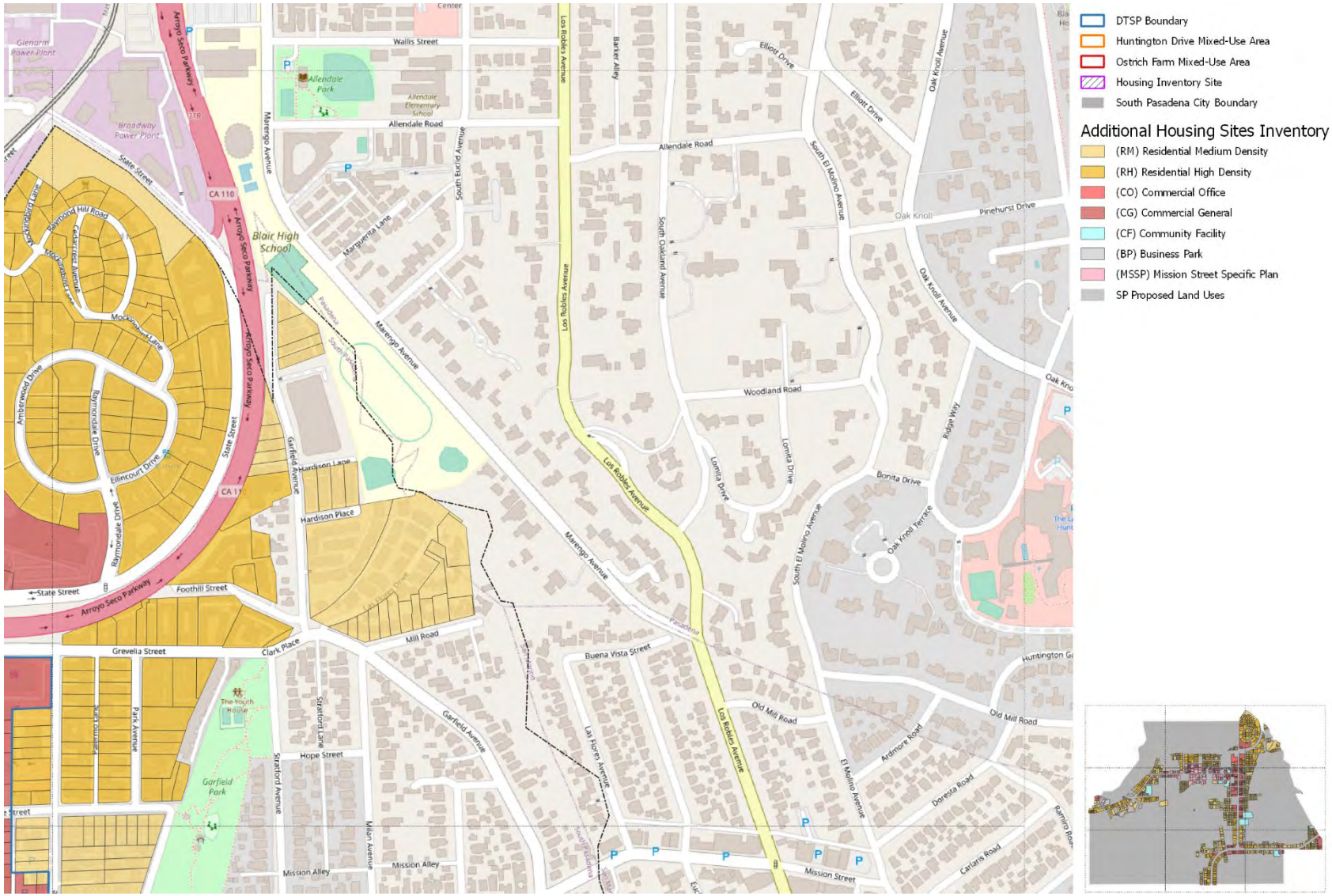


Figure A-3.g Map of Additional Sites to Accommodate Lower Income RHNA

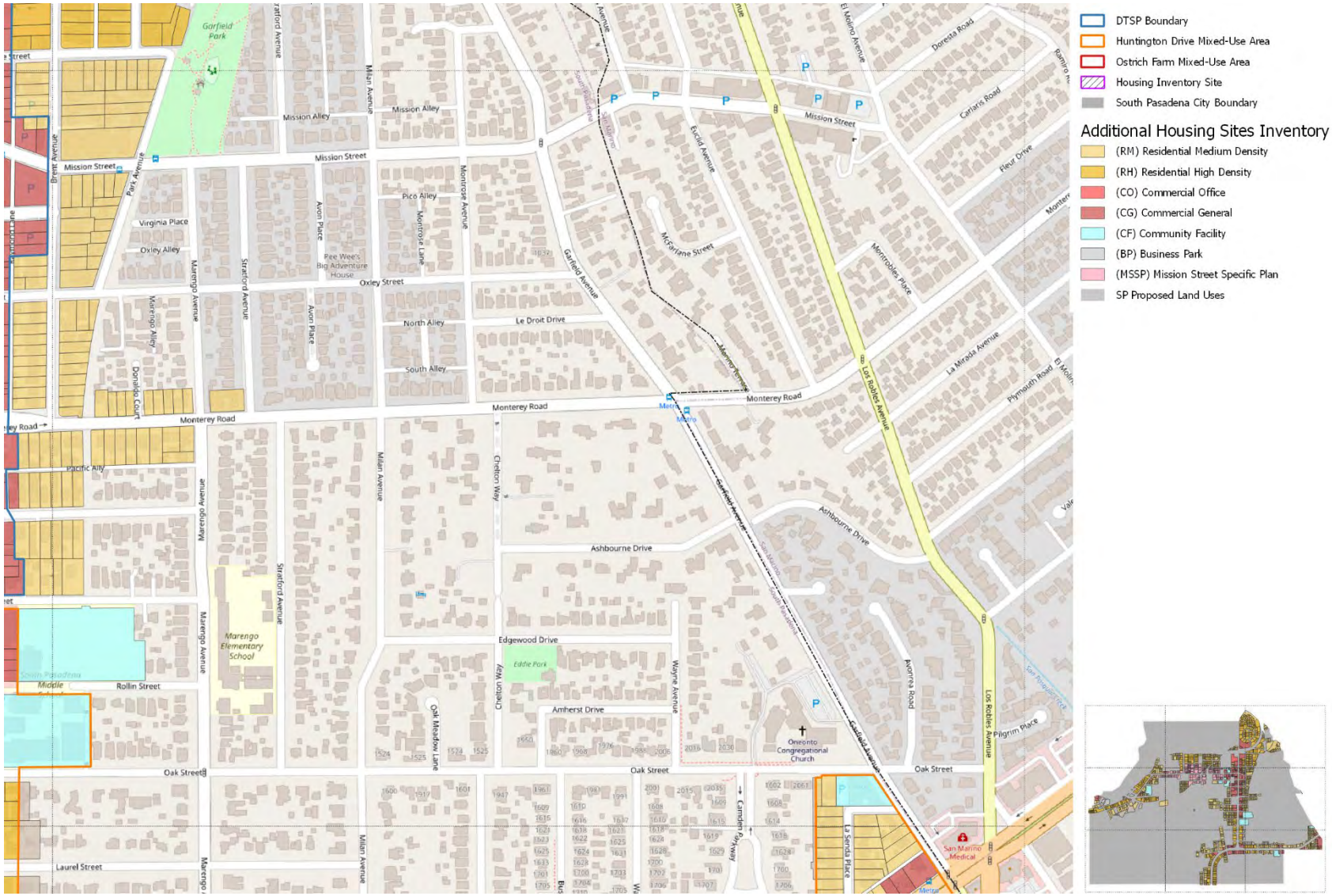
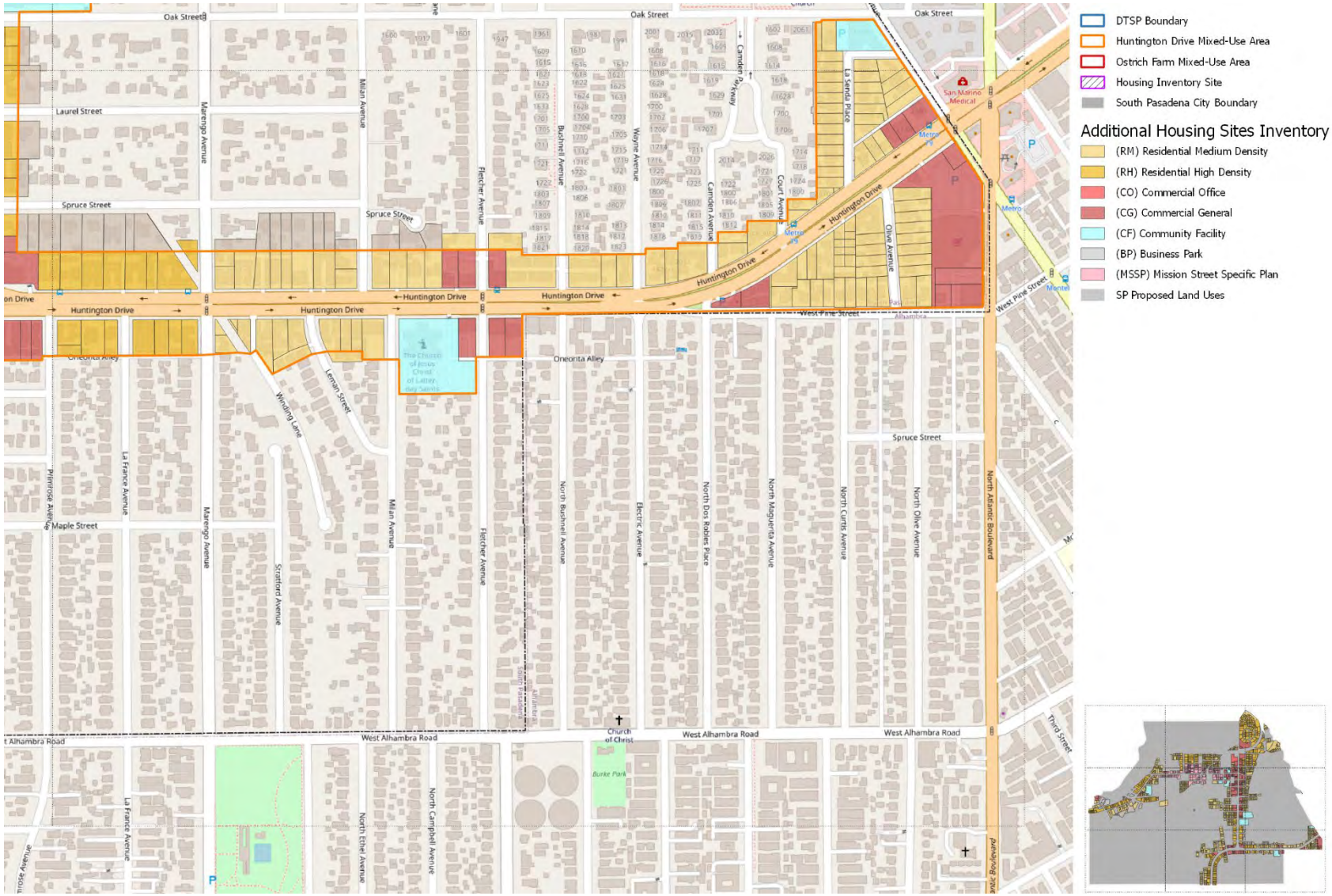


Figure A-3.h Map of Additional Sites to Accommodate Lower Income RHNA


DTSP Boundary
Huntington Drive Mixed-Use Area
Ostrich Farm Mixed-Use Area
Housing Inventory Site
South Pasadena City Boundary
Additional Housing Sites Inventory
(RM) Residential Medium Density
(RH) Residential High Density
(CO) Commercial Office
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
SP Proposed Land Uses
Oak Street
Laurel Street
Spruce Street
Maple Street
Huntington Drive
West Alhambra Road
Oneonta Alley
Milan Avenue
Marengo Avenue
Fletcher Avenue
Bushnell Avenue
Wayne Avenue
Camden Avenue
Court Avenue
Olive Avenue
La Senda Place
Camden Parkway
Lemon Street
Winding Lane
La France Avenue
Primrose Avenue
Stratford Avenue
North Bushnell Avenue
Electric Avenue
North Dos Robles Place
North Magueriga Avenue
North Curtis Avenue
North Olive Avenue
North Atlantic Boulevard
West Pine Street
Third Street
Church of Christ
Burke Park
North Campbell Avenue
North Ethel Avenue

SITES TO ADDRESS THE LOWER-INCOME RHNA OR WITH PENDING OR APPROVED APPLICATIONS

1. Vacant Site

This site is vacant.

Parcel Number	5311003096
Site Size (acre)	1.05 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use with Housing Opportunity Site
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	70 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes - Verbal communication between City staff and property owner representative; Property owner representatives requested meeting with City (7/28/21 and 8/9/21 meetings to discuss potential housing proposal).
Environmental Constraints	No known environmental constraints.

2. Business and Research Park parking lot site

Existing use is as a business park with offices and large surface parking areas. The site is underutilized given the large parking lot and proposed density. Bullseye Glass and Judson Studios (southwestern-most buildings) are relatively new tenants.

Parcel Number	5311004010
Site Size (acre)	2.23 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	50 lower-, 20 moderate-, 13 abovemoderate-income units= 83 total units
Property Owner or Developer Interest in Residential Development?	Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed.Property owner was supportive of rezoning for potential for multi-family residential development in the planning period. Developer interest in site.
Environmental Constraints	No known environmental constraints.

3. Monterey Road site

Underutilized parcels each with one single-family home on it. All three parcels have the same owner. Owner is interested in the development of housing and has submitted an application for a total of 8 market-rate units on the three parcels.

Parcel Numbers	5311015035, 5311010001, 5311010002
Site Size (acre)	5311015035 – 0.34 acres, 5311010001 - 0.33 acres, 5311010002 – 0.59 acres = 1.26 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM with Affordable Housing Overlay
Proposed General Plan Land Use	Medium-Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	8 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes, both Property Owner and Developer Interest. Property owner has submitted an application for residential development.
Environmental Constraints	Rear portion of the site is significantly sloped.

4. Tyco site

Existing uses include parking lots and underutilized industrial buildings. All parcels have the same owner. Owner is interested in consolidating the parcels and developing a few hundred units of high-density housing on the site.

Parcel Numbers	5313011007, 5313011009, 5313011010, 5313011012, 5313011013
Site Size (acre)	5313011007 – 0.89 acres, 5313011009 – 0.34 acres, 5313011010 – 0.24 acres, 5313011012 – 1.00 acres, 5313011013 – 0.80 acres =3.26 acres total
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	130 lower-, 57 moderate-, 30 above moderate-income units = 217 total units
Property Owner or Developer Interest in Residential Development?	Yes. Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed. Owner/Developer interested in building over 300 units during the planning period.
Environmental Constraints	No known environmental constraints.

5. Liquor store site

Existing use is liquor store. Underutilized site with surface parking and proposed density. The structure is 50-60 years old. There have been no planning/building permits applied for or issued for this site over the past ten years, indicating that there have been no major investments in the structure.

Currently, improvements on the site include an approximately 5,500 square foot retail building, and approximately 10,000 square feet of parking that includes 17 parking spaces. As shown below, the site can accommodate 31 housing units. The proposed Ostrich Farm Mixed-Use zoning will allow for up to 8,500 square feet of retail development in additional to the residential development shown. It is anticipated that redevelopment of the site to residential mixed-use will significantly increase the site's value over the existing use.

A question about this site was presented to developers during the City's developer forum, where the participants identified this site as "moderately likely" to be redeveloped. The judgement of the likelihood of redevelopment was made in comparison to other sites presented to the developer forum, all of which were in the Downtown Specific Plan area, and based on the shape of the site.

Parcel Number	5311012019
Site Size (acre)	0.55 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	19 lower-, 8 moderate-, 4 above moderate-income units = 31 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner. No expressed interest from any developers.
Environmental Constraints	No known environmental constraints.

6. Arroyo Vista Inn site

Existing use is a bed & breakfast inn. Owners are interested in affordable housing development on the portions of the site close to Monterey Road, retaining the existing buildings. Close to transit and amenities. The site was recently subdivided into three parcels. The housing potential is on the right-hand parcel and only on the street-facing third of the parcel. The owner has submitted an application for residential units on this parcel.

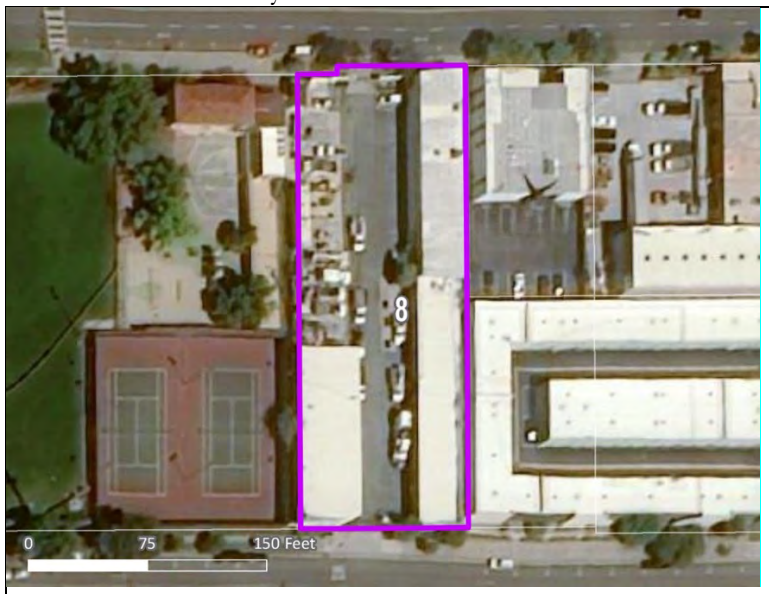
Parcel Number	5311012040
Site Size (acre)	5311012040 – 0.94 acres
Current General Plan Land Use	Estate & Very Low Density Residential
Current Zoning	RE
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RL with Affordable Housing Overlay
Proposed General Plan Land Use	Very Low Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	7 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes. Letter and Meetings with Property Owners for Housing Development during the planning period
Environmental Constraints	Rear portion of the site is significantly sloped.

7. Methodist Church site

Existing use is church buildings, parking lot, and open space/undeveloped area. The church that owns the property has been studying different scenarios for developing the site further to incorporate housing, including affordable housing units. The existing church building and historic community room building and parking lot would be retained along with some areas of slopes, but other areas of the site are underutilized and could easily accommodate housing development. Without these constraints, the site could accommodate 100 units. However, based on the constraints of the site, including the topography, historic resources, and intention of the property owner, it is anticipated that the site will reasonably accommodate 30 lower income units.

Parcel Number	5314003083
Site Size (acre)	6.65 acres
Current General Plan Land Use	Community Facilities
Current Zoning	CF
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	CF with Affordable Housing Overlay
Proposed General Plan Land Use	Civic with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	30 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes. Meetings with property representatives and architects in response to their interest in developing 30 housing units during the planning period.
Environmental Constraints	Site has significant topography and the property owner intends to keep the existing uses.

8. Public works yard site



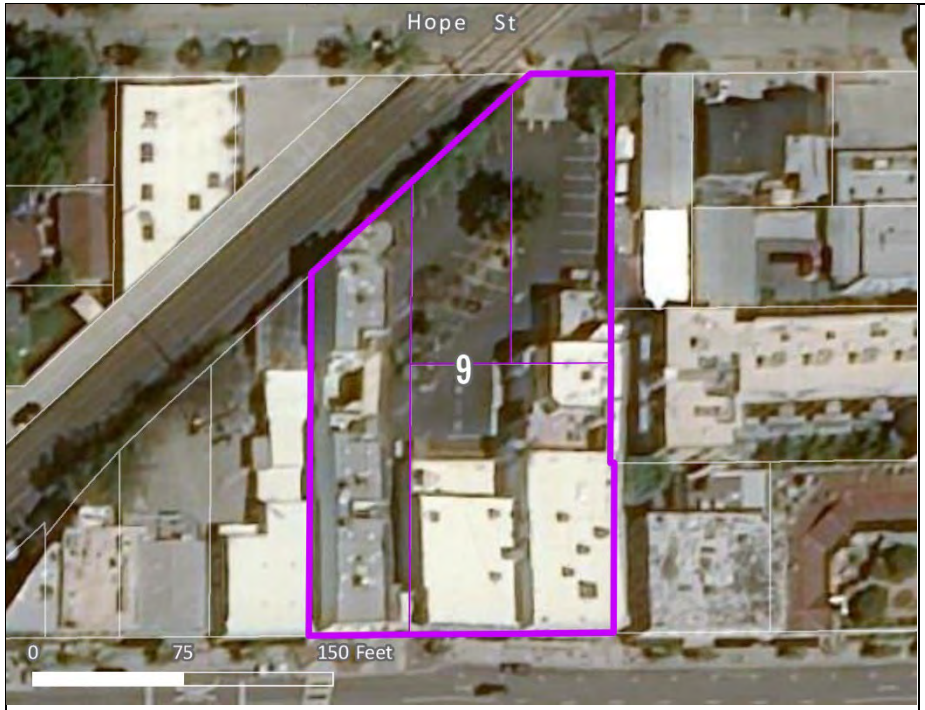
This property is owned by the City. Existing use is the City public works yard, with three distinct uses on site: offices, material storage, and vehicular storage. The City commits to relocating these uses during the planning period. The office uses will relocate to City Hall, the material storage uses will relocate and be combined with existing material storage located adjacent to the South Pasadena Dog Park on Stoney Drive, and the Public Works Department will purchase or lease a secured warehouse building for vehicular storage in South Pasadena or a neighboring community.

This site is centrally located near transit and services. Once vacated, the City will make this site available for a 100% affordable housing development. This property is included in Program 2.1 for developing City-owned sites with affordable housing.

The site inlcudes an underground gasoline tank and filling station on site that will be removed prior to redevelopment of the site. As part of the redevelopment, an environmental site assessment will be conducted to determine if any environmental remediation is required. However, there is currently no indication that remediation will be required. The underground gas tank is inspected regularly and no leaks have been detected. Any necessary remediation identified in the environmental site assessment will be conducted by the City prior to redevelopment of the site. It is not anticipated that the testing or remidation of the site, if required, will present significant constraint on redevelopment of the site, as this type of testing and remediation is common on many previously developed parcels. Site with soil contamination are generally remediated through the excavation and export of contaminated soil during the grading process.

Parcel Number	5315020901
Site Size (acre)	0.71 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	Maximum density 70 du/ac. Minimum density 60 du/ac.
Realistic/Net Units	42 lower- -income units = 42 total units
Property Owner or Developer Interest in Residential Development?	Yes, City-owned and replacement yard options identified.
Environmental Constraints	The site contains an existing gasoline filling station and underground storage tank. Potental soil contamination may impact timeframe and cost of redevelopment.

9. Meridian site



Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services. The property owner's plan to redevelop will be made more feasible by the proposed programs in this housing element, the DTSP, and height increases based on the density bonus and/or changes to the height maximum initiative.

Parcel Numbers	5315014030, 5315014032, 5315014033, 5315014044
Site Size (acre)	5315014030 – 0.23 acres, 5315014032 – 0.16 acres, 5315014033 – 0.13 acres, 5315014044 – 0.31 acres= 0.83 acres total
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street (adjacent to the track)
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	34 lower-, 15 moderate-, 8 above moderate-income units = 57 total units
Property Owner or Developer Interest in Residential Development?	Yes. Meeting and site visit with owner representative and City staff
Environmental Constraints	No known environmental constraints.

10. School District site

The property contains a historic school district building, but the majority of the property is a surface parking lot. This site is identified in the current adopted South Pasadena Housing Element. In 2021, the South Pasadena Unified School District sold the property to a developer. The current property owner has proposed a mixed-use project that includes retail, 89 market rate residential units, 19 moderate-income residential units, and adaptive reuse of the historic school administration building for commercial uses. The developer submitted the project in September 2021 and it received final approval from the Planning Commission on September 13, 2022. The units assigned to this site are based on the approved application. This site is centrally located near transit, schools and services.

Parcel Number	5315008047
Site Size (acre)	1.90 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	19 moderate-income and 89 above moderate-income units = 108 total units
Property Owner or Developer Interest in Residential Development?	Yes, application received and approved.
Environmental Constraints	No known environmental constraints.

11. Carrow's site

Existing use is Carrow's restaurant with surface parking. An application for a mixed-use project, utilizing the State Density Bonus, with 50 units (5 affordable units) and 3,769 square feet of commercial area was submitted on February 8, 2021 and approved by Planning Commission on April 18, 2022. The application was submitted prior to the effective date of the inclusionary housing ordinance, and as such was not subject to its provisions.

Parcel Number	5315009051
Site Size (acre)	0.81 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	5 lower- and 45 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Yes. Application under review; unit count based on current application
Environmental Constraints	No known environmental constraints.

12. El Centro St. and Edison Ln. Site

Existing use is a moderately used parking lot. The west parcel of the two parcels is owned by the City. Parking would be underground if the site is developed for housing. When developed, the project would need to provide at least 3 commercial spaces for the bank east of this site. The entire site is identified in the current adopted South Pasadena Housing Element. This site is centrally located near transit and services.

Parcel Numbers	5315003044, 5315003901
Site Size (acre)	5315003044 – 0.37 acres and 5315003901 – 0.19 acres= 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed-Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	20 lower-, 8 moderate-, 4 above moderate-income units = 32 total units
Property Owner or Developer Interest in Residential Development?	The smaller, west parcel is City-owned. Although no response was received from the property owner of the east parcel, the City will continue efforts to consolidate the parcels to develop a housing project.
Environmental Constraints	No known environmental constraints.

13. City-Owned Parking Lot site

Existing use on the three northern parcels is a parking lot and a small theatre building. The City has a short-term lease in place with the theater becaue the goal is to develop a 100% affordalbe housing development on this site. The lease was amended in 2022 so that it is a month-to-month lease that expires on March 31, 2024. These lease amendments were made to allow the City to redevelop the site into residential uses. Those three parcels are owned by the City. There has been recurring interest from developers over the years for senior affordable housing development. The fourth parcel at the south end of the site could be consolidated with the other three parcels to develop as one site. There is one single-family residence on the existing site. It is not occupied by a lower-income household. The owners are interested in their property redeveloping together with the City-owned parcels as multifamily affordable units. The City plans to issue an RFP for development of housing on this site.

Parcel Numbers	5315003903, 5315003904, 5315003902, 5315003035
Site Size (acre)	5315003903 – 0.18 acres, 5315003904 – 0.12 acres , 5315003902 – 0.12 acres, 5315003035 – 0.19 acres = 0.61 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	1 parcel Vacant, 2 parcels Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	36 lower- -income units = 36 total units
Property Owner or Developer Interest in Residential Development?	Yes, Three parcels are city-owned and the owners of the fourth parcel are interested in their parcels being consolidated with the city parcels and all four parcels redeveloping together for multifamily residential development during the planning period.
Environmental Constraints	No known environmental constraints.

14. Shaker's site

Existing use is a small restaurant, Shaker's, with substantial surface parking. This is a strong site for redevelopment for housing, and could incorporate the existing or a replacement restaurant and possibly other ground floor commercial uses. Staff has held multiple meetings with the property owner and property owner's representative, who are very interested in developing the site with a high-density housing/mixed-use project. Redevelopment of the site will require a Historic Resources Evaluation (HRE) report for demolition. This site is centrally located near transit and services.

Parcel Number	5315001070
Site Size (acre)	0.85 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	110 du/ac.
Realistic/Net Units	46 lower-, 23 moderate-, 23 above moderate-income units = 92 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner representatives have met several times with City staff.
Environmental Constraints	No known environmental constraints.

15. Pavilions parking lot site

Existing use is a supermarket (Pavilions) with a large surface parking lot with the commercial use set back from the street. Although recently remodeled to update the store, the owner has informed the City that they are also developing a proposal to redevelop the property with underground parking, a new market and high density housing on upper levels at the maximum that would be allowed by City zoning, and would include affordable housing units. The recent renovations are minor in nature and would not preclude redevelopment of the site. The project would be similar to others that the owner has implemented in other locations throughout the state.

Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that would include the grocery store use as well as housing. This site is centrally located near transit and services and schools.

In a February 2022 meeting with Community Development staff, the property owners provided a proposed mixed-use project description with high density residential, at the highest capacity allowed by Code using density and height bonuses, and a new market of similar size to the existing. Their continuing interest in a project of this scale was confirmed in a December 2022 letter and was reitterated at the February 1, 2023 City Council meeting during public comments.

Parcel Number	5319002034
Site Size (acre)	2.67 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	110 du/ac.
Realistic/Net Units	110 lower-, 55 moderate-, 55 above moderate-income units = 220 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff in higher density housing redevelopment during the planning period.
Environmental Constraints	No known environmental constraints.

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Appendix B: Public Participation Summary

Appendix B: Summary of Public Participation

Release of Public Review Draft Housing Element

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. Below is a summary of all outreach since initiation of the Housing Element update, all written comments on the Housing Element received by the City, and how comments on the draft were addressed in this revised draft Housing Element. The summaries of outreach and community input are organized by type of outreach or meeting.

Public Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform.

Workshops 1 and 2

The City held two online public workshops with the general public to solicit feedback from City residents on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. The same workshop was held on the two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about Housing Elements. That survey was available before, during, and after the workshops. In addition, the City set up an email address to receive input ahead of the workshops and throughout the Housing Element Update and encouraged participants to submit comments and questions via email.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with an overview of the 6th-cycle Housing Element Update process, with a question-and-answer period in the middle. The second part of the workshop presentation focused on the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. Interaction was conducted via chat and email to minimize inappropriate content or behavior or instances of Zoom "bombing" by uninvited guests. Participants were directed to share their questions either through Zoom's chat feature or to email their questions to the City. The City staff selected questions among those received and answered some of them during the meeting as time allowed. They indicated that all questions would be answered in a frequently asked questions (FAQ) document that they drafted after the meeting's end and was then posted on the City's website.

Public Workshop, May 30, 2020 (Workshop 1)

There were approximately 30 participants at this workshop. Due to technical difficulties with the chat feature for some participants, after the end of the presentation more questions were answered by City staff and the consultant team.

The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: https://www.southpasadenaca.gov/home/showdocument?id=21084

- Participants asked about the RHNA process and how the number was determined for South Pasadena.
- Participants asked about the potential for golf courses, school district lands, and other sites with existing uses to be re-purposed for meeting the City's RHNA.
- Participants asked about Accessory Dwelling Units (ADUs) and their potential for rental units for low-income housing as well as the potential implications of the legalization of AirBnB in the City.
- Participants asked about the impacts of potentially increasing maximum density and height limits to increase housing supply.

Public Workshop, June 2, 2020 (Workshop 2)

There were approximately 30 participants at this workshop. The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: ***https://www.southpasadenaca.gov/home/showdocument?id=24141***

- Participants asked about CalTrans-owned properties and how those might be used for new housing.
- Participants asked about the potential lowering of the City's RHNA resulting from the current economic slowdown and future elimination of Metro bus stops in the City.
- Participants asked about the consequences and penalties for a non-compliant housing element.
- Participants asked about the methodology for determining RHNA and how SCAG had arrived at the City's RHNA numbers.
- Participants asked about the City's future ADU guidelines.

Workshops 3 and 4

The City held two online public workshops with the general public to solicit feedback from City residents on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m. The same workshop was held on two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about what should be discussed at the workshops. That survey was available before and during the workshops and was closed after the workshops. In addition, the City continued to accept emails to receive input ahead of the workshops.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with a brief overview of the 6th Cycle Housing Element Update process and the strategies under consideration to address the City's RHNA. Meeting participants were then separated into virtual breakout rooms to discuss questions about RHNA strategies. The groups were small, at around five people, and each had staff or consultant facilitators. Polling questions were asked of participants soon after the beginning of the workshop, after the presentation right before the breakout groups, and then the same questions were asked again just after the breakout group segment to gauge whether opinions changed based on the breakout group discussions. The polling questions were:

First poll after slide 4 – second team meeting rolls slide

- Did you participate in the Housing Element Workshops 1 or 2?
- If not, have you watched presentations the City has posted on their website about the Housing Element?

Second poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

Third poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

The discussion questions for the breakout groups were:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena, either because of the size, style, mix of uses, features, degree of affordability, etc.?

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

The workshops concluded after the breakout room discussion.

Public Workshop, September 23, 2020 (Workshop 3)

There were approximately 12 participants at this workshop. The participants represented members of City commissions, City Council members, housing advocates, community members, those who work in South Pasadena, and both renters and homeowners. The results of the two substantive poll questions for Workshop 3 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 20%
  - Upzoning single-family areas – 30%
  - Increasing density without increasing height – 0%
  - **Increasing height and density – 50%**

Poll after breakout groups and report-backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 11%
  - Upzoning single-family areas – 22%
  - Increasing density without increasing height – 11%
  - **Increasing height and density – 56%**

There were two breakout groups at Workshop 3. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
   - Sees a lot of obstacles for housing and would like the City to think outside of the box
   - Knows many of the legislators that wrote the laws, wants to make sure the City makes decisions that would provide the best housing
   - Wants to make sure the City avoids liability with HCD and advocacy groups
   - Wants to hear what fellow residents thought about the different proposals and what is important for the future
   - Would like to see broad community support coming together to get behind this element.
   - Wants to make sure housing is built for everyone in the San Gabriel Valley
   - Wants to make sure RHNA gets distributed to affirmatively affirm fair housing and avoids concentrations of poverty
   - Would like to see increased density and sustainable landscapes
   - Concerned about big RHNA increase that the City has to absorb. Important to preserve small town character and single-family neighborhoods as we add housing
   - A lot of people want to live here, want to make it possible for a variety of people to live here. Likes idea of increased height limits and greater densities

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- Higher-density/height can provide more affordable/lower-income housing without looking like Downtown Los Angeles
- Two-thirds of ADUs can be deemed affordable
- Believes the City needs to upzone and increase densities and will need more ideas for low-income housing
- Should go beyond the targeted zoning for the six areas mentioned
- City will run into issues with the no-net-loss rule
- Does not believe HCD will give the City the minimum number of ADUs that is calculated
- Least favorite is upzoning single-family housing
- Would like to see more analysis that increased density/height is needed. Believes the City will face some difficulty with providing sufficient proof for specific parcels
- Frustrated with the City's ability to provide low-income housing since there is no redevelopment or assistance from the State, believes the only tool available is inclusionary housing
- It's hard to imagine the proposal for upzoning single-family would be accepted by most residents, interested in what kind of implications will happen from the Housing Element in different portions of the City
- ADUs could be problematic as long-term housing, especially for families. Shouldn't be the primary solution
- Higher densities could allow a blending of housing affordable to lower- and higher-income brackets
- Not opposed to ADUs, concerned with affordability levels
- Concerned about reliance on ADUs
- More potential for ADUs as a solution than other options
- ADUs are a wonderful idea. City should allow ADUs to be legalized/acknowledged without penalty
- Asked about Caltrans properties. City let the questioner know that they have not heard back from Caltrans regarding a potential partnership. City is interested in working with Caltrans to rehabilitate the Caltrans properties. Can't easily count those towards to RHNA because they are not new units.
- Desires choices for all affordability levels
- Increase in height and density sounds nice. Interested in understanding more about how to distribute height and density so as not to limit affordability options to confined areas
- Concerned about waiving or lowering parking requirements and traffic from ADUs
- Be careful with parking issues
- Important to consider reasons behind voter-imposed height limit
- Preserve small-town character

3. Are there certain areas of the city where increasing housing strategies should be concentrated?
    - To reduce GHG emissions, housing should be concentrated around High-Quality Transit Area (Gold Line Station)

- Should be as close to the Gold Line Station as possible, should eliminate parking requirements in those locations
- Along transit corridors (Huntington/Fair Oaks/Gold Line)
- Near the Gold Line is preferred; however, it is a historic district
- Vons center is a prime location
- Definitely near transit, there will be some capacity issues with the historic character, commercial corridors
- At least half of participants agreed housing should be dispersed through many areas of the City

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Monrovia/Azusa examples, options are diverse in terms of affordability
    - Smaller buildings on Raymond Street (south of Colorado) at Fair Oaks/Mission, need good design guidelines
    - Encinitas, higher-density project example (May 20th presentation to City Council)
    - Hiring great architects, variety of designs that are respectful of the context
    - The mix of densities by the middle school. There is a tradition of a mix of densities in South Pasadena.
    - Historic Ostrich Farm building in South Pasadena
    - President Apartments at 669 South Union in Los Angeles. It is a six-floor apartment building with 105 units.
    - We have a good mix all over town. Multifamily units are well integrated. Fit with diversity of architectural styles appropriate for each neighborhood
    - Mission Meridian in South Pasadena. It is a traditional mix with landscaping, setbacks, and quality materials. It did a good job of reflecting the historic character while also providing relatively dense housing and a range of bedrooms.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - As close to the Gold Line as possible, parking reformed
    - Proactive code enforcement, rental housing
    - Inclusionary Housing Policy
    - Sustainability
    - Affordability was mentioned by several people
    - Inclusive of income groups/families
    - Ability to be here in the long haul
    - More permanent supportive housing
    - Population-specific housing
    - Encourage long-term tenants and homeowners, mix of kinds of housing and affordability

- Community, sustainability, and infrastructure adapting to climate change

The following question was brought up during the breakout groups:

- Has South Pasadena explored tax increment financing in lieu of disassembly of redevelopment?

Public Workshop, September 26, 2020 (Workshop 4)

There were approximately 15 participants at this workshop. The participants represented members of City commissions, housing advocates, community members, students, those who work in South Pasadena, and included renters and homeowners. The results of the two substantive poll questions for Workshop 4 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 15%
  - Upzoning single-family areas – 31%
  - Increasing density without increasing height – 15%
  - **Increasing height and density – 38%**

Poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 0%
  - **Upzoning single-family areas – 43%**
  - Increasing density without increasing height – 14%
  - **Increasing height and density – 43%**

There were three breakout groups at Workshop 4. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
   - Has followed the state laws and wants to make sure the City builds good looking beneficial housing
   - Not against raising the height in certain area (Ostrich Farms)
   - Housing should relate to the existing character and add value to the City
   - Believes affordable housing should be done first
   - Wants to hear what the community wants in terms of meeting our RHNA goals
   - Wants development of Caltrans properties according to the character of the community
   - Interested in seeing more housing in the area, different types of housing suitable for families
   - Would like a housing element that will sustain growth that the City can accommodate reasonably
   - Concerned about impacts on schools
   - Favors some minor height improvements in key areas

- Need more flexibility for low-income housing design
- Inclusionary housing regulations
- Affordable housing
- Address density and height within zoning (increase)
- Wants priority city process to follow HCD guidelines
- Prioritize geographic equitable distribution of units
- Prioritize housing dispersed equitably not just in concentrated areas.

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- No. The City would have to work with an outside partner (regional). There is no incentive for developers to provide affordable housing.
- None of the above, none of the options presented were good. Need to build more and increase density. Concerns about traffic around Ralphs and Vons sites.
- Most residents favor height and density modifications in certain areas but not all over town. City-owned property on Mound/El Centro could be a good candidate for low-income mixed-use housing, three to four stories.
- Look at adaptive re-use/micro-apartments. Need to work with the state to get credit for these types of developments.
- Upzone throughout the City (single-family areas). Would provide more opportunities. Focus on specific parcels for more density and height.
- A few people said all of the above.
- Reduce parking.
- Increase density without increasing the height, and work with developers to not create boxy projects. Can do a lot with density without height, allow up to five stories perhaps? City doesn't allow smaller product because of density.
- Adaptive re-use is counted by HCD for RHNA.
- 80 percent development assumption is not likely.
- Eliminating parking minimums in the Mission/Meridian zone.
- Downtown does not need more parking to claim more affordable units.
- The more we look at density, upzoning single-family lots, and increasing height will make a difference for planning for versus the actual building of housing. Should keep in mind.
- Inclusionary zoning. Could achieve a large amount through inclusionary housing.
- A few people liked the height and density increase strategy and had these additional comments:
    - One worried about ballot measure actually passing.
    - Likes the Andalucia precedent project.
    - Concern about sites at the periphery, need transit-oriented development.
- Upzoning single-family would be good for disbursement of housing in City. So, favor single-family upzoning but may be a stretch.
- Closer to transit (rail).

- A few people were skeptical about aggressive ADU numbers. Some had additional comments:
    - Doesn't understand how that works for renters.
    - Hard to monitor.

3. Are there certain areas of the City where increasing housing strategies should be concentrated?

- Throughout the City but look for specific areas around transit, commercial areas, neighborhood amenities.
- Concentrate around transit stop, walkable places, Downtown, Fair Oaks, Mission District. Opportunity by Ostrich Farm can be created.
- Mound/Oxley is close to amenities and would encourage walkability/public transit.
- Huntington Drive has pockets that could accommodate increased density, paratransit would be needed to support development in other areas.
- All of the above - Downtown, Mission west of the subway stop, Mission should allow four stories.
- Mission west does not want to mess with the historic downtown. There is not a lot of transit ridership. Has been a decrease in ridership.
- If throughout City, not blanket, culture may not support it.
- City/PlaceWorks has done a good job of identifying areas but there are some additional/other areas: Huntington Drive is underutilized (four cities connect). Currently, medical offices and low rise that is underutilized. Also look at Ostrich Farm, Mission, and Fair Oaks.
- First priority is near Gold Line station. Incalculable asset that we are not realizing potential of.
- Meridian mixed-use is good. Exciting possibility for mixed-use and density in that corridor.
- Disbursement throughout City but with contextually different housing types. More near transit and services (Gold Line). Well served everywhere already, so can add housing anywhere.
- Prefer to see more housing near transit hubs (Mission/Fair Oaks and metro station).
- Near transit and where practical; consider vacant lots.
- Downtown could accommodate a lot; Fair Oaks has a lot of opportunity for mixed-use; should be spread to some of the existing multifamily areas - triplex/four-plex.
- Shouldn't only be in 3-5 targeted areas of the city. Look at single-family residential neighborhoods also. Allow higher densities on first two-three properties off main corridors.

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

- Different style in different places, Mission should look like it was built 150 years ago.
- Different styles are appropriate, design review process is important, micro-apartments is something that should be considered in some areas, should not limit ourselves to a specific style/type.

- Townhomes at Hope and Meridian is a good example, design standards that are not automobile oriented, cars are moved to the back, less curb-cuts, design and size should prioritize three bedrooms or more to accommodate families.
- Mission/Meridian townhomes, variety of styles, bungalow to Spanish, does not want generic developments, need to have a sense of place, or reflects the historic character.
- Needs to represent South Pasadena, Adobe style, historic examples, character needs to be similar to the unique neighborhoods.
- Respect the historic fabric of the neighborhood block, be flexible given the context of the neighborhood, save the front historic design and modifications are located in the back, concerned about affordable housing
- Generally, multifamily - Look at occupants, tenants (end users) as they transition over lifespan. Professionals, families, seniors; look at different users. Density/massing/open space/courtyards great but also can limit development so we need to look closer as implications of those constraints. It can be too restrictive. Need to dive into more and see specific examples.
- Dense, walkable courtyard multifamily buildings already exist in South Pasadena. See Bank Street (10 units of housing in communal setting possible because without onerous parking requirements). Would love to see that happen again. Currently, the City parking requirements do not allow such projects to be built. Would like to see requirements change to bring back those types of projects and diversity of housing types.
- Sierra Vista Apartments on Esperanza Avenue (low-income senior, 1-2 bed), example of dense affordable complex with beautiful exterior - Yosemite lodge style. Blends well with single-family and multifamily on block. It is only 45 units, so maybe higher density to get more units.
- Likes Andalucia example, doesn't like Aliso example.
- Mission Meridian.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

- Design standards are set in stone, we can make sure it looks good.
- That infrastructure/community services are able to support the new housing units.
- Specifically, how we address affordable housing. One concern of ADU plan is that her work as an architect has shown that ADUs are just additional single-family for real estate but does not meet the goal of affordable units. Not just adding units, but how can we assure they are affordable units? Multifamily development also needed to meet minimum they need to make their projects pencil out. Make it more viable and provide more assurance. Don't skim the surface. Financing for developing affordable units is needed, mentioned Pasadena as an example. Can City partner with bank or banks for affordable housing?
- Housing Element sets values to production. Wants to see recognition of race-based exclusionary practices. Contemporary recognition and repair of redlining and other racist practices. Altos de Monterey in the 1960s was the only place to allow non-white residents. Would like to see acknowledgement of past and commit to real policies that are equitable.
- In addition to being affordable, have permanent supportive housing.
- Reduce parking requirements near transit stops.

- Tenant protections.

The following questions were brought up during the breakout groups:

- Do all units count the same toward the RHNA requirement? For example, is a one-bedroom apartment treated the same as a three-bedroom dwelling?
- Could 710/Caltrans money be used for more transit?
- RHNA appeal, what are our chances to lower our numbers?

Workshop 5

Public Workshop, October 21, 2021 (Workshop 5)

The City held a hybrid public workshops after release of the public draft Housing Element on Thursday, October 21, at 6:30 pm. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the workshop was to provide an overview of the 2021-2029 Public Review Draft Housing Element. After the presentation, the public was invited to ask questions and share comments. The meeting had approximately 12 participants, including two in-person and others on Zoom. Four participants spoke. The following summarizes these questions, comments and staff responses:

- The first question asked for clarification about AB 1398 regarding the possibility for getting the Housing Element approved by HCD by the February 11th deadline in order to avoid the mandatory timeframe for rezoning. The City clarified that before AB 1398 was approved, the February 11th deadline was for the adoption of the Housing Element by the City Council. However, with the change in law, adopting the Housing Element by the February 11th date is no longer a requirement to stay on the 8-year housing cycle. The law says in order to avoid a deadline to complete the rezoning within one year of October 15, 2021, the City would need to have adopted their Housing Element and submitted the adopted Housing Element to HCD for a 90-day review and receive certification at the end of that review before February 11, 2022. That new timeline is not feasible because the City is at the initial point of submitting the Draft Housing Element for the first 60-day review by HCD and will not have enough time to adopt and submit the final to HCD by February 11, 2022. Consequently, the City will adopt after February 11, 2022 and be required to complete the rezoning before October 15, 2022.
- The next question asked was in reference to whether Junior Accessory Dwelling Units (ADUs) were included as part of the site inventory in order to meet the City's RHNA. The City answered that both ADUs and JDUs will be counted.
- The third question asked how the City plans to incorporate the 6th, 7th and 8th (future) Regional Housing Need Allocations (RHNA) if the General Plan update is a 25-year plan with the follow-up question about the City's approach for meeting the RHNA from the 1st - 5th Housing Element updates. The City answered that through the 8-year timeframes for updating the Housing Element, the City will attempt to show that the City has the capacity to build the units during the projection period while keeping in mind that the City's capacity to develop these units is in line with the longer-term General Plan. The Housing Element is on a different timeframe from the General Plan and will be updated again in 2030. Furthermore, staff clarified that the Program Environmental Impact Report (PEIR) will be covering the Housing Element, General Plan Update and Downtown Specific Plan (DTSP). Thus, the City will use the General Plan and the PEIR as guide when analyzing appropriate sites for the next housing element update. To answer the follow-up question, staff explained that the City was able to address capacity for the 63 RHNA units in the 5th Housing Element with existing zoning.

- The next question was in regard to the sites inventory. A property owner wanted to confirm that his property was included in the sites inventory as he is interested in developing housing. PlaceWorks confirmed and directed the speaker to find the site in the document. The property was identified as Site #4 and is shown in Table VI-46 and Appendix A. The speaker also wanted to know where the City was in terms of timeline for revising the General Plan. City staff answered that there is a draft of the General Plan Update from 2019, but that it had been put on hold during much of the Housing Element Update preparation in order to integrate consistent programs and policies that align with the Housing Element. Staff stated that the revised draft of the General Plan will be released for public review shortly.

The last comment was about the importance of the City undertaking companion capacity planning for infrastructure including schools, water, wastewater, parking, etc. The commenter noted that the community has been requesting this type of analysis for two years. He would be more comfortable with the plan for housing presented in the draft if that infrastructure analysis was completed.

Workshop 6

Developer Forum August 15, 2022 (Workshop 6)

There were 8 community members, including two Planning Commissioners in attendance at the City's Developer Forum on August 15, 2022. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics related to development in the City and received the following responses.

Questions #1: Please provide input on development standards, processes, and procedures

- A local developer recently had issues with the open space standards and the landscaping requirements for multi-family/high density projects. They felt these requirements could constrain a project and the City should consider reducing the amount of open space/landscaping requirements and allow for roof top landscaping. Program 3.n Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer that had done several hillside developments in 2017 was required to remove trees to do the project. This required several trips to the Natural Resources Committee which delayed the project. There were requests to build the units around the trees and bring back to the Committee which added more time and cost to the project. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- Another participant spoke about the entitlement process and specific issues with parking requirements. They found it was difficult to meet the density bonus requirement for parking reductions and stated that based on her experience South Pasadena has enough public parking available to meet local demands and the City should consider parking reductions. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review. The City is also considering a single parking requirement in the downtown that could reflect the transit-oriented nature and to require bike parking. **Program 3.b** - Mixed-Use Developments and Adaptive Re-Use Specific actions proposed to facilitate mixed use development in the Downtown Specific Plan include engaging the development community and property owners to promote shared parking and consider reducing on-site parking requirements on shopping streets to leverage transit access and to incentivize potential office and multi-family residential mixed-use development.

- This participant also said that the current height limit of 45 ft is very challenging and was aware that it could get waived with a state density bonus, but the process takes too long. They recommended that the height limit be increased to 55 or 65 feet in specific areas along Mission Street, Fair Oaks, Huntington Dr., and Monterey Road. **Program 2.n** Citywide Height Limit Ballot Initiative will require the City to place a measure on the ballot in a local election to increase allowed heights above the current citywide limit of 45 feet.
- Another participant suggested the open space/landscaping requirements need to be more flexible because when you have to provide open court yards and private open space you have to increase the height of projects because of requirements. They felt that the Open Space requirements (within downtown area) need more flexibility. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer suggested that the entitlement process he experienced allowed him to work with a planner in between Planning Commission reviews to help move the project along. He encouraged making that an option for the future.
- There was on suggestion that the City should implement an electronic permit system. **Program 3.e** required the City to develop an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.
- One comments from a developer was that the City doesn't have enough planner to handle the volume of projects that are coming in for application and the City should consider bringing on additional contract planners to assist with project application reviews. The Community Development Department also recognizes the concern shared by the developers and has staffed up to deal with the project demands and are now more able to take on the new case load.

Question #2: Input on Inclusionary Housing Ordinance

- A develop who has built housing in South Pasadena said that in his experience the inclusionary housing threshold of three units is too low of a requirement. He wanted to do a 4-unit project but it was too costly with the inclusionary housing requirement. The three-unit requirement encourages developers to do bigger units so they don't have to pay the inclusionary housing fee. **Program 2.m** the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints including the unit threshold, the In-lieu fees and cost of a comparable unit and how the inclusionary regulations relate to state Density Bonus law.

Question # 3: Input on likelihood of development of sites in key areas

- All attendees participated in a polling regarding the likelihood of development. The five shared sites were rated by most as either somewhat likely or highly likely to develop. The two most likely to develop were the Pavillions site and Shakers sites.
- Proposed Ostrich Farm Site 5 (Liquor Store)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
- Proposed Downtown Specific Plan Site 10 (Near Mission Meridian)

  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
  - Comments on site: The diagonal edges on Site 10 is problematic for parking. The odd shape makes it hard to design the parking layout and fit in the required number of spaces. Recommendation was to reduce the parking requirement.

- Proposed Downtown Specific Plan Site 14 (City-Owned Parking Lot and Single-Family Residence)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
- Proposed Downtown Specific Plan Site 16 (Shaker's site)
  - Voted highly likely to be developed for mixed-use or residential only develop by the developer panel.
  - Comments: Allowing for higher height limit would be helpful on this site since it's near transit (near the Freeway).
- Proposed Downtown Specific Plan Site 21 (Pavillions)
  - Voted highly likely to be developed with mixed-use or residential-only develop by the developer panel.

Workshop 7 & 8

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

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

Specific comments from community members that stopped by the booth included:

- Support for taking time for the community outreach on the height limit ballot measure
- Support for more housing and getting away from the exclusionary past of the City.
- Property owners in support of the housing overlay that will allow more housing on their property
- Support for modular ADUs and for pre-approved standard plans that residents could utilize (in line with Program 3.f in the draft HE)
- Opposition to any height limit cap revision and to more density
- Support for more height for residential only
- Support for allowing higher and denser development in Downtown near the L Line station, provided the architecture and design meet City standards.

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

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

After the presentation, the public was invited to ask questions and share comments. The meeting had approximately sixteen participants, including nine in-person and seven on Zoom. Thirteen participants spoke. The following summarizes these questions, comments and staff responses:

- Resident asked if there was a density that HCD would assume that anything over a certain density would be affordable.
  - City staff responded that there is a minimum density that sites need to be able to meet in order for the site to be suitable for affordable housing.

- Resident, who self-identified as former city planning director, stated that the existing General Plan maximum density of 24 du/ac is "ridiculously low." The maximum density could be raised to 36 du/ac without increasing the city-wide height limit. Supports removing the height limit in the proposed Downtown Specific Plan area.
  - City staff thanked the former planning director for his comments.

- Since sites less than half an acre aren't suitable for affordable housing, and a lot of the identified sites have been removed, it's not clear which sites the City is proposing to increase the density on to make up for the shortfall in units.
  - City staff explained that the City is taking two simultaneous paths to meet the City's housing needs. One path is to identify specific sites that the City expects will be redeveloped into housing during the planning cycle. The second path is to increase the allowable density in a large area of the city, focused on the proposed Downtown Specific Plan area, where some percentage of the sites throughout the entire area will be redeveloped without identifying which specific sites those will be.

- Could the City provide an overview of the terms of the stipulated judgement resolving the existing housing element lawsuit against the city?
  - The City Attorney provided an overview of the terms of the judgement: the City must submit a revised draft of the Housing Element to HCD no later than September 15, 2022; the City must initiate a ballot initiative to remove or revise the City's height limit, and if it fails do a mid-cycle review and update of the Housing Element to meet the City's housing needs under the existing height limit; until the Housing Element is adopted, the City will not object to Housing Accountability Act projects that are proposed; and a requirement to prepare more detail regarding the applicability of the identified sites in the site inventory.

- Where in the hierarchy of land use laws does the voter approved height limit fall?

  - City staff responded that a voter approved initiative supersedes both the General Plan and Zoning Ordinance of the city, and that if they conflict the voter approved initiative prevails. However, if the voter approved initiative is in conflict with State law, then the State law supersedes the voter approved initiative. Since South Pasadena's height limit does not directly contradict State law, and because there are alternative ways for the City to meet its requirements under State law that do not require the repeal of the height limit, it's the opinion of the City that State law cannot supersede the City's height limit.

- ADUs have been very popular in South Pasadena, what assumptions does HCD make regarding the affordability of ADUs.
  - City staff responded that the City must base its projection of the permitting of future ADUs on the number of ADUs permitted in past years, and that the City has to document rent on ADUs to take credit for the affordability of those new units in its annual report to HCD.

- Concerned about increasing the height in the downtown area, can the City look at increasing the density of areas outside of the downtown area instead of increasing the height. Also concerned about mixing condos and multi-unit developments in the single-family residential areas.
  - City staff responded that raising the density and height in the downtown area would allow for the necessary growth while preserving most of the city's existing neighborhoods. There is a choice the City and community needs to make about where these new units are going to go, and the direction most members of the community have provided is to increase the density in the downtown area since it's close to transit and walkable.

- What is the proposed new height limit?
  - City staff responded that currently there is not a specific height that the City is aiming for, but instead that the height needs to be tall enough to allow for the density anticipated by the Housing Element given the other development constraints imposed by the City's zoning. Furthermore, this is a question that the community will need to help answer, and is part of why the City is holding this community meeting and will be holding future community meetings on the topic.

- Can the City take credit for the affordability of ADUs that have been built previously, or only those built during the planning period?
  - City staff responded that the City can only take credit for the affordability of ADUs built during the planning period.

- On the General Plan and Mission Street Specific Plan committee during the 1990s, the goal was to downzone the city to reduce the projected population from over 60,000 as proposed in the previous General Plan from the 1960s to something more "reasonable." The City should be working to fight its RHNA allocation because accommodating that many new units will ruin the city as a small town. With the proposed changes, the added traffic will make the main thoroughfares of the city impassable.
  - City staff responded that the goal is to provide the community options for how to accommodate the city's housing needs.

- The City needs to do more public outreach, including making hard copies of the Housing Element and other planning documents available in hard copy at the public library, and to include visual aids in the documents that illustrate the different densities that are being proposed.

  - City staff responded that the City is doing outreach, such as this meeting, and that visual aids are included in the Housing Element to illustrate the proposed densities. Hard copies of the drafts have been available at City Hall and the Library, and as future drafts are released, they will also be made available in hard copy at these locations.

- Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing?
  - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

- What are the medium- and high-density residential densities in the draft General Plan?
  - City staff responded that the draft General Plan has not been finalized yet, but that it is expected that a public review draft will be available by the end of September.

- What are some creative solutions and options for meeting the housing needs other than building new units, such as converting existing family-owned apartments to low-income units?
  - City staff responded that the City cannot count existing units to meet its RHNA needs. Most of the time, existing family-owned apartments are the least expensive housing options in a community, so by converting those into deed-restricted Affordable Housing, it eliminates naturally occurring affordable housing and does not create any additional housing opportunities for the community.

- Concerned about the sustainability of the continuation of building new homes.
  - City staff responded that the solutions to our climate crisis and the solutions to our housing crisis are the same: building more housing near transit and building walkable, transit served communities.

- City has an ordinance that puts a constraint on demolishing buildings that are more than 45 years old.
  - The City does have a historic preservation ordinance that may require structures 45 years or older not identified as a cultural resource to obtain a Certificate of Appropriateness for demolition or alteration from the Cultural Heritage Commission (CHC). However, it is important to note that these projects taken to the CHC for demolition have not been denied since the ordinance was adopted. Therefore, the ordinance does not appear to be a constraint.

- What are the consequences of the City being out of compliance of the Housing Element Law?
  - The City Attorney responded that a lawsuit can be brought against the City where a judge could remove the City's land use authority and/or impose fines. The City was sued, and has a stipulated judgement that requires the city to take certain actions, described above, but does not remove the City's land use authority or impose punitive fines on the City. Additionally, the State Attorney General can sue the City and impose fines on the City, but since South Pasadena is working towards completing its Housing Element it is not expected that the Attorney General will sue the City and instead will focus on cities that are not working towards adopting a compliant housing element.

- Have we looked at other cities that have certified housing elements to see how they meet their housing needs?
  - City staff responded that the City is looking at the certified housing elements, but that many cities have significantly different conditions that make it easier to achieve a compliant housing element.

Workshop 9

Community Outreach at the Social Services and Social Justice Forum

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

Surveys

The City conducted public outreach via two online community surveys. Each of the surveys was launched prior to public workshops for the Housing Element Update.

Survey 1 – May - September 2020

The first survey was made available on the City's website in May 2020 and was open until September 2020 to allow for a long time period for input to be provided due to the impacts of the COVID-19 pandemic. The link to the survey was also sent to everyone who registered for Workshops 1 and 2. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to find out a little bit about their perspective on housing issues. A total of 33 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about housing and the General Plan Housing Element. This survey should take about 2 minutes.

1. *Are you:*
   a. *Renter in South Pasadena*
   b. *Property owner in South Pasadena*
   c. *Other*

2. *Have you heard of the Housing Element of the General Plan?*
   YES or NO
3. *Have you heard of the regional housing needs assessment or RHNA numbers?*
   YES or NO
4. *Please rank the following issues in order of importance to you.*
   a. *Production of additional housing stock*
   b. *Preservation of existing housing stock*
   c. *Creation of economically sustainable neighborhoods*
   d. *Providing a diverse cost range of housing opportunities*
5. *Has housing affordability impacted you or your family personally?*
   YES or NO
6. *Have you participated in the City's General Plan Update process?*
   YES or NO

The following summarizes the responses to the survey:

1. Are you a renter, property owner, or other?

   Approximately 60 percent of respondents were property owners, 35 percent were renters, and 3 percent chose other.

2. Have you heard of the Housing Element of the General Plan?

   Three quarters of respondents had heard of the Housing Element, one quarter had not.

3. Have you heard of the regional housing needs assessment or RHNA numbers?

   Approximately 80 percent of respondents had heard of RHNA, 20 percent had not.

4. Please rank the following issues in order of importance to you?

   Respondents ranked the four options in the following order from highest to lowest priority:

   - Providing a diverse cost range of housing opportunities
   - Creation of economically sustainable neighborhoods
   - Preservation of existing housing stock
   - Production of additional housing stock

   It should be noted however that most respondents chose all four options as priorities.

5. Has housing affordability impacted you or your family personally?

   Approximately 55 percent of respondents had been impacted personally in terms of housing affordability, approximately 45 percent had not been impacted.

6. Have you participated in the City's General Plan Update process?

   Approximately 58 percent of respondents had previously participated in the General Plan Update process, approximately 25 percent had not.

Appendix B

Survey 2 – September - October 2020

The second survey was made available on the City's website in September 2020 and was open until October 2020. The link to the survey was also sent to everyone who registered for Workshops 3 and 4. The main purpose of the survey was to identify the housing strategies people would like to learn about and discuss at Workshops 3 and 4. A total of 17 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about how the City of South Pasadena can achieve its Regional Housing Needs Assessment (RHNA) allocation for the 2021 Housing Element Update. This survey should take about 2 minutes.

During the workshops on September 23rd and 26th, 2020 we plan to discuss the following topics that are options for the City to address its RHNA allocation:

- *Effort to Appeal the City's RHNA number*
- *Options to Address the RHNA and Receive a Certified Housing Element*
    a. *Programs and strategies for an aggressive program to produce more affordable Accessory Dwelling Units (ADUs) in South Pasadena*
    b. *Options for zoning changes to increase density (number of housing units allowed on a property)*
        i. *Allowing more ADUs to be built on a single-family property*
        ii. *Allowing multifamily housing buildings to be built in single-family neighborhoods*
        iii. *Allowing housing to be built in areas that do not currently allow residential development*
        iv. *Increasing building heights and densities to allow more housing units to be built in mixed-use areas in town and/or just on specific sites*

1. *Have you participated in the City's previous Housing Element workshops?*
2. *Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?*
3. *Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target? Choose as many as you agree with.*
    a. *Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units*
    b. *Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development*
    c. *Increased density in specific areas of the City*
    d. *Increased height in specific areas of the City*
    e. *Increased density and height in specific areas of the City*
    f. *Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood*
    g. *Other*
4. *What other topics/options would you like to see discussed at these or future workshops?*
5. *What questions do you have about the RHNA or 2021 Housing Element Update?*

The following summarizes the responses to the survey:

1. Have you participated in the City's previous Housing Element workshops?

   41 percent of respondents said yes, 59 percent said no.

2. Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?

   35 percent said yes, 41 percent said no. Three people chose other and wrote in a response. The write-ins included two people who said the appeal won't work, another said don't spend any money on the RHNA appeal, and another said they don't know enough to choose yes or no.

3. Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target?

   The number of votes each strategy received is shown below from the strategies that received the largest number of votes to those that received the least votes.

   - Increased density in specific areas of the City – 9 votes
   - Increased density and height in specific areas of the City – 9 votes
   - Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development – 8 votes
   - Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood – 7 votes
   - Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units – 6 votes
   - Increased height in specific areas of the City – 6 votes

   Several write-in strategies were also proposed:

   - Convert any retail and business buildings that become vacant to residential
   - Widescale upzoning of single-family neighborhoods
   - Reuse empty commercial buildings for affordable housing
   - Increased height and density throughout the City.

4. What other topics/options would you like to see discussed at these or future workshops?

   - I would like to know what ways you guys are planning to fit the 2,062 housing units if the height limit is not changed.
   - Use of non-profit developers versus regular developers.
   - The aggressive ADU idea is an attempt to shirk the city's responsibility to build more housing. It will likely not succeed - as the state will not accept it. ADUs have been legal in South Pasadena for 3 years and there has been almost nothing built. There is little the city can do to get more "aggressive" - let alone reach the type of numbers being talked about. The City needs to allow real densities of greater than 30 units to an acre in your multifamily areas. The multifamily I've seen built has such low densities that it encourages only luxury 1,900 square foot condos.

- There is a lot of fear of change in South Pasadena. Can we help people visualize South Pasadena in a future that satisfies RHNA requirements? That might help focus energy on the choice between the options.
- Streamlined permitting process. Progressive ways to address the missing middle housing types.
- I hope to see the elimination of parking requirements to facilitate unit production and a serious discussion about inclusionary zoning.
- Adaptive reuse of commercial buildings for affordable housing.
- At the first Zoom Housing Meeting, numerous sites were presented as potential areas for development. But much of this data was based on a single conversation with the owner of the property who "said they were open to considering development." I found that rather loosey goosey. There were too many "ifs" in that scenario.
- South Pasadena, along with other towns, is bleeding commercial space. What are the options for converting some of these into work/living lofts?
- Finally, all of the development that has been greenlit in the city only offers 13 "affordable units." All development must focus on affordability or we can never come close to meeting the numbers. We know that developers don't make money on building affordable housing, so who will the city partner with to make that happen?
- What about the additional infrastructure that will be needed to support 20 percent more units and a 20 percent increase in population?
- We just came out of a 7-year drought. Where will the extra water supplies come from?
- Multiple studies in the last decade, including at Mission Meridian, have proven that transit based housing is an urban myth. It does not reduce traffic. If this plan goes forward, how will South Pasadena achieve its green Climate Action Plan goals in the coming 10 to 20 years?
- Regarding specific locations within the City to be up zoned – PlaceWorks' previous presentation at the Planning Commission did not address Huntington Drive or any area south of it.
- Even in a city as small as South Pasadena, effects of any changes will be distributed unevenly, which will produce uneven follow-on effects. I live near the Metro station and near the proposed Seven Patios project, which will create a significant traffic impact, especially on Farmer's Market days. How do any of the proposed options take into account the related structural changes that they will create?

5. What questions do you have about the RHNA or 2021 Housing Element Update?

- In what ways are you planning for the moderate and above moderate housing if you don't get the 1,000 ADUs?? What is the current zoning capacity of South Pasadena assuming the 50 units/acre for the Draft DTSP??
- In what ways is the City of South Pasadena critically thinking about progressive development, instead of just appealing the RHNA numbers?
- More information on inclusionary requirements, ADU considerations for RHNA counts, and Caltrans housing considerations for RHNA counts.
- I have some questions as to the accuracy of the predictions since they were determined pre-Covid. There are now more people moving out of the California than moving into the state.

- The increased density adjacent to the Gold Line Station under the pretense that all of these people will take the train to work in Pasadena/Downtown L.A. is a false flag. No one at the Mission Meridian Transit Village takes the Gold Line to commute. The ridership on the trains has steadily declined for three years. The few people I know who used the train to commute to Downtown Los Angeles are now driving as a precaution during Covid-19. The condos at the Mission Meridian Transit Village sold for upwards of $1.1 million in 2005. To be honest, it's highly unlikely that anyone who has paid that amount of money for a home is commuting by train. This was reported in the Los Angeles Times in 2007 and still holds true today. My council member used to ride his bike to take the train, but even he has quit doing that. He affirms that residents living at Mission Meridian are not commuting by train.
- Explain why South Pasadena never responded to the AFFH or LPFS surveys sent out by SCAG in 2018 and due back no later than April 2019. Our city's allocation now includes excess allocation from other cities who responded to the survey and saw their initial allocations reduced.
- When are you going to admit you want our city to look like Glendale, Pasadena, and Alhambra?
- Do we need to vote on these changes to the General Plan or will it be decided by the City? For instance, height increase was considered for the November Ballot, but up zoning wasn't. Who makes the decisions?
- Can we zone for/build more housing to exceed the target?
- What are resources I can consult to learn more about the RHNA process, specifically to understand how South Pasadena's RHNA number compares to that of other communities?

Hearings

City staff and their consultant, PlaceWorks, presented at multiple public hearings at different points in the update process prior to release of the public draft Housing Element.

July 21, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on July 21, 2020. The presentation covered the City's RHNA allocation, sites analysis and options for addressing the identified RHNA shortfall, options for inclusionary housing policy and ADU regulations, and potential options for increased density and height to accommodate additional housing. Information on potential changes to allowed density and height on specific sites was studied and presented. The following questions and input were received from the Planning Commission:

- Provide additional explanation of what moderate and above moderate RHNA means
- Has staff considered studying the Pavilions site?
- One consideration is changing what is allowed in single-family areas versus increasing the height limit in other areas
- Has staff looked at the stables site?
- Should think about a road diet on Monterey Road
- Consider street parking in the ADU regulations
- Could pre-approved ADUs include pre-fabricated units? It seems like they would be more affordable

- Are there precedents and incentives for converting market rate units to affordable units?
- What about the Caltrans properties?
- What about condo version to market rate then to affordable housing?
- Showing partial site redevelopment of Vons and Ralphs sites as the baseline condition with full redevelopment with density and height increases is misleading. If this is the approach needs to be supported more.
- Amount of parking provided for the precedent projects versus what would be required under South Pasadena's regulations?
- Wondering about the illustrative examples show versus the sites/areas a ballot measure to increase height would actually apply to
- Has City had conversations with the owners of all of these sites?
- Can regulations regarding height and zoning be adjusted after the Housing Element is adopted?
- Do Density Bonus units count towards the RHNA?
- Seems weird to have a ballot measure to increase height before the Housing Element.
- Will the RHNA change?
- Seems like the City would be forced to build more small units
- Makes sense to have less parking at the Gold Line Storage sites. Connect with the Downtown Specific Plan and General Plan and do that with all the 5 sites.
- Transit access to each of the 5 sites needs to be looked at
    - Ralphs site should be good, there are multiple bus lines
    - Ostrich farm site – not sure if there is sufficient transit access
- Increased density can add economic benefit/energize the area, just one edge might not make sense
- Premature for a height ballot initiative, the tail is wagging the dog
- Should fight the RHNA
- State Density Bonus – allows increased height
- South Pasadena isn't alone in facing a large RHNA increase
- The Council and the Mayor Pro Tem have personally written to and spoken with SCAG and state legislators and they aren't getting any traction on changing the RHNA
    - Alhambra – 6,000 + unit RHNA
    - San Marina – 398 unit RHNA
    - Beverly Hills – 3,096 unit RHNA
- The area a height increase applied to could be less site specific – a wider area
- More study is needed ahead of a ballot measure on height, leaning towards not recommending
- Supportive of strategic increased heights but thinks we aren't there yet, not enough time to make a decision to have a ballot measure ahead of the deadline for the general election. Not supportive of sending to City Council for November ballot
- Supportive of need to reconsider height limits
- Housing need is critical

- The consideration of height increase needs to be more thoroughly vetted, can't support at this time

Three recorded voicemail comments were received:

- First voicemail comment - SPRIG
  - Need an alternative that accommodates the RHNA within the 45-foot height limit
  - They gathered 67 signatures – don't want height increase
- Second voicemail comment
  - No height increase
  - Concerns about water, sewer, and electricity
- Third voicemail comment
  - Opposed to height-limit increase
  - Confirmed they had also submitted written comment

August 5, 2020

City staff and PlaceWorks presented to the City Council at their meeting on August 5, 2020. The presentation focused on the consideration by the Planning Commission at their July 21st meeting of recommending to the City Council to place a ballot measure to propose allowing increased height on the November ballot. Staff reported that the Planning Commission did not recommend moving forward with the ballot measure at this time. Staff also presented regarding a potential RHNA appeal by the City.

August 11, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on August 11, 2020. New analysis and information was presented about specific sites studied for potential height and density increases, following up on the presentation at the July 21st meeting. Updates included information on transit accessibility of candidate sites, parking ratios for precedent examples, and the addition of one site for consideration for potential height and density increases.

The following questions and input were received from the Planning Commission.

- Regarding Ostrich Farm Area:
  - Why not include parcels to the east of the vacant site?
  - Ostrich Farm area is appropriate, without needing to be as surgical as elsewhere
  - Need to look at how to make Ostrich Farm more of a complete neighborhood
  - Can it connect to Highland Park?

- Regarding Meridian Property:
    - Be careful to recognize historic district
    - Be careful not to overwhelm surrounding historic structures with additional height
    - Agree with sensitivity towards Meridian site
- Comments regarding sites in general:
    - Vons, Ralphs, and Ostrich Farm are good opportunities
    - Generally, site locations seem pretty smart
    - Concern about putting a lot of units in far corner of the city
    - Traffic and parking should be a top consideration
    - Traffic and parking analysis need to go hand in hand with these sites
    - Look at what State density bonus law means when considering additional heights
    - We need to build more housing
    - Presentation materials are going to be key pieces when communicating to residents
    - How much time do we have to make zoning changes outlined in Housing Element?
    - Does a height increase need to be in place at adoption of Housing Element?
    - What is required to prove redevelopment potential of a non-vacant site?
    - Question regarding ADU production target; answered that City will have to include aggressive programs
    - What does it mean if we don't raise heights? (need to explain to the public)
    - Is there a way to raise heights without going to the voters?
    - Can City get credit for units built in excess over prior Housing Element cycle?

September 8, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on September 8, 2020. The focus of the presentation was ADUs and options for supporting that housing type in the City as part of the Housing Element and ongoing City programming. Staff was specifically seeking input on update to the City's ADU zoning regulations and consideration of policies and programs to include in the draft Housing Element.

One recorded voicemail comment was received:

- City talked about ADU projection methodology at the July 21st Planning Commission meeting. Doesn't see that in the presentation this time.

The following questions and input were received from the Planning Commission:

- Will objective design standards be part of the near-term ADU ordinance update?
- Are the projected ADU numbers changing?
- Some ADU updates should be made now and maybe some later – before or after Housing Element adoption. The items to do later would be the more aggressive measures.
- Address parking problem related to ADUs
- Okay with duplex, deed-restriction ADU idea
- All were supportive of amnesty program.
    - One commissioner asked: Why does it need to be limited to non-historic properties?

- Yes, City should streamline planning and building review process
- Yes, supportive of homeowner assistance – guide to ADU development process
- Supports fee reductions for affordable ADUs
- Okay with ADU monitoring, but some concerns about staff time resources
- Okay with education and promotion around ADUs. Supportive of proactive/targeted outreach to certain neighborhoods and areas with larger lots
- Supportive of allowing two detached ADUs as long as there is enough room on the parcel for open space
- Concerned about streamlining impacts on staff workload. Should have as many standard ADU building types as possible. One-stop shop is a good idea.
- If City allowed two detached ADUs on a parcel could they require parking?
- Should include pre-fab ADU units – important for education program
- Should include costs and sources for loans in education and promotion program
    - City of Pasadena is offering two types of loans to encourage ADUs
- Careful who gets included on the list of resources (builders, etc.). Don't want to unfairly support or not support someone.
- Could tie education and promotion to streamlined approval
    - Homeowners could provide case study materials about the process, costs, how it went for them
- Could have objective criteria for which builders/others get included on the resources list

December 15, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on December 15, 2020. The presentation focused on additional design and economic analysis PlaceWorks prepared for certain sites to understand what types of housing projects would be feasible and acceptable on those sites and how changes to the City's General Plan and zoning related to density would relate to what is allowed under State Density Bonus law. The additional focused most on the Vons site.

January 26, 2021

City staff and PlaceWorks presented to the Planning Commission at their meeting on January 26, 2021. The meeting focused on the proposed Inclusionary Housing Regulations. Supporting information was presented regarding analysis of height and density on certain sites, following up on earlier meetings, in particular, the December 15, 2020, meeting.

May 26, 2021

City staff and PlaceWorks presented an update on the Housing Element process to the Planning Commission at their meeting on May 26, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the Planning Commission:

- Was the City concerned by HCD's preliminary review of some of the Housing Element sections?
- Asked about thresholds for sites analysis.
- Asked about the overlay described in Table VI-4 and details of the proposed zoning column.

- Mentioned public comment from Josh Albrektson from the previous Planning Commission meeting, not to forget it.
- What happened at the EIR scoping meeting?
- Thinks the City is being too optimistic about the analysis of the sites. Should remove small and steep single-family sites. In general, overly optimistic in all categories including ADUs, vacant and non-vacant sites.
- Multiple commissioners agreed yes, density increases are needed.
- Should ask other cities for ideas of how to meet the RHNA, need some magical solutions.
- Do City-owned sites included in the Housing Element have to be surplus?
- Does not want to include the ballfield or stables as Housing Element sites.
- Can the affordable housing production program be strengthened?
- Generally concur with strategies that were in the preliminary draft programs submitted to HCD.
- Would like another chance to review sites at the time of the public draft.
- Could there be some sort of "pre-permit program" for ADUs as a way to gauge interest in ADUs?
- Would it be possible for the planning commissioners to do a driving tour some of the sites?
- Interested in the church sites strategy.
- Likes the idea of redoing the City Hall site.
- Could the parcels by war memorial building on Fair Oaks possibly be added to the inventory?
- Can existing units be rehabilitated and counted towards the RHNA?
- Multiple commissioners said yes to the affordable housing overlay.
- Don't rule out all historic sites.
- Should increase densities in Ostrich Farm and Downtown.
- Should put increasing the citywide height limit back on the table and continue the community conversation.
- Will minimum densities be put into place?
- Raising height limits on certain properties should be considered.
- Multiple commissioners felt the sites to receive the affordable housing overlay will be competing with state density bonus in terms of incentivizing actual development. The overlay should be calibrated to produce results.
- In favor of affordable housing overlay but not as spot zoning.
- Feels the City doesn't have enough staff capacity to implement all of the proposed Housing Element programs. There is a long wait time for processing applications for ADUs. Need dedicated housing staff.
- Maybe strategy for projecting ADUs can be to project numbers annually – make more specific – year 2, year 3, etc.
- Can the parcel assemblage program work in conjunction with overlay zoning?
- They have done lot consolidation on hillside sites. There was an example of this from the previous Planning Commission meeting.
- Should spend time justifying the ADU projection number.

- Have demolitions of affordable units been an issue in South Pasadena?
- What the EIR is evaluating is a moving target, can't really finish the analysis yet.
- Please post the PowerPoint for this meeting.
- Need to get the word out to the public that the comment period is coming.
- History and context information in the Housing Element will be very helpful.
- There should be more aggressive publicity about the ADU amnesty program.
- Supportive housing for those with disabilities is needed.

October 12, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on October 12, 2021. The meeting focused on the release of the 2021-2029 public review Draft General Plan Housing Element. Public comments included:

- 95% realistic capacity because of density bonus?
- No analysis of inclusionary housing regulations?
- ADU projection numbers are too high

The following summarizes the input and questions from the Planning Commission:

- Which programs are state mandates, which are continuing from previous Housing Element? Please present this at the Oct 21st community workshop.
- Asked for clarification on state requirements regarding Senate Bill 9
- Asked for more context for regarding the level of input sought from the community at this point in the process.
- Need to explain RHNA and why the number is high.
- The Planning Commission requested an informational update at their Nov 9th meeting, including HCD comments if possible.

November 9, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on November 9, 2021. Four members of the public commented. These comments included:

- The City should have a requirement to hire local skilled workforce – both for reducing environmental/AQ/VMT impacts and for local jobs. The City of Hayward recently put this type of policy/requirement in place.
- Is the City applying for any state funding programs mentioned in the Housing Element programs?
- The ADU projection numbers are wildly optimistic.

The following summarizes the input and questions from the Planning Commission:

- Projected ADUs are only 20% of City's RHNA
- Is more than 50% of lower income RHNA being accommodated on non-vacant sites?

- Are there regional or nearby examples of projects - could any of that analysis or examples be strengthened/added to?
- The majority of the Planning Commission expressed concerns over the public's potential reaction to the rezoning and density changes included in the Draft, as well as the potential confusion about what the City is doing.
- Suggested strengthening the information in the water quality section of the Assessment of Fair Housing
- Asked for clarification about ADU track record information in the draft
- Could a program be added to close the gap between planning approvals and building permits?
- Could a program be added to work with prospective ADU applicants – ombudsman/mentor/technical assistance?
- Staffing and staff retention are critical to implementing the Housing Element programs
- Understand based on analysis presented earlier in the Housing Element project that the densities/units assumed in the HE will lead to bulkier buildings with smaller units if there is no density bonus/height increase for the project
- For rezoning, would be helpful to know what percent of the City will require rezoning?
- Agrees with public comment re: local skilled workforce and VMT reduction. Would be good for South Pasadena to have a local workforce requirement.
- Suggested more public outreach, with an emphasis on going to the people, and enhancing the site maps.
- What about the Caltrans housing?
- Some cities are fighting the RHNA
- Many of the regulations from the state in the Housing Element are impossible to meet
- Are many SCAG jurisdictions going to be in compliance?
- Sites maps could be better, add a legend/key. Note whether a site is vacant or non-vacant.
- Thinks the City has been doing a good job of getting the word out to the public about the project

November 17, 2021

City staff presented to the City Council on the public draft Housing Element at their meeting on November 17, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the City Council:

- Does the Monterey Road site (Site #3 in Appendix A) have an approved project?
- Ostrich Farm sites – what input has been received from property owners.
- Asked about the Carrow's site.
- Can the densities proposed in the draft fit within the 45 foot height limit?
- When will the aggressive ADU amnesty program happen?
- Is the City considering objective design standards to implement SB 9?
- Could SB 10 apply to only one parcel?
- Impressed with staff and the outreach that has been done to property owners. Thinks they've gone a long way toward addressing any controversy in the community.

- Amazing that there was no public comment at this meeting.
- The RHNA formula was unfair to South Pasadena.
- The Executive Director of Move LA was concerned about the RHNA approach related to High Quality Transit Corridors (HQTCs). Communities don't want HQTCs identified in the future because they will receive higher RHNA numbers because of them.
- Staff and consultants – good job addressing this complex topic.

May 10, 2022

City staff presented to the Planning Commission on the 2nd Public Review Draft and discussed the revisions made to the new draft (in person/virtual hybrid format).

July 20, 2022

City staff presented to the City Council on the HCD review letter for the 2nd Draft Housing Element.

July 26, 2022

City staff presented at the Planning Commission on the HCD review letter for the 2nd Draft Housing Element.

November 9, 2022

The City's Housing Element consultant presented at a Joint City Council and Planning Commission. The presentation included an overview of the California Department of Housing and Community Development's response letter regarding the Third Draft Housing Element, discussed anticipated responses to address the comments in the letter, and received feedback from the community, Planning Commission, and City Council on the comments and proposed responses.

February 1, 2023

The City's Housing Element consultant provided a summary of HCD's review letter regarding the 4th Draft Housing Element to the City Council and presented options for addressing remaining comments, including missing middle housing, identification of additional city-owned sites for lower income homes, increased zoning capacity along arterial corridors, and tenant protections.

February 9, 2023

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

February 15, 2023

City staff and the City's Housing Element consultant presented refined ideas for addressing remaining comments based on feedback received from the Council and community over the preceding two meetings. Staff rreceived direction from City Council and Planning Commission on how to revise the Housing Element.

Written Public Comments

Received Prior to Public Draft

The City received the following written public comments prior to the release of the Public Draft Housing Element.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 9, 2020) expressed concern over staff report indication that City does not currently allow ADUs within the Mission Street Specific Plan area. Mr. Gelfand noted that such a policy is unlawful, citing State code, GC 65852.2.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 13, 2020) expressed satisfaction with the recent Planning Commission meeting where the City Attorney confirmed that the City is required to allow ADUs in the Mission Street Specific Plan's Districts that allow residential uses. Mr. Gelfand stated that during a Planning Commission meeting, staff suggested the definition of 'public transit', under the state ADU law, is limited to major transit stops. Mr. Gelfand states that this is not true and provided a citation for ADU state law, Gov Code 65852.2(j)(10). Mr. Gelfand states that the City does not have a parking problem, it has a "driving problem". Mr. Gelfand believes that reducing parking will actually alleviate traffic. Mr. Gelfand states that parking is meaningless in consideration of citywide. high access to transit. Mr. Gelfand states that the City's proposal to count 1,000 ADU units toward its RHNA allocation is preposterous; however, the City's plan to incentivize ADU development is taken seriously. They feel it will result in a modest increase in ADU production.

Leonora Camner, Executive Director of Abundant Housing LA, and Anthony Dedousis, Director of Policy and Research of Abundant Housing LA, regarding Preliminary Sites Analysis from the July 21, 2020 Planning Commission Agenda Report (September 4, 2020). Ms. Camner and Mr. Dedousis identified major issues in the Preliminary Sites Analysis, including:

1. The report appears to treat new housing capacity (i.e. the potential for new housing) as equivalent to realistic housing production (i.e. actual new housing). This is incorrect; they are not the same thing.

2. The report contains extremely optimistic forecasts of future ADU production which are extremely unlikely to be achieved even with aggressive policies, based on recent development trends.

3. The Preliminary Sites Analysis for lower-income housing is unlikely to meet California's standards for affirmatively further fair housing.

4. By accommodating insufficient housing growth to meet the RHNA targets at each income level, the Preliminary Sites Analysis is likely to fall afoul of the No Net Loss requirement.

They conclude their letter noting that Abundant Housing LA (AHLA) published a detailed memo, "Requirements and Best Practices for Housing Element Updates: The Site Inventory", explaining the key legal requirements and AHLA's recommended best practices for housing element updates. They offer availability to discuss our concerns further, and offer recommendations for additional policies to incorporate into South Pasadena's Housing Element Update.

Dr. Josh Albrektson (via email to HCD, February 25, 2021) informed HCD that they would receive a letter from Abundant Housing LA, YIMBY Law, and others regarding South Pasadena's current Housing Elements plans. Dr. Albrektson claims the City is not following any of the rules in the HCD's

June 10th memo. Dr. Albrektson states the City is going to HCD for a review soon, so Dr. Albrektson wanted to give HCD some local knowledge. Dr. Albrektson states that the City is passing an ADU ordinance that will make it harder to build ADUs. Dr. Albrektson states that in the fire zone, they will require all ADUs to be within 150 ft of the front property line, have sprinklers, and for all garage and structure conversions the parking lot must be replaced.

Dr Josh Albrektson (March 8, 2021) provides a list of six issues he identified as "illegal" in the preliminary draft Housing Element sections, referencing a Housing Element Memo he states the City does not comply with. Theses issues are:

1. Claiming a projection of 1,000 ADUs in the Housing Element.

2. Objective design standards versus subjective design guidelines for ADUs and what really qualifies as an objective standard.

3. It is illegal to backdate an ordinance or apply it to projects that have completed a pre-application checklist. This comment related to the City's inclusionary housing ordinance and the definition of "deemed complete."

4. Inclusionary units and density bonus cannot be used to count for RHNA units in the Housing Element. The analysis MUST use the base zoning.

5. The inclusionary housing ordinance will cause a significant drop in realistic development capacity.

6. AB 1505, regarding rental inclusionary housing, commenter provided a link to an HCD 2019 memo about this law.

Dr. Albrektson concludes with stating that South Pasadena will not produce a compliant Housing Element due to not following HCD's guidelines. Dr. Albrektson states that there are more reasons other than what he listed for which he predicts HCD will reject the City's draft element.

Abundant Housing LA (March 10, 2021) references a past 2020 letter the organization sent to the Mayor and identifies five concerns, some of which are carried forward from the 2020 letter, about the City's preliminary draft Housing Element sections. The five major concerns are:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its map of best candidate sites appears to include many sites where redevelopment is extremely unlikely.

2. Planning continues to make overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies.

3. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

4. Planning indicates that the proposed Inclusionary Housing Ordinance will help the City achieve its lower-income RHNA targets without a clear assurance that this ordinance will be accompanied by adequate zoning densities.

5. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

The organization provides recommendations for each identified concern for the City to consider.

Dr. Josh Albrektson (via email to HCD, April 12, 2021) introduced himself and summarized past public comments he has provided to the City about the Housing Element. Dr Albrektson indicates when he believed the City's actions were in conflict with State housing law and/or other guidance from HCD. The time frame of his comments range from July 2020 to April 2021.

Dr. Josh Albrektson (via email to HCD, April 13, 2021) presenting items he would like HCD to tell South Pasadena regarding its preliminary draft Housing Element sections. The list of points is below:

1. ADU estimates must be realistic.

2. A 10% Low and 10% VLI inclusionary housing requirement is a significant governmental constraint to housing and that must be accounted for in the realistic development capacity calculations.

3. Realistic development calculations must include factors like topography [and existing uses meaning that]...realistic development potential for these sites ...should be much less than 50%.

4. All sites included must be realistic. Sites that are currently leasing or have no owner affirmation or city sites that require replacements cannot be included in the sites inventory.

5. All sites included in vacant land list must actually be realistically able to be developed.

6. All sites must include a realistic number of possible affordable units.

7. Provided link to own sites inventory sheet

Dr. Albrektson provides additional information in the email that generally appeared to support his initial points above and offered some new ideas, listed below:

- Development limitations, including the City's height limits and inclusionary housing ordinance are impeding development.
- Market trends indicate multifamily development interest is low
- The City offers "representative project" examples that are dated (from 2005/2017) and would not comply with current laws and are therefore not representative.
- Using inclusionary units and state density bonus is not a substitute for appropriate zoning and is specifically outlawed. What this will actually do is make it so that almost all buildings can no longer be financially viable and nothing will get built in South Pasadena.

Andrew Jarnagin (April 28, 2021) describes what he identifies are three key issues with the City's 5th Cycle Housing Element that should be addressed in the 6th Cycle. These three issues are:

1. Encourage transit-oriented development in the downtown area

2. Remove barriers to affordable housing

3. Provide data to support policy and projections

Mr. Jarnagin offered additional comments for the City's Planning and Building Department. Mr. Jarnagin concludes with questions for the City related to its capacity to support meeting RHNA targets.

Dylan Casey, Executive Director of California Renters Legal Advocacy and Education Fund, (May 5, 2021) commented on the City's ADU ordinance. Mr. Casey states that the ordinance as currently proposed presents numerous conflicts with state ADU standards. Mr. Casey claims that if the Council fails to amend the ordinance to resolve these conflicts, South Pasadena would lose the ability to apply any development standards to ADU permits, and be forced to apply only the state minimum standards. Mr. Casey states that the proposed ordinance is in violation of Gov. Code Section 65852.2, as it would be more restrictive than is permitted under state law. Mr. Casey believes that the City should embrace ADU development and consider its benefits.

Anthony Dedousis, Director of Policy and Research at Abundant Housing LA, (via email to HCD, May 5, 2021), referenced two past letters (September 2020 and March 2021) submitted to City Planning. Mr. Dedousis notes that they have not received a response from City staff and City councilmembers.

Dr. Josh Albrektson (via email to HCD, May 20, 2021) sent information about inclusionary housing ordinance affordability levels recently passed by four different cities to provide a comparison demonstrating that South Pasadena's should be lower. The comparison cities were Pomona, Alhambra, Pasadena, and San Francisco.

Andrew Jarnagin (July 26, 2021) notes that he attended the May 26th, 2021 South Pasadena Planning Commission meeting and reported that HCD's review of the preliminary draft Housing Element sections was discussed in a positive light, which oversimplified the significant changes expected of the Housing Element in order to be in compliance. Mr. Jarnagin provided comments about HCD's informal review of the City's ADU projection and sites inventory. Mr. Jarnagin states that the South Pasadena community should be prepared for a non-compliant Housing Element from HCD. He believes that elected officials and residents must be presented realistic options for RHNA numbers to assess different approaches and determine policies that best align with local desires.

The Steering Committee Members of Our Future LA (September 14, 2021) provided feedback broken down into six focus areas. The focus areas are listed below along with the major topics within each focus area:

1. Protections – tenant protections including just cause eviction protections and enforcement, rent stabilization, tenants' right to counsel, strengthen permanent tenant education, and tenant anti-harassment protections.

2. Preservation – prioritize rezoning in high resource neighborhoods, don't include rent stabilized units in the sites inventory, implement no net loss laws, institute local programs and funding sources to preserve existing affordable housing.

3. Prioritization of Affordable Housing – value capture, create affordable housing on public land, 100% affordable housing overlays including for areas zoned R1.

4. Site Capacity Assessment – likelihood uses will discontinue, realistic capacity, report on progress towards 5th cycle RHNA, include a 15-30% buffer of sites.

5. Affirmatively Furthering Fair Housing – increase concentration of lower income households in areas where concentrations are currently low, reduce concentrations of lower income households in areas of noise or pollution, reduce noise and pollution, invest in historically disinvested areas including place-based strategies, analyze patterns of segregation and discrimination, prioritize site identification in high opportunity census tracts, identify funding and programs to ensure affordable units are built, solicit input on the housing element from all socioeconomic groups.

6. Forecasts of ADU Development – should use safe harbor methodology, provide for mid-cycle adjustments, use city-specific data to forecast affordability.

Our Future LA requested the opportunity to meet with the City to address their concerns in greater detail.

Comments Received on Public Draft

Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them

due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.

- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
    c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
3. Accessory Dwelling Units
    a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
    b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
4. Zoning
    a. Allow residential to be built in areas that are zoned for commercial use.
    b. Allow flexibility in inclusionary zoning.
5. Better entitlement process and reducing barriers to development
    a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
    b. Reduce parking standards and eliminate parking minimums.
    c. Cap fees on all new housing.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.

Anne Bagasao/John Srebalus (May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds

of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

Page 2 Housing Element Letter-Public Comments-D.W. Shane May 2, 2022

support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program

will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses

to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws

and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

--

Davis White he/him

yimbylaw.org

(415) 298-0788

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing

Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs

portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page

13) https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

10A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

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

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

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Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025.

Timeline: For the last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

8. The pre-application is eliminated, effective immediately.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

12. Removal of CUP for all projects under 50 units.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

17. The FAR requirements as stated in SB 478 are implemented immediately.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

19. Private open space required for all projects changed to 75 sq ft per unit

20. Common Open Space required cut in half for all projects.

21. Removal of all requirements for how the private open space is accessed from the apartment.

22. Removal of all dimension requirements for the common open space.

23. Elimination of all open space requirements of elevation

24. Removal of all uncovered area requirements

25. Open Space, either common or private, can be on the roof of the building.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

27. Removal of all commercial parking requirements within the downtown specific zone.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

29. Single family parking requirements lowered to one spot.

30. Signage made by the city for all public parking lots. This should be done by 2025.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

34. Removal of the Public Art Fee

35. Water connection and Sewer connection should be at cost.

36. Removal of all fees for ADUs.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Comments Received during the 7-day Review Period (September 15, 2022)

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

Governor Newsom signed AB 1466 in September 2021 which mandates that racially restrictive covenants contained in any real estate deeds be removed.

https://www.clta.org/news/581830/Governor-Newsom-Signs-Bill-Requiring-Redaction-of-Unlawful-Restrictive-Covenants.htm#.YlhKDflKY2I.gmail

Find out when (the date) this action is to be completed.

Also see
https://www.kcra.com/article/newsom-signs-bill-remove-racist-language-housing-deeds/37790221#

A more detailed narrative is given in the KPBS article
https://www.kpbs.org/news/local/2021/11/18/keep-remove-racially-restrictive-covenant-attached-yourhome

A significant quote in that articles appears:

> When faced with racism, Dew said his grandparents didn't dwell on it or share it openly with their kids because they had to survive and find ways to thrive, "to be stronger than what society makes of you."

> He understands why his elders felt that way, but he also knows that when we avoid the hard truths of history, they are often erased.

as well as here

"You see it a lot in NIMBYism," said Nancy Kwak, a University of California, San Diego historian. "People are pushing back against changes that would make a neighborhood more accessible, so a really simple example is more affordable housing."

Kwak says when San Diegans talk about property values and things like "I earned this house" or "this is something that I deserve," she hears the same logic that was used in the past to defend segregation.

Although such statements aren't overtly racist, many homeowners' perceived right to control who can and can't live near them helps maintain the inequities embedded in the current housing system, say Kwak and others.

"Make no mistakes about it, yes the covenants are gone, but the zoning took its place and it's been wildly effective," said Ricardo Flores, executive director of LISC San Diego, a local nonprofit committed to affordable housing in the region.

With more than half of San Diego's residential areas zoned for single-family homes, Flores wants to see higher density housing built in these areas.

"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."

As well as this pivotal language that brings us back to the argument about "affordable housing" initiatives:

> The same mindset that gave rise to racial covenants a century ago was on display during the 2020 presidential election when former President Donald Trump made "protecting the suburbs" for white people a key plank in his campaign.
>
> Speaking to a crowd of supporters in Midland, Texas in July 2020, Trump drove the message home.
>
> "People fight all their lives to get into the suburbs and have a beautiful home," he said. "There will be no more affordable housing forced into the suburbs."
>
> A month later, he and Ben Carson, then Secretary of the U.S. Department of Housing and Urban Development, penned an op-ed in the Wall Street Journal entitled, "We'll Protect America's Suburbs."
>
> The tagline read: "We reject the ultraliberal view that the federal bureaucracy should dictate where and how people live."

<u>The hidden history of racism in San Diego deeds</u>

Buried in the deeds of homes and subdivisions across San Diego County are racially restrictive covenants that serve as stark reminders of the region's racist past.

> Without mentioning race, Trump clearly painted a picture of an imagined white-suburb under attack from "outside" forces that would change the neighborhood and perhaps even the value of one's home.
>
> Across the country and in San Diego suburbs have become increasingly diverse, but in this case, many viewed the use of the word "suburb" as a euphemism for "white."
>
> While racism is just one of a number of reasons why California remains mired in an affordable housing crisis, experts argue it's important that the history of housing discrimination remain front-and-center in our present-day debates.
>
> Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."
2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. *Permit Streamlining Act provision requiring completeness determination within 30 days*
2. *Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has*

more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

> "The first three objectives of the Land Use Plan were stated as:
>
> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

> *" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We*

are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership.

However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

Tenant Protections,Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities.

Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

Maintaining Affordable Housing Inventory

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved

this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Elizabeth Anne Bagasao (September 14, 2022)

SPTU would like to add that the Third Draft Housing Element does not go far enough to support and assist low income and moderate income residents who live in South Pasadena today. The City has an opportunity to do more for these residents especially tenants with the Housing Element. Please take the opportunity to protect existing tenants and keep this individuals and families stable in our community.

Sincerely ,

Anne Bagasao
Sent from my iPhone

Comment: Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

- **How addressed:** The City's Inclusionary Housing Ordinance is mandatory for projects of a certain size, unlike the option to take advantage of state density bonus law. In addition, certain incentives are provided under the Inclusionary Housing Ordinance if applicants comply with objective design standards.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

- **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

- **How addressed:** Additional information about the Inclusionary in-lieu fee study that the City has been conducting has been included in this draft in Section 6.4. Program 2.i in Section 6.8 commits the City monitoring the effectiveness of the Inclusionary Housing Ordinance annually and revising the ordinance if needed to improve its effectiveness at producing affordable housing units.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

- **How addressed:** ADU building permit approvals in the City continue to increase and permit processing times have decreased. No revisions have been made in response to this comment.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
    - **How addressed:** This type of program is required by the state for inclusion in the Housing Element. If any deed-restricted affordable housing is created during the planning period, the City will implement this program related to those units.
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
    - **How addressed:** Revisions have been made to Program 2.a to provide more certain timing for program actions.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
    - **How addressed:** Comment noted.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
    - **How addressed:** According to LACDA, there were 10 vouchers in use in South Pasadena in 2021. Revisions were made to Program 2.d to increase outreach to encourage use of vouchers in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
    - **How addressed:** Most of the sites included in the Housing Element that are proposed to received the Affordable Housing Overlay only allow lower densities currently. No revisions have been made in response to this comment.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
    - **How addressed:** Program 2.l has been substantially revised since the last draft of the Housing Element.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
    - **How addressed:** An additional incentive has been added to Program 3.d along with more detail about program timing and implementation.

- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
    - **How addressed:** The City processing time for ADUs has decreased in recent months. The applications received and building permits approved for ADUs has continued to increase substantially during 2021 and early 2022.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
    - **How addressed:** Comment noted.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
    - **How addressed:** Comment noted. The City has already made progress implementing Program 3.l which is noted via revisions to the program in this draft.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
    - **How addressed:** The City took action by urgency ordinance to establish objective standards for SB 9 in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. Revisions have been made to Program 3.m with this updated information.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.
    - **How addressed:** No revisions have been made in response to this comment.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

- **How addressed:** Refer to earlier response related to the Inclusionary Housing Ordinance.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the

scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

- **How addressed:** See earlier responses.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

- **How addressed**: The City Hall site has been removed from the sites inventory in this draft.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.
    - **How addressed:** The City has continued to reach out to property owners about interest in development of sites in the inventory. Additional information has been added to Appendix A as applicable.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.
    - **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.
    - **How addressed:** See earlier responses regarding ADU production.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.
    - **How addressed:** Revisions have been made to Section 6.6 and Appendix E, however the City continues to rely on the SCAG affordability analysis as it is the best data available.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

- **How addressed:** See earlier response regarding monitoring of the effectiveness of the Inclusionary Housing Ordinance.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.
    - **How addressed:** Section 6.4 Fair Housing Assessment has been substantially revised since the last draft to address comments received and to address a new state law AB 1304 that went into effect since the previous draft was released.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

- **How addressed:** No revisions have been made in response to this comment.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
        - **How addressed:** Historic exclusionary practices occurred throughout South Pasadena. Rezoning to address housing needs will address all income categories and will take place in areas of the City that are high resource.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
        - **How addressed:** No revisions have been made in response to this comment. However, revisions have been made to Programs 1.c to address the need for tenant protection in addition to Program 1.d which was already included in the draft Housing Element.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
        - **How addressed:** The City's Inclusionary Housing Ordinance was adopted in 2021. Part of its intent is to create more homeownership opportunities for lower income residents or those who would like to become residents of South Pasadena who have historically been excluded. In addition, Program 5.c has been added to this draft to support inclusion and to remove racially restrictive covenants from property deeds citywide.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback

requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.

- **How addressed:** Zoning work called for in Program 3.a addresses this comment. Revisions have been made to that program and to Section 6.4 to address constraints associated with existing development standards.

b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.

- **How addressed:** The City is committed to complying with state no net loss statute and has included as many suitable sites as possible that can be analyzed to be adequate. The number of sites included in this draft exceeds the City's RHNA. Residential development will be allowed on a substantially larger number of sites once the General Plan, DTSP and associated zoning changes are complete.

c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.

- **How addressed:** Housing regulations statewide and locally in South Pasadena have changed significantly in the last two years including related to ADUs and with the adoption of the Inclusionary Housing Ordinance. Basing likelihood of development for the 6th cycle on the 5th cycle housing unit development doesn't make sense in light of these changes.

3. Accessory Dwelling Units
   a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
      - **How addressed:** Programs 3.g and 3.h address this comment.
   b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
      - **How addressed:** Programs 3.g, 3.i, and 3.k address this comment.
4. Zoning
   a. Allow residential to be built in areas that are zoned for commercial use.
      - **How addressed:** Sites currently zoned for commercial use are proposed to receive the Affordable Housing Overlay or to have their base General Plan land use and zoning changed in order to address the City's RHNA.
   b. Allow flexibility in inclusionary zoning.
      - **How addressed:** The City's Inclusionary Housing Ordinance allows a variety of options depending on the project type and whether an applicant chooses to comply with the objective design standards in the ordinance.
5. Better entitlement process and reducing barriers to development
   a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
      - **How addressed:** The sites rezoned to address the lower-income RHNA as called for in Program 3.a of this Housing Element will allow projects with 20 percent affordable units ministerially. Other projects are eligible for ministerial review under state law.
   b. Reduce parking standards and eliminate parking minimums.
      - **How addressed:** Program 3.a calls for the city to evaluate parking requirements as part of the DTSP and zoning amendments to implement the Housing Element.
   c. Cap fees on all new housing.
      - **How addressed:** No revisions have been made in response to this comment.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.
    - **How addressed:** No revisions have been made in response to this comment.

Anne Bagasao/John Srebalus ((May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

- **How addressed**: The City held the following meetings to gain additional input on the draft Housing Element. #1 Public Workshop on October 21, 2021. #2 Developer Forum on August 15, 2022. #3 Community Outreach at South Pasadena Farmer Market on August 18, 2022. #4 Community Forum and Informational Workshop on August 20, 2020. Comments received at this meeting have been included in Appendix B.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

- **How addressed:** The normal operation of the City was significantly affected by the COVID19 pandemic, resulting in the closure of City offices, as well as financial challenges for the City. This created new situations with which the City had to contend with, and at the same time address the housing element preparation in a challenging new work environment. We apologize for any impact that posed on SPTU and other participants. The immediacy of the health issues became a priority, but the State did not authorize any extensions of the housing element timeframe, and a small staff struggled to attend to both efforts. As the City pivoted to virtual meetings and events, outreach efforts persisted. The web page contains an opt-in mailing list link, and both respondents have taken advantage of that opportunity and have been receiving emails from housingelement@ on a regular basis informing about related events, meeting or milestones. City staff has always been open to suggestions for participation but is not aware of any offer to provide information from the respondents.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

- **How addressed:** The comment appears to reference issues that occurred two years ago, with significant communications, outreach meetings, public meetings, and plan amendments since. Both respondents are included in the email list that regularly receives information. As the CDD employees referenced in this comment (Joanna Hankamer and Margaret Lin) are no longer at the City, current staff is not aware of the 9/30/2020 email and how it was followed up at that time. We disagree that ensuring that SPTU was at every meeting is without excuse or the responsibility of the City. As respondents were included on the mailing list and staff had communications with SPTU, significant efforts were made along the way to include the commentor.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

- **How addressed**: The City held 7 public workshop, a developer forum and conducted an online community survey in addition to regular updates at the Planning Commission and City Council to keep the community engaged and updated on the Housing Element update process.

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

- **How addressed**: The commentor appears to clarify that 10% of the members at the Fall workshop were members of Abundant LA. This cannot be verified, and is not a group affiliated with the City. When a meeting is open to the general community, the City cannot control its participation. All are invited to attend. Ultimately the proposed housing element policies are developed based on a number of factors, including State law, HCD guidance, planning principles

and public comment. The housing element team did its best to use the input received from all, whether in large or small numbers.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

- **How addressed:** Consultation with individuals outside of public fora is not prohibited and remains a valuable way to understand community concerns. Current staff is unaware of this meeting and its contents. The parties the commentor references have continued to provide comments during the evolution of the housing element drafts, and remain engaged in public dialogue.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

- **How addressed:** All agendas for public meetings were posted in compliance with the Brown Act. The dates and times stated would comply with the Brown Act. As Ms. Hankamer is no longer with the City, we have no further information about this event.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

- **How addressed:** The City attempted to keep the public informed of processes and to provide opportunities for input given the resources available to it. While more potentially could have been done in the past to encourage more involvement, we are unaware of any noticing that did not meet applicable codes. Due to extremely high staff turnover during part of 2021 direct outreach to certain groups was unable to be completed. It appears that those groups are now well engaged and able to participate in the remainder of the process. Their comments on the content of the element are well taken.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant

difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: Program 3.f, Allow and Facilitate ADUs, Program 3.g, Monitor ADU Production and Program, Program 3.h, Back up to Address Shortfall in Anticipated ADUs and Program 3.i, ADU Amensty Program have all been updated to address HCD comments and provides a realistic path for the incentivizing the production of ADUs to meet the City's RHNA.

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We

stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

- **How addressed:** The commentor's frustration with the state mandated system is noted, and in receiving a RHNA that is challenging in the context of South Pasadena's small area and built-out character. The City explored all options in appealing the allocation when that opportunity was offered, but recent court decisions have made it clear that further legal action on the allocation is not available. Some jurisdictions have posed challenging the statewide basis of the RHNA allocations, but the City has not chosen to proceed in that manner. The City has been actively working toward complying with the complex web of new requirements and the RHNA allocation in order to adopt a compliant housing element as is required under the law.

GENERAL COMMENTS

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

- **How addressed:** Thank you for your comment.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

- **How addressed**: Program i.e. - Environmental Health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino.

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

- **How addressed:** Thank you for your comments climate change will be addressed in the updated General Plan.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

- **How addressed**: Program 2.b Affordable Housing Production identifies that the City will establish a Housing Divisions to help fund and build affordable units on sites in higher-income neighborhoods to facilitate housing mobility.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

- **How addressed:** The commentor's statement is noted.

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

- **How addressed:** SB381 provides a way for housing currently owned by the state to be put into use again. It allows the City to be part of the process to ensure that such housing is made available. The City has chosen to move forward with evaluation with each eligible property on

a parcel-by-parcel basis. The housing element does not mandate that any one parcel be accepted by the City, let alone that all do. The housing element does not, nor can it, amend the provisions of the state law created by SB 381. The housing element creates a program to proceed under the SB 381 process. The housing element recognizes that these parcels are an important part of how the city will address its housing needs. However, it does not mandate and outcome on any specific property at this time.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

- **How addressed**: Thank you for your comments.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

- **How addressed:** Thank you for your comment.

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

- **How addressed**: See response above.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

- **How addressed:** The commentor appears to be addressing concerns about retaliatory actions by landlords against tenants who complain about substandard living conditions. Such retaliatory behavior by landlords is illegal under state law. The city supports challenging such unlawful behavior with referrals to the Housing Rights Center (HRC). These efforts are addressed through Program 5.a.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

- **How addressed:** Thank you for your comment.

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

- **How addressed**: The commentor's position regarding a past project is noted. The data evaluated from CalEnviroscreen 4.0 showed that South Pasadena had cumulative scores for air pollutants below the thresholds for further action. Parcel level site analysis is done at the time of individual project evaluation, not at the housing element level. The analysis performed did show a threshold for further analysis for water contamination. Program 1.e was included to address the water contamination issues. The city has already begun to address the water contamination issues through remediation activities, seeking reimbursement through legal action against responsible parties, and continued monitoring of water quality. These are addressed through Program 1.e.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

- **How addressed:** Thank you for your comment, please check back with the City's Virtual Planning Desk to find out about housing project applications.

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

- **How addressed**: Program 2.h has been updated to address HCD comments.

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

- **How addressed**: Program 2.j has been updated to address HCD comments.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open

space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

- **How addressed:** Implementation of a City-owned affordable housing sites inventory will occur after adoption of the Housing Element. Please check back with the City after Housing Element adoption for status updates of this program.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

- **How addressed:** This program is required due to the RHNA allocation to the City. It is being revised, and will demonstrate compliance with State law, including efforts to move toward objective standards and non-discretionary processes for housing.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

- **How addressed:** Parcel level zoning detail is not required for approval of a Housing Element. The zoning for particular parcels follow the policy level determinations under the Housing Element. Pursuant to Government Code section 65754(b), City's zoning code is required to be completed within 120 days after the Housing Element has been amended by the City Council.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that

residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

- **How addressed:** Please refer to California Government Code Section 65915(c)(3).

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

- **How addressed:** Program 3.d has been updated to address HCD comments.

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

- **How addressed**: Short-term rental analysis will be included in the City's General Plan update.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

- **How addressed:** Jurisdictions are not required to adopt or evaluate SB 10. The timeframe stated for examining SB 10 is to allow sufficient time for analysis and community outreach should the City decide that its provisions would be beneficial for housing production.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

- **How addressed**: BP refers to Business Park Zone.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the

Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

- **How addressed**: Program 4.a includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

- **How addressed**: Program 4.b includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

- **How addressed**: California Senate Bill 35 (SB-35) was signed by Governor Jerry Brown on September 29, 2017 and was effective January 1, 2018. SB-35 applies in cities that are not meeting their Regional Housing Need Allocation (RHNA) goal for construction of above-moderate income housing and/or housing for households below 80% area median income (AMI). SB-35 amends Government Code Section 65913.4 to require local entities to streamline the approval of certain housing projects by providing a ministerial approval process. Please refer to the Government Code Section 65913.4 for more information.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

--

Davis White he/him

yimbylaw.org

(415) 298-0788

- **How addressed:** The City plans to review the SB9 urgency ordinance adopted in December 2021. Such review will allow for review of the standards noted and an implementation process to be addressed. Although this process has been delayed due to other department priorities, a revised ordinance will be developed in consideration of more recently issued comments and interpretation of SB9's provisions.

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

- **How addressed:** Sites included in the Housing Element must allow for and be suitable for residential development. Inclusion in the Housing Element is not a guarantee of residential units being built on a site.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in

relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

- **How addressed:** All APNs ending in 900, 901, 904, and 905 have been removed. APN 5308032902 has also been removed. 5312016015, 5312016014, 5301028036, 5301028035, 5301028034, 5301028054, 5301028053, 5301028052, 5301028051, 5301028050, 5301028049, 5301028055, 5306006024, 5306006025, 5306006053, 5306006048 have also been removed because they would have to have the road developed.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

- **How addressed**: Ralphs and Vons have been removed from the inventory and Pavillions remains included and is counting the parking lot and not the whole building.

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

- **How addressed**: Only the parking lot portion of Pavillions is being included in the land inventory. Development would include ground floor parking and residential above.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

- **How addressed:** This parcel is 2.73 acres and owned by the City. The southern portion of the parcel is not underneath the overhead lines. The 15 units assumed for this site were anticipated to be able to be developed on this southern portion of the site.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

- **How addressed**: This site was removed from the inventory. Appendix A says the parking lot doesn't provide required parking for the commercial uses to the west meaning that parking doesn't address parking spaces required to be provided by the City.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

- **How addressed**: This site was removed from the inventory.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

- **How addressed**: From Appendix A: "Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services."

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

- **How addressed:** This site is a city owned site and the current CIP includes a comprehensive assessment of City-owned facilities that are be suitable for relocation of the public works yard, in order to vacate the property for an affordable housing project. The City will remediate any environmental constraints on this site prior to development for residential.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications

with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

- **How addressed**: The commentor's statements regarding the request to produce documents are disputed by the City. The City endeavors to comply with all PRAs through a process monitored by the Office of City Clerk. The city is unaware of any outstanding requests from the timeframe noted, and has provided all non-exempt, responsive documents to the respondent in this context in the city's possession. Since this comment, the city has responded to several other PRA request from the commentor.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and

italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page 13)

https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

- **How addressed:** The sites included in Table VI-44 that are on slopes are all on slopes less than 20 percent and are developable in accordance with the City's hillside ordinance. Additional detail about projects approved on slopes in included on Page 168 in blue highlighting.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** This site was removed from the inventory.

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** The Rite Aid sites has been removed from the inventory.

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed**: Program 2.e has been updated to address HCD comments.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

- **How addressed**: The City will comply with state ADU regulations and coordinate with. local fire and safety requirements for allowing future ADUs.

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

- **How addressed**: Thank you for your comment.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

- **How addressed**: The ongoing evaluation of CIP needs and the action taken on May 23, 2022 does not negate the program in 3B to pursue transportation facilities for people without vehicles.

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

- **How addressed:** The particular project made reference to on May 23, 2022 has a long history associated with it and the Council used their independent judgment as to *that* location, not as to bike lanes in general as the comment would suggest.

  The bike plan is a more accurate reflections of the city's commitment to multimodal transportation, and is properly referenced in other elements of the General Plan, rather than the housing element. It is included in the draft GP due to be released soon.

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

- **How addressed**: This site was removed from the inventory.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

- **How addressed:** Site 21 was removed from the sites inventory. Site 20 remains included due to the current renovations being minor in nature and would not preclude redevelopment of the sites. In addition, the only portion of Site 20 being counted is the parking lot and redevelopment of the parking lot would include ground floor parking with residential above. It was also stated by participants at the Developer Forum on August 15, 2022 that the City has sufficient parking and should reduce parking requirements where feasible.

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

- **How addressed:** Program 3.m requires the City to develop guideless for SB 9 units by December 2022. There are no SB 9 units being counted towards meeting the City's RHNA.

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

- **How addressed:** That is correct.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

- **How addressed:** In March 2022, the City Council modified its lease with the South Pasadena Theatre Workshop so that it would be a month to month lease to allow for the future development of the City-owned Site 14 without the constraint of a long-term lease.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

- **How addressed:** Site 9 is owned by the City and the unit assumptions were updated to address HCD comments.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

- **How addressed**: These sites inventory has been updated to reflect realistic capacity.

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

- **How addressed:** ADU assumptions have been updated to address HCD comments in Table VI-46.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

- **How addressed**: ADU affordability analysis has been updated on Page 231 with additional survey of ADU costs.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

- **How addressed**: Thank you for your comment.

0A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

- **How addressed**: Program 3.a requires the City to rezone to meet the City's RHNA requirement.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

- **How addressed**: The City has included Program 3.n – Zoning Changes, the City will review and revise development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will need revising include height limits, open space standards, parking requirements including variances and findings for design review.

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

- **How addressed:** The City is unaware of delays in this project attributable to the City, its staff, or its codified processes. The Mission Bell project has been moving through B&S, with many rounds of corrections to the developer-provided plans needed to get the plans to comply with building code. There is also delay related to their electrical connection (Edison), again as a result of developer design issues regarding compliance with state codes rather than the City code or staff related issues.

  Published comments from various news sources often do not have the full picture of what has transpired. The ability to address that record here is appreciated.

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

- **How addressed**: "Program 2.m – Update Inclusionary Housing Regulations.

Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

- 10 unit threshold
- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

- **How addressed**: The City will update the Inclusionary Housing Ordinance as described in Program 2.m above.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

- **How addressed:** The City held a forum with local developers on August 15, 2022 to discuss development constraints, including the City's Inclusionary Housing Ordinance. In attendance were numerous developers that have a history of working in South Pasadena or who are currently processing projects in the city, including Victor Tang. The Inclusionary Housing

Ordinance was not identified by the developers in attendance as a general constraint, but was identified as a constraint for projects less than five units.

Program 2.m, Update Inclusionary Housing Regulations requires that the City revise its Inclusionary Housing Ordinance to ensure that it is not a constraint for future development.

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

- **How addressed:** See above response.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

- **How addressed:** The commentor's position and opinion is noted. There is a record of the outreach efforts that were made over the past two years. As noted in Appendix B, prior to the release of the previous public review draft of the Housing Element, the City held public workshops on:
  - May 30, 2020;
  - June 2, 2020;
  - September 23, 2020; and
  - October 21, 2021.

  In addition, the City held the public hearings on:
  - July 21, 2020 at Planning Commission;
  - August 5, 2020 at City Council;
  - August 11, 2020 at Planning Commission;
  - September 8, 2020 at Planning Commission;
  - December 15, 2020 at Planning Commission;
  - January 26, 2021 at Planning Commission;
  - May 25, 2021 at Planning Commission;
  - October 12, 2021 at Planning Commission;
  - November 9, 2021 at Planning Commission; and
  - November 17, 2021 at City Council.

  During this time period, the City was operating under and emergency declaration due to the COVID-19 pandemic, which prevented most of the meetings from being held in person and required them to occur online.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

- **How addressed:** Appendix B has been updated to include public comments received on the draft Housing Element and responses to comments in the draft Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to

develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

- **How addressed**: Vons and Ralph's grocery stores were removed from the inventory. Pavillions remains on the inventory and only the parking lot is being included in the inventory and any future development would include ground floor parking and residential above.

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

- **How addressed:** The Rite Aid site was removed from the inventory.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels. The sites inventory has been updated to reflect this information.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

- **How addressed**: This site was removed from the inventory.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

- **How addressed**: The City made contact with the property owner and they support rezoning for future multi-family development.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of

being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

- **How addressed**: Sites previously listed on Harriman Ave have been removed from the inventory.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

- **How addressed**: The City has included Program 2.n Citywide Height Limit Ballot Imitative to facilitate destines above 50 dwelling units/acre on sites in the Housing Element.

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

How addressed: The analysis done as part of the housing element update process indicates that upzoning all CG, M and R zones adjacent to commercial corridors in South Pasadena is not necessary to meeting the City's RHNA. However, upzoning is necessary in certain areas of the city, as shown in Program 3.a - Rezone and Redesignate Sites to Meet RHNA, The City will redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A to address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended.

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

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

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold

- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold
  - In-lieu fees and cost of a comparable unit
  - How the inclusionary regulations relate to state Density Bonus law"

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

- **How addressed**: Thank you for your comment, the City will continue to explore all options to provide more housing in the City of South Pasadena.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

- **How addressed**: The Housing Element has been revised to include documentation of transportation network improvement, including Fremont/Huntington Mobility Active Transportation Project, North-South Corridor (Fair Oaks) Intelligent Transportation System Deployment, Rectangular Rapid Flashing Beacons at three locations in the City's lower-income residential area, and the Mission Street Slow Street Pilot Program. Additional transportation network updates will be addressed in the forthcoming revision to the City's General Plan and the Downtown Specific Plan.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

- **How addressed**: The City's Slow Streets Program is intended to provide space for residents to safely walk and ride, and to support local businesses' use of outdoor space for dining or other purposes. The next step in this program is the installation of temporary program equipment purchased with grant funding for short-term installation, such as temporary striping, curb extensions using reflective delineators, and bicycle lanes using short-term paint/tape and signs. Other placemaking elements are also incorporated like furniture, plants, art pieces, and parklet structures outside of businesses, to create usable street space. The temporary installation is planned for Spring 2023 and is expected to be in place for 6-months, after which an assessment of the design's observable performance, and an evaluation of the community's experience, will be conducted – this should inform the future consideration of potential permanent changes to Mission Street.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

- **How addressed**: Bicycle lanes along Mission Street and Pasadena Avenue are included in the City's adopted Bicycle Master Plan. Temporary bicycle lanes are expected to be implemented along Mission Street in 2023 within the Slow Streets Program, and the incorporation of bicycle lanes at the intersection of Pasadena Avenue and Mission Street are being evaluated in the current street resurfacing project, which is in the mid-design phase.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

- **How addressed**: City Council has directed staff to focus the next round of Metro Measure M Multi-Year Sub-Regional Program funding requests on bicycle facilities and pedestrian crossing improvements. Staff plan to focus this funding request evaluation on neighborhoods containing schools.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

- **How addressed**: A Class 1 bicycle lane is not proposed to replace the existing Class 2 bicycle lane along Marengo Avenue in the City's adopted Bicycle Master Plan, however, a Class 1 bicycle path is proposed parallel and adjacent to Marengo along the Southern California Easement from Garfield Park to the City of Alhambra.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

  4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025. Timeline: For the

last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

- **How addressed**: A Class 3 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

- **How addressed**: The City currently has 1 planning manager, 3 associate planners, 1 assistant planner and 1 planning counter technician FTE positions funded this fiscal year. The assistant planner began employment on Sept. 6 and the city is currently recruiting for the Planning Counter Technician position. In the meantime, a part-time planning management intern assisting until the Counter Technician position is filled.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

8. The pre-application is eliminated, effective immediately.

- **How addressed**: The pre-application is intended to be a tool for developers and it is optional. The Pre-Application process helps streamline the overall entitlement process by helping the applicant and staff identify and resolve critical issues very early in the process.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

- **How addressed**: The City remains committed to allowing project planners to be hired by applicants willing to expedite their projects. Such process does not affect the remining projects in the queue as no staff members are used to review such projects to the detriment of non-expedited projects.

To ensure that no delay occurs due to this project opportunity, the City will facilitate special meetings of the planning commission and city council (as applicable) to ensure sufficient time for projects to be considered without delay.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

12. Removal of CUP for all projects under 50 units.

- **How addressed**: The requirement for a CUP has not been identified previously as a constraint on development and has not been included as one of the specific policies in the Housing Element. However, this comment will be considered when developing the Downtown Specific Plan's requirements for residential development.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

- **How addressed**: Developments in these areas of the city will need to comply with CEQA, including analysis for transportation, noise, climate, and utility impacts. Developments will be considered for categorical exemptions if they are eligible.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

- **How addressed**: Such requirement is a undue burden on the City and staff, and would cause delays in other aspects of duties by the planning division, while providing only marginal benefit towards the production of additional housing opportunities. City will continue to monitor ways other agencies are updating such information and evaluate if new technologies can be employed to address this issue.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

17. The FAR requirements as stated in SB 478 are implemented immediately.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of that amendment.

19. Private open space required for all projects changed to 75 sq ft per unit

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

20. Common Open Space required cut in half for all projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

21. Removal of all requirements for how the private open space is accessed from the apartment.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

22. Removal of all dimension requirements for the common open space.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

23. Elimination of all open space requirements of elevation

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

24. Removal of all uncovered area requirements

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

25. Open Space, either common or private, can be on the roof of the building.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

27. Removal of all commercial parking requirements within the downtown specific zone.

- **How addressed**: New development standards will be included as part of the Downtown Specific Plan.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

29. Single family parking requirements lowered to one spot.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of this amendment.

30. Signage made by the city for all public parking lots. This should be done by 2025.

- **How addressed**: This comment does not relate to the Housing Element. It will be addressed in other parts of the General Plan.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

- **How addressed**: Changes to the Inclusionary Housing Ordinance will be made as part of Program 2.m.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

- **How addressed**: The height limit will be considered consistent with the court order and Program 2.n.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate alternative funding sources for such project requirements for multifamily housing projects.

34. Removal of the Public Art Fee

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

35. Water connection and Sewer connection should be at cost.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

36. Removal of all fees for ADUs.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

- **How addressed:** The Housing Element has been updated to more fully address the City's history of using land use controls as a way to make South Pasadena an exclusive community. The goals and programs throughout the Housing Element are intended to open South Pasadena up and expand the housing opportunities throughout the City.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."

2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

- **How addressed:** These two dates are for different programs. Site 3 is not a vacant site, and is therefore addressed as part of Program 2.k. The Housing Element currently anticipates the construction of 8 above moderate income units on the site, which is consistent with the application the developer has submitted to the City for this site.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. Permit Streamlining Act provision requiring completeness determination within 30 days

2. Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

- **How addressed:** Program 3.b requires that the City adopt objective development standards for mixed-use and adaptive re-use projects within 120 days of the adoption of the Housing Element. Additionally, Program 3.e requires that the City develop an electronic permitting system to help streamline the approval process and address many of the issues raised by this comment.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

- **How addressed:** Program 3.f requires that the City to review its ADU ordinance within six months of receipt of comments from HCD regarding the ordinance.

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** Program 2.m requires that the City update its Inclusionary Housing Ordinance within six months of adoption of the Housing Element. Program 2.i requires that

the City monitor the effectiveness of the Inclusionary Housing Ordinance and to make changes by the end of 2023, then annually thereafter as revisions are needed.

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

- **How addressed:** Program 2.n and the court order require that the City place a measure on the ballot by December 31, 2024 to remove or amend the height limit to allow for the densities necessary to meet the City's RHNA requirements under this Housing Element. As part of this ballot measure, the City will work with developers and community members to determine an appropriate height limit and to build support for the ballot measure.

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

- **How addressed:** The draft housing element acknowledges past exclusionary practices and states commitment through policies to ensure that there are housing opportunities for all current and prospective residents, regardless of income. (pages 76-77).

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

> "The first three objectives of the Land Use Plan were stated as:
>
> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

- **How addressed:** The recent reorganization of the Community Development Department includes creation of a housing division and additional Planning staff (Programs 2.b, 3.l), with a senior analyst to focus on housing program implementation. City staff will work with the SPTU to review the CHO to address any barriers to affordable housing that could be removed through updates to the CHO.

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership. However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

- **How addressed:** As detailed in Program 1.b, existing state law (SB 381) requires that the California Department of Transportation (Caltrans) sell the surplus residential property it owns in South Pasadena for use as affordable housing. The law requires that Caltrans offer the unoccupied surplus residential properties to the City of South Pasadena first, and then to the Los Angeles County Development Authority (LACDA) and then to housing related entities. The City of South Pasadena has expressed interest to Caltrans to purchase all of the unoccupied surplus properties in the city, and is currently analyzing the feasibility of purchasing the properties for use as affordable housing. Whether the City or another entity purchases the surplus properties, any entity purchasing the properties will be required to maintain them as deed restricted affordable properties.

Tenant Protections, Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts

tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities. Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

- **How addressed:** South Pasadena implements State law regarding tenant protections. Program 1.c states the intent "to reduce displacement risk of tenants living in currently substandard housing." When implementing a proactive program based on the survey conducted (Table VI-26), those units that have substantial violations or are dilapidated will be prioritized. It should be noted that these units are all single-family properties, and do not include multi-unit rental properties. The protection of any tenants will be included as part of this program. Program 3.c confirms replacement of lower-income housing units when new construction is proposed, in addition to the creation of new affordable housing units through the inclusionary housing program.

Maintaining Affordable Housing Inventory

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

- **How addressed:** SPMC Section 36.350.200.K (ADUs) currently prohibits renting out ADUs for a period of less than 30 days. The City has the option to require a deed restriction to enforce this regulation.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

- **How addressed:** The most updated data that the City has in regard to unhoused people is discussed in the Housing Needs section (page 56). However, after publication of this draft of the Housing Element for public review, the County of Los Angeles published the 2022 Point in Time count numbers, which showed that South Pasadena's homeless population increased from 15 in 2020 to 50 in 2022. The City's response system, detailed in Program 2.f responds to the data from recent County homeless counts and reflects the City's partnerships to address the issues regionally.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney

that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

- **How addressed:** The new Housing Division will be reviewing the contract with HRC, which is pending renewal, and will confer with the SPTU to ensure that the revised contract, as well as its oversight, improves service to the public and meets the needs of tenants.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

- **How addressed:** The details of the ballot initiative will be developed with significant community outreach, as discussed in Program 2.n., with the goal of facilitating the densities needed to implement the RHNA.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Comments on the 3rd Draft Housing Element

Yvonne LaRose (November 11, 2022)

The Wednesday night joint Council-Planning Commission meeting brought out and discussed a number of issues in relation to a state mandated 2,065 dwelling units increase. We struggle to meet that requirement.

However, after the meeting, Alan Erlich and I talked. He pointed out that San Marino (which has a smaller population than South Pasadena) is only required to increase its dwelling units by 100. Similarly,

I think Alan mentioned Alhambra, which also has a smaller population than South Pasadena, is being required to increase its dwelling units by 200.

Alan also pointed out the reason for the drastically different requirements of the three cities. It is because South Pasadena is considered to be a transportation rich city due to the fact that the Gold Line passes through it.

While it is definitely true that the Gold Line is part of a reliable rail system of public transportation that's available on a 24-hour, 7 days a week, at 15 to 20 minute intervals, and the line does, indeed, pass through an area near the heart of the city, it deposits passengers at a public transportation bus stop (MTA Line 258) that is essentially an afterthought.

Line 258 runs every 60 minutes along Mission Street, Monday through Friday. It is not operational on Saturday or Sunday. It has 29 stops; among them are CSULA, where it appears it only stops two times, at 9:23 PM and 10:23 PM. Of the three routes it offers, one terminates at Avenue 63 and York Bl. as it passes along South Pasadena via Mission Street.

South Pasadena also has the benefit of MTA Line 260 which runs the length of Fair Oaks from the Alhambra border, through South Pasadena (past Huntington Hospital), and then into Pasadena. That line runs every everyday, starting from the Artesia Station at 4:21 AM and ends at 10:31 PM. at approximately 15 to 20-minute intervals.

South Pasadena offers its residents who are seniors and/or disabled transportation five days a week (Monday through Friday) from 8:30 AM to 4:00 PM via Dial a Ride. We have learned through the Community Services highlight during a Council meeting that the new scheduler considers all passengers are interested in getting to medical appointments or shopping, typically for groceries. The scheduler will confirm a reservation but makes an independent, subjective determination as to whether the reservation should be honored and will (sometimes without notice to the passenger) cancel or change a reservation, leaving the client without transport and needing to change their business itinerary and appointments for that day unless they are able to use an alternative transportation service.

Dial a Ride has become a dismally unreliable means of transportation in and around South Pasadena.

While there are other transportation alternatives such as Uber, Lyft, Access, or taxi, the above three public transportation systems constitute the "rich transportation" of South Pasadena. Given the limited availability of the City's staple transportation, it can be said with accuracy that South Pasadena is definitely not a transportation rich city.

Based on this analysis, the City should challenge the requirement to develop 2,065 units. The burden on a city of 2.5 square miles is too great. The "rich transportation" is imaginary. What does exist can barely support the 25,000 residents; to add even 2,000 additional people (let alone dwelling units) would overtax all of the City's resources.

Viva

Yvonne LaRose

Organization Development Consultant: Diversity/Title VII, Harassment, Ethics

Consultant's Desk - http://consultantdesk.blogspot.com

The Desk - http://thedesk.wordpress.com

Cell: 626-606-4677

- **How addressed:** There are many different factors that are taken into account when determining a City's Regional Housing Needs Assessment, including the proximity to jobs and transit access. The City was allocated 2,067 units after the reallocations by SCAG after several agencies made various appeals and many factors were weighted. The City is addressing the full amount of its share of housing needs as determined through the RHNA process, and this Housing Element has been drafted to meet those housing needs.

Yvonne LaRose (November 12, 2022)

It seems Agenda Items 3.3 and 3.4 had exhibits to be used with them. Those exhibits were not in the Council chamber when the meeting started. Perhaps they were available at the booth in the lobby of City Hall. The lack of such exhibits for the public made grasping all of the proposed details difficult to navigate. Some members of the audience had questions about the proposed changes but were unable to present those questions and concerns. Frustration was the result.

One of the properties involves Foremost Liquor at Monterey Rd. and Pasadena Ave. The proposition is to remove that structure and convert the property into a different type of use, possibly residential. The issue with that prospect is that is the only convenience store in the area and appears to generate more business and revenue than the small businesses on the west side of Monterey Road. Perhaps there are other alternatives to removing that business. Interpretation of the proposed change seemed to be tear out the liquor store and rebuild with a multi-use/family dwelling.

- **How addressed:** Foremost Liquor (Site 5 in Appendix A) will be rezoned as part of the larger Ostrich Farm Mixed-Use area to remove barriers to and incentivize the production of housing units. The City is not "tearing out" the liquor store. This mixed-use area will include additional retail opportunities for the west side of the city, which may include a liquor store.

There was also discussion of the Pavilion's parking lot. The proposal is to resurface the parking lot (which was recently completed), install additional parking, as well as build a residential building on the lot. No one in the audience could envision a dwelling unit on that lot that would aesthetically blend in with the area. There also seems to be quite limited space for a proposed dwelling unit in that location. The proposed changes do not appear to be feasible.

- **How addressed:** The Pavilions parking lot (Site 16 in Appendix A) is approximately 2.67 acres of flat land within a transit rich area. As discussed in the letter from the property owner, the owner intends to redevelop the entire site with a new store which would include a housing component. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Moving just one-half block to the south of the Pavilion's site is Golden Oaks Restaurant, which is also proposed as a site for demolition and erection of a multi-unit dwelling, plus parking spaces. Again, the aesthetics of that type of change is questionable, not to mention there is scant space to make those types of changes.

- **How addressed:** Aesthetics are not an issue that is considered or addressed under state law in the Housing Element. Such issues are addressed through zoning regulations such as the Downtown Specific Plan that will come after the Housing Element indicates were to locate housing resources. Parking is not required in this area due to recently enacted state law under AB 2097 prohibiting cities from imposing minimum parking standards for residential and commercial projects within one-half mile from public transit. Program 3.b has been revised to commit the City to updating its zoning code to conform to the parking standards set by state law.

It sounded as though the Public Works yard is also being planned for renovation and demolition. It's troubling to try to understand where Public Works will be located if their base is removed. Perhaps what was missed in the interpretation of the proposal is that the yard will somehow be upgraded (perhaps with more energy refueling pumps) and remain in the same location.

- **How addressed:** The City's existing Capital Improvement Program includes a list of sites suitable for relocation of the activities currently conducted at the Public Works yard. The City intends to vacate the Public Works Department from this site so it can be redeveloped as affordable housing with no Public Works activities remaining on the site.

These are the proposals that more significantly stand out in my recollection of Wednesday's meeting.

Viva

Yvonne LaRose

Cell: 626-606-4677

Josh Albrektson (November 21, 2022)

For APN 5308034015 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308034015 has been removed from the Housing Element.

Josh Albrektson (November 21, 2022)

1131 El Centro St is a 3 story condo complex built in 1988. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1131 El Centro St. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1131 El Centro St. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that these 34 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

700 Orange Grove Ave is a 3 story Condo Complex built 20 years ago. You guys are claiming there is a chance that this 3 story Condo Complex might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

For APN 5314020007, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** There is an existing public driveway that provides access to APN 5314020007

Josh Albrektson (November 21, 2022)

715 Prospect Ave and 807 Prospect Ave are 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 715 Prospect Ave. and 807 Prospect Ave. are not identified sites for affordable housing production. 715 Prospect Ave. and 807 Prospect Ave. are part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The Housing Element simply says that the possibility exists, and that the Housing Element programs make it more likely, that these sites will be redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

Every single house in the next two pictures are single family homes that South Pasadena claims will be torn down and replaced with a low income unit. By law, south Pasadena is required to subtract the current unit count from any potential future unit count, so for all of these they should not be able to claim any housing.

- **How addressed:** Images were not provided as part of this comment. It is unclear which single family homes are being discussed in this comment.

For every current housing site in the downtown specific plan South Pasadena didn't subtract the current units on the site as required by law. For example at 820 Mission there is a 38 unit condo complex. South Pasadena is claiming 17 units at this site and not subtracting any of the current condos.

This is the case for 50 of the sites claimed in the Downtown Specific Plan.

Sent from my iPad

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The projected number of units for 820 Mission St. does subtract the existing dwelling units from the calculation of the projected net increase in housing units on the site. The site is an approximately 1.75 acre and is located in the proposed Downtown Specific Plan area. This area will allow for a maximum of 70 du/ac, which means the site will accommodate up to 122 dwelling units. As mentioned in the comment, there are currently 38 existing units on the site, which would net 84 housing units if it were to be redeveloped. The analysis of the Downtown Specific Plan anticipates there is a 20% likelihood that a parcel in the Downtown Specific Plan is redeveloped. Twenty percent of 84 housing units is 16.8, which was rounded to 17 as the number of net new housing units anticipated on the site prorated for the likelihood of redevelopment of the site.

Josh Albrektson (November 22, 2022)

All page numbers refer to the 3rd draft page numbers

For APN 5315021008 on page 191 South Pasadena claims 27 units on a 0.57 lot. This is the southern part of the mission meridian complex built in 2006 and there are already 23 units on this lot.

For APN 5315021031 on page 191 SoPas claims 20 units on a 0.45 lot. This is the middle part of the Mission Meridian complex built in 2006 and there are already 20 units on this lot.

For APN 5315021051 on page 188 SoPas claims 24 units on a 0.65 acre lot. This is the north part of the Mission Meridian complex built in 2006 that already has 23 condos on the lot.

For APN 5315007055 on page 185, SoPas claims 22 units on a 0.91 acre lot. This is a 21 unit condo complex built in 1988.--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

On page 193 it is claimed that the realistic capacity is based on 20% of the sites being developed at 100% capacity.

The total acreage is 54.95 acres with a density of 50 DU/acre. This is a maximum capacity of 2748.

20% of 2748 is 550 units, not 642 units as claimed.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The maximum density of the Downtown Specific Plan is 70 du/ac, not 50 du/ac. Table VI-51 has been corrected in the Fourth Draft to reflect the corrected maximum density. Table VI-51 does identify the total acreage of the Downtown Specific Plan area that has the potential to be redeveloped as 54.95 acres. At a density of 70 du/ac, the maximum capacity of this area is 3,846 units. Twenty percent of 3,846 is 769, which is more than the 642 units that is anticipated to be developed in the Downtown Specific Plan area during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5310016028, this is a 15 foot wide lot that is somebody's garden.

https://twitter.com/JalbyMD/status/1538996186765348864?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

https://twitter.com/JalbyMD/status/1538996243224924160?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5310016028 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

1522 Mission Street is the historic Fair Oaks Pharmacy that has been operating for over 100 years. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??? It made it 100 years, it is going to close in the next 7??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1522 Mission Street is not an identified site for affordable housing production. 1522 Mission Street is a part of the Downtown Specific Plan area and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

1401 Mission Street is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1401 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

At 820 Mound Ave the city is about to install electric panels and have a long term lease with SoCal Edison. This was just voted on 3 months ago. Is South Pasadena planning on breaking this lease??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 820 Mound Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 820 Mound Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For Site 16 you guys claim that only the parking lot will be developed and not the newly renovated grocery store that had a grand re-opening on August 3rd.

You can hear the city council and planning commission trying to explain possible ways that the parking lot could be developed without disrupting the grocery store from 27:00 to 31:00 of the November 9th meeting. They were discussing what they would say that HCD would find acceptable. It is pretty obvious that the owner is not themselves considering developing just the parking lot.

http://www.spectrumstream.com/streaming/south_pasadena/2022_11_09.cfm

How can you guys claim there is substantial evidence that the parking lot will be developed when it is clear from the meeting that the owner is not actually considering it??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store within the 6th Cycle. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 22, 2022)

For Site 14 the owner is getting a new foundation for one home and once that homes foundation is finished he is planning on moving on and doing the foundation of the second home. This site is 2 blocks from city hall. You guys can go down and see the Foundation Repair LA INC sign in front of 1508 El Centro right now. Attached to this e-mail is a picture of this sign if it doesn't make it into the comments section of the Housing Element.

How can you guys claim there is substantial evidence that the current use is being discontinued when the current owner of these single family homes is getting two new foundations at this time??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 14 has confirmed with the city that they are interested in redeveloping the site with multifamily housing.

Josh Albrektson (November 22, 2022)

802 Fair Oaks is the Fair-Hope building and is one of the few remaining early twentieth century structures in South Pasadena Fair Oaks Corridor. This is South Pasadena designated cultural heritage landmark number 49. Are you going to allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 802 Fair Oaks is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 802 Fair Oaks is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5308002059 this is a front yard and driveway

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002059 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following APNS do not exist in the Los Angeles County Records and if claims that homes could be built on them they should have APNs that actually exist:

5308023004

5317009909

5310034900

5310018903

5314017901

5314016044

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The APNs identified in this comment have been updated in the Housing Element to reflect the new APNs given to these parcels since the Housing Element was first drafted.

Josh Albrektson (November 22, 2022)

For APN 5311001018, at the Design review board meeting of Sept first a plan was approved for a new commercial building. This site is not eligible to be considered for housing.

https://www.southpasadenaca.gov/home/showpublisheddocument/30612/638000752592000000

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311001018 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following is a list of single family homes and duplexes that South Pasadena is claiming will be new housing in the 3rd Housing Element/Downtown Specific Plan. In every case you guys are claiming the homes would be torn down and replaced by a low income unit in this planning period without subtracting the original home from your calculations. Sometimes you guys have a duplex that would turn into one low income unit, which is a net -1 home.

You are required to subtract out the original housing and only claim NET housing for RHNA.

Single family homes

515 Mission st

519 Mission St

802 Orange Grove Ave

815 Magnolia

821 Magnolia

827 Magnolia

805 Prospect

700 Prospect

704 Prospect

909 Magnolia

913 Magnolia

806 Meridian

808 Meridian

810 Meridian

1007 Hope St

808 Fairview

806 Fairview

804 Fairview

1103 Hope st

1107 Hope St

1111 Hope St

803 ½ Fremont Ave

807 Fremont Ave

812 El Centro

1011 Mound Ave

825 Brent Ave

Duplexes

706 Prospect

521 Mission St

1115 Hope St

1117 Hope St

1123 Hope St

833 Brent Ave

817 Adelaine

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** All of these properties are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 23, 2022)

1100 El Centro is the South Pasadena Unified School District. They just purchased this building last year and moved all of their offices into this building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you talked to anybody at the school district?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1100 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1100 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5314018010 it is in the middle of the block and no access.

https://twitter.com/JalbyMD/status/1538994198770339843?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314018010 is a flag lot that has access to Bank Street.

Josh Albrektson (November 23, 2022)

1050 Fremont Ave is Calvary Presbeterian Church. It is one of the oldest churches in the city, at least 4 stories tall, and probably the best looking church in the city. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for

low income sites??? Have they talked to the church? It also has a preschool Monday to Friday which is one of the more popular pre-schools in the city but they are COVID deniers.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1050 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1050 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

The building at 1019 El Centro is the South Pasadena Bank Building. It is the first bank in the city and is South Pasadena designated cultural heritage landmark number 8. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1019 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1019 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For Site 16, Can you guys point to examples of grocery stores that have had their parking lot turned into housing while the grocery store remained open??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner for Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 23, 2022)

1023 Fair Oaks Ave is the historic Rialto Theater. It was built in 1925 and is one of the most historic theaters in San Gabriel Valley. There currently is a lease by Mosaic Church for another 20 years. It is South Pasadena designated cultural heritage landmark number 25. Would South Pasadena allow this historic theater to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1023 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1023 Fair Oaks Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5311010065 this is someones front yard

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311010065 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

1000 Mission Street is the Century House. It is also where Micheal Myers lived in the movie Halloween. It is the second oldest building In South Pasadena built in 1888 and was South Pasadena designated cultural heritage landmark number 34. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1000 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1000 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

1500 to 1518 Mission Street were all built over 100 years ago and considered to be part of the historic business district. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The buildings at 1500 to 1518 Mission Street are not a part of a designated historic district, although they are eligible to become part of a historic district. The buildings at 1500 to 1518 Mission Street are not identified sites for affordable housing production. The buildings at 1500 to 1518 Mission Street are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

For APN 5314016030, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314016030 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

815 Fairview is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 815 Fairview is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

For APN 5317011025, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317011025 has been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

For APNs 5308034018, 5308034018, and 5306006001, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034018, 5308034018, and 5306006001 have been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

1501 Mission Street was built in 1923 and is South Pasadena designated cultural heritage landmark number 37. What is the substantial evidence the current use will be discontinued as required for low income sites??? It also has an apartment on top and you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1501 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

804 to 810 fairview and 1103 to 1123 Hope street contained multiple single family homes and apartments. You are required to subtract the current unit count from any proposed unit count.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 804 to 810 Fairview and 1103 to 1123 Hope Street are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

954 Mission Street is the Mission Hotel and one of the oldest buildings and is considered historic by South Pasadena. It is South Pasadena City Landmark number 26. Is South Pasadena going to allow a

by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 954 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 954 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 25, 2022)

For Low Income site number 3 there are 8 above moderate income units. This is clearly stated on A1-15. There is a duplex on one APN, a duplex on one APN, and a 4 plex on the 4th APN. On Page 183 Table VI-50, instead of putting 2, 2, and 4 as the unit count for Site three, you guys put 8 on one APN and then claimed 7 and 14 low income units on the other APNS that you shouldn't be able to claim. So there are actually 21 low income units you are claiming on Site 3 that you cannot claim. Please remove these 21 units from your calculations.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Table VI-50 has been updated to correct reflect what is shown in Appendix A.

Josh Albrektson (November 26, 2022)

1001 Fremont Ave is the South Pasadena Post Office. It is a historic building and the main Post Office of South Pasadena that includes all sorting for delivered mail. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you guys talked to anybody at the United States Postal Service??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1001 Fremont Ave is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 26, 2022)

For APN 5320018022 this is a silver of land with a homes garden on it.

https://twitter.com/JalbyMD/status/1538998300530970626?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320018022 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

820 Mission street is a group of Condos that were built in 2017. You actually site them as representative examples of recent building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** See discussion of 820 Mission Street in response to comment dated November 22, 2022.

Josh Albrektson (November 26, 2022)

For APN 5311017018, there is half a home on the land

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311017018 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5320030038, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320030038 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5311006068 there is a home on the land

https://www.redfin.com/CA/South-Pasadena/1250-Oak-Hill-Ave-91030/home/7003471

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311006068 has been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

For the following APNs there is no street access:

5311010028

5311010029

5311010030

5311010033

5311010034

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As noted in Notes 3 to Table VI-44, These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Josh Albrektson (November 27, 2022)

For APNs 5308034017 and 5308034003 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034017 and 5308034003 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

913 Meridian Street is the historic Meridian Iron Works Building. It was a Japanese history museum but when South Pasadena kicked their Japanese residents out of the city in 1942 it was confiscated. It is now the home of the South Pasadena Preservation Foundation. It was built in 1887 and is City Landmark number 5. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued as required for a low income site?? Will South Pasadena allow it to be torn down?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 913 Meridian Street is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 27, 2022)

For APNs 5312016016 and 5308021009, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5312016016 and 5308021009 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

920 Fremont Ave is Grace Brethren Church. The building was built in 1907 and is City Landmark number 22. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites??? Have they talked to the church?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 920 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 920 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 27, 2022)

Baranger Studios at 729 Mission St is one of the oldest buildings in South Pasadena and considered Historic by South Pasadena standards. It is South Pasadena designated cultural heritage landmark number 27. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://www.pasadenanow.com/weekendr/historic-iconic-baranger-studios-building-in-south-pasadena-is-sold-for-6-8-million/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 729 Mission St is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 729 Mission St is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

812 Fremont is a 3 story condo complex. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Fremont Avenue is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308002064, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002064 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5317009903, the actual APN is 5317009033 and this is someone's garden.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317009903 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

824 FairOaks is the Comerica Bank Building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 824 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 824 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

For APN 5308022009, there is a home on the land (real APN of 5308022043

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308022009 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5312031029 there is a home on the land

https://www.redfin.com/CA/SOUTH-PASADENA/20-SHORT-WAY-ST-91030/home/7004227

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5312031029 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308019034 this has a home and backyard on it

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308019034 is a developable lot between two existing homes. Currently it contains a patio structure for one of the neighboring homes.

Josh Albrektson (November 28, 2022)

812 Orange Grove, 810 Orange Grove and 802 Orange Grove are all 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are not identified sites for affordable housing production. 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period. The Downtown Specific Plan will allow for heights at least six stories or 60 feet, in accordance with Program 2.n.

Josh Albrektson (November 28, 2022)

For Low income site number 12 the city only owns 0.19 acres (35%) of the site. This is not large enough for a low income site. If the city does not have ownership of the whole site by Jan first, 2026, would it be willing to remove it as a low income site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Program 3.o requires the City to evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites no later than December 31, 2024 and December 31, 2026. Site 12 will be part of this review and evaluation.

Josh Albrektson (November 28, 2022)

The block surrounded by Meridian, El Centro, Diamond, and Mission street is a national historic district and has been since 1983. These buildings cannot be torn down.

https://catalog.archives.gov/id/123859524

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** While some of the building on this block are identified in the National Registrar of Historic Places with local historic significance, some of the buildings in this block have been deemed to not contribute to the historic character of the district. Furthermore, buildings identified as historic identified in the National Registrar of Historic Places can be adaptively reused (see Program 3.b) and added on to so long as the character defining features of the existing structures remain.

Josh Albrektson (November 28, 2022)

1200 Fair Oaks is an Arco station that was recently sold. In the listing brochure it mentioned that Arco has a 15 year lease on the property. What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1200 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1200 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308034016 and 5308021008 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034016 and 5308021008 have been removed from the Housing Element.

Josh Albrektson (November 29, 2022)

700 Orange Grove Ave is a 3 story apartment building. You guys are claiming there is a chance that this 3 story apartment building might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to comment dated November 21, 2022, 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The

possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308002072, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002072 is a buildable lot that has existing driveway access through APN 5308002060.

Josh Albrektson (November 29, 2022)

The former bank at 901 Fair Oaks Ave just underwent an extensive renovation changing it from a Bank to 5 commercial units including Chiptole and Habit Burger (which I eat at 4 times a week). An ATT store just opened and Rice and Nuri is about to open in the next couple of months. What is the substantial evidence the current use will be discontinued as required for low income sites???

https://southpasadenan.com/fairoaksmission-project-chipotle-coming-to-south-pasadena/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 901 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 901 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

Lewis Markey building at 634 Mission Street is the South Pasadena designated cultural heritage landmark number 31. It was built in 1928 and was designated a landmark 35 years ago. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://calisphere.org/item/e5794b9f06005a528fedab717bb7332b/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 634 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 634 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

The Trader Joes at 613 Mission is the second Trader Joes in history. It is also one of the most active grocery stores in the city. What is the substantial evidence the current use will be discontinued as required for low income sites??? And you also removed this site in previous drafts because you didn't believe the current use would turn over.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 613 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 613 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

For Low Income Site number 8 you describe an underground gasoline tank and soil contamination. How much would it actually cost to remediate the site?? Can you find costs or similar sites that have been used for housing?? And there is no 0.71 acres of extra land in South Pasadena that the public works yard could be moved to. Is South Pasadena willing to state that there will be a RFP issued by Jan first, 2025 and if there is no plans for housing by Jan 2026 than the site would be removed as a possible site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Appendix A has been revised with additional information regarding the environmental constraints for Site 8. Program 3.o has been modified to require the City to "evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites" no later than December 31, 2024 and December 31, 2026.

Josh Albrektson (November 30, 2022)

For APNs 5311010027 and 5308006024 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5311010027 and 5308006024 have been removed from the Housing Element.

Josh Albrektson (November 30, 2022)

For Low income site Number 2 there is a claim that Bullseye Glass and Judson studios are relatively new tenants. If you label the 6 buildings from west to east, these are buildings 1 and 2.

Those Bullseye and Judson have been there since November 2016 as shown in this google image:

https://goo.gl/maps/s95ehqP1Z7uUU8ZBA

It is actually the entire second floor of building number 3 and the entire building number 5 that just were leased in the past year to Yellow Pike Media and Elementary. How can you guys claim there is substantial evidence that the current uses will be discontinued when there were just new leases signed at the site??

Loopnet Brochure for the listings for buildings 3 and 5.

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As stated in Appendix A, Site 2 is an under-utilized commercial building that will be redesignated as mixed-use. The land owner has expressed interest in redeveloping the site under the new land use, once adopted.

Josh Albrektson (November 30, 2022)

707 to 809 Meridian is a 3 story condo complex built in 2006. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 707 to 809 Meridian is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 707 to 809 Meridian is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

1124 Fair Oaks Ave is a 3 story Freemason building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1124 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1124 Fair Oaks Ave is a part of the

Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Sam Shink, The Albertsons Companies (December 1, 2022)

Albertsons Companies

WRITER'S TELEPHONE NUMBER: (714) 300-6727
WRITER'S E-MAIL: SAM.SHINK1@SAFEWAY.COM

December 1, 2022

Angelica Frausto-Lupo
Community Development Director
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Via Hand Delivery

Subject: Pavilions #2228; 1213 South Fair Oaks Avenue, South Pasadena

Dear Ms. Frausto-Lupo:

I am writing in response to your request related to the City's draft General Plan Housing Element to advise you that ACI, parent company of Pavilions, is considering redevelopment of the subject property sometime prior to 2029. The plans being considered include redevelopment of the entire site and would consist of a new store, residential uses, and parking. We look forward to continuing to serve the residents of South Pasadena.

Very truly yours,

SAM SHINK
Director of Real Estate

letter to city of SP regarding redevelopment plans

Working together to be the *favorite local supermarket*™

Amigos · United Express · Randalls · Albertsons · SAFEWAY · Tom Thumb · PAVILIONS · shaw's · ACME · star · CARRS · Market Street · VONS · Jewel-Osco · United supermarkets · Lucky · Albertsons market · Super Saver

- **How addressed:** Appendix A has been updated with additional information from property owner.

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

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

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** As detailed in Program 1.b, the City is complying with the acquisition process authorized by SB 381 for the acquisition of the surplus Caltrans properties. The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

Comments on the Public Review 4th Draft Housing Element

Josh Albrektson (December 5, 2022)

Page A1-11 has an outdated picture

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The map on page A1-11 has been updated.

Josh Albrektson (December 5, 2022)

The following APNS you are claiming 100% chance of 100% development in the downtown specific plans, including the Mission Meridian condos:

Page 187, the condos behind the post office you are claiming 22 condos will turn into 22 low income units

5315007055

The following 3 are the mission meridian Condos that you are claiming a 1 for 1 replacement with low income units.

Page 190

5315021051

Page 193

5315021008

5315021031

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Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to the comment dated November 22, 2022 regarding these same parcels, each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element..

Delaine Shane (December 6, 2022)

To the Housing Element Consultant and City Management:

Enclosed are my comments pertaining to the red-lined version of the Draft Housing Element, Version 4. Frankly, I didn't read your recent document—just skimmed it. No realistic time was given to us to allow for a thoughtful read through. In addition, while I appreciated the City's turnout at our most

recent walk through in the Meridian neighborhood that has several of the vacant Caltrans properties, having the Consultant snap a picture of us and marking that check box as being part of public engagement is a false narrative.

A mindset at City Hall continues to exist, as exhibited in this draft document, that the non-legislative alternative to SB 381 and the Caltrans properties is either non-existent or illegal. It is NOT illegal. I and others have already provided you with information readily available on the internet that it has been done and can be done in California by government entities.

Nothing in Caltrans' regulations prevents that agency from implementing the non-legislative alternative that the South Pasadena Preservation Foundation has so clearly prepared and presented to the City on numerous occasions. Just because Caltrans says NO? So, why aren't our City officials meeting with our state legislators to convince Caltrans otherwise? This wouldn't be the first time that Caltrans is misusing its powers to the detriment of our community. I and my neighbors expect that our City management and Consultant support us and not dictate a choice that they themselves would not appreciate if they lived in our community.

All we want are for the vacant properties to be sold to qualified buyers (be they present/former Caltrans tenants or other qualified buyers) who will fix up their homes, live in them, pay their fair share of property taxes, and contribute to our wonderful and diverse neighborhood. This can still happen if the Housing Element is revised to include the very viable non-legislative alternative to SB 381, i.e., side-by-side escrow agreements. These properties were what the Freeway Fighters were fighting to preserve for over 60 years. It would be a harsh and cruel irony if the houses were torn down not by Caltrans but by the City or its designees (HREs).

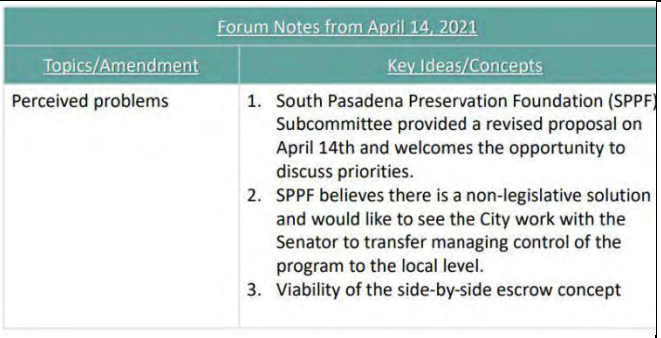
Sincerely,

Delaine Shane

2003 Meridian Avenue

[Continued on next page]

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
1	2-3	"SB 381 requires that Caltrans offer unoccupied homes for sale to the City of South Pasadena. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE)."	This statement does not include the non-legislative approach on the disposition of vacant Caltrans housing that the South Pasadena Preservation Plan (SPPP) has been presenting to the City of South Pasadena (City). That is, the more efficient, economic, and expeditious process of side-by-side escrow agreements for unoccupied homes. Yes, this section of the Housing Element is on legislation; however, MANY discussions between the City and the public also concerned a parallel track involving a viable non-legislative track in conjunction with SB 381. The City did agree to consider this non-legislative approach during previous discussions between the City Council and Ad Hoc Committees. This process is legal and is done by other governmental entities. If Caltrans is not interested in such an approach, why isn't our City Council seeking relief on this matter with our newly elected State Assembly Member Michael Fong or other prominent state legislators? Getting entangled in a large real estate portfolio and process could result in the City Council not meeting its other mandates to its residents. As a reminder, here is a slide from the City Council Agenda, Item No. 14, July 21, 2021 (though I vehemently disagree that this is a "perceived problem"):	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do no exist under existing law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			 Forum Notes from April 14, 2021 Topics/Amendment: Perceived problems Key Ideas/Concepts: 1. South Pasadena Preservation Foundation (SPPF) Subcommittee provided a revised proposal on April 14th and welcomes the opportunity to discuss priorities. 2. SPPF believes there is a non-legislative solution and would like to see the City work with the Senator to transfer managing control of the program to the local level. 3. Viability of the side-by-side escrow concept The City should behave as a pass through to allow current/former tenants and/or qualified home buyers and not get into the real estate developer's market nor sell to HREs. Our community want the homes to be returned to homeowners that meet the criteria of the Roberti Act so that these properties return to the tax roll. Sixty plus years of these Caltrans homes have yielded NO PROPERTY TAXES! It is time for this situation to be changed by relying on side-by-side escrows. THEY ARE NOT ILLEGAL!!! Specific text should be added to the fourth version of the Housing Element that includes the option of side-by-side escrows.	
2	3	"AB 2011, the Affordable Housing and High Road Jobs Act of 2022, was signed into law on September 28, 2022. AB 2011 allows for ministerial, by-right approval of affordable housing on commercially-zoned lands, and allows for mixed-income	How does the City intend to be a good steward of our precious historic resources in light of AB 2011? What protections will there be for the City's approved historic landmarks and potentially historic structures have in commercially zoned lands? It is difficult to view specifics in Appendix A as to which structures would fall under AB 2011, but I have been told that the Kaldi's Coffee building could	AB 2011 does not apply to projects where, "the development would require the demolition of a historic structure that was placed on a national, state, or local historic register."

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		housing along commercial corridors so long as the project meets certain labor and environmental criteria."	be vulnerable to being torn down. This is the City's first bank and still retains its integrity, association, and context from a historic perspective. Does that mean that many of our landmarks whether on the City's list or not, can be destroyed? Also, what is meant specifically by the phrase "…certain labor and environmental criteria?' This is a legal document and one which will be available to the public. The residents do not necessarily have the time or the opportunity to cross check AB 2011 with other documents to understand what this means or what the ramifications are for them and for the City.	
3	5	Program 1.b - Convert Caltrans Homes to Affordable Housing "The California Department of Transportation (Caltrans) is obligated by State law to offer unoccupied Caltrans-owned surplus residential properties located in South Pasadena for sale to the City of South Pasadena. The City has expressed interest to Caltrans in purchasing these twenty (20) unoccupied surplus properties through this State program, which contain twenty-two (22)	Please clarify the text -- will this conversion program result in rental property or home ownership? My neighbors and I support affordable home ownership for these vacant homes where the owners will fix the houses up and live in them and contribute to the well being of our neighborhood, which is quite diversified. The homeowners, like us, will then be paying property taxes. Currently, Caltrans pays zero in property taxes. The vast numbers of these vacant houses are in the southwestern portion of the City. If they go to HREs, then the houses will continue to not be on the tax rolls. The neighborhood will continue to be disproportionately impacted due to the legacy of the SR 710 Extension Project.	These decisions regarding whether the homes will be for-sale or rental, or whether an HRE will be involved in the renovation or other aspects of the project, have not been made by the City at this time.

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		housing units. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on these surplus properties ensuring that they are made available for purchase by moderate-income households or for rent to lower income households to moderate or lower income households. Through this Program, if economically feasible, the City will preserve and rehabilitate these properties, and make them available to moderate and lower income households."	This program is biased and not equitable where affordable housing should be distributed throughout the City. The City Council has already approved several large mixed-use developments with NO affordable units (except for Mr. Odom Stamp's project at 625 S. Fair Oaks Avenue). Yet, these Caltrans homes that have been allowed to deteriorate over the decades are being considered as affordable rentals rather than as affordable home ownership that will put these properties back on the tax roll. The City should NOT be involved with rehabilitating these homes. Our streets have not been paved for decades, the failing West Side Reservoir is a human disaster waiting to happen, we don't have decent street lighting, we deal with speeders that don't even live in our neighborhoods but wear out our pot-holed and ever deepening cracks (which in turn will impact existing substructures embedded below the streets), etc. How can the City consider funding this program through the General Funds or relying on HREs? Why not provide the residents who live here now with the services that we deserve. As mentioned in Comment No. 1, the City should employ the non-legislative approach, i.e., the side-by-side escrow agreements. The City has had issues with HREs in the past who don't take responsibility in managing their properties, not to mention the loss in tax revenues to the state and City. There is also nothing	

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			mentioned about providing security of the Caltrans houses between the times of the purchases by the City and the properties eventual sales. We have been living in fear with the brazenness of squatters and more importantly the danger that these decrepit houses pose, including faulty electrical wiring, mold, asbestos, sewage spills/leaks, etc. that could be released should the squatters inadvertently initiate a catastrophic event. Our houses are so close together that we fear our homes would suffer whatever happens to the nearby Caltrans homes caused by squatters. There is nothing here in this document that alleviates our concerns about our safety.	
4	62	"Development may have also been hindered by the City's decades-long struggle to reverse the planned 71 Freeway extension, which was finally cancelled by Caltrans."	The "71 Freeway"? I've noticed a lot of spelling errors throughout the document. We are paying the consultants a lot of money to write properly. "Cancelled by" Caltrans? A number of individuals, organizations, and municipalities rose up and fought against this useless project and Caltrans for decades. This statement makes it seem as if Caltrans just changed its mind. Revise this statement to interject reality and accuracy.	The identified typo has been corrected.
5	63	"These incentives include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects."	The author was originally correct by stating "concessions" rather than the revision to "incentives." What are the eligible residential projects? List specifics and how much is the City giving away to the developers? Will there be any yards in the future for new housing? Where will the cars be parked since most residents will still be using their own transportation, whether gas powered or	The identified changes to development standards are incentives for projects to include affordable units. These incentives are required by State law.

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			electric powered? How tall will the height increases be? Does our Fire Department have the capability to put out fires on high rise buildings?	
6	209	"Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. "Funding has been secured for a feasibility study on	Same comment as in Comment No. 1. No mention about the non-legislative and legitimate approach of relying on side-by-side escrow agreements. And just what will the Housing Division do when "administrating affording housing?" Will the City or its designee, an HRE, manage the affordable units, collect the rent, and maintain the units? How can that be when so much of our neighborhood needs vital services and maintenance activities now? The City is not qualified to handle this major endeavor and to pass it to an HRE will just be a repeat of Caltrans' past behavior.	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do not exist under existing law.

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		surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H)."		
7	219-220	Discussion related to Program 1.b - Convert Caltrans Homes to Affordable Housing	Same comment as Comment No. 3. Security costs will be excessive with respect to the program and to date those costs have not been estimated. Occupancy by October 2024 is also overly optimistic. Given the bureaucratic processes of both agencies, the costs and distribution of supplies and equipment, labor availability, the unanticipated repairs that are yet to be discovered until rehabilitation occurs, and the requirement that if HREs are involved that they can pay prevailing labor wages is naïve thinking at best when dealing with renovation projects of this magnitude. Selling these properties immediately in side-by-side escrows will substantially alleviate the risks to the City and will enable the City to focus on existing and urgent City matters and services. As yet again a reminder, just look at the snail's pace of the City in turning two vacant former Caltrans lots into pocket parks. Several years have passed and the City is still working with designers/engineers with no results at this time. Imagine if security was focused on those sites? Such costs would be astronomical.	The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

South Pasadena Tenants Union and Care First (December 8, 2022)

City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

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

Regarding: South Pasadena Housing Element, Fourth Draft

Dear Ms. Frausto-Lupo,

Care First South Pasadena and the South Pasadena Tenants Union write jointly to provide feedback about South Pasadena's third draft of the Housing Element.

Executive Summary

- South Pasadena should develop affordable housing throughout the City to create income diverse neighborhoods and promote fair housing. We want the City to:
  - Use the 20 vacant Caltrans house sites,[1] which the City will purchase in the coming months, to develop a blend of duplexes, triplexes, quads, and denser multi unit buildings for affordable ownership and rental opportunities. A number of the vacant houses are 0.25-0.50 acres and could accommodate multi-unit development.
  - Pilot an affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus).
  - Recruit 100% affordable developments through non-profit low-income housing developers, identify at least four (4) viable locations for 100% affordable developments, and identify potential financial and regulatory incentives the city could offer such developers.
- South Pasadena should take more steps to support and protect renters and maintain availability of existing below-market units, including:
  - Enact an urgency ordinance before January 1, 2023 to amend South Pasadena's no-cause eviction ordinance to require landlords to pay tenants increased relocation assistance if they are being evicted.
  - Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent.
  - Enact a rent control ordinance.
  - Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

I. Promoting Affordable and Fair Housing Development

The Housing Element determined that the City's "prior race and ethnicbased socio-economic discrimination had a long-term impact on racial diversity in the City" which is only 3.6% Black or African

[1] For a sites inventory of the vacant Caltrans properties, see a map we created at https://www.google.com/maps/d/viewer?mid=1nt13dEdP-7ddQxN85ewo35xhQEKD-kc&ll=34.11207520783854%2C-118.1570014&z=15 (last updated Dec. 7, 2012).

American and only 18.5% Latinx. (Redline of Fourth Draft Housing Element at 39). Limiting multifamily development has made South Pasadena unaffordable, which contributes to the City's lack of diversity. Zoning data from August 2021 revealed that approximately 75% of all residentially zoned land in South Pasadena is zoned exclusively for one or two dwelling units per parcel that do not allow for higher density housing such as apartments or condominiums (Id. at 104). Jurisdictions with the highest proportion of exclusively single-family zoning have the highest percentage of White residents and lower rates of diversity generally. (Id.).

During the last housing element cycle, only 10 affordable units were permitted out of 93 new units. The City has not tracked whether any affordable units have, in fact, been developed.

Despite these deeply concerning data, the City's Fourth Draft Housing Element falls far short of what is needed.

Vacant Caltrans Houses. Under SB 381, the City will soon acquire 20 vacant houses currently owned by Caltrans.[2] The houses are dilapidated from years of vacancy and lack of maintenance. They are in residentially-zoned areas. Under SB 381, the houses must become deed-restricted affordable housing for low- or moderate-income people for a period of 45 or 55 years, depending upon whether they become owner occupied housing units or rental units, respectively.

The vacant Caltrans houses represent a monumental opportunity for South Pasadena to expand affordable multifamily housing in South Pasadena, yet they are scarcely mentioned in the Housing Element. The City proposes Program 1b to "preserve and rehabilitate" the vacant houses and make them "available to moderate or lower income households." This program was modified from the Third Draft, but in the wrong direction by committing to "preserve and rehabilitate" the houses.[3]

Care First and the Tenants Union implore the City to:

- Add the vacant Caltrans houses to the site inventory, including data regarding the lot size, year constructed, and historic designation (or not), and maximum potential number of affordable units that could be made available at each site for rental and/or ownership.[4]
- Upzone residentially zoned areas in South Pasadena, including along the 710 corridor, to accommodate denser housing.
- Implement SB 9 and SB 10 at the vacant Caltrans sites by clearing a path for multifamily housing in the form of duplexes, triplexes, quads, and 10-unit buildings where possible.[5]

[2] Following this first phase of acquisition, the City will likely have future opportunities to purchase more Caltrans homes if they are refused by current occupants. To prepare for this near future, the City should apply a similar framework as we propose here for the conversion of these properties into multi-unit affordable housing, while preventing displacement or meeting the housing needs of current tenants. The City should account for these plans in the Housing Element.

[3] The significance of this change, though seemingly minor, is that the South Pasadena Preservation Foundation has been lobbying the City to bypass SB 381 and sell all 20 vacant Caltrans properties at fair market value to private buyers who would restore them as single-family houses. At a City Council meeting on December 7, 2022, the Chair of the City's Cultural Heritage Commission told the City Council that he has petitioned to add all the Caltrans houses to the national historic registry. The City Council is capitulating to the demand that it "preserve and rehabilitate" the houses. The vacant houses are dilapidated; each will cost hundreds of thousands of dollars to restore. In other words, these houses are teardowns but for the primacy of "historic preservation" in our town. We recognize that South Pasadena is home to beautiful architecture. But valuing historic preservation above all else is backward in the midst of a severe housing crisis.

[4] Given that the City has included a number of non-vacant sites in its sites inventory, it follows that the City should add the tenant-occupied Caltrans houses to its sites inventory as well as potential sites for affordable housing development.

[5] The Housing Element claims that South Pasadena is built out, and that "[i]t is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local

- Develop auxiliary dwelling units as affordable rental units at as many of the houses as possible.

We ask the City to explore denser development with the larger houses, such as:

- 535 Meridian St. (21,920 sq. ft., ~ 0.5 acres),
- 530 Orange Grove Ave. (7500 sq. ft.) and 534 Orange Grove Ave. (10,010 sq. ft.) (adjacent parcels that represent 17,510 sq. ft., ~0.40 acres),
- 1131 Columbia St. (16,998 sq. ft., ~ 0.39 acres),
- 529 Prospect Ave. (15,419 sq. ft., ~0.35 acres),
- 540 Prospect Ave. (11,505 sq. ft., ~0.26 acres),
- 217 Fremont St. (13,310 sq. ft., ~0.31 acres)
- 216 Fairview Ave. (13,240 sq. ft., ~0.30 acres),
- 1110 Glendon Way (11,250 sq. ft,. ~0.26 acres).

Compare these lot sizes to the lot sizes in Table VI-49 (at 182), Representative Projects on Small Sites in Region. In Pasadena and Santa Monica, developments on comparable lots accommodate 15-53 units. Conservatively assuming 20 units per parcel on the large lots listed above, **the City could add 160 affordable rental units on these parcels alone.**

The Fourth Draft Housing Element slates virtually all of the housing affordable to very low- and low-income people in areas zoned as Business Park, Commercial, Community Facilities, Mission Street zoning areas save for one site in the Estate and Very Low Density Residential area (335 Monterey Rd.). (Table VI-50).

The Housing Element's allocation of all low-income housing to transit corridors, outside of residential single-family neighborhoods, does not comply with principles of fair housing. Concentrating dense low-income housing in certain limited areas is antithetical to affirmatively furthering fair housing. It undermines meaningful housing integration in this exclusionary town. The City should rezone single-family areas within the City, including along the 710 freeway corridor, to allow for more affordable housing. The vacant Caltrans houses could provide housing to low-income people within single-family home residential areas, and further the City's goal of creating income-diverse neighborhoods.

SB 381 allows the City to sell seven (7) houses designated as historic "as-is" at market rate to private buyers, so long as it uses the funds to develop affordable housing at a 3:1 ratio. The City **should not** opt for this route. There is no scarcity of large estate houses in South Pasadena. There is an acute shortage of affordable housing. The City should develop multi-unit housing on the historic and non-historic Caltrans parcels alike.

If the City does sell the historic houses, the **Housing Element should reflect its plans to commence construction of affordable units *within three years*, as required by statute**. As evidenced in this draft of the Housing Element, the City is short on available sites for affordable housing development and has identified no potential affordable housing projects that will start or be completed within this short time frame. The Housing Element should identify where those units will go, how they will be financed, what type of housing it will build, etc.

No matter what, the City should not aim to "preserve and rehabilitate" these homes by pursuing historic designation of new properties. These were strategies used once to prevent the building of the 710

codes." (143). But South Pasadena is in the driver's seat regarding these 20 properties. It must start leading on implementing the state laws rather than passively wait to see what homeowners do.

freeway, which is no longer at issue. Historic designation, starting with the commencement of nomination to historic and endangered listings, is antithetical to affirmatively furthering fair housing in South Pasadena. Historic designation of homes would make them unaffordable and environmentally unsustainable to maintain, cementing the city's 20th century redlining policies into the future.

South Pasadena must complete another draft Housing Element that fully accounts for the vacant Caltrans houses it will buy in the near future, with concrete proposals about how to use these parcels to expand affordable housing. Since the City intends to purchase the vacant homes in the coming months, thus making these City owned properties, we expect to see these parcels listed on the Inventory Site list in the next draft.

100% Affordable Developments. Care First urges the city to actively recruit 100% affordable developments through non-profit low-income housing developers (i.e. bolster its commitment to Program 2.h).[6] We recognize that the City has identified two City-owned sites (9 and 14) as candidates for 100% affordable. (229 & Table VI-50). We propose that the City Council double down on its efforts to identify two more viable locations for a total of four (4) for 100% affordable developments, excluding the Caltrans properties discussed above (which are all slated for affordable housing anyway by statute). Additional sites should be for very low, low and moderate income households combined and provide housing opportunities for families.

Auxiliary Dwelling Units. The Housing Element relies heavily on ADUs to create affordable housing and to further fair housing. But the evidence is thin that encouraging ADUs will be anywhere close to sufficient.

South Pasadena has no system in place to ensure that the ADUs it permits actually become rental units, much less affordable ones. The code states that ADUs are not to be rented for a period less than 30 days, but the City currently has no enforcement mechanism in place to monitor the use of ADUs.[7] It is just as likely that ADUs will become short term rentals listed on apps like airbnb, home offices, and guest houses for visitors. The existing ordinance does not go far enough to ensure homeowners who take advantage of a program designed to increase housing opportunities for those who need housing are using the dwelling as intended by the spirit of State law

Even when ADUs are rented, the data emerging so far suggests that these units are not affordable. (176). Finally, the whole endeavor relies on homeowners investing large sums of money to build these ADUs. Rising inflation may dampen ADU construction.

We recommend that the City pilot an affordable ADU program, like Backyard Homes in Los Angeles. Affordable ADU programs offer free or heavily discounted ADUs to homeowners in exchange for covenants to charge below-market rental rates. The Backyard Homes project, run through LA Mas, offers a few model ADU options and charge discounted construction and design fees in exchange for

[6] The city's previous position was that it would simply work within the San Gabriel Valley Housing Trust to build affordable housing in the region. Care First is encouraged to see that the third draft of the housing element takes a more proactive approach.

[7] It is common for short term rental operators in our city to rent their units for two months at a time. While that complies with the letter of the code, the owners are benefiting financially via an unlicensed commercial short term rental at market rates.

renting to a Section 8 voucher holder.[8] Piloting an innovative model like that could spur ADU construction and support affordable housing and income-diverse neighborhoods.

II. Protections for renters

South Pasadena residents are more than 50% renters. Renters account for most of the demographic and economic diversity in South Pasadena. More than two-thirds of renter-households are rent-burdened, with 64% spending more than 30% of their household income for housing.

The Housing Element sets conservation of existing housing stock as a prominent goal, and contains some general provisions aimed at protecting renters. (220). But monitoring affordable units, offering technical assistance to landlords, and vague commitments to vouchers will not be enough to prevent dislocation and erosion of existing below-market rental units. (220-221). **The City cannot accomplish a goal of preventing tenant displacement without enacting more tenant protections**. Currently, South Pasadena relies almost entirely on Statewide protections set in AB1482. These have proven not to go far enough in protecting tenants from evictions or self evictions due to unbearable rent increases due to current inflation.

The landlords and homeowners have "rent control." When they buy the apartments, the mortgage payment they pay is set for 30 years. It does not change even if inflation happens. Renters are demanding, not even the same stability, just something where their rent remains close to inflation, and the right to stay in their home if they pay their rent.

Landlords are making massive profits on rent. Most "mom and pop" landlords in South Pasadena purchased their apartments 20 to 30 years ago. Over the past year, 13 apartment buildings have sold in South Pasadena at an average of $1.6 million. Meanwhile, the average original purchase price of these 13 apartments was $256,000. Most "mom and pop" landlords are realizing massive profits off people struggling to stay in South Pasadena.

Renters love South Pasadena and want to make it their home just like homeowners. Tenants have a right to be a part of this long-term community and not have to worry if the housing crisis means someone richer will take their place.

No cause eviction protections. South Pasadena Tenants Union and Care First South Pasadena request an urgency ordinance to stem the tide of no-cause evictions expected in early 2023. Building on the progress advocates made with its just cause eviction ordinance in 2019 and its substantial renovations ordinance in 2021, we ask that the City update the law to require landlords effectuating no-cause evictions to provide relocation assistance that goes beyond AB1482.

The relocation amount should be equal to two (2) times the daily pro-rata portion of the tenant's current rent. All units removed for owner occupancy must be held off the market for no less than three years. If an owner evicts a tenant for no-cause because that unit will be taken off the market for owner occupancy, the owner must register the unit with the City as "owner occupied." If the owner violates the ordinance and puts the unit back on the market within the three year period, a $50,000 fine will be levied. Funds collected from fines would support Housing department staff and enforcement staff.

[8] Sam Lubell, Los Angeles Times, March 5, 2021, "Well-designed rentals that L.A. can afford. That's the mission of the Backyard Homes Project." https://www.latimes.com/entertainment-arts/story/2021-03-05/backyard-homes-project-adu-los-angeles

For evictions due to justified substantial renovations, the ordinance should include a first right of return for tenants who do not want to relocate out of South Pasadena. The owner should cover the rent or cost of housing during renovation up to what the tenant was paying for rent at the unit undergoing renovation. The tenant should be allowed to return to the unit at the same rate as was being charged prior to renovation. If temporary relocation due to verified substantial renovation exceeds 120 days, the landlord may terminate the tenancy with the additional payment of relocation assistance as follows: (1) 2.5 times the monthly Fair Market Rent (published by HUD) plus (2) a Moving Expense Allowance of $1,338 (if all occupants are adults) or $4033 (if any of the occupants are minors, a senior, or a person with a disability.

These protections would provide much more support to South Pasadena renters than the municipal code currently provides, and prevent displacement.

Rental assistance. The City currently allocates its CDBG funding to meals on wheels for seniors and sidewalk repairs. We demand that the City initiate a rental assistance program with some of the CDBG funding plus allocate yearly amounts from its General Fund to provide low- and moderate-income residents and prospective tenants to pay security deposits and rent. The program should also offer rental assistance to moderate-income rent-burdened residents. Additionally, the City should pay partial rent for Section 8 voucher holders to make up the difference between rent and the voucher. Because many Section 8 voucher holders in Los Angeles County are unable to secure housing in time and lose their vouchers as a result, the City should help ameliorate this problem by incentivizing and assisting landlords within the City to join the Section 8 program. At present, there is an abysmally low number of Section 8 voucher holders residing in the city (10 total according to the Housing Element). Referring residents to the County (224-25) will not help anyone get into affordable housing when there are no voucher-accepting units in South Pasadena.

Rent control. The City should adopt a rent stabilization ordinance. A local rent control ordinance would give low income and moderate income families, seniors, the disabled and students and workers a fighting chance to stay in South Pasadena. The bleeding out of affordable existing rentals is gradually affecting the diversity of our schools, local culture and economics. South Pasadena being almost an exclusively high rent community, means more transient households that are less likely to support our community health through civic participation and investment in our churches, nonprofits, and schools. With a lack of enthusiasm for building new affordable housing, the City needs do more to maintain the little existing affordable housing we have and protect all tenants from further displacement because of ever increasing rents and cost of living that does not mirror increases in incomes.

This would include, but not be limited to, provisions such as limiting rent increases to no more than 2-6% based on inflation, with the ceiling set at 6%. The ordinance would maintain a floor of 2% allowable regardless of percentage of inflation. If inflation is 1%, rent can be raised 2% The ordinance would apply to all buildings as allowed under Costa Hawkins. If Costa Hawkins is repealed or modified to allow newer buildings, then rent control in South Pasadena automatically applies 20 years after certificate of occupancy.

The ordinance would require a lease term of one year (12 months), and 60-day notices for rent increases. If a unit become available due to an eviction, rent on the unit can only be raised up to 20% of what the landlord was charging the previous tenant. The ordinance should also include the establishment of a local rent control board to establish yearly rent increases, monitor enforcement, and adjudicate tenant and landlord disputes, among other duties

Funding improvements in exchange for affordability covenants. Policies 1.1-1.3 in the Housing Element are focused on improving energy efficiency and bringing older housing units up to code (218). There is a real risk, however, that requiring owners to make financial investments to update older units will result in rent increases, evictions for substantial renovation, and dislocation of low- and moderate income renters in South Pasadena.

We ask that the City provide funding to make needed improvements to make housing units habitable and safe for tenants contingent upon the landlords' covenants not to evict tenants or raise rents excessively once the units are improved. The City has already identified potential funding sources for such improvements. (220).

Thank you for the opportunity to provide feedback. We look forward to participating in the process as it proceeds.

Best regards,

South Pasadena Tenants Union & Care First South Pasadena

- **How addressed:** The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time. It is the intention of the City to preserve these homes as affordable housing, not as historic resources. The Housing Element has been updated to more clearly make this point.

The Housing Element focuses on encouraging the development of new housing throughout South Pasadena. It is anticipated that sufficient new housing will improve the housing market for both renters and buyers looking to live in South Pasadena.

As shown in Program 2.l, the City has committed to issuing an RFP to affordable housing developers for one of the city-owned affordable housing sites no later than December 2024, and other RFPs in 2026 for the development of housing on these city-owned site.

Program 3.g commits the city to monitor the number of ADUs built, and to survey ADU owners annually to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Program 3.h commits the city to modify its zoning code or identify additional affordable housing sites if it is determined that the affordability of ADUs is less than expected in the Housing Element. This survey is scheduled to begin in 2023.

Comments on the 4th Draft Housing Element

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

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

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** Program 1.b has been revised to substantially match the proposed language in this comment.

Josh Albrektson (December 19, 2022)

South Pasadena comments:

Downtown Rezoning

They are going to 70 DU/ACre and 60 ft/6 stories which is good. Of note, most buildings need 7 stories to get 70 DU/Acre.

They have a TON of bullshit sites that would never be developed. When Los Angeles did their analysis they got rid of these sites. It is one thing to claim 20% of developable sites will be developed at 100% capacity. It is quite another to claim 100% of a complete downtown would be developed when 30% of the downtown has zero chance of actual redevelopment.

I will be doing a twitter thread on it and there will be EXTENSIVE complaints if these bullshit sites are allowed to be counted. These include multiple official South Pasadena historical monuments, multiple condo complexes that are 15 years old, Historic theaters, Micheal Myers House from halloween, single family homes on 4,000 sq ft lots, 100 year restaurants, 10 foot alleys, historic banks, etc, etc.

Every condo complex built in the last 22 years, every historical monument, all buildings over 70 years old, and all single family homes under 0.2 acres should be removed from the calculations and only the

buildings that ACTUALLY has a chance of development should be counted as 20% likely to be developed.

Inclusionary Housing Ordinance

Their own study shows that 15% is not viable in South Pasadena. They also believe that they can make the 15% Very Low or 7.5% Very low and 7.5% Low.

I have attached an e-mail from the Mission Bell owner to the planning director on Sept 29th stating that his fully market rate project is not currently financially viable. If their fully market rate project is not viable then a 15% IHO is not viable.

South Pasadena should be required to change their IHO to 10% Low OR 5% Very Low and if housing is actually built using the IHO, then they can increase it if they find housing is actually being built, rather than go the other way around.

Especially since they intentionally killed all projects with their 10% Low and 10% Very low which is currently still in place.

Realistic Development Capacity

They are claiming that almost every non-vacant low income site will be built out at 95% Capacity, even though every one is on a primarily commercial street. You rejected Santa Monicas draft for this reason and you have cited multiple cities for this.

Here is Danville:

https://twitter.com/JalbyMD/status/1602454496822497282?s=20&t=qjjmEng2_VMCWagab4n-dw

[twitter.com]In May 2021, before Chris Holden called your director, you had a problem with South Pasadena claiming 80% RDC.

It is completely unacceptable that you guys are allowing South Pasadena to claim a ridiculously high number.

Processing Timelines

South Pasadena has had 4 mid level projects proposed from 2018 on. As of yet, none of them have building permits. It is absolutely unacceptable that you guys say that they can be by right at 20% affordability in order to avoid these processing times.

Santa Monica committed to making all projects that fit the zoning under one acre by right. And they have actually historically produced housing. South Pasadena has not.

I even sent you information about how they required a preliminary application a year before a real application and how they forced 815 fremont to undergo TWO complete redesigns.

In the Housing Element you have a letter from Victor Tran about how he submitted applications in March of this year that South Pasadena hasn't even acknowledged they have been turned in.

Appendix B

South Pasadena was one of two cities to receive a grant from SCAG to pay for objective design standards for all it's multifamily housing. They need to be required that all projects with 10% low be by right.

Something needs to be explicitly written out in the Housing Element with actionable measures to ensure projects are processed. They also need to commit to following the law on the permit streamlining act which they currently regularly violate.

Low Income Sites

You will receive separate more in depth individual e-mails where Gustavo and Megan are CCed with these low income sites and the exact part of the law that are being ignored if these sites are approved. I want to be sure that they will not be able to claim they didn't know that the laws are intentionally being ignored when this comes up in the future.

I did a twitter thread, which I will also submit as a different comment:

https://twitter.com/JalbyMD/status/1602435712846290944?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 2

Just to be clear, two of the biggest buildings JUST GOT LEASED:

https://twitter.com/JalbyMD/status/1602449467042430976?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]And I just want to say it is fucking bullshit that Paul thinks I have to prove they are not short term leases. South Pasadena gets to lie about what is leased and that is okay, but when I show that buildings that make the site undevelopable are lease, I am required to get teh leases to show they are not short term leases…..

This is a copy of the exact part of AB 1397 talking about leases that you are choosing to ignore the actual legislation passed by the legislator and signed by the governor and not to apply to this site.

https://twitter.com/JalbyMD/status/1602450748377370624?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 8

There is no replacement site, if they had a replacement site they would have pay millions for the site, they would have to pay millions to build a new public works yard, then they would have to pay to tear down the building and remove the gas tanks, and then after the multi-millions spent, only then could it be offered for an affordable housing project.

Before Chris Holden called your director you actually cared about this site. When I posted it on twitter a developer told me he estimated it would cost "Tens of Millions" just to replace the site and make it available for house.

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Site 12:

The City doesn't own most of the site. They own 0.19 and do not have plans to buy he rest. Also see Site 15 comment for sites under 0.5 Acre.

Site 13:

The City has a lease going through 2024 for this site. They actually turned down someone who wanted to build affordable housing on this site. They added a single family home that they do not own to get over 0.5 acre.

Site 14:

You ignored almost all the actual laws passed by considering this site.

Link to video:

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Just to be clear, both homes are getting brand new foundations. They have hired an architect to renovate the homes (Harvest Architecture). This site is under 0.5 Acres. I sent you an e-mail from the owner stating his plans were to renovated the home s(which is actually happening right now.)

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by saying South Pasadena has substantial evidence the current use will be discontinued in the planning period.

https://twitter.com/JalbyMD/status/1602438163506794498?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by allowing a under 0.5 Acre site to be considered a low income housing site:

https://twitter.com/JalbyMD/status/1602447693690720256?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 16:

Newly renovated grocery store with grand Re-Opening August 3rd. You can read my tweets on it here:

https://twitter.com/JalbyMD/status/1602439866897211393?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They first claimed it was the whole grocery store, then it was just the parking lot, then you guys told them how to lie to you so that the parking lot would be acceptable. Here is a link to the mayor spitballing ideas of how they could lie to you about the parking lot:

https://twitter.com/JalbyMD/status/1602443223150256129?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They got a letter from the owner in the Housing Element which I am sure they wrote what SoPas asked them to write.

Site 17:

I recently received all e-mails from South Pasadena and the site owner. In the e-mails the owner is asked if they are considering housing on the site and he says "I think we are good." When asked if they want to still be on the Housing Element site list, he replies "I guess"

Along with the brand new lease signed this year this is pretty damn good evidence that the owner has no interest in developing housing in the planning period.

Please refer to the above link to the law talking about how leases should be considered.

Programs:

South Pasadena needs specific objective circuit breakers in their Housing Element programs. As mentioned in the call, you can pay a consultant to produce a study proving the highest inclusionary housing ordinance in the state is viable even when it is blatantly not, and that is exactly what South Pasadena did. They cannot be trusted to evaluate their sites in 2024, update the inclusionary housing ordinance, look into reducing parking and open space requirements, or do a realistic rezone if the ballot measure fails. These things need to be spelled out in this housing element so they are enforceable.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been substantially revised to address these comments, including increasing the height limit, removing identified sites, and revising the analysis of the DTSP sites to account for additional constraints such as historic designations.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as

a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future.

Site 14 is two single family homes. Paul McDougall has an e-mail that the owner sent to the city in 2020 stating he was planning on flipping the homes and selling them.

That renovation is happening right now and Paul McDougall KNOWS that the homes are being renovated. They are currently getting brand new foundations by Foundation Repair LA (https://foundationrepairla.com/ [foundationrepairla.com]). These are the same people who repaired my foundation.

They also have an architect, Harvest Architecture based in South Pasadena that are designing the interiors. https://www.harvestarchitecture.com/

[harvestarchitecture.com]Here is a video where you can see the signs for both of these companies and one of the single family homes getting the foundation as it is being filmed.

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

These single family homes are literally being renovated to be BETTER single family homes and Paul McDougall knows this and doesn't care.

But not only that, these sites are below 0.5 Acre. THIS IS SPECIFICALLY OUTLAWED BY AB 1397.

Again, citing the law passed by the legislators and sign by the governor:

(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.

Sites 12 (0.19 acre owned by city) and Site 13 (0.42 owned by the city) Both fall under this category.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Site 14 has been removed from the Housing Element. Site 12 is 0.56 acres.

Josh Albrektson (January 2, 2023)

This is one of a few e-mails you will be getting where I am going to cite a "low income site" that South Pasadena is claiming could be turned into low income housing this cycle and the exact law that specifically outlaws these sites.

Every one of these sites Paul McDougall said was okay in our November 15th meeting.

I just want to be sure that Jason and Gustavo cannot say in the future that they did not know that Paul McDougal and Megan Kirkeby are intentionally not following the laws passed by the legislator and signed by the governor.

I will be sharing these e-mails with every legislator if South Pasadena is allowed to claim these sites, along with the hundred other examples of illegal low income sites that I personally e-mail Paul McDougall about and he approved.

I get that Chris Holden had a personal and urgent phone call with Gustavo to discuss the South Pasadena Housing Element, but that does not mean that HCD should decide not to enforce the laws that are the actual laws.

Site two is a businesspark in South Pasadena. They literally just leases two new businesses this year and these two businesses occupy the entire buildings for two of the 6 buildings.

Check out the leasing brochure. This is high quality offices:

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf [images1.loopnet.com]

This is from the summary of AB 1397:

This bill would require the methodology to consider, among other things, the city's or county's past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment, as specified.

And here is the actual text from the law:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

Paul McDougall knows these buildings were JUST leased, and he doesn't care. When I told him again that they were leased this year, he asked me to prove they were not month to month leases.

The job of HCD is to enforce Housing Laws, and Paul McDougall should not be allowed to just ignore the laws at his will, and that is currently what is happening under Gustavo's leadership.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for Site 2 to further encourage the redevelopment of the site. Furthermore, development standards for this site, as well as all mixed-use parcels, will be revised to encourage redevelopment.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future. Site 8 is the Public Works yard for South Pasadena. You can see a video of the yard in this tweet:

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=U_d2X2e5GgNUrylao7D03w

[twitter.com]Let me be clear about what South Pasadena is claiming for this site. Sometime in the next 7 years, they will find a replacement site. They do not have any open land right now for this replacement site, but they will find one somewhere. They will then build a brand new public works yard on this replacement site. They will then tear down the old public works yard. They will then remove the gas tank that has been there for decades. They will then remediate any toxins in the soil from this being a public works yard for 40 years.

We are talking about tens of millions of dollars spent before this site could even be considered for low income housing. This site is the kind of bullshit sites that will NEVER be housing but cities like to claim it so they don't have to zone for housing somewhere else.

In the last letter from Paul McDougall, HCD actually explains how the city should lie to HCD in a manner they would be willing to accept.

"For Site 8 (Public Works Yard), the element should discuss the impacts of the underground gasoline tank and filing station and soil contamination on the timing and cost of development in the planning period."

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis

of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to further describe where the existing uses of Site 8 will be relocated and to address the potential environmental constraints on the site.

Josh Albrektson (January 9, 2023)

I have come across this information from a respected individual. They believe that the density that can be built at 45 feet is about 40 to 44 DU/Acre. The is under 1 DU/Acre per ft of height.

If a City such as South Pasadena wants to claim 70 DU/Acre, they need to have a height limit of at least 75 ft.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the height limit of the mixed-use zones.

Josh Albrektson (January 12, 2023)

Please consider this thread on the downtown rezoning and the extensive number of buildings that could NEVER be developed included in their calculations.

https://twitter.com/JalbyMD/status/1613662763473342465?s=20&t=YWu-t552VhhJiPuR8JBnXA [twitter.com]

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The analysis of the DTSP area has been extensively revised to address this comment. Revisions include removal of many of the identified parcels from the analysis, and additional considerations regarding the probability of redevelopment of parcels within the DTSP area.

Josh Albrektson (January 31, 2023)

Please consider the following separate comments:

1. Glendon and Meridian from Monterey to the 110 freeway should be included in the Downtown Specific plan and significantly upzoned, especially since they are touching the train station.

2. Monterey Road from Pasadena Ave Southwest should be significantly upzoned. This abuts a mountain, and has very close access to parks and an elementary school and has a lot of run down single family homes that can be upzoned.

3. I like the idea of SB 10 around Fair Oaks and Huntington

4. Consider upzoning Fremont Ave from Monterey to the 110 freeway.

You are actually further away from compliance than you think. HCD has not certified a Housing Element that doesn't have a significant buffer (They recommend 15%) and I doubt you will be the first.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity in all of the areas identified in this comment.

Josh Albrektson (February 1, 2023)

I just read through the staff report for tonight's meeting. After reading through it, I expect that your next draft will also be rejected.

There are two major issues.

In the 4th draft for low income units you were required to have 1155 and you showed 1178 for 23 total excess. That is a 2% buffer. Some of the sites you have will not be allowed, so once you remove those sites you will actually be under the required amount.

To date HCD has not allowed a Housing Element to be accepted without a significant buffer. Most accepted Housing Elements have a minimum buffer of 10% or greater. In their memo on the bottom of page 22 they state you should have a 15 to 30% buffer.

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

I sent a separate e-mail noting the 4 places I would upzone. If you guys do choose to try to submit another Housing Element without a buffer it will be the first issue I raise with them.

The second problem is that you actually need to create programs to affirmatively further fair housing (part 3 in the letter). South Pasadena has yet to actually propose an AFFH program and what is described in the staff report definitely would not be good enough.

San Marino and Santa Monica both legalized 2 to 4 plexes for their AFFH program. If you guys don't want to do that, you can probably get by implementing rent control and stating that allows people to stay in their homes.

And I hope after having been told many many many times that they need to put firm data and specific information in the Housing Element, your staff will realize they need to:

1. Spell out exactly what development standards will be relaxed in what manner

2. Specify what fee reductions and streamlining will be implemented

3. The exact IHO percentage

4. The number of units the IHO applies to

5. The hard trigger that would show if the IHO is effective or not with the change that will be made if the trigger is not met

6. If the city will remove the height limit completely or change the height limit to 84 ft and 7 stories

One thing to note about the height limit. As it stands SB 828 will give South Pasadena another 2,067 units in 2030. If you do a limited height restriction removal, you will have significant problems at that time. And I doubt HCD would give you 2 years to put it on the ballot since you will end up with plenty of warning in the years leading up to it.

Also note that because you are including a lot of historic properties in your Housing Element (Specifically downtown), and your ability to stop a development on these properties is going to be very limited. Anybody who wants to buy the Fair Oaks pharmacy or Rialto Theater and tear it down for apartments can.

I strongly suggest you guys consider what buildings you want off limits, remove them, and upzone a different part of the city you do not care as much about. This could probably even be done after you have a compliant Housing Element.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity to account for a 15% buffer for lower income units and more than a 30% buffer across all income categories.

Josh Albrektson (February 6, 2023)

I cannot make the meeting do that previous commitments. I want to put this comment in the public record. I support all of the zoning changes and programs mentioned on the February 1 city Council meeting by city Council and staff with one exception. I think great progress is being made.

I do believe the historic downtown properties should be completely removed from the zoning so that they cannot be re-developed. I will have a much more extensive letter in support of the housing element once I get back.

It would be great if this meeting was recorded and published.

Also, the staff does not need to respond to my comments on the previous draft due to the fact, I think there will be significant changes on the draft. Please refer to this paragraph and not waste any time responding to previous comments.

- **How addressed:** The zoning changes and programs mentioned during the February 1st City Council meeting have largely been implemented in the Housing Element, as refined during the City Council meetings held on February 9th and 15th.

Josh Albrektson (February 6, 2023)

Just to be specific.

Please withdraw all comments from me that were received after the last housing element was published. If they need to be included in the record please do not feel to respond and refer to this comment saying SoPas does not need to respond.

- **How addressed:** The previous comments are included in this Appendix with brief responses.

Josh Albrektson (February 13, 2023)

I got back from my cruise and listened to the Thursday meeting. I think you guys are doing a great job and I'll do whatever I can to help you get compliance with the zoning.

So this is what I have for my letter that would give you substantial evidence. Once you guys finish your plans, I will add onto it.

https://docs.google.com/document/d/1WJf1YEmjngsUVDaCq3lcy9SIMGx-E3q80K6tCtWeBPU/edit?usp=sharing

I fully believe that with either citywide 4 plexes with right of return OR Transit 4 Plexes with right of return and rent control, you will pass AFFH. I have talked to Anne and you heard from John. If you guys include a program for rent control, you will have a strong letter from the SPTU asking HCD to find you in compliance.

With my letter and SPTU's, I think you should get compliance.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to allow for four-plexes citywide, expect in high fire hazard areas, and to include a right to return policy (Program 6.b.).

Josh Albrektson (February 13, 2023)

So I talked to Matt Gelfand (CCed on email) and told him about my idea for a grocery overlay zone.

It would be to give Ralphs and Vons the same zoning that Pavilions requested, but since they are much less likely than Pavilions to develop in the planning period, only counting 25% realistic development capacity of the maximal density.

So for Vons it would be 3.96 Acre x 140 DU/Acre x 0.25 chance of development for 139 units

Ralphs would be 3.09 acre x 140 DU/acre x 0.25 chance of development for 108 units.

Matt is okay with removing those sites from the banned sites for this kind of zoning and calculation. It is part of your agreement, not stipulation, so it would just require you guys signing a piece of paper.

I also don't think HCD would have a problem with it since the calculation is just like what they have on the top of Page 22 and I will be including it in my letter providing you with substantial compliance.

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

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Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for these parcels, along with all of the parcels adjacent to Fair Oaks Ave., to 110 du/ac.

Alan Ehrlich (February 14, 2023)

Hi Angelica, Armine,

Like you and many others, I would like to see the city submit a HE that can be accepted by HCD with this next go. My general sense from the questions and comments of the special council meeting last week is that members of the council finally seem to 'get it" and are (mostly) ready to accept the additional changes which will be necessary in So Pas's 5th draft submittal.

With that it mind, and in spite of pushback I expect you would receive from certain members of the community, please accept these suggestions for inclusion in this next draft. Like you, I believe we would all like to see this phase of the HE to be done so we can get on to the next part of our lives.

1) Remove the 45 year CHC review from the planning code. According to Mark Gallatin, state law permits the same review and in the 6 instances where a property was reviewed during Mark's term on CHC, all have been approved. This is a gimme.' Effectively, the city is giving up nothing, but to HCD it will appear the city is removing a constraint. CHC will squawk, but by Mark"s own statements, there is no there there.

2) Mark Gallatin corrected a public comment I made about SB 381 requiring 3 housing units for each CT property sold. Mark clarified that this only applies to the 7 historic properties of the 67 lots within our city. In my comment I had said that if the city committed to 3 AFFH for all properties, that would provide a minimum of 60 units, giving the HE the cushion needed for this section. HCD is obviously very aware of the CalTrans properties and the potential they represent to meeting the city's AFFH and RHNA targets. Instead of continuing to battle HCD on this point, allow me to suggest that the 5th draft commits to adding a minimum 3 AFFH for every CT property, regardless of whether the city redevelops the site, partners with an HRE, or sells the site to a private buyer. If the requirement exists for the 7 historic properties, it is not a stretch to apply the same condition to the 20 non-historic properties as well. It does not prevent the city from acquiring and selling the 20 properties, it just provides HCD an assurance that the sale of public land will be used for public housing purposes. Standardizing the rule, respectfully, this is also a gimme, a no-brainer.

3) As a practical matter for the elected members of the city council (and feel free to share this with them), this is perhaps the optimal time to go for broke and submit the plan that HCD will approve. 2022 elections are over, so anything submitted/approved now would not affect Michael or Janet in

2026 and we are stilll far enough from the 2024 elections for it to concern Jon, Evelyn or Jack. On the other hand, if the city continues to fight HCD by submitting bad HEs, there will no doubt be several builder remedy projects filed before 20024 and the voters will remember that when they had the chance, Jon, Evelyn and Jack did nothing and will be held to blame.

4) One final recommendaion, please add a slide to the presentation showing the number, names and $$$ of grants available to provide, restore and rehabilitate AFFH. HCD, SCANPH and SCAG send NOFA's out regularly announcing new programs, many of which I have forwarded to you Given the estimated costs of what it will take to rehabilitate the CT homes, it is only appropriate that the council and members of the community know how many hundreds of millions of dollars the city is leaving on the table by not having an approved HE and not being eligible to apply. It would be the understatement of the year to say the city has neither the funds, staffing or expertise to manage any of the CT properties.

As I've suggested to both of you before, I don't know what the perfect plan is, or even if one exists, but I do know, and you know, that there are a variety of options out there that could work. Its time to get off the crazy train. If the city needs to be engaged with lawsuits over the HE, I'd rather it against the neanderthals holding the city back than CA Homeowners and Chris Suttons of the world. Let the Urquharts, Shanes, Takedas, Carlsons, Gallatins, Nuckols and thier ilk put their money at risk fighting state mandates, rather than making the rest of the city's taxpayers assume the cost of their NIMBYism.

I'm looking forward to seeing you both at tomorrows council meetings. I do not have Grant's email address, otherwise I would have included him as well.

best, Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

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"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

- **How addressed:** The Housing Element has been revised to further address the Caltrans homes and to greatly increase the zoning capacity throughout the city.

Care First (February 15, 2023)

Re: **Special Joint Meeting of the City Council and Planning Commission, February 15, 2023**

Comment, Agenda Item No. 2, Receive Housing Element Presentation and Provide Direction on 5th Draft

Dear Mayor, City Councilmembers, Planning Commissioners:

Care First South Pasadena is pleased to submit the following comments on the fifth draft of the City of South Pasadena's Housing Element. At this critical juncture where the city stands to lose local control over the development of the city, we strongly recommend the city to adopt the following policies to affirmatively further fair housing, encourage the development of more affordable housing in an equitable manner, and preserve existing affordable housing.

Care First continues to demand:

- A commitment to use the 20 vacant Caltrans house sites, which the City will purchase in the coming months, to develop on site a blend of duplexes, triplexes, quads, and denser multi-unit buildings for affordable ownership and rental opportunities (A number of the vacant houses are 0.25-0.50 acres and could accommodate redevelopment with even more housing units.);
- A pilot affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus); and
- Recruitment of 100% affordable developments through non-profit low-income housing, developers for at least four (4) clearly identified and viable locations for 100% affordable developments, plus spelling out specific financial and regulatory incentives the city could offer such developers.

The City should also adopt the following policies as ordinances with accompanying budget allocations as needed to implement the programs, within six (6) months from the date the Housing Element is adopted:

- Rent stabilization with an 8 percent annual cap for all apartment complexes that have ten or more units;
- Provide tenants the right of return in the event they must vacate their rental units to accommodate substantial renovation or redevelopment; and
- Increase relocation assistance for tenants subject to no-cause evictions.
    - Landlords would be required to pay households at or below 140% of median income for Los Angeles County a relocation allowance equal to two (2) months fair market rent as established by the U.S. Department of Housing and Urban Development (HUD).
    - In addition to the relocation allowance, a landlord must also pay the tenant a moving expense allowance in the amount of $1,120 for adult households or $3,364 for households with dependents, disabled or senior members.
- Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent, by committing to evaluate the city's available funds during each budget cycle and to dedicate a reasonable amount to achieve this goal; Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

We incorporate the details of these tenant protections from the South Pasadena Tenants Union comment, dated February 14, 2023.

Additionally, to further the goals of fair housing, the City should"

- Eliminate historic preservation policies and practices—including in ordinances, the Historic Preservation Element, and duties entrusted to the Cultural Heritage Commission—that impede development of affordable housing in the city, especially those impacting the city's transit corridors and Caltrans property sites;
- Review all properties that have been nominated for or placed on the city's Inventory of Historic Resources and/or designated as historic under the city's historic preservation policies;
- Codify the city's Sundown Town Resolution by adopting an ordinance that prohibits the use of historic preservation policies and practices that would cause discrimination or disproportionate economic harm on the basis of race, ancestry, national origin, color, religion, sex, or sexual orientation;

- Upzone currently zoned R-1 (single-family only) to R-4 (allowing for fourplexes) in the city's transit corridors, as identified in previous presentations delivered by the city this month;
- Implement Senate Bill 9 to encourage lot subdivisions and higher density in single-family neighborhoods rather than impede its use.

Best regards,

Care First South Pasadena

- **How addressed:** The Housing Element has been revised to address this comment by: 1) revising the program related to the surplus Caltrans homes and committing the City to add additional units to these properties as ADUs or Missing Middle housing where feasible; 2) adding a new goal and programs related to tenant protections, including a rental registry, right to return, relocation assistance, and rent stabilization; and, 3) committing the City to allow for Missing Middle housing citywide, except for in high fire hazard areas.

Comments on the 5th Public Review Draft Housing Element

South Pasadena Preservation Foundation (March 3, 2023)

Let it be stipulated and acknowledged at the outset that the process for the acquisition and disposition of Caltrans surplus properties in the City of South Pasadena created as a result of that agency's decision not to build a northerly extension of State Route 710 through the city is governed by myriad state laws and regulations, including but not limited to, SB 381 (2021). The purpose of providing the following alternative language for Program 1.b. of the Housing Element is not to circumvent or ignore the requirements of SB 381, an amendment to the Roberti Law, but rather to seek to prevent some very real externalities that perhaps were not contemplated when the legislation was drafted and signed into law, but which nevertheless will cause implementation of the letter of that law to undermine whatever well-intentioned spirit brought it into existence in the first place. These externalities include the inflation of rehabilitation costs created by requirements placed on the City or other Housing Related Entities that private individuals and families are not subject to, making acquisition and rehabilitation by those entities financially unfeasible. Another example of an unintended consequence of the existing law would be the concentration of affordable housing in one or two neighborhoods of the city where the surplus properties are located, rather than a more equitable and dispersed concentration throughout all parts of the city. The South Pasadena Preservation Foundation wishes to see the City promote creation of new affordable housing with as few constraints as possible, so that it has the flexibility to respond creatively and nimbly to a dynamic housing market and evolving community needs.

Program 1.b - Maximize the proceeds from the sale of the Caltrans surplus properties to create new affordable housing throughout the city

The California Department of Transportation (Caltrans) currently owns 68 surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City will leverage the 20 unoccupied Caltrans surplus properties, two vacant lots and those of the remaining 46 occupied Caltrans surplus properties that are not purchased by former or existing tenants and use the proceeds from the sales of such properties to generate capital to create new, deed restricted affordable housing units throughout the city, whether on city-owned land, or on privately owned property. These proceeds can serve as a "force multiplier", by unlocking the combined equity of those properties and leveraging it to maximize funding for affordable housing creation and housing element implementation. Several alternatives exist within State law and Caltrans regulations for the City to partner with Caltrans to maximize the proceeds from the sales of the

Caltrans properties and place them directly into a restricted account (i.e. the SR 710 Rehabilitation Account) dedicated solely for the use of the City of South Pasadena to create affordable housing. Some other alternatives, after further study, may be financially infeasible so in order to promote affordable housing in South Pasadena all alternatives, including that proposed here, must be considered.

Eight-year Objective: To facilitate the acquisition and disposition of the maximum number of Caltrans surplus properties to individuals and families and to leverage the proceeds from the sale of these properties to generate capital for the creation of deed-restricted affordable housing units throughout the city to expand housing mobility opportunities for lower-income households and revitalize underutilized areas.

Funding Source: SR 710 Rehabilitation Account

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Begin implementation of sales program in 2023 and at least annually throughout the planning period until disposition of all surplus properties is complete.

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Josh Albrektson (March 3, 2023)
Love the Housing Element and I am pretty sure it will be accepted.

I think you guys accidentally didn't include that the IHO would not apply to buildings under 10 units. I would add that.

On the South side of Monterey Road you have Victor Trans Site 3. He has mentioned before that he would like to put about 50 units on the site. I would consider making that half of the road Residential High Density zoning instead of Residential Medium Density. You could also then count Site 3 as 1.26 acres*45 units/acre rather than the 8 above mod units you are counting now. I'm not gonna complain about this but he is going to reach out to you.

The right of return program is also not quite right but that is something that could be worked on later. Here is a LA Times article on it.
https://www.latimes.com/opinion/livable-city/la-ol-gaisford-right-to-remain-gentrification-20180212-story.html

I've read the rest of it and I could not find anything else missing.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** The Housing Element has been revised to include an exemption to the IHO for developments under 10 units. Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element. Proposed tenant protection programs will be further researched and refined.

Victor Tang (March 5, 2023)
Hi Angelica,

This is Victor Tang, the developer for 181, 185, 187 Monterey Road with 1.25ac land and site #3 in city's site inventory. Our site is vacant and ready for development.

In the special joint meeting on 2/15/2023, Housing Element consultant Mr. Grant Henninger had proposed an Extended Ostrich Farm Zone with 70u/ac density that included Monterey Road. It had the support of planning commission members as Monterey road was wide with all the utilities available. However this zone was not implemented in the latest Housing Element Draft.

Although we have submitted a development plan for 8 market rate units, we are interested in a new development for 50-80 units including low income housing. Current Housing Element's density for our site is 30u/ac. We need a higher density (probably 50u/ac) for a new development to be financially feasible. If the city can give our site a higher density, we can withdraw existing 8-unit plan and the city can count additional RHNA from our site.

Best regards,
Victor Tang,

- **How addressed:** Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element.

John Lawrence (March 6, 2023)

The proposal to allow mult-unit housing anywhere in South Pasadena is a terrible proposal that would ultimately destroy the character, uniqueness and quality of life in South Pasadena. I understand there are concessions that are going to have to be made to the state housing plan but to simply say, "well OK, we will abdicate all control, all ability to self-manage our own destiny is irresponsible and destructive.

Who supports it his dystopian vision of South Pasadena? I'd really like to know. I suspect it is a purely political position being pushed by people who have no history, no investment, emotional or otherwise, and life connection at all to the city. Must be nice to look in from outside and advocate destruction when it doesn't affect you.

- **How addressed:** The comment misstates what is being proposed as there is not a proposal to allow "multi-unit housing anywhere" in the city. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Samuel Lin (March 6, 2023)
Dear whomever it may concern:

My wife has grown up in South Pasadena since she was a young little girl and I have since just moved been a resident for about 5 years. South Pasadena has always been known to be as a quaint small town everyone knows each other.

Until recently, there's been a lot of traffic, kids have been stuffed in schools. Even our own small elementary school in Marengo has a waiting list for the very same people who would live on the same street.

This proposal is not only going to bring in more congestion and traffic, it is going to change the very nature of our small city. We don't have the capacity to fit medium density because we eliminated the 710 freeway, we have a lot of traffic on Fremont. Also, you're going to turn our small beautiful city in a dense packed traffic, terrible place. I strongly urge you to reconsider the elimination of single family zoning, we do not need dense housing in this city, we cannot handle the traffic and we don't have the resources.

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Ed Donnelly (March 6, 2023)
City Planning staff,

It has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

This will significantly impact the very things that define living in South Pasadena. Over the past several years I have worked side by side with fellow residents to secure city revenue through the UUT and the increased local sales tax. We have worked diligently to secure and sustain funding for our schools and our public library. Those campaigns, while a tremendous amount of work, were ultimately personally rewarding for our volunteers because what we were truly campaigning for was sustaining our way of life here in South Pas. And voters here in 91030 overwhelmingly agreed with us

in every case. This is much the same as the generation before us fought tooth and nail to prevent the 710 freeway from tearing the town asunder. And despite all of this an existential threat now looms unnecessarily.

I fully support responsible development and the building of affordable housing here in South Pasadena. There are sensible options. In addition, I completely understand the demands of the HCD and the consequences of not complying with them as we are already seeing with the project on the Shaker's property. Embracing strategies that will immensely impact our police and fire departments, infrastructure and schools while drastically reducing tax revenue due to diminished property values isn't just simply foolish, it's irresponsible governance.

I urge you to find another way to realistically meet the RHNA numbers without destroying the fabric of our way of life here and dooming the city to be just another banal concrete wasteland on the edge of Los Angeles.

Ed Donnelly
1935 Edgewood Dr.
SOUTH PASADENA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Delaine W. Shane (March 7, 2023)
Dear Community Development Department Staff and Management:

The fifth version of the Housing Element is insufficient. Furthermore, it does not adequately address legitimate questions and concerns that I brought up in my earlier comments on the previous versions. As a professional environmental planner with decades of experience, I know when I've been "blown off." So, my original comments stand and are part of today's comments to you. My intent is for you to reconsider some of the policies and make them more nuance or simply more limited in your approach and understand the underlying ramifications of them including financial burdens that will be placed on our city.

This whole process has been messed up. The housing element should have been part of the general/specific plan update. Now, it is not. When the CEQA process (environmental review) is finally undertaken for the plans, it's very essence has been destroyed. Since the housing element will be approved, it can not be modified during the general/specific plan environmental analysis. Even if the housing element causes significant environmental impacts as determined in the general/specific plans EIR, there is little recourse of modifying the housing element to lessen such impacts unless the council modifies the housing element itself. And that of course will not happen. The council won't do it and who will be paying for potential mitigations? It won't be the developer that's for sure. "Little things" like upgrading the Fire Department's capabilities to reach high rise fires, new and/or more expensive water supply sources to meet the needs of new housing units not to mention how water pressure can be created for such high rises, etc. It will be on the residents and businesses of this small city.

You can say that the issues of infrastructure, traffic, water supply, etc. is not a requirement of the housing element. That it will be part of the plan updates. But, really, they are all interrelated. So, maybe HCD doesn't care about our aging and inadequate infrastructure and public services, but the City governance needs to address these issues and plan on how to fix them NOW. And, that includes the financing of such improvements! "Kicking the can" down the road is irresponsible. What happened to the wishes of over 1,000 residents who initially participated in the general/specific planning process when David Watkins was the Planning Director? Residents had participated in that process for months and brought up reasonable growth scenarios of somewhere between 700 and 1,000 new housing units that could be accommodated in the next 20 years. The delays and the petty politics created what we now face. Credit of this latest fiasco is given to the planning consultants (all including the current one) that have failed to please HCD several times before. This version will probably be the one that HCD approves of because the consultant has given everything that the agency demands. The consultant should be responsive to our community and not have hidden YIMBY agendas. He doesn't even live in this region.

He indicated that we must accept SB 381 (Program 1.b-page 254). That is misinformation. Documented evidence has already been supplied to you that the side-by-side escrow can work and has been done before without implementing SB381. Many of my neighbors and I continue to support the return of the Caltrans housing to current/former Caltrans tenants or qualified buyers who will purchase these properties, fix them up, and live in them, and thereby add to the property tax base and contribute to the neighborhood's charm. Our neighborhood already has dense housing and our existing infrastructure is in terrible condition. Affordable housing as described in the housing element needs to be distributed in various areas throughout the City. It is also states that the City WILL construct ADUs on these parcels. First, it should be the homeowners' decisions as well as the practicality of building anything on some of these small parcels. Second, the "City WILL build" presumes the City owns the properties outright, and that would be a terrible mistake. Where is the funding for this? There are many problems with our existing infrastructure that equally need to be addressed but have been ignored due to a lack of funding. Or, at least that is what we have been told over the years.

For the special needs program (Program 2.h-page 263): The housing element states: "Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties." Are these related to the Caltrans housing? Or is this separate? There is no Huntington Avenue, it's Huntington Drive (it figures for a consultant that doesn't live here). Why isn't Fair Oaks/Mission/El Centro considered as well?

He indicated that we must comply with SB 10. Page 268 has a policy that states: "Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption." SB 10 is strictly voluntary and it is my understanding that the council had publicly backed away from supporting this previously. Why, therefore, is it in this housing element version?

For the height limitations policy (Program 2.n-page 267), why is the City so inclined to place so many limits on itself at this time? By having so many YIMBY restrictions and conditions, the will of the people that live in this City is being curtailed. This is clearly undemocratic and thwarts local control. Clever architects and innovative developers can create smaller housing units within our currently defined building height limit. But, apparently that isn't even considered in this version of the housing element.

For rezoning (Program 3.a-page 268), do the residents really know that you are proposing to rezone their properties in this fashion? The way this housing element has been advertised, you must know that most residents are unaware. As a cautionary aside, I remember traveling to Sedona, Arizona to view the red rocks over the years. Just before the pandemic, my husband and I took our then teenage daughter to Sedona. It was a disaster! Where once it was a sweet town with some tourists, it was now a complete zoo and utter chaos. Turned out that the State of Arizona had permitted opportunities for the Airbnb-type businesses and there would be no local control. In time, developers had bought up many, many houses and used each bedroom to rent short term to tourists. Local schools were impacted and at least one had closed because the population had shifted from residents to tourists. And the sites themselves had been compromised by such heavy influx. We can't correct a national crisis in housing by destroying our community. It's just a 3 ½ square mile city. The rezoning needs to be more nuanced than what is now being proposed. It is too much.

For mixed use (Program 3.b, page 268) developments and adaptive re-use, such tall buildings and limited to no parking, we might as well become either Glendale or Pasadena Annex. The height of the buildings alone question the ability of the Fire Department to respond to high rise fires, as well as the necessary water pressure to support fighting fires or having operational fire water sprinklers. Parking availability? Most people do not rely on the Gold (L) Line to get anywhere except perhaps to go to special events. The Mission/Meridian garage was noted years ago in a L.A. Times article that people were parking there from elsewhere to do shopping. Few to none were actually parking to use the Gold Line for work outside of South Pasadena. Families with kids or elderly relatives will still need cars whether gas- or electric-operated. Parking is going to be worse (not a CEQA issue but a real life experience nonetheless).

For demolition of vacant properties (Program 3.c, page 270), how does this program relate to the Caltrans housing? Does the program mean that automatically if a vacant Caltrans housing is "viewed" as not fixable, it will be torn down and replaced with three units at that site? Many of the Caltrans vacant properties are small and located on hills where soil stability may be an issue.

I do not support Program 3.d, page 271 (Enable Parcel Assemblage) as currently written. It emphasizes a strong and lopsided City-developer partnership when maybe the homeowner doesn't want to sell their property. There has to be support for the property owner as well. Forcing the property owner to sell their property would in turn create hardship for that resident. Home prices and mortgage rates are too high now and in the foreseeable future and so that property owner would not be able to resettle elsewhere in South Pasadena. That is outrageous. And your consultant never answered my question as to whether eminent domain would be invoked if the property owner was unwilling to sell.

Program 3.h, page 274, states that if the ADU numbers fail to materialize that MORE rezoning will take place! There are many reasons why people don't want to or are unable to build an ADU. But, regardless, if this magical number doesn't happen, we will be further rezone? Just how many people are we going to have here in a 3½ square mile area? Has that been calculated? Again, the financing for this unlimited rezoning journey? The schools? The streets? The water? This is ridiculous. Why

not just obliterate the zoning and put out the welcome mat for hordes of people? Watch the tax base shrink further because there will actually be fewer property owners. Floating bonds? Reducing municipal services? But, yes, make the YIMBYs happy. Whatever happened to responsible planning and considering possible future scenarios and costs?

I could go on, but I end with a plea. Look at the policies, each one very carefully. Are they really helpful to the residents and can they be financed and monitored in a productive and positive way by the City? Or, are they just offerings to appease YIMBYS? The financing must also be considered seriously.

Most of us agree to responsible and sustainable growth in the next eight years. I personally witnessed that with the individuals I met at the planning charettes years ago. Before you rush off this version to HCD, please review the policies individually and responsibly. Edits are needed to ensure sustainable growth.

Thank you,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The lawsuit brought against the City for failure to comply with State Housing Law caused environmental evaluation to be completed pursuant to Government Code Section 65759. The Housing Element is not subject to environmental review at this time. The City is preparing an Environmental Assessment that will be considered at the time of Housing Element adoption in accordance with applicable laws.
- **How addressed:** The City must follow SB 381 regarding the purchase and dispensation of the surplus Caltrans properties. The other options suggested in the comment are not legally valid. Per the March 7th draft, Staff will explore possible solutions.
- **How addressed:** Affirmatively Furthering Fair Housing (AFFH) is a requirement of the Housing Element under state Planning Law. The City is not opting into SB 10 citywide, but instead is using the framework of the law to create the Missing Middle Housing program to achieve the AFFH goals. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character.
- **How addressed:** The current height limit is a constraint on development. The City must eliminate identified constraints on development. HCD has questioned whether a building could be designed at 70 du/ac or more with a 45 foot height limit. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City held three public meetings, on February 1st, February 9th, and February 15th to discuss the proposed zone changes to allow for missing middle housing.

Kristine Kwong (March 7, 2023)
I am requesting the City change the section of the housing element to limit the area that allows four-flex parcels on major traffic corridors only or near the Metro station. Since the City has a voter imposed height limit, I suggest removing the mention of 7-10 story building that are above the current limit until the time the voters have had a chance to consider this issue.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit must be stated for certain parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. The recommended height limit change only applies to those specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Peter Giulioni (March 7, 2023)
Dear Armine,

Hopefully this finds you and your family continuing to be safe and healthy.

This is an out-reach from a SoPas community member, rather than a commissioner, so, please consider it through that lens.

Recently, it has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. Is my understanding correct?

While I'm a relative new-comer to SoPas (I moved here with my family in 1996) I believe this will significantly impact the very things which define living in our community.

Over the past several years I have worked side by side with fellow residents to ensure passage of the UUT and the increased local sales tax. We worked to secure and sustain funding for our schools through SPEF initiatives, and even our public library. While a tremendous amount of work, it was/is personally rewarding for us as volunteers because we were truly campaigning for sustaining our way of life here in SoPas. And please note, I used the word "sustaining" not "protecting" - I am a proponent of thoughtful and conscious growth and expanded thinking. The advocacy of many of my SoPas neighbors can be seen as a continuation of the spirit shown by the generation before us who fought to prevent the 710 freeway from bisecting our town.

While not completely conversant around the demands of the HCD and the consequences of not complying with them; embracing potential solutions that will impact our police and fire departments, infrastructure and schools while potentially reducing tax revenue due to diminished property values seems counterproductive at best and irresponsible at worst.

Please consider this a "formal" request that you direct the city staff to find another way to "meet the numbers" without negatively impacting the very nature of our way of life here in SoPas. I believe we are special in so many ways, and don't want to see us become yet another "characterless" wasteland on the edge of Los Angeles.

As always, please feel free to reach out for more information or clarification.

Stay safe and healthy, warm regards, Pete

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Leonard Mlodinow (March 7, 2023)
To whom it may concern: I just heard that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. I feel strongly that this would have an enormous negative impact on our community and that it is not in character with what I and my neighbors understand and appreciate as South Pasadena. I hope you can illuminate those changes from the plan.

Leonard Mlodinow

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023. The recommended height limit change applies only to specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Brian Bright (March 7, 2023)
Hi Council,

Living in South Pas has been a great experience. This city has a long history of preserving its identity, history, and way of life. South Pasadena was bisected in the 40's by the 110 and the people said "never again" to be pushed around by Sacramento, so they fought when the 710 expansion was going to decimate the city by splitting it into fourths with the 110. South Pasadena prevailed, thankfully, or this city would have been split up.

Now the overlords in Sacramento want to control our town again, adding an unreasonable amount of new construction due to a blanket law that pays no attention to the amount of apartments vs single family homes in each community. South Pas is almost evenly split with rentals vs single family homes, unlike many of our neighboring cities (looking at you San Marino). To make things worse, we have paid shills for the development industrial complex who have infiltrated our town and are on social media complaining about a lack of housing ad nauseum, all the while living in their affluent single family homes. How this expansion of units effects our schools, infrastructure, and way of life is never discussed in a logical debate.

Unfortunately, city council did not fight hard enough against the state punching down a few years ago, and here we are. 10 story buildings in South Pas, our of historic homes being able to be 4 plex apartment buildings...seriously? Lets fight now to preserve our town, we owe it to those who fought the good fight in years past and to every homeowner in this city!

Sincerely,
Brian Bright

- **How addressed:** The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Donna Scott (March 7, 2023)
To whom it may concern:

The new zoning proposal for South Pasadena is unacceptable.
Eliminating zoning for SFRs, as well as increasing building heights to 7-10 stores will completely change the character of our town.
Also, there seems to be a movement to push through this HUGE change without much discussion, or publicity.
I would request slowing the process down, making details known through local papers etc.,in order to get more input and allow for the proposal of different options.

Thank you.
Donna Scott
1970 La France Avenue
South Pasadena
626 840 7189

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss these changes. The City has a court-imposed timeline for responding to HCD's comments, which necessitates the speed with which the City is acting on these policies. Additionally, the City has a page dedicated to the Housing Element where all updates have been posted.

Bruce A. Finstead (March 7, 2023)
We are writing you because we fear that South Pasadena's approach to the state mandated Housing Element requirements may destroy the small-town atmosphere of the city where our family has lived since 1971. We are well aware of the NIMBY potential of our comments and the difficulties you have in balancing the desires of our small community with the societal need to provide additional affordable housing for California residents. We further realize the frustrations of dealing with regulations that may well not take into account the divergent needs and desires of small vs large communities.

Of paramount concern to us is the proposal to eliminate single family residential zoning throughout the city. Among the many characteristics of our city that make it special are its neighborhoods of people living next to one another in single family homes. Neighborhoods have people with bonds developing over years; this cannot occur if multifamily dwellings with relatively short-term residencies are intermingled with homes of families living there for years, or even generations. Expanding the areas or corridors where multifamily residences are allowed is not the ideal situation, and may be necessary, but to eliminate single family residential zoning for the entire city should not even be under consideration.

South Pasadena does not have much undeveloped land; it may well be necessary to go up rather than out to obtain more developable space; raising the building height limits may be aesthetically undesirable, but it may be a necessary concession to the state. It might be more tolerable if mixed use buildings were required with businesses on the ground floor and residences above. Is it possible to provide financial incentives to current "tall" building owners to convert their buildings to mixed business/residential use?

Thank you for your consideration. If you wish additional input from us, we would be pleased to provide it.

Bruce A. Finstead, M.D.
Melissa Finstead
1947 La France Avenue, South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Michael Girvigian (March 7, 2023)
Hello,

As a longtime resident of South Pasadena, I urge the city staff to significantly re-think the latest draft of the city's housing element.

I understand there is a statewide mandate to increase housing, which is several years old now.

This statewide mandate, however, was made at a time when the projected state population by 2040 was 50 million people.

The population growth has stopped, and the state population is shrinking.

The state's population could remain stagnant for the foreseeable future.

There are a number of reasons for this, which include: increased out-migration, reduced immigration, low birth rates.

Future mass transit ridership adjustments are already underway based on new projections of shrinking population growth.

High speed rail update gets closer to reality, but major risks remain
https://www.masstransitmag.com/rail/news/53027098/ca-how-many-people-will-use-californias-bullet-train-planners-lower-ridership-estimates
High speed rail update gets closer to reality, but major risks remain

Thus, destroying the quality of life of the people in small towns, in the name of an outdated mandate, is not fair or equitable.

I urge the city staff to re-think this latest draft of the housing element.

Sincerely,

Michael Girvigian
310 Meridian Ave.
South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Cathleen Hoadley (March 7, 2023)
I've been made aware that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

I can't even imagine South Pasadena suddenly having a skyline with buildings higher than four stories; it will completely change our little town. The other issue is that we have neighborhoods with single family homes, and also certain parts of town with high density apartment buildings, and then there are some areas with a healthy mix of both, but none are higher than four stories.

My neighborhood of Buena Vista/Foothill/Prospect/Meridian/Highland/Fairview, nestled between Fremont on the east, Orange Grove on the West, and just north of the 110 freeway (Foothill) and bordered by Columbia on the north, has no apartment buildings at all; if someone were to purchase a home, and raze it, and put up a multi-unit apartment building, that would completely change the nature of the neighborhood I have been fortunate to live in for the past nearly 23 years. I have neighbors on all sides who have lived on Buena Vista for coming up on 50 years. These are the people who fought the 710 extension which would have ruined South Pasadena forever. I know many people are creating ADRs, which are welcomed, but perhaps not enough.

Please be mindful of how being able to construct a new apartment building with four units in the middle of a solely single family neighborhood will drastically impact the nature of these traditionally single family home neighborhoods.

Thank you,

Cathleen Hoadley
1109 Buena Vista St.
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Sandy Kitto (March 7, 2023)
To: The City of South Pasadena

As long-time residents of the city, we reviewed the current draft of the City of South Pasadena (City) 2021-2029 General Plan Housing Element with concern. The elimination of single-family zoning, and the height limitations for multi-family residential units reaching 7-10 stories would negatively impact the appearance and personality of the city that attracted so many residents like us.

These concerns are as follows:

- The universal elimination of single-family zoning is short-sighted in allowing up to four units being built on a single parcel anywhere in the city. Many parcels in the city, such as our house on Bonita Drive, would be challenging if not impossible to accommodate four units, yet that would be permitted. The construction would create unimaginable chaos for the neighborhood, and a parking nightmare afterwards.

We suggest that a parcel size requirement be included that would limit this expansion to parcels that could reasonably accommodate the units and parking for the residents.

- The current plan eliminates the requirement for parking for any construction within a half-mile of mass transit, most likely the Gold Line at Mission Street and Meridian Avenue. Imagining multiple seven story buildings in that neighborhood, would create mammoth parking issues. Just because people live near the Gold Line does not mean they work in an area serviced by the Metro. And even if that were the case, it does not eliminate the necessity of having a car in the Los Angeles metro area for errands and weekend travel. Even the grocery stores on Fair Oaks Avenue may exceed the resident's willingness to remain pedestrians while carrying groceries.

So many of these residents will still have vehicles clogging the limited parking available. This potentially would impact the merchants along Mission Street by blocking customers from accessing the area.

We suggest reducing the height restriction (and thereby the number of units), AND requiring parking accommodation be part of the project.

- From an aesthetic point of view, allowing new construction of 7-10 stories is a dramatic change from the current situation in the city. A sudden influx of 7-10 story buildings would forever alter the landscape of South Pasadena; blocking mountain views, casting huge shadows on adjacent parcels, and reducing the charm of the neighborhood. The Eclectic Music Festival, and semi-annual Arts Crawl would be a completely different "vibe," as would daily living.

We suggest limiting the height maximum to a more reasonable 4 stories to maintain the City's appeal.

For these reasons, we urge the City leaders to reconsider the plan as currently proposed.

Sandy Kitto and Joe Walters
911 Bonita Drive
South Pasadena, CA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements, as well as incorporate other state requirements such as elimination of parking requirements in close proximity to transit. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Sally Kilby (March 7, 2023)
To Whom it May Concern:

One change I would request is that buildings of up to a fourplex be limited to parcels on such major traffic streets as Fair Oaks, Huntington, and Fremont, and to those near the Metro South Pasadena station. I would also recommend excluding mention of 7-10 story buildings since South Pasadena has a voter-imposed building height limit. Citizens can be asked to vote on this at an upcoming local election.

Sally Kilby
City Clerk, Retired
1000 El Centro Street
South Pasadena

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit for parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. As to the actions regarding the height limit, indeed the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Linda Poore & John Poore (March 7, 2023)
I have lived in South Pasadena for 47 years and taught many years at all 3 elementary schools. This community is filled with many creative innovative people who have solved many problems over the years including The 710 freeway corridor , library funding, numerous tax raises to improve services, etc. It's time to find solutions that involve input from many residents, including reviewing how other small communities are complying to the new requirements. Please feel free to contact me at any time.

Linda Poore & John Poore
1964 La France Avenue
South Pasadena, CA 91030-4608

1-626-390-0059

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Mike Mitchell (March 7, 2023)
As a new owner of a single family home in South Pasadena I have serious concerns about the changes being suggested by local and state government. I am understanding of the need for more units and lower income housing to create more access to housing for a wider range of individuals, but the changes are too extreme and will have deleterious effects on the community.

As someone who has spent over a year waiting to get planning permission, I understand that the city takes very seriously the cohesiveness of neighborhoods and how that cohesiveness affects home ownership for us all. Suggesting that it is acceptable to go from areas entirely comprised of single family homes to suddenly giving large investors the right to build complexes over 7 stories high is incredibly extreme. Even tempering this suggestion to complexes of 3-4 stories would have an impact, but would be understandable given the state mandate for increased housing. People have invested huge sums of money in their home here to live in what feels like a special community. We want more people to have access to it, but not at the expense of damaging those people's investments.

It may seem callous to talk about investment in a community in financial terms, but those investments are people's future stability, and in Southern California represent a huge portion of a person's material wealth. It is even more callous to wantonly disregard how difficult home ownership is in this state by diminishing people's values and subsequently their future stability.

Change is needed in order to bring new, lower income families into this city, and more of them. Change should however, be brought about in ways that do not damage the existing balance in the community but rather improve it. I would like to think that the very intelligent members of our local government can find a way to bring about the changes we need while preserving what drew people to this community to begin with.

thank you,

-Michael Mitchell

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Keith Tsang (March 7, 2023)
Hello,

I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a voter imposed height limit, I

would recommend removing the mention of 7-10 story buildings that are above the current limit until such a time when the voters have had a chance to weigh in on this.

Keith Tsang
1440 Indiana Ave

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Nicholas Greco (March 7, 2023)
The city's infrastructure cannot handle the additional volume of residents should the four Plex allowance be authorized. Homeowners pay the majority of taxes and this will lead to an undue burden on the homeowners of South Pasadena and a decline in the quality of schools and city services that we all cherish. State mandated ADU add ons that are rentable will bring in additional residents while also allowing for increases in property tax revenue by the homeowner. Please don't disrupt our way of life and diminish the quality of our quaint town. We hope that the City Council considers this as they were elected to protect the way of life that South Pasadena homeowners and residents have come to appreciate.

Sincerely,

Nicholas W Greco MD, FACEP
Operations Director
Emergency Department
Huntington Hospital

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

South Pasadena Tenants Union (March 8, 2023)
Dear Ms. Becker and Ms Fausto:
South Pasadena Tenants Union leadership are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are however surprised to learn that as of last night, the original draft of March 2nd has already been substantially revised and without any published responses/comments indicating public input. In reviewing the March 7 redline version, we are disappointed to see that the proposed program addressing the fate of the CalTrans homes and the implementation of SB381 has changed drastically from the March 2 version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest change.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change with a modification. We can support triplexes and fourplexes being limited to the high transit areas but we will need the City to commit in the Housing Element to a rent stabilization ordinance that is fully enacted no later than June 2024. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

> *For program 6.d, SPTU asks that you include within the 5th draft a deadline of no later than June 2024 for implementation of a rent stabilization ordinance.*

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We appreciate and trust that staff will do as proposed, but will need to see good faith that the City weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Jenny Bright (March 8, 2023)
Very well said!! I am in agreement that we need more affordable units. It is the heavy hand of Sacramento overriding local control with threats that is not in the spirit of South Pasadena. Rezoning is the wrong direction. There are still locations in town to add affordable housing that we can support financially without having to erode the entire character of the City. We already have >50% rentals here so it is not as if we are out of balance.

On Wed, Mar 8, 2023 at 8:15 AM richard schneider <rdschneider0@yahoo.com> wrote:

> I am certainly in favor of the city having a mixture of housing for different income levels. We need more units for low and moderate income levels. When I and my wife moved here years ago we were low income renters. But I think the provisions suggested for the new Housing Element, however well intentioned, are going in the wrong direction. What is needed is state subsidies for affordable units distributed throughout the city. Some of that subsidy money could be obtained by market rate sale of Caltrans properties. There are thousands of Caltrans properties around the state which could be utilized.
>
> The current housing crisis was not caused by the City of South Pasadena nor its residents. And responsibility for crisis solution should not be transferred from the state to local communities.
>
> Yours very truly,
>
> Richard D.Schneider, MD

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable

homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Dan Evans (March 8, 2023)
Ladies and Gentlemen:

I believe it may be a mistake to treat this issue as normal, administrative "compliance" with properly-enacted state law. In reality, we do not face normal legislation in SB 9, SB 10, etc. What we face is an attack on the way of life we choose to live in South Pasadena. Big-government social activists have seized the single-party government in Sacramento for a social revolution – to eliminate the middle class by removing our choices on how we live. We choose to live in single-family homes with gardens, not in massive housing projects as the social revolutionaries in Sacramento insist.

Confronted with a social revolution, "compliance" is a weak, conciliatory approach which will further empower the social revolutionaries. South Pasadena led the way against big-government plans to build a freeway through town, we should also lead resistance to these Big Brother housing efforts. Our resistance will lead to litigation; eventually cooler heads in court will see that SB 9, SB 10, etc. constitute a "taking" of property without due process. (fyi – I have taught Constitutional law.) We must stand up for the way of life we choose to live, not cave to big-government activists!

Dan Evans
dmevans@southpas.org
(626) 403-0575

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Felix Gutierrez (March 8, 2023)
Dear South Pasadena City Leaders:

I understand that an elimination of Single Family zoning in South Pasadena has been proposed and is being considered by the city government.

Please register my strong support for continuing Single-Family Housing Zoning in the range of zoning options available to the city and residents. Other options should also be included and new ones added without eliminating one that has served the city well over the years and is needed for the future.

Single-family homes are a defining characteristic of some of our neighborhoods. Eliminating that zoning option could lead to overcrowded lots, schools, streets and parking spaces, not to mention additional demands on police, fire and other first responder services. We have already seen these overcrowding impacts on nearby cities.

I strongly urge you to keep South Pasadena's best long-ranges interests in mind as you contemplate possible changes.

Sincerely,

Félix Gutiérrez
632 Milan Avenue
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The Housing Element includes policies that commit the City to allow for missing middle housing types along high-quality transit corridors, if property owners so choose.

Laurie Chatham (March 8, 2023)
Dear All Concerned,

The DRAFT Housing Element has come to my attention via my concerned neighbors. I wanted to give my input as a concerned community member, having lived in South Pasadena for 26 years, and having visited my Great Aunt in this city since 1958.

Is it true that the DRAFT includes elimination of zoning for single family homes throughout the entire city? Is it true that there is a proposed height limit for buildings being increased to seven story structures? These proposals will have a negative impact on South Pasadena and are extreme. We have seen how other neighboring communities have allowed higher density development on lots that previously contained a single family home. There is significantly more traffic and the community atmosphere is negatively impacted. Please consider limiting the change in zoning to the high transit corridors (not city-wide) and elimination of references to seven or more story buildings in South Pasadena.

Thank you for your consideration,

Laurie Chatham
1915 La France Ave.
South Pasadena, Ca. 91030
How addressed: No, it is not true that zoning for single-family homes throughout the City is being proposed. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. It is also not true that the height limit is being increased. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
Deni Sinnott (March 8, 2023)
I am writing to comment before today's deadline on South Pasadena's plan to build affordable housing.

I am confused by the fact that the city wants to march forward on the plan to supply affordable housing but has decided the Golf Course is off limits.

From Appendix B:

Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing? - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

Who is the council affiliated with that they need to back off from using this piece of land for the plan?

It would seem to be ideal and could be used to create housing in the Arroyo which is idyllic compared to some of the sites proposed, in particular, JAMMING housing on smaller parcels or even in between current houses that exist on residential streets.

I am in favor of lifting height restrictions on buildings but those newer, taller buildings would need to be built on major thoroughfares.

We do need to build more housing and there are some buildings/parcels that I just know could be purchased to accomplish this tasks are:

- Crash Champions Body Shop on 300 Fair Oaks- two large lots could accommodate 1 building each.
- 1499 Huntington Drive office building at Fair Oaks (old and needing rehab) Occupancy is not 100%. I believe this is taller than 4 stories already!
- Bargain Market and adjacent retail could also be used for new homes/apartments/condos.

I am sure there are many more places in the city that could be repurposed without disturbing the streets where we have mostly single family homes. If ADU is a desired route, the city should subsidize the building of those to homeowners who would like to participate and STREAMLINE the permitting process to be less onerous.

--

Deni Sinnott
Homeowner, 2066 Fletcher Avenue, South Pasadena
CLPF, NCG, MBA
626-233-4128

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the City. The Housing Element does consider these other parcels as potential candidates for redevelopment, but the City does not have substantial evidence that they will be redeveloped during the planning period. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

Mary Urquhart (March 8, 2023)

The recommendation to repeal the current 45-foot height limit on any residential or mixed-use project is in opposition to the vast majority of residents. The minimum requirements of 84 feet and 7 stories or 110 feet and ten stories, depending on whether the project is in an area with a density of 50 or 100 units per acre, respectively, is unacceptable.

However, the approach of layered zoning in major corridors has the potential to be a bonus to our City. Mixing affordable housing with middle and higher-income housing options along with retail in major corridors that have a much higher traffic flow, such as Huntington Drive, should be listed as an option. Once the HE is approved, we can explore ways to work with our community to do this where this may be a bonus to our community. Areas that may apply to this concept are located on Huntington Drive and Arroyo, which are currently not offered in the current HE.

The second area that is of deep concern in the 5th draft is the implementation of SB9 and SB10, the Missing Middle Housing (MMH). SB10 is NOT a mandate and our City and our City were not considering this. Why was this included? Can you imagine this being allowed in our historic Bungalow Heaven? This language should not appear in our HE.

I do applaud the hard work that our City Planning Department has done in the past few months to pass an acceptable HE.

- **How addressed:** The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing (AFFH) and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. Removing or increasing the current height limit is the only way to accommodate the RHNA requirements without upzoning the existing low-density residential zones. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The policies in the Housing Element fulfill the requirements of AFFH.

Mary Farley (March 8, 2023)
There was given no time for working people in South Pasadena to respond to this proposal. We are being railroaded and this needs to be litigated. The impact on our tiny town is wildly disproportionate compared to contingent communities.

When my family moved to South Pasadena from Boston forty three years ago, we asked my husband's employer, USC, what would be a good place for a mixed race family to relocate near the medical school, and the suggestion was South Pasadena.

The introduction of racial elements into this battle over development is bogus and there should have been adequate time in which to challenge it.

- **How addressed:** Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss the Housing Element revisions. State law requires that all housing elements address racial wealth and homeownership gaps as part of the Affirmatively Furthering Fair Housing (AFFH) analysis.

Eric Hausner (March 8, 2023)
Dear City of South Pasadena,

As a home owner and resident of South Pasadena, I wanted to provide feedback on the proposed General Plan Housing Element. In particular, I am concerned with allowing duplexes, triplexes or fourplexes throughout the city.

This change will fundamentally harm the fabric of South Pasadena that makes it so unique and special. Instead, I would suggest limiting these changes to major traffic corridors only, such as Huntington, Fremont, Fair Oaks, Mission (near downtown) or near the Metro station.

I also think it's a good idea to wait on revising the height limit until voters have had a chance to cast their votes on the matter.

I understand the enormous pressure the city is under to make these changes. However, hopefully we can find a way to be compliant while also preserving the character and history of this amazing city.

Respectfully,

Eric and Emily Hausner
1722 Milan

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. The Housing Element does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced.

Helen Mendoza / Pamela Privett (March 8, 2023)
To the City Council:

While we are in favor of increasing and diversifying housing within the city of South Pasadena, we believe the new draft of the Housing Element is at best, extreme and out-of-line, and at worst, thoughtless and irresponsible. As we understand it, the new draft 1) eliminates zoning for Single Family Homes 2) allows for development of up to 4 units on any property city-wide and 3) raises building height limits to 7-10 stories.

These are outrageous rules and will 1) negatively impact the property values for all residents in the city 2) severely encumber a school district already stretched to the limits on space and resources and 3) destroy the very character and quality of life that has made South Pasadena the kind of community people want to live and raise their families. In addition, we feel you have failed to consider that the city's infrastructure is neither designed nor capable of dealing with the increased need for resources should these new rules go into effect.

Yes, we need to find a solution for affordable housing for the city's residents and those who want to move here. However, doing so by creating rules that will make it possible to fundamentally change the fabric of our town and destroy the value of historic neighborhoods like Buena Vista in the northside or Edgewood/Milan/Stratford to the south side or those in Monterey Hills would be irresponsible and negligent.

South Pasadena's "calm" within the "chaos" of Los Angeles is what brought us here. We wanted to raise our children in good schools and live in a diverse and welcoming community. It was the history of the old house we got to restore, and the small town neighborliness we love that have kept us here.

There is a saying about buying real estate — don't purchase a single family home that has a multiple family unit on the block. The city's new plans will make it possible to put multi-unit apartments on ANY property… and that would devalue all the property for all residents.

These new Housing Elements would fundamentally destroy the face and skyline of the city, and it would in turn dismantle South Pasadena's character and heart.

Every city is having difficult conversations about how to deal with their fluctuating population densities. The draft presented, however, is short-sighted and misguided. Surely the city can find more creative solutions to these issues than what has been put forward.

Helen Mendoza / Pamela Privett
Buena Vista Neighborhood
201 Beacon Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Jenny Bright (March 8, 2023)
South Pasadena is a wonderfully unique City with a balanced housing stock of owners and renters and also a balanced and diverse population of residents. Eliminating single family zoning would erode the entire character of the City that attracted its diverse population in the first place. It would make the City indistinguishable from every other community just outside of LA. Raising the height limit of buildings would be an irreversible step and make this City that has been so thoughtfully preserved for the last 135 years unrecognizable. We can and should add affordable housing units but we can do this without destroying the City.

-Jenny Bright

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. As to the actions regarding the height limit, the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Jim Tavares (March 8, 2023)
I believe there is general consensus that it is the right thing to create more housing within South Pasadena; the concerns are how that housing is created, what it looks like, and ensuring it does not

create unintended consequences of congestion and loss of South Pasadena's community feel. If South Pasadena simply becomes a place, and no longer a community, the process will have failed.

I don't think that has to happen.

I think roundly rejecting SB 10 is a must, as is rejecting the idea of a ballot measure for unlimited building heights at 50 du/acre. It will create endless disharmony between opportunistic developers and residents and break the character of our community. An 8,000 sf lot with ten units on it will accomplish the density needed to exceed 85 feet in height and shadow a residence next door.

Market rate sale of Caltrans properties can go a long way for Los Angeles as well as South Pasadena to fund more affordable housing projects vs. repurposing of these homes and the costs to do so--private owners can purchase and rehabilitate the homes with the sale profits going to other projects throughout the city, retaining the character of existing neighborhoods.

I think it is folly to have any properties that do not supply parking at a rate below one per unit, and higher form 2+ bedroom units, despite proximity to public transportation. While I hope public transportation will be used and ease congestion, ridership has trended down over the past 5 years, and while it has recently been on the upswing among certain demographics, safety concerns and reliability/destination proximity will likely force many into their cars, no matter where they live, straining surface streets for parking access.

Lastly, massing at the street and a provision for length of unbroken wall in a given plane and raking of massing from the street, with some green space around structures can go a long way to preserving the community feel so many have come to South Pas to experience. these details need to be ironed out in the Housing Element to ensure development that people want to stay within and around.

Very truly yours,

Jim Tavares

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

How addressed: SB381 has state-mandated requirements on how to acquire, utilize, and transfer homes currently owned by Caltrans. The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Mark Gallatin (March 8, 2023)

The City of South Pasadena has made tremendous progress under unprecedented circumstances toward the development of a housing element that can satisfy the rigorous requirements of state law. Now however, with a court-appointed deadline for completion looming, this progress could be endangered by two proposed programs in the 5th draft of the element that, as presently constituted, do not yet reflect the most creative approaches to the issues they seek to address and will quite likely provoke opposition from many residents.

The first of these is Program 2.n, the Citywide Height Limit Ballot Initiative. This program calls for a referendum on repeal of the current 45-foot height limit on any residential or mixed-use project on which the housing element anticipates a base density in excess of 50 units/acre. It proposes to replace the current height limit with either no height limit or a minimum requirement of 84 feet.

The reason for essentially doubling the current maximum height to a new minimum height is ostensibly to accommodate the greater densities planned in localized areas to stated density goals in order to help the City meet its RHNA target and to achieve the densities identified in the Downtown Specific Plan (DTSP). Despite being revised to reflect a lower minimum height limit, the current language of Program 2.n still tracks with that from the State of California's Department of Housing and Community Development. As such, it does not yet reflect a locally developed solution created with input from community members, appointed and elected officials seeking to maximize compliance and minimize harm, a thoughtful, more nuanced approach that better aligns with the tradition and character of the city's built environment.

What might such an approach look like? For starters, it would restate the modest proposal made by the City's original general/specific plan consultant to consider raising the height limit along Fair Oaks Avenue frontage properties within the DTSP from 45 feet to 50 feet to facilitate well designed and proportioned four-story buildings on Fair Oaks Avenue.

Second, it would draw on the incredible depth of talent, expertise and experience of design and architectural professionals that call South Pasadena home, as well as interested laypeople, to fashion a strategy that de-emphasizes governing metrics such as minimum height in feet or number of stories and instead focuses on standards such as floor area ratio (FAR) and unit size to create a "building envelope" capable of accommodating the desired densities within the confines of the existing height limit or a modesty increased one. That such an approach can yield the densities contemplated in the DTSP or in overlay zones on arterial corridors has already been demonstrated by projects completed in cities across the region, in locations as diverse and different as Santa Monica and San Gabriel. The inclusion of some of these standards in the latest draft of Program 3.b is a good beginning but it is hoped they are just the starting points for further discussions rather than faits accomplis, as the real work will begin when drafting new zoning provisions to implement the adopted element. Creative approaches to density, such as the "layered zoning" approach on major corridors, as recently presented at a WISPPA forum on the housing element, should be given serious consideration and embraced, lest we become consigned to monolithic housing blocks with minimal setbacks and amenities. Density simply doesn't have to be done that way, as history both here and abroad should have taught us.

The second program of concern in the 5th draft is Program 3.m, Implement SB 9 and SB 10. Missing Middle Housing (MMH) is a key strategy in helping the City meet its housing goals but it should in no way be conflated with SB 10. MMH was being successfully implemented in California and other states long before SB 10 was even dreamed of. SB 10 is not a mandate to be blindly followed by cities under threat of penalty but is in fact legislation that requires that cities opt into it voluntarily. Our City Council wisely voted not to opt into SB 10 when presented with the opportunity to do so. MMH can

be implemented with greater flexibility without choosing to opt into SB 10. By placing the very valuable strategy of MMH under the aegis of SB 10, Program 3.m unnecessarily stokes fear in residents to the detriment of acceptance of the housing element as a whole.

The key policy question for the city as regards the implementation of MMH is whether to apply it only in selected areas of the city or allow it citywide as what planners refer to as a "floating" zone. Such a zone is not tied to a specific area, but rather would make MMH a possibility on any residential property that meets certain objective design and development standards. The latest draft of Program 3.m favors the former approach by establishing a nexus between the location of MMH housing types and proximity to high-quality transit corridors and/or transit stops. Such a nexus is logical, given the importance high-quality transit corridors and/or transit stops played in determining the City's RHNA allocation. Suffice it to say that perhaps preliminary criteria, such as minimum lot size, can be established to screen out areas where MMH might be infeasible, being mindful of the fact that some neighborhoods have a preponderance of lots less than 5,000 square feet in size.

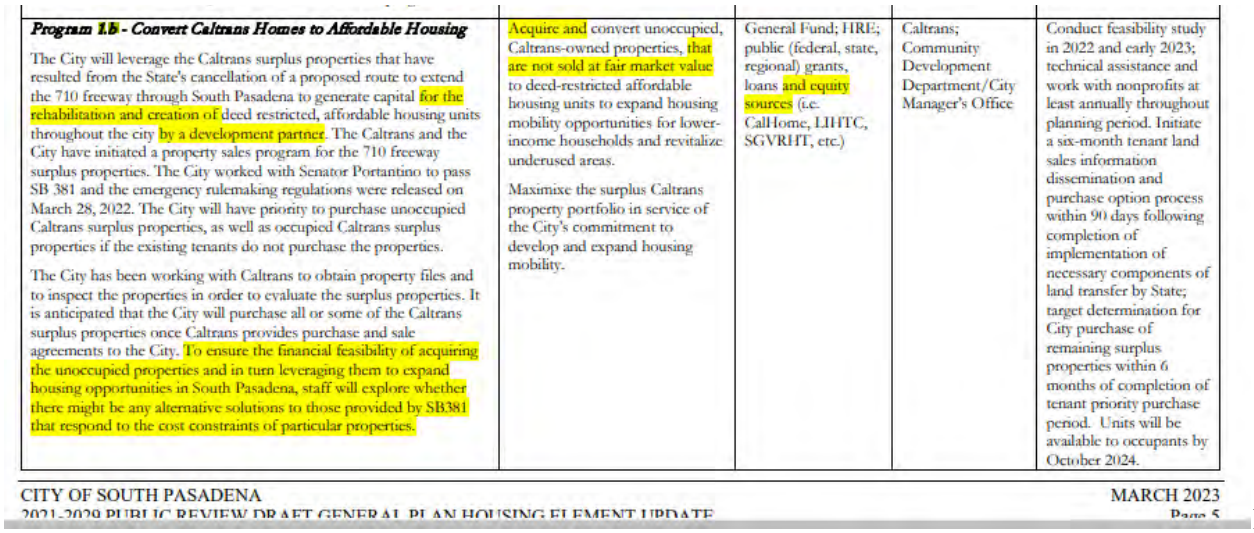
In conclusion, the shortcomings of Programs 2.n and 3.m not withstanding, the latest update of the 5th draft of the Housing Element is appreciated and raises hopes that the conversation around implementation changes from one about terms like density, multi family and upzoning and instead begins to focus on form, scale and housing types. The first version of the 5th draft was representative of a philosophical approach which has dogged the preparation of the housing element from the beginning. That is, whether to craft a creative comprehensive and inclusive grassroots approach to housing policy that reflects and respects the will of the people or to place trust in the community's future with an all-knowing, all-powerful state government dictating and mandating from on high. With the element so close to completion now, it is sincerely hoped that the choice will be the former, rather than a community vision of the state, by the state and for the state.

- **How addressed:** The new height limit in Program 2.n is not a minimum height, it a revised maximum height limit to allow for the densities identified in the Housing Element. If the height limit is replaced, the new height limit shall be no less than 84 feet. Nothing in this would prevent a land owner or developer from proposing and constructing a building that is less than 84 feet. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The Housing Element is specific about which housing types the city is going to consider as part of its missing middle housing implementation, as well as the areas of the city where missing middle housing will be allowed.

Delaine W. Shane (March 8, 2023)
Dear Community Development Department Staff and Management:

Thank you so much to be willing to making last minute text edits on the proposed housing element. I will limit my response in this email to Program 1.b concerning the fate of the Caltrans housing. Some of your yellow highlighted text I get are meant to be a compromise, but they are so wishy washy that

"explore" means nothing. There is no real commitment. Here are my suggested revisions, based on the latest version online



Program 1.5 - Convert Caltrans Homes to Affordable Housing The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB381 that respond to the cost constraints of particular properties.	Acquire and convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas. Maximixe the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.	General Fund; HRE; public (federal, state, regional) grants, loans and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)	Caltrans; Community Development Department/City Manager's Office	Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State; target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

CITY OF SOUTH PASADENA MARCH 2023
2021-2029 PUBLIC REVIEW DRAFT GENERAL PLAN HOUSING ELEMENT UPDATE Page 5

If financially feasible and demonstrated as such in writing by a qualified financial expert, the City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by an experienced, qualified development partner in the affordable housing construction industry. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City may purchase some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will prioritize and pursue alternative solutions, including the side-by-side escrows or double escrows, outside of SB381 that respond to the cost constraints of particular properties.

Acquire, if financially feasible, and as a last measure, convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas, so long as the neighborhoods of the remaining Caltrans properties are not overly represented. Expanding housing mobility opportunities shall be shared equally and distributed throughout the City.

The statement in the right column at the bottom states: "Units will be available to occupants by October 2024." Seems to be overly optimistic. Recommend deleting it or saying X months after work has been completed that the units will be fit for occupation. You have no control over construction/rehab contractors, supply distribution systems, and actual materials. Delays are unfortunately part of our new normal post pandemic. Why box yourself in a corner with HCD by setting an unrealistic and really naïve date?

Thanks again for allowing input by the public in this manner.

Sincerely,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Ed Elsner (March 9, 2023)
Dear Director Frausto-Lupo,

Avoiding displacement of existing residential tenants should be a higher priority in the City's housing element.

The 5th draft housing element proposes to include Huntington Drive as part of the Downtown Specific Plan, change the zoning of medium and high density residential parcels to mixed-use, and increase density to 70 du/ac -- a higher increase than the 30 du/ac and 45 du/ac proposed for medium and high density residential zones elsewhere in the City.

This proposed rezoning of Huntington Drive would promote displacement of existing tenants residing in multi-unit apartment buildings along Huntington Drive, and while the housing element's proposed tenant protections may help mitigate the displacement, as a practical matter the displacement will be permanent.

Displacement most acutely affects families with children (who may have to be pulled out of school mid-year), the elderly, and the disabled, and the impacts can be devastating.

In my experience representing residential tenants in eviction cases off and on for 30 years, the "right of return" is illusory in most cases.

This is primarily because two moves are required. While the landlord would be required to pay relocation assistance to the tenant on the way out, the right of return typically does not include a requirement for the owner to pay moving expenses for the return move. The right of return depends on the landlord giving the displaced tenant a written offer, and the tenant typically has a limited period of time (typically, 30 days) to accept the offer. The mailed notice may or may not be received, whether because of problems with mail delivery, a property owner who is a bad actor who does not follow the notification rules, a tenant who has moved and neglected to provide a forwarding address, etc.

If the notice is received, it may come years after the tenant was evicted. The tenant may have moved out of the area and established roots in another community, the tenant may not be able to afford the return move, the tenant may be in the middle of a fixed term lease that the tenant cannot break, etc. A successful tenant must be vigilant in monitoring the construction process and may have to hire an attorney to enforce their rights. But most importantly, the tenant's personal situation must be flexible enough that the tenant can make a quick decision at some uncertain time in the future to make the return move, and the tenant must have the financial resources to do so.

A 2018 Los Angeles Times article illustrates the practical reality of the right of return in a City with a well-funded, fully staffed housing department.

The 5th draft housing element also appears to understate the number of existing units on Huntington Drive that would be affected by redevelopment.

To take a random example, parcel 5319037001 (1170 Huntington Drive) is identified in the draft housing element as high density residential parcel with 0 existing units. However, this is actually a 20-unit apartment building. There are many other examples of parcels identified in the draft as medium or high density residential parcels having 0 or 1 existing units when the parcels actually have multi-unit apartment buildings.

Rezoning of medium and high density residential parcels on Huntington Drive should be the same as for medium and high density residential parcels elsewhere in the City.

The "missing middle housing" program in the pre-March 7th draft had good potential to increase housing production while minimizing displacement of existing residential tenants. This is because eligible properties would be single-family parcels occupied in most cases by the property owner, who would be making a voluntary decision to participate or to sell the property to a developer and relocate.

However, the March 7th update may have effectively gutted the program. Before the March 7th update, the missing middle housing program would have applied citywide in all residential zones except high fire hazard areas, and there was a commitment to implement the provisions of SB 10. In the latest update, only parcels in "low-density residential zones along high quality transit corridors and/or transit stops" (and not in a high fire hazard area) would be eligible, and the scope of the program is yet to be determined "by the community, Planning Commission, and City Council."

It is unclear which low-density residential zones would be considered to be "along" the City's high quality transit corridors, identified in SCAG's Data/Map Book as Fair Oaks Avenue and Huntington Drive east of Fair Oaks, as there is no low-density residential zoning actually on either street, and the March 7th update does not identify parcels or zones that would potentially be eligible (subject to a future scope determination).

The housing element should include a more robust missing middle housing program.

Thank you for your consideration,

Ed Elsner
edelsner44@gmail.com

- **How addressed:** Goal 6 and the policies within that goal will be developed after further research to mitigate the potential for and impacts of displacement. The number of existing units was pulled from building permit data. The data was spot checked, but may be incomplete for some parcels.

Ed Elsner (March 9, 2023)

Dear Director Frausto-Lupo,
I'm writing to describe a possible alternative to program 2.n. in the 5th draft housing element (as updated on March 7, 2023), the Citywide Height Limit Ballot Initiative. The alternative would be a general plan amendment modifying the forty-five foot height limit established by local initiative in 1983.

This general plan amendment could be implemented on the same 120-day timeline as the housing element's other rezoning programs (which include other amendments to the land use element of the general plan), and with more certainty than the proposed 2024 ballot measure.

Recognizing that this alternative program may not be viable politically, I'm hoping this comment at least provides additional perspective that may be useful as the City works towards achieving its housing element goals.

The General Plan and the Land Use Hierarchy

The state Planning and Zoning Law establishes the authority of local governments to regulate the use of land. Gov't Code § 65000 et seq.; Neighborhood Action Group v. County of Calaveras (1984) 156 Cal.App.3d 1176, 1182. Each city must adopt a general plan for the physical development of the city. Gov't Code § 65300. The general plan takes precedence over other local zoning laws:

> The general plan is atop the hierarchy of local government law regulating land use. It has been aptly analogized to "a constitution for all future developments." [Citation omitted.]...Subordinate to the general plan are zoning laws, which regulate the geographic allocation and allowed uses of land. Zoning laws must conform to the adopted general plan. [Citations omitted.] These enactments provide the authority and the criteria for the regulation of land uses.

Neighborhood Action Group, 156 Cal.App.3d at 1183; Gov't Code § 65850 (authorizing cities to adopt zoning ordinances).

Local Initiatives and General Plans

Although a city's general plan may be amended by local initiative (DeVita v. County of Napa (1995) 9 Cal.4th 763), the electorate must have adequate notice of the purpose of the initiative:

> We cannot at once accept the function of a general plan as a "constitution," or perhaps more accurately a charter for future development, and the proposition that it can be amended without notice to the electorate that such amendment is the purpose of an initiative. Implied amendments or repeals are disfavored in any case [citation omitted], and the doctrine may not be applied here.

Lesher Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531, 540-541. "Since we cannot presume the existence of such intent [to amend the general plan], it must be found, if it exists, in the ballot measure itself or the explanatory material in the ballot pamphlet." Id. at 542. Stated another way, in order to amend the general plan, the text of the local initiative or the explanatory ballot materials must provide notice that the measure is something "other than an ordinance in the nature of a zoning ordinance." Id. at 544.

The 1983 Height Limit Initiative

In a 1983 special election, South Pasadena residents voted to approve a local initiative establishing a citywide height limit of forty-five feet (Reso. 5642):

The initiative did not identify a provision of the general plan that it would amend, nor did it state that it was adding to the general plan; therefore, absent some other basis in the ballot materials to conclude that its purpose was to amend the general plan, the 1983 initiative has the status of a zoning law subordinate to the general plan in the land use hierarchy. Lesher Communications, 52 Cal.3d at 541.

Amending the General Plan to Modify the Height Limit

Section 9217 of the Election Code generally provides that local initiatives may not be amended or repealed except by a vote of the people, and program 2.n. assumes that the City's forty-five foot height limit cannot be modified without voter approval.

However, if the 1983 initiative is subordinate to the general plan, section 9217 would not restrict the City Council's authority to amend the general plan to modify the height limit, and once amended, the general plan would prevail over the inconsistent subordinate law:

> The Planning and Zoning Law itself precludes consideration of a zoning ordinance which conflicts with a general plan as a pro tanto repeal or implied amendment of the general plan. The general plan stands....The Planning and Zoning Law does not contemplate that general plans will be amended to conform to zoning ordinances. The tail does not wag the dog. The general plan is the charter to which the ordinance must conform.

Lesher Communications, 52 Cal.3d at 541.

For similar reasons, the 1983 initiative cannot be interpreted as superordinate to the general plan. The local electorate's right to initiative is co-extensive with the legislative power of the local governing body (DeVita, 9 Cal.4th at 775), so if the City Council cannot enact a land use law above the general plan in the land use hierarchy -- which it has no authority to do under the Planning and Zoning Law -- neither can the electorate via local initiative. Legislature v. Deukmejian (1983) 34 Cal.3d 658, 674-675 (initiative power is subject to the same limitations as legislative action).

The Housing Accountability Act provides additional support for the suggested general plan amendment. If a proposed housing development project is consistent with objective general plan standards and criteria, but the zoning for the project site is inconsistent with the general plan (for example, because a zoning ordinance includes a lower height limit), the project will be deemed "not inconsistent" with applicable zoning standards and criteria for purposes of approval of the project's land use application. Gov't Code § 65589.5(j)(4).

The 1983 initiative could have included clear language that it was amending the general plan, but as written, it left the door open for the City Council to modify the height limit through a superseding general plan amendment.

Noncompliance with the Housing Element Law

The City has been out of compliance with the housing element law since October 2021, and because it missed the October 2022 deadline to adopt a housing element and to obtain certification from HCD, the City will remain out of compliance until the City adopts a compliant housing element and completes the related rezoning programs.

Given recent media attention, there is more widespread awareness of the consequences of noncompliance with the housing element law, including the loss of authority to disapprove land use applications for housing projects that are inconsistent with the City's zoning laws, also known as the "builder's remedy." Gov't Code § 65589.5(d)(5). As a result, the electorate has a better understanding why South Pasadena needs to obtain housing element compliance sooner than later, and anyone following the progress of the City's housing element should understand how a modified height limit in designated higher-density zones is critical to achieving that goal while avoiding a radical upzoning of the the entire city.

Thank you for your consideration,

Ed Elsner

edelsner44@gmail.com

- **How addressed:** The Housing Element proposes a program to amend the zoning code height limit which was adopted by the voters. Any ordinance enacted by the voters may only be amended by the voters. The Housing Element establishes a program to put this question to the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

Julie Pearson (March 9, 2023)
To our city staff,

As a resident of the city for 25 years, married to a resident of over 50 years, who is the child of a resident of nearly 60 years, we oppose the city's intention to remove all single-family zoning requirements, city wide. We also oppose the city's intention to allow structures in the city to rise more than 6 stories.
These proposed changes in our opinion would change the feel of our town as well as the neighborhoods, and be detrimental to the family friendly environment that is central to our city.

Thank you for considering my comments.

Sincerely,
Julie Pearson, Keith Pearson and Margie Pearson
1749 Via del Rey

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Bill Kelly (March 9, 2023)
Public Comment on Second Draft of Draft 5 (March 7, 2023) of South Pasadena's Housing Element
(Submitted March 9, 2023)

Greetings:

Thank you for the opportunity to comment on the second draft (March 7, 2023) of the fifth draft (March 2, 2023) of South Pasadena's proposed Housing Element 🤓 in my hopes that it will result in a third draft of the fifth draft.

The comments below first cover general concerns with the latest draft. The second part covers various concerns reflected in previously published and verbalized community comments regarding state housing requirements, as well as an email sent by a resident to unspecified individuals aimed at

prompting comments and complaints to City management and Councilmembers, which you have no doubt received.

Specifically, I urge you to:

- End R-1 zoning throughout the city (except in areas with wildfire and geologic hazards); and

- Get started with affordable housing by committing in the City's housing element to seeing that denser affordable housing is built on as many of the unoccupied Caltrans properties as possible. (The well documented need for affordable housing amid the widely discussed housing crisis need not be amplified here. It is a well-established feature of the landscape.)

In submitting the next draft of the Housing Element to the state, foremost please remember that zoning does not build housing, only investment does, and the vacant Caltrans properties at this point represent the only palpable prospect the City can increase its stock of desperately needed affordable housing in the next few years. Moreover, change will not come overnight with rezoning. Change will come only over a decade or more. Indeed, many of us who are debating housing will be dead and gone before any appreciable change.

General Concerns

First of all, South Pasadena is not alone among cities that to date have failed to see their housing elements approved. It is clear that cities are dealing with relatively recently passed laws and emotional divisiveness among their residents as change rarely is easily accepted. Nowhere, perhaps, is that more true than in South Pasadena, one of the few communities across the nation that stopped the extension of a freeway. That said, much of the traffic the freeway would have conveyed now travels on city streets, including Fair Oaks and Fremont that are regularly gridlocked. Meanwhile, polluting diesel trucks hauling containers from the region's ports don't pass through South Pasadena to reach logistical centers on the periphery of the region, but instead travel along the 60 and I-10 freeways through less affluent communities, many of which are predominantly of color. At the same time, the City has been essentially unable to agree and carry out any significant effort to use available funds for traffic calming, active transportation facilities, and surface street projects, as other cities move forward.

When it comes to housing, some City residents have fought any efforts or plans to allow for increased density, instead seeking to shoehorn density into narrowly prescribed strips along commercial streets and major arterials. In addition, the city's planning and permitting process is lengthy and tedious. As a result, there has been relatively little change in the landscape in the more than thirty years I've lived here. Indeed, residents—including freeway fighters, historical preservationists, and many prosperous owners of large single family homes on large parcels, aided by others prone to fear of change—have managed to keep South Pasadena more or less the way it has been since the post-World War II era, a quaint bedroom community that celebrates the days of Route 66, classic cars, good schools, and beautiful gardens, a community that many residents view as charitable and charming. And no doubt all these things contribute to South Pasadena's much locally celebrated and revered "neighborhood character."

Personally, I must admit that I was drawn to the community upon returning to Southern California in 1988 due to its neighborhood character. However, a lot has happened since then and as I've witnessed the changes—hollowing out of the middle class, offshoring of manufacturing, stagnation of wages, growing inequity, increasing social and racial tension, rampant drug addiction and social

dysfunction, growing homelessness, overcrowding, housing insecurity, a wave of mental illness, and the astronomical cost of housing, and rapidly accelerating climate instability—my view of what it means to live here in South Pasadena, in the region, and in the world has changed dramatically. Today, it's become increasingly apparent that the magnitude of change needed to address this complex of interrelated problems has become so great that over the next ten to 20 years just about everything around us must change, including here in South Pasadena. However, this view is assuredly not shared by apparently influential residents who say they support "thoughtful and conscious growth and expanded thinking" as long as it's not next door. They complain about any proposal to add much needed housing, grasping at any potential plausible objection, such as lack of water, lack of power, traffic, burdens on schools and services, lack of open space, ***and mostly the perception that growth will diminish their property values***. They dispose of anything that's seemingly proposed, yet never articulate on their own what a housing element, or general plan should include. And history has shown their tendency is to get the city to legally contest many state requirements aimed at solving these problems, and then slow roll any local actions developed to meet the requirements once legal actions play out. This pattern clearly is based on the view that South Pasadena is exceptional and should be left to manage its own affairs without regional and state oversight. Yet, this is despite that the source of the wealth here stems from proximity to the second largest metro area in the nation situated on the rim of trans-Pacific trade and in the heart of a state with one of the world's biggest economies. ***Indeed, the message seems to be: I'll enjoy the personal wealth the region offers, but don't ask me to contribute much toward solving the region's problems. Moreover, don't call us irresponsible, because we supported local tax measures and contribute to local charities that are "truly . . . sustaining our way of life here in SoPas." In this case sustaining is a substitute for "not changing."***

However, as city officials and Councilmembers it is incumbent on you to lead, rather than to cater to such provincialism. Just imagine that the story is much the same in small cities across the region and the state when it comes to the state's housing requirements. Note too that such attitudes have prevailed for decades, while problems have mounted and festered. Indeed, it's the lack of any local effort to address the housing crisis that led lawmakers in Sacramento to enact new state requirements. So now, it's reckoning time. Unless we look in the mirror as a community and make the change, the problems that everyone seems to acknowledge and agree must be solved, won't be solved by doing the same as we have done in the past.

Addressing Specific Contentions Voiced in the Community

City-wide R-4 zoning will diminish property values

Don't tread on me and my property value by continuing to maintain R-1 zoning. Numerous studies cited below show that increasing density, particularly everywhere, will result in rising property values and likely check rising rents and housing costs. In addition, the city's inclusionary housing ordinance will require more affordable units.

https://masslandlords.net/gentle-density-increases-nearby-property-values-evidence-shows-contrary-to-popular-belief/

https://www.strongtowns.org/journal/2022/1/18/what-would-mass-upzoning-actually-do-to-property-values

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

Also, increasing allowable density city-wide will open better housing opportunities to all and destigmatize affordable housing residents. It will address the baked in ongoing classism in the City and its racist legacy during the Sundown Town era.

We don't have the water or power to add additional housing units

Housing not lawns is the rejoinder. Indeed, half or more of the water is used outside to water lawns. If the lawns had housing on them, water use would not increase. Indeed, more than half the people dwelling in multi-unit housing in South Pasadena use only half the water used by the less than half that live in single family homes. That's because half the water use at the average-sized single family residence is used to water lawns.

Table 4-1 Demands for Potable and Non-Potable Water - Actual

Submittal Table 4-1 Retail: Demands for Potable and Non-Potable[1] Water - Actual			
Use Type	2020 Actual		
Drop down list May select each use multiple times These are the only Use Types that will be recognized by the WUEdata online submittal tool	Additional Description (as needed)	Level of Treatment When Delivered Drop down list	Volume[2]
Add additional rows as needed			
Single Family		Drinking Water	1,962
Multi-Family		Drinking Water	992
Commercial		Drinking Water	450
Institutional/Governmental		Drinking Water	85
Landscape		Drinking Water	4
Losses		Drinking Water	46
Other	Fire Protection	Drinking Water	7
		TOTAL	3,546
[1] *Recycled water demands are NOT reported in this table. Recycled water demands are reported in Table 6-4.* [2] *Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Table 2-3.*			
NOTES:			

From: https://www.southpasadenaca.gov/home/showpublisheddocument/27639/637738897658270000

In fact, one study shows that on R-1 lots in the area, as much as 70 percent of water use is for lawn irrigation.

https://deeply.thenewhumanitarian.org/water/community/2017/08/09/city-wide-study-shows-how-much-water-urban-landscaping-really-uses

Lack of Power

California utilities are in the midst of major distribution circuit upgrades to increase capacity to deliver power. The California Public Utilities Commission and California Independent System Operator require utilities to show they have enough power for each coming year by performing a "resource adequacy study." To pass the test, the utilities must show they have adequate power purchase contracts for a one-in-ten-year weather event. Utilities also are subject to long-term transmission planning requirements, as well as power procurement requirements.

Overwhelming Transportation Infrastructure

Look Ma, no traffic. A Montreal residential neighborhood at rush hour in fall of 2022.

Contrary and seemingly counterintuitively, density does not necessarily result in increased traffic. Instead, low density single-family development increases traffic. Montreal is a case in point. The four million who live within the city limits there get around by walking, biking, and riding the clean, well maintained, and extensive subway system. Retail, including supermarkets, drug stores, etc. are scattered throughout the city. This has enabled Montreal to minimize the space it allocates for the auto compared to the typical U.S. city, particularly in suburban areas. That has opened up public spaces, which are distributed throughout the city.

Indeed, a new study conducted at U.C. Davis recently showed that increased density will help meet greenhouse gas and other air pollution reduction goals by minimizing the need to drive, even in electric cars. This will help reduce dependence on foreign metal mining for batteries, magnets, etc. used in electric vehicles.

https://www.theguardian.com/us-news/2023/jan/24/us-electric-vehicles-lithium-consequences-research

https://www.climateandcommunity.org/_files/ugd/d6378b_3b79520a747948618034a2b19b9481a0.pdf

Impact on Schools & Open Space

Schools have the ability to expand by building up. Schools also can cooperate with the City to close streets to expand playgrounds and athletic fields. In fact, SPUSD did this when South Pasadena Middle School was rebuilt more than 15 years ago. Moreover, even South Pasadena freeway fighters who support maintaining R-1 zoning have touted closing the 1-710 stubs in Los Angeles and Pasadena, respectively, to expand the Cal State Los Angeles campus and to create new park space in Pasadena. Why not expand elementary school campuses by closing or narrowing adjacent streets where possible.

In addition, areas in Garfield Park under the SCE lines and also areas around the periphery of the fields in the Arroyo could be used to site local basketball courts, etc., or additional community gardens. They are not well maintained and are under-utilized. At one point the updated general plan, which still is pending years later, contemplated placing a walking trail under the SCE lines paralleling Fair Oaks in the Marengo District. It hasn't been done or pursued as the general plan remains in limbo after years of discussion.

Conclusion

To conclude, we are only limited due to our limited way of viewing the world, despite that those voicing opposition to density claim they back expansive thinking. By increasing allowable density citywide and by beginning with seeing that quads, triplexes, etc. are built on the vacant Caltrans lots where feasible, South Pasadena can begin to address the complex of interrelated problems that we all want to solve. However, if South Pasadena and hundreds of other cities continue to do what they have in the past, the problems will continue to grow and make life—with its traffic, pollution and climate change, homelessness, and social inequity—worse and worse. We can either be part of the solution or part of the problem. That's why we must look ourselves in the mirror and decide to truly bring about the change that is so clearly is needed and so long forestalled.

Bill Kelly
South Pasadena Resident

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore possible solutions. The remainder of the comment does not include any proposed changes to the Housing Element, but supports many of the policies already contained in the Element.

Jeremy D (March 6, 2023)
I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a height limit, I would recommend removing the mention of buildings that are above the current limit until the time when the voters have had a chance to weigh in on this.

Page 26:

Additionally, the City will permit "Missing Middle" housing types in all residential zones citywide, except for in high fire hazard areas. Missing Middle housing types shall include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts. The City will adopt objective design standards for each housing type.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. Program 2.n does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting

the RHNA housing goals. Pursuant to the Court order in the existing litigation regarding failure to adopt a compliant Housing Element by the statutory deadline, the City is required to place a measure on the ballot to revise the height limit for residential uses. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Josh Albrektson (March 11, 2023)
This e-mail is CCed to City Council. SoPas planning Staff, and HCD. This is meant mostly for HCD.

There are two major problems with the 4th draft South Pasadena Housing Element. At first I thought they were mistakes but after my conversation with SoPas staff on Wednesday I realized they were intentionally done.

South Pasadena's housing element should not be accepted without these being changed, and it is my hope that South Pasadena changes them before the Housing Element is submitted on Monday. I told them they needed to fix it at our Wednesday meeting and in a subsequent e-mail.

1. The city is using intentionally low FAR to ghost zone the 70 DU/Acre and 110 DU/Acre and make them not feasible.
The March 2nd draft had FARs of 7.0 and 10.0 respectively. They released a new draft on March 7th that changed it to 2.5 FAR. That 2.5 FAR makes 70 and 110 impossible to build and staff knows this.

815 Fremont Ave is a 50 unit density bonus project approved by South Pasadena in April 2022. It has a FAR of 3.3, a density of 61.7 DU/Acre, and a height of 56 feet.

This is a real world example of the FAR needed to build in South Pasadena. Based on this approved project, the FAR for 70 DU/acre should be at least 3.75 and for 6.0 FAR for 110 DU/Acre.

The 2.5 FAR makes both of these densities impossible and the Housing Element needs to be changed to at least the numbers I listed above.

I raised this issue with SoPas staff at my 3/9 meeting, and I found out this was intentionally done.

When I told Allison Becker (AB) that the 2.5 FAR made 70 and 110 infeasible, she told me that General plans, specific plans, and housing elements need to be internally consistent and they changed it to 2.5 FAR because that is what was in the 2020 proposed Downtown Specific Plan (DSP).

I told her that was BS, because the Housing Element was going to have densities of 70 and 110, and if you actually wanted the documents to be internally consistent than the FARS needed to be changed because the 70 and 110 are going to be in the Housing Element and the FAR should be changed to be consistent with the required density.

She then changed her response to say that the community didn't support over 2.5. AB stated 2.5 FAR is what the community agreed to in the DSP in 2020.

AB and Grant Henninger (GH) then stated that the 2.5 FAR is there because of the 45 foot height limit and when the community votes to raise the height limit there will then be a discussion at that time with the community as to what the appropriate FAR should be.

Of note, I have an e-mail from Woody Tescher of Placeworks who wrote our 2020 DSP. The reason he said 2.5 FAR was picked was because that is the biggest building that could be built with 50 DU/Acre and 45 ft height limit. If that is the biggest that can be built under those conditions, then 2.5 FAR is absolutely inadequate for 70 Du/acre and 110 DU/acre at 84 feet.

This kind of ghost zoning is just as bad as their repeated claims that 70 DU/Acre was feasible under the 45 foot height limit and the Housing Element should be changed so that the FAR allows the density stated in the Housing Element to be built. It should be 4.0 for 70 DU/Acre and 6.0 for 110 DU/Acre.

2. SoPas is intentionally setting the zoning for site 3, Pavilions, significantly under what the owner's representative stated was needed for financial viability.

At the Feb first City Council meeting SoPas asked the owner of Pavilions to give a public comment stating that they wanted to redevelop the property and was not concerned about parking during construction. Mr Anderson, the owners lawyer, went much further than that.

Here is the link to the video. Starting at 2:07:30 he gave a 3 minute public comment and then at 2:12:08 he was called back to answer a question from Council Member Braun until 2:14:00. I really encourage you to listen to everything he said.

http://www.spectrumstream.com/streaming/south_pasadena/2023_02_01.cfm

He said he was asked to sign a letter stating intent to redevelop and he did. He also said that he REPEATEDLY told SoPas staff that the zoning proposed in previous housing elements were not financially viable.

He said that the only way they would redevelop the property with housing is if they could replace the grocery store with a bigger grocery store and they were very interested in that.

He also stated that they needed 150-160 DU/acre for the zoning and 140 DU/acre was the absolute minimum needed for financial viability. He also said they could do it at 84 ft.

South Pasadena is zoning this lot for 110 DU/Acre and this is intentionally below what Mr. Anderson said was needed to be viable.

In the March 2nd draft the zoning was 10.0 FAR, 110 feet. and 110 DU/Acre. In the March 7th draft they changed it to 2.5 FAR, 84 feet, and 110 DU/acre.

In my meeting with SoPas Staff I told them that with the changes they were now zoned for less than the very specific requirements Mr. Anderson stated.

AB told me that they had removed Pavilions, like I asked them to. I said no you didn't. It is still there. AB said well they planned to. GH interrupted her and said that they should have this conversation offline.

It appears that there had been discussions in SoPas staff to remove site 3 with the zoning proposed.

AB then asked me "Well, don't you think that this was just an ambitious proposal from the owner used as a negotiating tactic??"

The goal of a Housing Element and SoPas staff should be to actually have the housing be built. It should not be a negotiation with the owner to make the feasibility of a project so low with the least amount of apartments so that the project may or may not be built. This site is one of the best sites to build housing in all of SoPas and SoPas should be doing whatever is possible to put the most possible units on this site.

Instead they are intentionally making sure the zoning would not allow redevelopment.

This Housing Element should be rejected unless South Pasadena zones this site for 160 DU/acre as Mr. Anderson specifically stated was required.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** There is no intent by the City to make sure zoning standards do not achieve stated Housing Element goals. The City is committed to taking such actions within the required 120 days post-adoption to amend zoning and other codes to address the goals of the Housing Element.
- **How addressed:** The stated FAR and other development standards outlined in Program 3.b of the Housing Element are consistent with the current height limit. When adopted, within 120 days after adoption of the Housing Element, the General Plan, Downtown Specific Plan, and other zoning amendments will need to be consistent with the current height limit. If the height limit is repealed or increased through voter initiative, development standards for affected zones with residential uses will be updated to be consistent with the new height limit within 120 days thereafter.
- **How addressed:** This draft of the Housing Element represents a significant increase in the density allowed on Site 15, from 70 to 110 du/ac. At the February 1st City Council meeting, the representative of this site indicated that they analyzed the site's feasibility using the existing inclusionary requirement of 20%, as well as a higher requirement of 30%, and under those requirements would need at least 140 du/ac to make redevelopment of the site be feasible. The City is reducing the inclusionary requirement to 15% and providing significantly more incentives and reduced development standard requirements to ensure that redevelopment of sites like this one are feasible. Furthermore, this site is not necessary for the City to meet its RHNA numbers, and instead the site only adds to the City's RHNA buffer.

Mike Thurman (March 12, 2023)
Hi Michael!

I wanted to reach out and share my thoughts on a win-win approach to meeting the State's housing element requirements. I looked over the City's draft proposal and was surprised at the low estimate for ADU conversions (50 over the next eight years) in meeting the 2,067 additional unit requirement.

I believe that our city has hundreds of unpermitted ADU units that are currently fully occupied by low-income residents that are not being counted because of their status. Issuing permits for these fully-occupied units would immediately:

1. Lift the City's count of the number of low-income residents that currently live in these units.
2. Increase homeowner property values by increasing the habitable square footage of their properties.
3. Allow homeowners to fully insure their properties for the full replacement value of their properties, including the ADU units.
4. Avoid any new construction and associated impacts for these additional units.
5. Avoid any new parking impacts for these existing units where residents are already housed.

City leadership may be under the impression that the City's previous efforts to encourage ADU conversions generated only limited results, and therefore this might not a viable option for generating significant additional low income units. However, that impression is incorrect.

Based on my own experience, although City staff prepared a brochure and encouraged residents to apply for ADU conversions, suggesting these would involve low-cost and low-documentation reviews, in fact once the Building Department became involved it immediately become apparent that the costs associated with the conversion, including completion of a complicated application and architectural and structural engineering plan requirements, would be prohibitive, and my hunch is that the City received very few applications from that effort.

However, it is important to appreciate the fact that all of these unpermitted units in South Pasadena are already occupied, meaning that this prohibitive ADU conversion process has simply prevented existing units from being permitted and has guaranteed that they remain uncounted.

Another unfortunate reality is it appears from the Report that the City has no accurate count of the number of these units in the City. I firmly believe there are at least a dozen of these units located in just my neighborhood, one street within the City. My sense is this could, and should, be a much more significant element in the City's plans for complying with the State requirements.

I believe our City could make a significant dent in meeting the State's additional housing requirements, and at the same time support many of our homeowners, by carefully examining the ADU conversion process, simplifying it and providing additional resident support in the process. I can foresee (and will volunteer to lead or be part of) a citizen-led promotion of such a program to encourage and maximize ADU conversion application submissions by South Pasadena residents who own these units.

Thank you for considering these thoughts and for your continued service to our City. Please feel free to contact me with any questions or feedback on this issue.

Best wishes to you and your family,

Mike Thurman
(626) 399-6205 (cell)
michael@thurmanlegal.com

- **How addressed:** The Housing Element includes a significant discussion of the City's existing ADUs, as well as projected ADUs accounting for a portion of the City's RHNA requirements. Additionally, the Housing Element includes programs to encourage and monitor the construction of ADUs to ensure that ADU production meets the projections throughout the planning cycle.

Care First South Pasadena (March 12, 2023)
City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

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

Re: South Pasadena Housing Element, Fifth Draft (March 7)

Dear Ms. Frausto-Lupo:

We are dismayed by the City of South Pasadena's unilateral revisions of the Fifth Housing Element draft between March 2 and March 7. These changes set back progress on the development of the 20 vacant Caltrans properties. The City is no longer committing to converting these properties to affordable housing on site and, instead, is returning to entertaining "alternative solutions" to Senate Bill 381.

The Caltrans properties are the only certain parcels of land for the development of 100% affordable housing in the foreseeable future in South Pasadena. Other programs and sites identified in the Housing Element are only ideas for potential developments. Similarly, zoning, building, and other code changes will not guarantee affordable housing development, functioning only to support and incentivize prospective projects.

The City's March 7 revisions to the Caltrans properties continue the City's decades-long history of racial and economic exclusion and do not affirmatively further fair housing.

It comes as no surprise that both the March 2 and March 7 drafts also fail to address our comments about the City's use of historic preservation policies. The City will continue to use these policies to impede affordable housing development and maintain much of its racial and economic exclusion in higher resource neighborhoods. And, the City has no plans to stop doing so.

Worse, not only is the City attempting to skirt existing laws on fair housing and Caltrans properties, but the City has also eluded the public participation process required for the Housing Element. Nothing in the March 7 version explains why the City made significant revisions from the March 2 version. Prior to March 2, the City held three public meetings on February 1, 9, and 15 to receive public comment and to direct City staff on how to revise the Housing Element. The March 2 version reflected these discussions. We can reasonably surmise that between March 2 and March 7, the City received comments from residents and Councilmembers and changed the draft accordingly, outside of the public process. The City must disclose in this draft, with opportunity for public comment, all communications it received pertaining to the fifth Housing Element draft.

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

Constructing affordable units on the Caltrans sites is critical to bringing in any new affordable units in the City because there are no other sites in the City that are already obligated to hold 100% affordable housing. While the City committed to converting Caltrans homes to affordable housing on site in the

March 2 version of the Housing Element draft, it completely changed course on March 7. **The City should adopt the March 2 version of this program.**

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

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

Redline Version, p. 266 (emphasis added).

> In the **March 7 version**, the City added a new provision about alternatives to Senate Bill 381, and walked back its commitment to construct additional units on the sites of the Caltrans properties:
> To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any *alternative solutions to those provided by SB 381* that respond to the cost constraints of particular properties.
>
> . . .
>
> [T]he City *may consider* the construction of additional units, either as ADUs or Missing Middle housing, on *certain* parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 267 (emphases added).

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

In a March 8 meeting with Care First, City staff shared it is the City's intention to comply with the spirit of Senate Bill 381—to convert the properties into affordable housing—but also it would like to explore "alternative solutions" for certain properties. These are contradictory goals. The City identified exempt properties to include ones that have the main subject of community debate: those located in the City's higher resource neighborhoods. When we asked for the City's inspection reports and other documents they are relying on to determine the feasibility of development, the City declined to share this information.[9] The City fails to provide any evidence in this Housing Element to support its conclusions that some properties are not financially feasible for development.

As explained in our December 8, 2022, comment, the City has not disclosed legally viable "alternative solutions" to the public. Mayor Jon Primuth, alongside Cultural Heritage Commission Chair Mark Gallatin (who simultaneously sits on the board of the private non-profit organization, the South Pasadena Preservation Foundation), has publicly advocated for these solutions, despite the City Attorney's opinion that these alternatives are unlawful.[10] One such alternative is selling the Caltrans

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

[10] On November 2, 2022, then-Mayor Pro Tem Jon Primuth, as one of the two members of the SB 381 implementation committee, stated at a city council meeting: "There's a proposal that we look at an alternative to SB 381. We are exploring

properties through a double escrow process and selecting preferred homebuyers vetted by the Cultural Heritage Commission. Again, Senate Bill 381 does not allow for this or other alternatives. Moreover, the Cultural Heritage Commission, which has a mandate to enforce the City's historic preservation laws rooted in racial and economic exclusion, must not be allowed to participate in any homebuyer selection process.

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

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

In the **March 2 version**, the City proposed to permit Missing Middle housing types "in all residential zones citywide, except in high fire hazard areas." The City did not specify the types of Missing Middle housing types for each category of residential costs, only that they could include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts.

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

- Specify Missing Middle housing types to include triplexes and fourplexes. Without concrete commitments on density, the City risks falling short of its promises to allow for greater density

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that as one of our options as well." See http://www.spectrumstream.com/streaming/south_pasadena/2022_11_02.cfm# (starting at approximately 02:44:00).

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

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

See Attachment 1 (November 2, 2022 email).

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

in these targeted areas. For example, if the City only allows for duplexes, that will not be financially feasible for developers and will not result in greater density.

- Designate upzoning as the default policy (not an opt-in program). Staging this as an opt-in program creates another administrative hurdle in the development process rather than streamlining it; thus, this component of the program should be removed.
- Define "high fire hazard areas." The City leaves "high fire hazard areas" undefined in this draft. Based on the City Council and staff's public outreach discussions (e.g., Special Joint Meeting of the City Council and Planning Commission, February 15, 2023), the intent of this provision is to account for areas that have a high risk of fire. This provision should be narrowly interpreted and should not be used broadly to designate as many neighborhoods as possible as high fire hazard areas.

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

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

  The parcels that currently contain the most demographic diversity will have their densities increased while the more homogenous regions will remain significantly lower – despite their proximity to available resources and their relatively flat topography. The largest, flattest, lots in the City are currently zoned RE – and the current draft of the Housing Element largely omits those lots from any future density development. Given the small area of the City, restricting density to transit corridors largely serves the purpose of keeping density contained where it currently exists.

- Allow lot subdivisions. Another inadequate method being proposed is the use of SB 9 lot splits to achieve greater density. To date there has not been a single SB 9 lot split approved in the City. Studies have shown that the legal requirements of SB9 splits make them prohibitive (see https://ternercenter.berkeley.edu/research-and-policy/sb-9-turns-one-applications/). South Pasadena relies on this inadequate method because there is not true intention to allow for more diverse development. The underlying principle in the city's programming is that current property owners can increase density via ADUs. But this does not provide equitable pathways to ownership and upwards mobility, it reinforces existing socioeconomic boundaries. A much more equitable means would be allowing lot subdivisions. The city's Housing Element has only allowed for lot consolidations along existing corridors.

<u>Goal 6.0 – Expand and strengthen tenant protections for South Pasadena's existing renters</u>
Program 6.a – Rent Registry

Program 6.b – Right to Return Policy
Program 6.c – Relocation Assistance
Program 6.d – Rent Stabilization

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

Thank you for considering our comments.

Sincerely,
Care First South Pasadena

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore additional possible solutions.
- **How addressed:** The Housing Element does specify which types of missing middle housing will be allowed, including tri-plexes and four-plexes. As noted in the letter, the City does have a current definition of "high fire hazard areas."
- **How addressed:** The Housing Element includes significant areas of Very Low and Low Density Residential uses where missing middle housing will be allowed, all within ½ mile of high quality transit corridors along Fair Oaks Avenue and Huntington Drive.

Gail Maltun, et al (March 12, 2023)
Dear City Manager Chaparyan , Council Members and City Planning Staff,

We are writing to express our profound dissatisfaction with the 5th Draft of the Housing Element. While we understand that South Pasadena has been mandated by the State to provide more than 2,000 units of housing, we strongly believe that this can be achieved without the ill-conceived and draconian solutions proposed in this draft.

We are further distressed by the City's failure to present this Draft to the citizens of South Pasadena. The housing policies proposed in this document will drastically alter the architectural character of our City. Despite this, the Draft was released only to people who had previously signed up for updates on the Housing Element. That email went out on March 2, notifying us that comments on the more than 500-page document would be due in less than a week. The Neighborhood Pulse, distributed to the community by the City, included a cheery note about South Pasadena's 135th Birthday, but not a word about the Housing Element.

A few of our major objections are detailed below:

- The new height limit is dictated to be a minimum of 84 feet. We support a modest increase in height to allow for well-designed four and five story buildings, but 84-foot buildings—with 110 feet mentioned elsewhere--would drastically change the character of our town.
- In Program 3M, titled "Implement SB9 and SB10", you commit the City to participating in SB 10. This is a voluntary program that the City had previously vowed to opt-out of. SB 10, as you know, will allow massive upzoning (with CEQA exemptions) of much of the City—anything within ½ mile of the Gold Line Station and possibly within ½ mile of major bus stops as well.
- An "Affordable Housing Overlay"—otherwise known as rezoning—has been proposed in Program 2J/k. This overlay would allow "up to 30 units per acre" in "selected sites outside of the Downtown and Mixed-Use districts". Where this upzoning might land is completely unspecified: it might be on any street in town.
- The City commits to building "100% Low Income" units on several City-owned properties in the Downtown district. This is just terrible, outdated planning. Low-income units need to be incorporated into buildings that also include moderate and market rate units. To do otherwise is to stigmatize the residents of the low-income buildings and to create contemporary versions of the blighted "projects" of decades past.
- The "missing middle" units may sound great in concept, but what that means is eliminating single family zoning in a very large portion of the City. We believe most residents will find this objectionable.
- Perhaps our largest objection is the complete and intentional elimination of the more than 30 acres of City-owned land in the Arroyo from any consideration for development. The Arroyo Seco Golf Course and the Stables constitute, by far, the largest undeveloped land in the City. They could accommodate the development of many hundreds of housing units – and produce a huge financial windfall for the City in a potential joint venture with a developer. These properties are used by relatively few South Pasadena residents. Golf courses are water-guzzling facilities that are being redeveloped for housing throughout the State. The Stables are used primarily by upper-income horse owners, with stable prices ranging from $685-$785 per month, per horse. And the stables and golf course generate very little income for the city. Despite these properties being characterized in the report as open, natural space, neither are "natural space," and both are fenced off from the general public. Unlike the playing fields and park in the Arroyo, neither the Stables nor the Golf Course should be considered sacrosanct. The Arroyo, both in South Pasadena and in the City of Los Angeles, already contains both single-family and multifamily housing. In the course of public meetings, both the stables and the golf course were proposed for housing sites. If we have to choose between putting housing on these two sites and eliminating single-family residential zoning in most of our city and allowing □-10 story buildings, we believe the wiser choice is clearly to develop the stables and golf course properties. That the City excluded these two properties from our planning for housing at a time when the State is demanding more than 2,000 new units in our community demonstrates a level of ineptness and lack of imagination that borders on malpractice.
- We also object to the general tone of self-flagellation that permeates the document. The inclusion of the excerpt from "When South Pasadena was a Sundown Town", by Jerry Friedman (P. 104), and the heavy emphasis on our 70-year-old "Sundowner" past, in Section 6.4.6, "South Pasadena History," is a biased, one-dimensional view of our City. It ignores the fact that we long ago evolved into one of the most racially, ethnically and economically diverse

> cities in the area. Moreover, it is irrelevant to the task that the State has asked us to execute: namely, locate sites for 2,000 housing units: nothing more, nothing less.

It will be difficult to incorporate more than 2,000 new housing units in South Pasadena in the next few years. No one thinks this task will be easy. But we believe that it is possible to do this without destroying the architectural character of South Pasadena. By adding the Golf Course and the Stables to the sites available for development; by concentrating larger multifamily complexes that combine lower/moderate/market units on major streets such as Huntington and Fair Oaks, the Ostrich Farm area, and the Gold Line Station area; and by a modest increase in height limits to allow well designed four and five story buildings in selected sites—we think that we can achieve a successful Housing Element that will spark a more vibrant downtown while preserving our peaceful streets and small town character.

Sincerely,

Gail Maltun
Alan Maltun
Niles A. Pierce
Gillian Pierce
Diemha Hoang
Kathy Eastwood
Michael Eastwood
Shelley Stephens
Valerie Greco
Nicolas Greco
Nichole Dunville
Mary Farley
Christina Schwarz
Benjamin Schwarz
Eileen Lee
David Lee
Mark Haines
Julie Winkle Giulioni
Peter Giulioni
Terry Halberg
Lilian Lu
Henry R. Jones
Margie Ferree Jones
Joe Jacob
Bonnie Tsang
Corey Miller
Charlene Miller
Katherine Adamson
Tina LaMonica
Clarice Knapp
Harry Knapp
Michael Messner
Pierrette Hondagner-Sotelo
Valerie Huber
Jenny Teal

David Ho
Vicki Ho
Deni Sinnott
Mako Koiwai
Donna Bartlett
Kevin Lutz
Deborah Lutz
Stephen Lawes
Gina Lawes
Joanne Nuckols
Tom Nuckols
Peter Lam
Wendy Lam

- **How addressed:** The City held three public meetings to discuss the changes made in this draft of the Housing Element, and ensured the community had ten days to provide public comments. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Julian Petrillo (March 13, 2023)
Hello there. Julian Petrillo here, going on 25-year resident of South Pasadena. Recently it came to my attention that there's a draft of a new SP housing element which would consider allowing multi-unit dwellings just about anywhere, and also that height limits of 7-10 stories are under consideration. These policies will change the way of life that all residents of 91030 prioritize and strive for when they pay their significant property taxes. I urge the city and staff to find another way to meet occupancy and density requirements, rather than taking on new regulations such as those.

Thank you for your consideration.

Julian Petrillo
800 Adelaine Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements.

Mary Urquhart (March 13, 2023)
The 5th Draft on Housing Element is nearing its completion. However, I did want to make an additional comment before the final deadline.

We have City properties that should be considered when developing additional housing in order to provide affordable housing for City staff and the community at large. These properties could be considered alternatives to other options already identified by the City. We currently have an 18-hole golf course, which could be turned into a 9-hole golf course to allow for a girls' softball field and possibly another playground and outside tennis courts. That would allow the city to build additional housing and affordable housing on the City-owned site located at 1102 Oxley Street, which actually "fronts" the intersection of Mission Street and Orange Grove Avenue, adjacent to a softball field and playground. The mechanical repair and storage building at that location should be moved to a

location outside of the area so critical to transportation. The community building at that location needs significant repairs and has limited historical relevance. A conversion to housing, moving the recreation facilities to the golf course area, would be a great solution. Using a 'layering approach' we can be creative to redesign this area to respect the adjacent homes and helps solve our housing crisis. The proximity to the train station is key, and there is close access to the 110 Freeway.

Changing single-family residential neighborhoods to densify our city should change only after we have exhausted all available corridors on Fair Oaks, Huntington Drive, Mission Drive (west of The Gold Line), and the Arroyo.

Thank you for your consideration,

Mary Urquhart

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the city. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

South Pasadena Tenants Union (March 13, 2023)
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030
Attn: Allison Becker and Angelica Fausto

Re: AMMENDED 5th Draft Housing Element – Public Comment

Dear Ms. Becker and Ms Frausto-Lupo:

After further contemplation, South Pasadena Tenants Union leadership is submitting this amended public comment on the March 7, 5th Draft Housing Element.

We are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are not happy to learn that the original draft of March 2nd was substantially revised and without any published responses/comments indicating public input. In reviewing the March 7th redline version, we oppose the proposed program addressing the fate of the CalTrans homes. In this draft, the proposed implementation of SB381 has changed drastically from the March 2nd version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest

change and urge the City to revise the draft submitted to HCD to include the original text from March 2.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change. In order to ensure that the City can maximize housing for lower wage earning residents and middle income residents, we support triplexes and fourplexes being limited to the high transit areas with a rent stabilization ordinance that is fully enacted no later than December 2023. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

For program 6.d, SPTU asks that you include within the 5th draft implementation of a rent stabilization ordinance by December 2023.

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We are aware that at least one Councilperson had requested that her constituents oppose major components of the March 2 draft with letters to the City Manager. Within hours of that email being circulated, the March 7 redline version was published.

South Pasadena Tenants Union expects that the City act in good faith and weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Joanne Nuckols (March 13, 2023)
I am opposed to any unbundling or separating of parking from any housing development as on page 153 referencing Downtown Specific Plan. This would be a disaster with many unintended consequences. Any reference should be removed from the HE draft unless and until there is a thorough study of the negative impacts of doing so.

Joanne Nuckols
South Pasadena

- **How addressed:** The Housing Element incorporates existing California law with regards to parking in proximity to high-quality transit.

Ed Elsner (March 22, 23, and 24, 2023)
[**Note from City:** The City received three comments from this commentor over the course of three days all on the same subject. All three comments are shown below, and only one response is provided to these three comments since they deal with the same subject.]

March 22, 2023 comment letter
Dear Director Frausto-Lupo,

The draft housing element's rezoning capacity analysis (Table VI-51) is seriously flawed.

The table undercounts existing housing units. For example, every listed site whose current land use is High Density Residential is incorrectly shown as having "0" existing units. This error means that thousands of existing units have not been counted, and that the total Maximum Additional Development Capacity for the listed sites is therefore overstated by the same amount.

On the other side of the coin, the Table VI-51 miscalculates the total Development Capacity Adjustment for every listed site with a residential zoning capacity of 50 du/ac or more. Although these sites are ostensibly given a 400% development capacity adjustment, the 400% adjustment is not included in the calculation of the total adjustment for any site, resulting in the understatement of total Anticipated Development Capacity by hundreds of units, possibly more. Anticipated Development Capacity is perhaps the most critical metric in the housing element.

These errors have obvious and serious implications for policy making.

For example, as a last-minute addition to the draft housing element, the rezoning of Huntington Drive (to mixed-use with 70 du/ac density) will promote the displacement of many residential tenants. As a practical matter, the displacement will be permanent, for the reasons discussed in my previous comment published at page B1-234 of the draft. The human impacts of mass eviction and involuntary displacement can be devastating, and the decision to rezone Huntington Drive was a rushed decision that was not supported by reliable data.

Every listed Medium Density Residential site and High Density Residential site whose existing unit count is shown as "0" or "1" is suspect and should be checked by searching the APN on the County Assessor's online portal (https://portal.assessor.lacounty.gov/). The existing unit count for each site should be updated as necessary.

Also, the 400% density adjustment should be included in the total development capacity adjustment for every listed site with a residential zoning of 50 du/ac or more. There is likely a formula error in the spreadsheet that needs to be resolved.

Once these errors are fixed, a determination should be made whether it is really necessary to rezone Huntington Drive to mixed-use, 70 du/ac, in order to meet the city's RHNA obligations. If the city is able to rezone residential sites on Huntington Drive to 30 du/ac (medium density) or 45 du/ac (high density), as it is doing elsewhere in the city, this would minimize the displacement of existing tenants.

Thanks again for your continuing work on the housing element and for your consideration of these comments.

Ed Elsner
edelsner44@gmail.com

March 23, 2023 comment letter
A quick follow up to my comment submitted yesterday:

Once the 400% development capacity adjustment is correctly applied to listed sites with a density of 50 du/ac or more, the new total anticipated development capacity is 3,819 housing units according to my calculation.

To put this in perspective, this is 2641 more housing units than the 1,178 total anticipated development capacity stated in the draft housing element for the sites listed in the uncorrected Table VI-51.

It is also 574 more housing units than the city's entire RHNA allocation of 2,067.

With an accurate count of existing units, the total anticipated development capacity will decrease.

But the magnitude of the capacity adjustment error suggests that the city will be able to meet its RHNA obligations without needing to increase density on Huntington Drive to 70 du/ac.

In any event, I don't think the city should be committing to the rezoning programs included in the draft housing element until a corrected Table VI-51 is reviewed and analyzed, even if that means delaying the submission of the draft to HCD.

Thanks again,

Ed Elsner
edelsner44@gmail.com

March 24, 2023 comment letter
Dear Director Frausto-Lupo,

Thank you again for the opportunity to comment on the 5th draft housing element that will be submitted to HCD later today.

The draft indicates that the development standards for the Huntington Drive zone will mirror the standards for the Mission Street Zone of the Downtown Specific Plan.

One suggestion would be to clarify that with respect to residential parcels in the Huntington Drive zone whose current land use is Medium Density Residential or High Density Residential, a specific allowable density is yet to be determined through a zoning process subsequent to the adoption of the housing element, with input from the community and especially from residential tenants who live on Huntington Drive, who would be at risk of displacement from redevelopment.

Stated another way, the allowable 70 du/ac density for the Mission Street Zone in the Downtown Specific Plan should not be considered an objective general plan standard or criteria for the Medium Density Residential or High Residential Density parcels in the Huntington Drive Zone, but a possible allowable density along with 30 du/ac or 45 du/ac mentioned in my previous comments.

A 70 du/ac density in the Huntington Drive zone should be reserved for existing commercial parcels which would be more suitable for redevelopment as mixed-use projects, and I'm

confident that the city can still meet its RHNA obligations with lower densities for residential parcels on Huntington Drive.

One final suggestion, there should be protections against tenant harassment as part of the package of protections for residential tenants, with appropriate remedies to deter bad actors from improperly influencing tenants to vacate in order to avoid compliance with the other tenant protections the city is proposing.

Thanks again, and best of luck with the submission of the draft.

Ed Elsner
edelsner44@gmail.com

- **How addressed:** City staff met with commenter on 3/24/23, prior to his final comment, to discuss his concerns. Staff acknowledged the limitations of the dataset that is used for the capacity analysis (Table VI-51). Data was pulled from our vendor's site and was not closely screened before building the new table. Staff also acknowledged the possibility of a formula error in the table. Upon further review after the meeting with the commenter, the City's Housing Element consultant determined that there is not a formula error in the table.

  Staff clarified that the purpose of the table was to illustrate the breadth of the future rezoning areas and that the upcoming general plan update process would be used to refine the rezoning strategies. Staff clarified that our obligation with the housing element is to identify areas where development can be achieved and our commitment is to engage in a public process to rezone within the areas identified to accommodate our RHNA obligations with a reasonable buffer in order to produce a responsible long-range general plan.

  Staff addressed the potential impact of rezoning on existing multi-family residential buildings and underscored the City's commitment to developing a slate of tenant protection programs.

  Staff clarified that in the instance of Huntington Drive, the term "mixed-use zone" was used to reflect the existing corridor conditions with comingled multi-family and commercial zoning. New "mixed use" is contemplated for existing commercially zoned properties, and increased development capacity is contemplated for existing multi-family properties. The City is not considering converting residential to commercial land uses.

Steven Appleton (March 24, 2023)
Public Comments on the City of South Pasadena 5th Draft Housing Element, Clean Version.
Submitted on March 23, 2023.
Submitted on March 24, 2023 at 11:55 am

COMMENT 1:

In several locations in the 5th Draft Housing Element of the City of South Pasadena the subject of Rental Housing inspections is addressed, including direct mention of Assembly Bill 838. References can be found on pages 7, 67,68,255 and B1-47. The following statement summarizes the City's stated intent:

"To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement but also preventing tenant habitability issues before they emerge. "page 7.

I am a tenant who complained about substandard conditions and requested Code Enforcement inspection of the unit my family rented in South Pasadena, but City refused to inspect even after July 1. 2022 when it was obligated to inspect per the provisions of AB 838. The City continues to state a policy of "no inspection" of rental housing. As such, I question the 8-year timetable for implementing a full inspection program stated on page 7. If the Housing Element is approved with such a liberal timeline for compliance with AB838, it would enable the continuation of practices that play a role in the displacement of tenants.

I offer the below as rational for my comment:

On three occasions after July 1, 2022, I requested Code Enforcement of the City of South Pasadena to inspect the premises because of improper egress (substandard stairs to unpermitted sleeping quarters), fire code violations, and lack of heating etc. In each case I was told that "City of South Pasadena does not have an occupancy inspection program and will not inspect the property." I was referred to a nonprofit tenant's rights group.

City of South Pasadena's refusal to inspect our rental premises is an unfulfilled obligation. The failure to inspect as required by law impacted our move-out. Future tenants are also impacted. Objective code and habitability inspection would reveal unsafe conditions, including structural deficiencies caused by unpermitted construction that continue to pose risk to any future tenants. Therefore, I have continued to request an inspection of the premises based on the fact that the failure to inspect when requested is an unfilled obligation of the City. The response of City staff was to quote the "no rental housing inspection policy of the City," as noted below:

Angelica Frausto-Lupo , Community Development Director, City of South Pasadena, January 17, 2023: "I had my building team look into the matter and there is insufficient reason for further investigation or to open a code enforcement case. Further, the City of South Pasadena currently does not have an occupancy inspection program and as such we will not pursue inspection of these properties."

Paul Riddle, Fire Chief, City of South Pasadena, March 13, 2023:

"I discussed with our Building Department had they advised that this matter has insufficient reason for further investigation or to open a code enforcement case. They also cited the fact, the City of South Pasadena does not have an occupancy inspection program and as such they will not pursue inspection of these properties. Tenants can reach out to a landlord/tenant rights organization such as the Housing Rights Center, https://www.housingrightscenter.org/ or the LA County Department of Public Health to file a complaint.

I suggest that the Housing Element is deficient unless the City of South Pasadena revises it to state that the City of South Pasadena will:

1) Immediately accept and process rental housing inspection requests made by tenants or tenant agents in line with the provisions of AB 838.
2) Immediately instruct all staff to change messaging to reflect that tenants have a right to request an inspection and be informed of the results of inspections.
3) Retroactively inspect any housing where a complaint was made by a tenant after July 1,2022 but City refused to inspect. (If a request was made after July 1, 2022, the City's refusal to inspect is an unfulfilled obligation. The unfulfilled obligation has continuing impacts on past and future tenants.)

COMMENT 2:

I guide you to page Page B1-135 under "How Addressed". In reference to Table VI-26, the document states, "It should be noted that these units are all single-family properties, and do not include multi-unit rental properties."

The Housing Element should clarify that the City will accept and process rental housing inspection requests of tenants of multi-family housing.

Steven Appleton

- **How addressed:** The City acknowledges that at the time of the events Mr. Appleton refers to, the City was unprepared to fulfill its responsibilities under AB 838. The City is currently aware of its responsibilities under AB 838 and we are attempting to comply with the law. Should a tenant contact the City to request an inspection, we will respond in compliance with AB 838. This obligation is being formalized into a program under the Housing Element by including a proposed occupancy inspection program which would entail systemic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes as noted in the Housing Element Program 1.c-"Housing Rehabilitation and Code Enforcement." As stated in Program 1.c., the proposed occupancy inspection program "will support the City's inspection of rental properties in response to tenant's complaints of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge."

Anonymous (March 24, 2023)

As a resident, small developer and commercial property owner on Huntington Drive, I think the city's future development needs require a more aggressive plan for the Huntington Corridor. Right now the Housing Element's main focus is developing the DTSP and expanding the DTSP development standards to other areas including the proposed mixed-use zones.(See Program 3.A and 3.B., Housing Element, 5th draft). But that seems flawed as the DTSP development standards are based on the limits of the downtown area. These include historical resources, the area's existing density, traffic congestion, the small two lane roads that make up Mission St.and Monterey St. and the many more smaller one lane roads that intersect them. However, none of these qualities exist in the same proportion on the Huntington Drive Corridor. Huntington Drive is about 110ft wide. It is a large 3 lane road with NO significant historical resource or comparable density and traffic. Consequently, Huntington Drive can support development standards that are DOUBLE that of the DTSP. With sufficient height and density allowance the majority of the City's RHNA obligations can be satisfied from this area alone. This would create less of a burden to develop the more historically sensitive neighborhoods that make up the DNA of the City's heritage and charms. However, as the area consists largely of income generating commercial and multi family properties, the DTSP development

standards as proposed (namely a 70/110 DU/AC and 2.5 F.A.R. is insufficient to motivate us to risk losing guaranteed existing income.

Consequently, creating a different development standard that provides for even more density and massing than the DTSP is warranted and should be supported. Additionally, developing the Huntington Corridor into a highly dense lively mixed use zone will create desperately needed housing and provide for the City's future growth whilst protecting the City's historic family neighborhood charm.

-Anonymous Resident, Owner and Small Developer

- **How addressed:** The Housing Element accommodates the City's RHNA requirements throughout the city, including within the downtown area and along Huntington Drive.

Josh Albrektson (May 4, 2023)

At the Feb first city council meeting, Mr. Anderson, the lawyer for the pavilions property, clearly stated that he needed 140 to 160 DU/acre in order for the project to be feasible.

In response, the City of South Pasadena set the density to 110 DU/Acre, 35% lower than what Mr. Anderson said was required for feasible. Alison Backer in her meeting with me told me that it was intentionally and they considered removing the site as a possible housing site.

South Pasadena is intentionally trying to make sure the pavilions cannot be redeveloped and they should be forced to rezone the Fair Oaks corridor to 140 DU/Acre.

If they do not do this, then there should be a hard deadline that if they do not have a project proposed on Fair Oaks, say by May 1st, 2026 then it would automatically go to 140 DU/Acre.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** As the City discussed with HCD during its April 24th meeting, Site 15 will be rezoned to allow for 110 du/ac, along with the entire Fair Oaks Avenue corridor. As HCD's research shows, this density is sufficient to ensure the site is viable for redevelopment to residential uses. Furthermore, the comments made by the property owner's representative during the February 1st City Council meeting mentioned a variety of viable densities. While they did state that 140 du/ac would be needed, that was with a higher inclusionary requirement than the city currently has, while the City has committed to reducing its inclusionary requirement, and to review and update the reduced requirement throughout the planning period to ensure that it does not create a constraint on development.

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Appendix C:
Letter to Property Owners

CITY OF SOUTH PASADENA

OFFICE OF THE PLANNING AND COMMUNITY DEVELOPMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: (626) 403-7210 ▪ FAX: (626) 403-7211
WWW.SOUTHPASADENACA.GOV

October 20, 2020

[PROPERTY OWNER NAME]
[PROPERTY OWNER ADDRESS LINE 1]
[PROPERTY OWNER ADDRESS LINE 2]

Re: 2021-2029 Housing Element Update

Dear Property Owner,

The City of South Pasadena (City) is in the process of updating its Housing Element of the General Plan as required by state law. The new Housing Element is intended to address the housing needs of current and future City residents. One of the requirements of the Housing Element is for the City to demonstrate that there is sufficient land to allow the development of a range housing types to include higher density multi-family units.

The City has identified the property at [PROPERTY ADDRESS], which our records indicate you own, as having the potential to be developed with higher density multi-family units. A development with up to 30 units per acre is already allowed in this location either under current zoning or would allowed by the draft General Plan and Downtown Specific Plan, currently undergoing community input and anticipated for adoption in mid-2021. One of the options the community will consider through ongoing outreach is whether to allow increasing the height or density on specific sites or in certain areas of the City to accommodate more affordable housing.

The City would like your input regarding the future of your property.

- ☐ **Are you interested in new residential development at [PROPERTY ADDRESS] within the next 3-8 years?**
  - o **If yes:**
    - ▪ **Have you already begun to explore this possibility?**
    - ▪ **Have you considered a particular type of project?**
    - ▪ **Have you considered developing the property with affordable units?**
    - ▪ **Would an increase in height or density change your perspective?**
- ☐ **Do you have any concerns about your property being identified for potential housing development in the Housing Element?**

We look forward to your input to ensure we develop the most accurate and feasible plan for our housing future. Please send us an email at HousingElement@SouthPasadenaCA.gov to provide us with your feedback by November 3, 2020, so that we can complete our Housing Element update effort. If you have any questions or comments please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development at MLin@SouthPasadenaCA.gov or (626) 403-7236.

Sincerely,

Joanna Hankamer
Director of Planning and Community Development

Appendix D:
Qualified Entities

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
FRESNO	Fresno Housing Authority	P.O. Box 11985	Fresno	CA	93776	(559) 443-8475	Edward Stacy	ned@pacbell.net	(559) 445-898	Local, regional, national nonprofit org.		6/14/17	12/16/98
ALL COUNTIES	American Baptist Homes of the	6120 Stoneridge Mall Road, 3rd F	Pleasanton	CA	94588	(925) 924-7162	Ancel Romero		(925) 924-723	Local, regional, national public agenc	X	8/14/14	12/22/98
ALAMEDA	Housing Authority of City of Alar	701 Atlantic Ave	Alameda	CA	94501	(510) 747-4300	Denise Connors	dconnors@alamedahsg.org	(510) 522-784	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of the City of	3203 Leahy Way	Livermore	CA	94550	(925) 447-3600	Jon D. Hovey	livhsg@prodigy.net	(925) 447-094	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of County of A	22941 Atherton St	Hayward	CA	94541	(510) 538-8876	√	obasgal@aol.com	(510) 727-855	Local, regional, national nonprofit org.			12/23/98
ALL COUNTIES	USA Properties Fund	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Jesse Slansky		(323) 650-474	Local, regional, national public agenc	X	12/13/13	12/23/98
CONTRA COSTA	Rubicon Programs, Inc.	2500 Bissell Ave	Richmond	CA	90804	(510) 235-1516	Tom Matthews	TomM@Rubiconpgms.org	(510) 235-202	Local, regional, national nonprofit org.		6/5/17	12/23/98
KERN	Golden Empire Affordable Hous	3600 CheSte.r Ave. Ste. B	Bakersfield	CA	93301	(805) 633-1533	Gary Kammer		(805) 633-161	Local, regional, national nonprofit org.		6/14/17	12/23/98
LAKE	Lake County Housing Services I	255 N. Forbes St.	Lakeport	CA	95453	(707) 263-2510	Linda Hedstrom	linda_h@co.lake.ca.us	(707) 263-275	Local, regional, national nonprofit org.		6/14/17	12/23/98
LOS ANGELES	West Hollywood Community Ho	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Robin Conerly	robin@whchc.org	(323) 650-474	Local, regional, public agency	X	8/14/14	12/23/98
LOS ANGELES	City of Pomona Housing Authori	505 South Garey Ave	Pomona	CA	91766	(909) 620-2368	Benita DeFrank, Neighborhood Services Director		(909) 620-370	Local, regional, national nonprofit org	X	6/14/17	12/23/98
LOS ANGELES	Hollywood Community Housing	1726 N. Whitley Ave	Hollywood	CA	90028	(323) 469-0710	Christina V. Duncan		(323) 469-189	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Hope - Net	760 S. Westmoreland Ave	Los Angeles	CA	90005	(213) 389-9949	Canoace Whalen	hope-net@pacbell.net	(213) 389-009	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Skid Row Housing Trust	1317 E. 7th St	Los Angeles	CA	90021	(213) 683-0522	Jim Bonar		(213) 683-078	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	The Long Beach Housing Devel	333 W. Ocean Blvd., 2nd Flr	Long Beach	CA	90802	(562) 570-6926	Diana V. McNeel		(562)570-674	Local, regional, national nonprofit org	X		12/23/98
MARIN	Housing Authority of the County	4020 Civic Center Drive	San Rafael	CA	94903	(415) 491-2530	Anna Semenova	ASemenova@marinhousing.org	(415) 491-253	Local, regional, national nonprofit org	X	2/26/14	12/23/98
MARIN	Canal Community Alliance	91 Larkspur St	San Rafael	CA	94901	(415) 454-2640	Tom Wilson	canalca@aol.com	(415) 454-396	Local, regional, national nonprofit org	X		12/23/98
ORANGE	Neighborhood Housing Services	350 Hillcrest	La Habra	CA	90631	(562) 694-2051	Diane Ste.wart	nhs@aol.com	(562) 694-205	Local, regional, national nonprofit org	X		12/23/98
SAN DIEGO	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN DIEGO	San Diego Housing Commissior	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	8/14/14	12/23/98
SAN DIEGO COU	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7590	Dottie Pierce	dottiep@sdhc.org	(619) 578-735	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN FRANCISCO	Tenderloin Neighborhood Devel	201 Eddy St	San Francisco	CA	94102	(415) 776-2151	Don Falk	tndc@ix-netcom.com	(415) 776-395	Local, regional, national nonprofit org	X		12/23/98
SAN JOAQUIN	Stockton Shelter for the Homele	P.O. Box 4803	Stockton	CA	95204	(209) 465-3612	Bill Mendelson		(209) 943-480	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Cambrian Center, Inc.	2360 Samaritan Place	San Jose	CA	95124	(408) 559-0330	Dale J. Harrington	dale2360@ix.netcom.com	(408) 377-047	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Charities Housing Development	195 East San Fernando St	San Jose	CA	95112	(408) 282-1125	Chris Block	chblock@aol.com	(408) 282-113	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Palo Alto Senior Housing Projec	455 E. Charleston Rd	Palo Alto	CA	94306	(650) 494-1944	Genie Dee	gxdee@california.com	(650) 493-743	Local, regional, national nonprofit org	X		12/23/98
SONOMA	Burbank Housing Development	3432 Mendocino Ave	Santa Rosa	CA	95403	(707) 526-9782	John Lowry	burbank@sonic.net	(707) 526-981	Local, regional, national nonprofit org	X		12/23/98
ALAMEDA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702		Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/9/17	12/24/98
ALL COUNTIES	Resources for Community Deve	2220 Oxford St	Berkeley	CA	94704	(510) 841-4410	Dan Sawislak	dsawislak@rcdhousing.org	(510) 548-350	Local, regional, national nonprofit org	X	6/5/17	12/24/98
ALPINE	Amador-Tuolumne Community A	935 South State Highway 49	Jackson	CA	95642	(209) 223-1485 E	Raj Rambob	rrambob@atcaa.org	(209) 223-417	Local, regional, national public agenc	X	5/24/17	12/24/98
CALAVERAS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
COLUSA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
CONTRA COSTA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	East Bay NHS	2320 Cutting Blvd	Richmond	CA	94804	(510) 237-6459			(510) 237-648	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
CONTRA COSTA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
EL DORADO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
FRESNO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
FRESNO	Better Opportunities Builder, Inc	P.O. Box 11863	Fresno	CA	93775	(559) 443-8400	Tracewell Hanrahan	nandersen@bobinc.org	(559) 443-849	Local, regional, national nonprofit org	X	8/14/14	12/24/98
GLENN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
KERN	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
KINGS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
LASSEN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
LOS ANGELES	Housing Authority of the City of	2500 Wilshire Blvd, PHA	Los Angeles	CA	90057	(213) 252-4269	Larry Goins			Local, regional, national public agenc	X	3/3/11	12/24/98
LOS ANGELES	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
MADERA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MADERA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIPOSA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MERCED	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MERCED	Eskaton Properties Inc.	5105 Manzanita Ave.	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
MERCED	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
MONTEREY	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
MONTEREY	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
MONTEREY	South County Housing, Inc.	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
NAPA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
ORANGE	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
ORANGE	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
PLACER	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
PLACER	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
PLACER	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
RIVERSIDE	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Bill Bolstad		(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
RIVERSIDE	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SACRAMENTO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SACRAMENTO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SACRAMENTO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN BENITO	South County Housing, Inc.	7455 Carmel St.	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SAN BERNARDIN	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN BERNARDIN	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SAN DIEGO	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Harvey Mandel	hmandel@neighbor.org	(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
SAN DIEGO	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
SAN FRANCISCC	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN JOAQUIN	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SAN JOAQUIN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SAN MATEO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN MATEO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN MATEO	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CLARA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CRUZ	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SISKIYOU	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SOLANO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SOLANO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SOLANO	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
SOLANO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SONOMA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
STANISLAUS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
STANISLAUS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TULARE	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TUOLUMNE	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
VENTURA	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
YOLO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
YOLO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
ALL COUNTIES	BRIDGE Housing Corporation	345 Spear Strett, Suite 700	San Francisco	CA	94105	(415) 989-1111	Brad Wiblin		(415) 495-489	Local, regional, national public agenc	X	12/24/10	12/28/98
AMADOR	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CALAVERAS	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CONTRA COSTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
EL DORADO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
GLENN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
LOS ANGELES	FAME Corporation	1968 W. Adams Blvd.	Los Angeles	CA	90018	(323) 730-7727	Sandra Hernandez	sandrah@famecorporations.org	(323) 737-571	Local, regional, national nonprofit org	X	8/14/14	12/28/98
NAPA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
NEVADA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
PLACER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SACRAMENTO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SAN JOAQUIN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SHASTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SUTTER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
TEHAMA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YOLO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YUBA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
RIVERSIDE	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SACRAMENTO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
SAN BERNARDIN	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SAN FRANCISCC	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SOLANO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
YOLO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
ALL COUNTIES	Foundation for Affordable Housi	384 Forest Ave., Suite 14	Laguna Beach	CA	92651	(949) 443-9101	Darrin Willard		(949) 443-913	Local, regional, national nonprofit org	X	8/14/14	12/30/98
BUTTE	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
GLENN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
LASSEN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
PLUMAS	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SHASTA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SUTTER	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
TEHAMA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
ALAMEDA	East Bay Asian Local Developm	310 Eighth Street, Ste. 200	Oakland	CA	94607		Lynette Jung Lee	ljunglee@ebaldc.com	(510) 763-414	Local, regional, national nonprofit org.		5/9/17	1/5/99
CONTRA COSTA	East Bay Asian Local Developm	310 Eighth Street, Suite 200	Oakland	CA	94607	(510) 287-5353			(510) 763-414	Local, regional, national nonprofit org.		6/5/17	1/5/99
FRESNO	Fresno Co. Economic Opportun	3120 W. Nielsen Ave., Ste. 102	Fresno	CA	93706	(559) 485-3733	George Egawa	eocnlsn@psnw.com	(559) 485-373	Local, regional, national nonprofit org.		6/14/17	1/5/99
SOLANO	Fairfield Redevelopment Agency	1000 WebSte.r St., 2nd Floor	Fairfield	CA	94533	(707) 428-7688	Lark Solis	lsolis@ci.fairfield.ca	(707) 428-762	Local, regional, national nonprofit org	X		1/5/99
EL DORADO	El Dorado County Housing Auth	937 Spring St	Placerville	CA	95667	(530) 621-6167	Joyce Aldrich	jaldrich@innercite.com		Local, regional, national nonprofit org.		6/14/17	1/6/99
LOS ANGELES	American Family Housing	15161 Jackson St.	Midway City	CA	92655	(714) 897-3221	Donna Gallup	info@compuall.net	(714) 893-685	Local, regional, national nonprofit org	X	1/5/17	1/6/99
SAN FRANCISCC	Bernal Heights Neighborhood C	515 Cortland Ave	San Francisco	CA	94110	(415) 206-2140	Housing Director		(415) 648-079	Local, regional, national nonprofit org	X		1/6/99
SAN FRANCISCC	Mission Housing Development C	474 Valencia St, Ste. 280	San Francisco	CA	94103	(415) 864-6432	Philip Dockow		(415) 864-037	Local, regional, national nonprofit org	X		1/8/99
STANISLAUS	Modesto Redevelopment Agenc	940 11th St	Modesto	CA	95355	(209) 577-5247	Bill Cooper	bcooper@ci.modesto.ca.us	(209) 544-398	Local, regional, national nonprofit org	X		1/8/99
SAN FRANCISCC	Chinatown Community Develop	1525 Grant Ave	San Francisco	CA	94133	(415) 984-1450	Joanne Lee	cchd@hooked.net	(415) 984-149	Local, regional, national nonprofit org	X		1/11/99
ALL COUNTIES	The Trinity Housing Foundation	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	2/26/14	1/12/99
LOS ANGELES	The Long Beach Housing Devel	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	PICO Union Housing Corporatio	1038 Venice Blvd.	Los Angeles	CA	90015	(213) 747-2790	Jesus Torres	jtorres@puhc.org	(213) 743-381	Local, regional, national nonprofit org	X	8/14/14	1/12/99
VENTURA	A Community of Friends	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	Korean Youth & Community Cer	680 S. Wilton Place	Los Angeles	CA	90005	(213) 365-7400	Jimmy Lee		(213) 353-128	Local, regional, national nonprofit org	X		1/19/99
CONTRA COSTA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	tomlf@earthlink.net	(925) 439-083	Local, regional, national nonprofit org	X	6/5/17	1/21/99
IMPERIAL	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
RIVERSIDE	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN BERNARDIN	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN DIEGO	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SOLANO	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	Pacomseru@aol.cn	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
SONOMA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	pacomseru@aol.com	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
ALAMEDA	Community and Economic Deve	250 Frank H. Ogawa Plaza Ste. 5	Oakland	CA	94612	(510) 238-3502	Jefferey P. Levin	jplevin@oaklandnet.com	(510) 238-369	Local, regional, national nonprofit org.		5/9/17	1/27/99
ALAMEDA	Bay Area Community Services	629 Oakland Ave	Oakland	CA	94611	(510) 499-0365	Daniel Cooperman	dcooperman@bayareacs.org	(510) 569-458	Local, regional, national nonprofit org	X	5/9/17	1/28/99
ALL COUNTIES	National Community Renaissan	9421 Haven Avenue	Rancho Cucamor	CA	91730	(909) 204-3508	Tracey Williams	twilliams@nationalcore.org	(909) 483-652	Local, regional, national public agenc	X	5/24/17	5/17/99
ALL COUNTIES	Community Housing Assistance	3803 E. Casselle Ave	Orange	CA	92869		Ken Robertson	chapahq1@aol.com	(714) 744-685	Local, regional, national public agenc	X	8/14/14	5/18/99
CONTRA COSTA	Community Housing Developme	1535 Fred Jackson Way ste A	Richmond	CA	94801	(510) 412-9290	Donald Gilmore	Dgilmore@chdcnr.com	(510) 215-927	Local, regional, national nonprofit org	X	5/24/17	5/19/99
DEL NORTE	Redwood Community Action Ag	904 G St.	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
HUMBOLDT	Redwood Community Action Ag	904 G St	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99
LOS ANGELES	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
MONTEREY	Peoples' Self-Help Housing Cor	3533 Empleo St	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ORANGE	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN BENITO	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	http://www.pshh.org/	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SAN DIEGO	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN DIEGO	Bayview CDC	5100 Federal Blvd, 2nd Floor	San Diego	CA	92105	(619) 262-8403	Stasi Williams		(619) 262-783	Local, regional, national nonprofit org	X		5/19/99
SAN LUIS OBISP	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SANTA BARBAR	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SANTA BARBAR	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
VENTURA	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	X	9/26/08	5/19/99
VENTURA	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ALL COUNTIES	DML & Associates Foundation	6043 Tampa Ave, Ste. 101A	Tarzana	CA	91356	(818) 708-2710	Myron Lieberman		(818) 708-194	Local, regional, national nonprofit org.		5/23/17	5/21/99
ALL COUNTIES	EAH, Inc.	22 Pelican Way	San Rafael	CA	94901	(415) 599-2712	Scott Johnson	scott.johnson@eahhousing.org	(415) 453-368	Local, regional, national public agenc	X	5/23/18	5/21/99
ALAMEDA	Satellite Affordable Housing Ass	1835 Alcatraz Ave.	Berkeley	CA	94703	(510) 647-0700	Susan Friedland	Susanfriedland@sahahomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
KERN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
NAPA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
ORANGE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
RIVERSIDE	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
RIVERSIDE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SACRAMENTO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SACRAMENTO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN BERNARDIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN DIEGO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN FRANCISCO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SAN FRANCISCO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN JOAQUIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN MATEO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA BARBAR	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA CLARA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SOLANO	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
SOLANO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
STANISLAUS	Housing Authority of the County	P.O. Box 581918	Modesto	CA	95358	(209) 523-0705	Rich Chubon	Rchubon@stancoha.net	(209) 522-863	Local, regional, national nonprofit org	X		6/10/99
VENTURA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Abode Communities	701 E. Third St., Ste. 400	Los Angeles	CA	90015	(213) 629-2702	Holly Benson		(213) 627-640	Local, regional, national public agenc	X	8/14/14	3/9/00
ALL COUNTIES	University River Village	7901 La Riviera Drive	Sacramento	CA	95826	(916) 381-2001	Kaci Walsh		(916) 381-732	Local, regional, national public agency		5/10/17	6/1/00
ALL COUNTIES	National Affordable Housing Tru	2335 North Bank Drive	Columbus	OH	43220	(614) 451-9929	Robert Snow	bsnow@naht.org	(614) 451-337	Local, regional, national public agency		5/24/17	6/1/00
SAN DIEGO	San Diego Co. Dept. of Housing	3989 Ruffin Road	San Diego	CA	92123	(858) 694-4805	Alfredo Ybarra	aybarrcd@co.san-diego.ca.us	(858) 694-487	Local, regional, national nonprofit org	X		9/19/00
ALL COUNTIES	California Housing Partnership C	369 Pine Street, Suite 300	San Francisco	CA	94104	(415) 433-6804	Matt Schwartz	mschwartz@chp.net	(415) 433-680	Local, regional, public agency	X	8/14/14	10/23/00
ALL COUNTIES	Solari Enterprises, Inc.	1544 W. Yale Ave	Orange	CA	92687	(714) 282-2520	Bruce Solari	solari@solari-ent.com	(714) 282-252	Profit-motivated individual or organization		5/24/17	12/29/00
LOS ANGELES	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
RIVERSIDE	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
SAN BERNARDIN	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
ALL COUNTIES	Mercy Housing, Inc.	1999 Broadway, Suite 1000	Denver	CO	80202	303-830-3300	Janet Gaf	info@mercyhousing.org	(303) 830-330	Local, regional, national public agency		5/24/17	1/17/01
ALL COUNTIES	California Community Reinvestn	100 West Broadway Ste. 1000	Glendale	CA	91210	818-844-4951	David Saltzman	david.saltzman@e-ccrc.org	(818) 550-980	Local, regional, national nonprofit org	X	5/23/17	1/18/01
FRESNO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
KERN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
LOS ANGELES	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
RIVERSIDE	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN BERNARDIN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
SAN DIEGO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
ALAMEDA	Christian Church Homes of Nort	303 Hegenberger Road, Ste. 201	Oakland	CA	94621	(510) 632-6712	William F. Pickel	bpickel@cchnc.org	(510) 632-675	Local, regional, national public agency		5/9/17	2/6/01
ALL COUNTIES	Goldrich & Kest Industries, LLC	5150 Overland Avenue	Culver City	CA	90230	(310) 204-2050	Carole Glodney	Carole@Gkind.com	(310) 280-576	Profit-motivated individual or organiz	X	8/14/14	4/25/01
LOS ANGELES	LTSC Community Development	231 East Third Street, Ste. G 106	Los Angeles	CA	90013	(213) 473-1606	Takao Suzuki	tsuzuki@ltsc.org	(213) 473-168	Local, regional, national nonprofit org	X	8/14/14	4/25/01
ALL COUNTIES	East Los Angeles Community C	530 South Boyle Avenue	Los Angeles	CA	90033	(323) 269-4214	Ernesto Espinoza		(323) 261-106	Local, regional, national nonprofit org	X	12/24/10	7/13/01
LOS ANGELES	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
ORANGE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
RIVERSIDE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN BERNARDIN	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN DIEGO	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SANTA BARBAR	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
VENTURA	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SACRAMENTO	Norwood Family Housing	630 I Street, Second Floor	Sacramento	CA	95814	(916) 440-1328	Darren Bobrowsky	dbobrowsky@shra.org	(916) 442-673	Local, regional, national nonprofit org	X		1/9/02
ALL COUNTIES	Bayside Communities	1990 North California Blvd., Ste. 1	Walnut Creek	CA	94596	(925) 482-9406	Basil Rallis	brallis@baysidecommunities.com	(510) 891-900	Profit-motivated individual or organiz	X	5/10/17	9/10/02
ALL COUNTIES	Newport Development, LLC	9 Cushing, Ste. 200	Irvine	CA	92618	(949) 923-7812	Warren Allen	wallen@newportpartners.com	(949) 585-044	Profit-motivated individual or organiz	X	5/24/17	9/10/02
ALL COUNTIES	Mercy Housing California	1360 Mission St., Suite 300	San Francisco	CA	94103	213-743-5830	Ed Holder	eholder@mercyhousing.org	(415) 553-637	Local, regional, national nonprofit org	X	5/24/17	12/9/02
ALL COUNTIES	KDF Communities, LLC	1301 Dove St., Suite 720	Newport Beach	CA	92660	(949) 622-1888	John Bernard		(949) 851-181	Profit-motivated individual or organization		5/23/17	12/13/02
SONOMA	Divine Senior Apartments	P.O. Box 148	Occidental	CA	95465	(707) 874-3538	Richard W. Blanz		(707) 874-353	Local, regional, national nonprofit org	X		5/29/03
ALL COUNTIES	California Human Development	3315 Airway Drive	Santa Rosa	CA	95403	(707) 521-4788	John M. Way	CaliforniaHumanDevelopment.org	(707) 523-377	Local, regional, national nonprofit org	X	8/14/14	6/30/03
ALL COUNTIES	Reiner Communities LLC	100 Spectrum Center Dr. Suite 83	Irvine	CA	92618	(949) 753-0555	Dylan Feliciano	df@reinerllc.com		Profit-motivated individual or organiz	X	5/16/17	6/30/03
ALL COUNTIES	Petaluma Ecumenical Properties	1400 Caulfield Lane	Petaluma	CA	94954	(707) 762-2336	Vera R. Ciammetti	pep@pephousing.org	(707) 762-465	Local, regional, national nonprofit org.		5/10/17	8/19/03
ALL COUNTIES	The John Stewert Company	1388 Sutter St., 11th Floor	San Francisco	CA	94109	(415) 345-4400	Margaret Miller	mmiller@jsw.net	(415) 614-917	State-wide, for-profit	X	5/24/17	8/19/03
ALL COUNTIES	William G. Ayyad, Inc.	9252 Chesepeake Dr., Suite 100	San Diego	CA	92123	(858) 244-0900 *	Rebecca Ayyad	rayyad@udgi.net	(858) 244-090	Profit-motivated individual or organization		5/24/17	8/19/03
MENDOCINO	CDC of Mendocino County	1076 North State Street	Ukiah	CA	95482	(707) 463-5462	Todd Crabtree	crabtret@cdchousing.org	(707) 463-418	Public housing authority		2/26/14	8/25/03
SONOMA	Sonoma County Community De	1440 Guerneville Road	Santa Rosa	CA	95403	(707) 565-7901	Nick Stewart	Nick.Stewart@sonoma-county.org				8/14/14	9/8/03
ALL COUNTIES	Linc Housing Corporation	100 Pine Avenue, # 500	Long Beach	CA	90802	(562) 684-1100	Sid Paul		(562) 684-1137			8/14/14	9/15/03
LOS ANGELES	Francis R. Hardy, Jr.	2735 W. 94th Street	Inglewood	CA	90305	(323) 756-6533	Francis R. Hardy, Jr.		(323) 756-6533				9/18/03
ALL COUNTIES	Domus Development, LLC	594 Howard St., Ste 204	San Francisco	CA	94105	(415) 856-0010	Meea Kang		(415) 856-0264		X	8/14/14	2/4/04
ALL COUNTIES	BUILD Leadership Developmen	P.O. Box 9414	Newport Beach	CA	92658	(877) 644-9422	Tracy Green		(949) 719-971	Local, regional, national nonprofit org.		5/16/17	2/4/04
ALL COUNTIES	Skyline Real Estate Developme	P.O. Box 7613	Newport Beach	CA	92658	(949) 293-4705	Lynn Miller	skylinerealestate@cox.net	(949) 719-971	Profit-motivated individual or organization		5/24/17	2/4/04
LOS ANGELES	A Community of Friends	9 Cushing, Ste. 200	Irvine	CA	92618	(415) 856-0010	Meea Kang	meea@domusd.com	(415) 856-0264		X	8/27/13	2/4/04
ALL COUNTIES	MBK Management Corporation	23586 Calabasas Road, Ste. 100	Calabasas	CA	91302	(818) 444-2100 e	Jessica Robbins	jrobbins@mbkmgmt.com	(818) 337-7578		X	5/23/17	3/4/04
ALL COUNTIES	Cabouchon Properties, LLC	Pier 9, Suite 114	San Francisco	CA	94111	(415) 433-2000	Susan Terrado		(415) 433-2000			5/23/17	4/28/04
ALL COUNTIES	Maximus Properties, LLC	23586 Calabasas Road, Ste. 103	Calabasas	CA	91302	(818)449-4004	Jeffrey S. McGuire	jmcguire@remax.net	(818) 449-4004			5/23/17	4/28/04
ALL COUNTIES	Squier Properties, LLC	1157 Lake Street	Venice	CA	90291	(310) 418-6389	Scott Richards√	gsquier@earthlink.net	(310) 418-638	Profit-motivated individual or organization		5/24/17	4/28/04
LOS ANGELES	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
LOS ANGELES	Winnetka King, LLC	23586 Calabasas Road, Ste. 100	Los Angeles	CA	91302	(818) 222-2800	Rick Macaya		(818) 222-2800				4/28/04
SANTA BARBAR	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin		(805) 496-4948				4/28/04
VENTURA	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
ALL COUNTIES	Creative Housing Coalition	4612 Alta Canyada Road	La Canada	CA	91011	(805) 736-9342	Jane Anderson		(805) 736-9342			5/23/17	5/19/04
ALL COUNTIES	Fallbrook Capital Corporation	6700 Fallbrook Avenue, #111	West Hills	CA	91307	(818) 712-6931	Brandt Blaken		(818) 712-6931			5/23/17	6/1/04
LOS ANGELES	Los Angeles Housing & Commu	1200 W.7th Street, 9th Floor	Los Angeles	CA	90017	(213) 808-8654	Franklin Campos	fcampos@lahd.lacity.org	(213) 808-8999		X	8/14/14	3/15/05
ALL COUNTIES	West Bay Housing Corporation	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
SAN DIEGO	A Community of Friends	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
ALAMEDA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878	Erin Coyle	erin.coyle@nclt.org	(510) 548-7562		X	8/14/14	6/10/05
CONTRA COSTA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
LOS ANGELES	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
MARIN	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
RIVERSIDE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600x	Todd Cottle		(714) 242-2092		X		6/10/05
SAN BERNARDIN	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN DIEGO	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
SAN FRANCISCO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
SAN MATEO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Riverside Chartable Corporation	3803 E. Casselle Ave	Orange	CA	92869	(714) 628-1650	Kenneth S. Robertson		(714) 628-1657			8/14/14	9/2/05
LOS ANGELES	Home and Community	2425 Riverside Place	Los Angeles	CA	90039	(213) 910-9738	Sabrina Williams		(213) 913-5819				11/28/05
ALL COUNTIES	Wakeland Housing & Developm	1230 Columbia St. Ste. 950	San Diego	CA	92101	(619) 326-6215	Tim Wray		(619) 235-5386		X	5/24/17	12/27/05
LOS ANGELES	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
ORANGE	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
KERN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151			6/14/17	2/8/06
KERN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936			6/14/17	2/8/06
LOS ANGELES	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
LOS ANGELES	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ORANGE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
ORANGE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
RIVERSIDE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
RIVERSIDE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN BERNARDIN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN BERNARDIN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN DIEGO	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN DIEGO	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ALL COUNTIES	Hampstead Development Group	3413 30th Street	San Diego	CA	92104	(619) 543-4200	Chris Foster		(619) 543-4220		X	8/24/11	5/5/06
KERN	Housing Authority of the County	601 24th Street	Bakersfield	CA	93301	(661) 631-8500	Stephen M. Pelz		(661) 631-9500			8/14/14	5/5/06
SANTA CRUZ	Housing Authority of the County	2931 Mission Street	Santa Cruz	CA	95060	(831) 454-5901	Ken Cole					8/14/14	5/5/06
LOS ANGELES	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ORANGE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
RIVERSIDE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
SAN BERNARDIN	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
VENTURA	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ALL COUNTIES	A. F. Evans Development, Inc.	4305 Univeristy Ave. Suite 550	San Diego	CA	92105	(619) 282-6647	Anne Wilson		(619) 282-4145		X	1/26/12	10/11/06
ALL COUNTIES	California Coalition for Rural Ho	717 K Street, Suite 400	Sacramento	CA	95814	(916) 443-4448	Alicia Sebastian	alicia@calruralhousing.org	(916) 447-0458		X	5/23/17	10/11/06
ALL COUNTIES	Chelsea Investment Corporation	725 South Coast Highway 101	Encinitas	CA	92024	(760) 456-6000	Jim Schmid		(760) 456-6001			5/23/17	10/11/06
ALL COUNTIES	Corporation for Better Housing	15303 Ventura Blvd., Suite 1100	Sherman Oaks	CA	91403	(818) 905-2430	Mary Silverstein		(818) 905-2440			5/23/17	10/11/06
ALL COUNTIES	Community HousingWorks	2815 Camino Del Rio South, Ste.	San Diego	CA	92108	(619) 858-9031	Daniel Marcus	dmarcus@chworks.org	(619) 282-414	Local, regional, national nonprofit org	X	6/7/18	10/11/06
IMPERIAL	Calexico Community Action Cou	2306 M.L. King	Calexico	CA	92231	(760) 357-2995	Steve F. Rivera		(760) 357-2923			6/14/17	10/11/06
LOS ANGELES	Clifford Beers Housing, Inc.	1200 Wilshire Blvd. Ste. 205	Los Angeles	CA	90017		James Bonar		(213) 316-0111		X		5/3/07
ALL COUNTIES	USA Properties Fund	2440 Professional Drive	Roseville	CA	95661	(916) 773-5866	Geoffrey C. Brown		(916) 773-5866			5/24/17	7/12/07
CONTRA COSTA	City of Walnut Creek	1666 N. Main Street	Walnut Creek	CA	94596	(925) 943-5899	Laura Simpson	Simpson@walnut-creek.org	(925) 256-3500		X	2/26/14	9/11/07
ALL COUNTIES	Bank of America, N.A.	555 California St., 6th Floor	San Francisco	CA	94104	(415) 953-2631	Gabriel Speyer		(415) 622-1671			5/16/17	12/4/07
ALL COUNTIES	Fairfied Residential LLC	5510 Morehouse Drive, Suite 200	San Diego	CA	92121	(858) 824-6406	Paul Kudirka	pkudirka@ffres.com	(858) 635-8606			5/23/17	12/4/07
MONTEREY	CHISPA Inc.	295 Main Street, Suite 100	Salinas	CA	93901	(831) 757-6251	Normond V. Kolpin		(831) 757-7537				5/29/08
ALL COUNTIES	Allied Pacific Development, LLC	169 Saxony Road, Suite 103	Encinitas	CA	92024	(760) 557-1480			(760) 557-1480		X		5/27/10
ALL COUNTIES	Belveron Real Estate Partners,	268 Bush St., #3534	San Francisco	CA	94104	(415) 273-6801			(415) 520-5688		X		5/27/10
DEL NORTE	Humboldt Bay Housing Develop	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Bonnie Hughes	bhughes@housinghumboldt.org	(707) 826-7319		X	8/14/14	5/27/10
HUMBOLDT	Humboldt Bay Housing Development Corporation (DBA Housing Humboldt)	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Elizabeth Matsumoto	bmatsumoto@housinghumboldt.or	(707) 826-731	Local, regional non-profit	X	8/14/14	5/27/10
ALL COUNTIES	Richman Group of California, LL	21520 Yorba Linda Blvd, Suite G-	Yorba Linda	CA	92887	(714) 837-6138	Pamela Mikus	MikusP@therichmangroup.com			X		5/28/10
ALL COUNTIES	Renaissance Housing Communi	110 Pacific Avenue, Suite 292	San Francisco	CA	94111	(415)0419-4027	David Silver		(415) 789-448		X		8/9/10
ALAMEDA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404	Linda Gardiner	linda.gardiner@ac.gov.org	(510) 670-637	Local, regional, national nonprofit org.		5/9/17	9/27/10
ALL COUNTIES	Mesa Realty Advisors	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
CONTRA COSTA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404			(510) 670-637	Local, regional, national nonprofit org	X	9/27/10	9/27/10
LOS ANGELES	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ORANGE	A Community of Friends	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
ORANGE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
RIVERSIDE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
SAN BERNARDIN	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
ALL COUNTIES	California Commercial Investme	4530 E. Thousand Oaks Blvd., St	Westlake Village	CA	91362	(805) 495-8400			(805) 495-5471		X	8/14/14	12/24/10
ALL COUNTIES	Dawson Holdings, Inc.	300 Turney Street, 2nd Floor	Sausalito	CA	94965	(801) 244-6658	Tim Fluetsch		(801) 733-6116		X	8/14/14	12/24/10
ALL COUNTIES	WNC Community Preservation I	17782 Sky Park Circle	Irvine	CA	92620	(714) 662-5565			(714) 662-4412		X		3/3/11
AMADOR	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Rachel Iskkow	rachel@mutualhousing.com	(916) 453-840	Local, regional, national public agenc	x	4/21/16	3/3/11
SOLANO	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Holly Wunder Stiles	holly@mutualhousing.com			x	8/14/14	3/3/11
ALAMEDA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
BUTTE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
CONTRA COSTA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
EL DORADO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
FRESNO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
IMPERIAL	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KINGS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
LOS ANGELES	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MADERA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MENDOCINO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MERCED	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MONTEREY	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
ORANGE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
PLACER	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
RIVERSIDE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SACRAMENTO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BENITO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BERNARDIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN DIEGO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN FRANCISCO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN JOAQUIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN LUIS OBISP	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN MATEO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA BARBAR	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CLARA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CRUZ	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
STANISLAUS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
TULARE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
VENTURA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101			6/14/17	3/28/12
LOS ANGELES	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
NAPA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
ORANGE	City of Newport Beach	100 Civic Center Drive	Newport Beach	CA	92660	(949) 644-3221	Melinda Whelan				X	8/14/14	3/28/12
ORANGE	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SAN BERNARDIN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SOLANO	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
SONOMA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
VENTURA	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
ALL COUNTIES	Preservation Partners Developn	21515 Hawthorne Blvd. Suite 125	Torrance	CA	90503	(310) 802-6681	Chuck Treatch	Chuck@preservationpartners.org	(310) 802-668	A California limited partnership, for-p	X	8/14/14	1/16/13
ALL COUNTIES	Berkadia	823 Colby Drive	Davis	CA	95616	(916) 769-7768	Al R Inouye	Al.inouye@inouyeapartments.com			X	8/1/16	2/26/14
ORANGE	Jamboree Housing Corporation	17701 Cowan Ave, #200	Irvine	CA	92614	(949) 214-2395	Roger Kinoshita	rkinoshita@jamboreehousing.com	(949)214-2395	Local, region, national, nonprofit org		4/22/16	4/22/16
ALL COUNTIES	American Community Develope	20250 Harper Avenue	Detroit	MI	48225	(313) 884-0722	Derek M. Skrzynski	derek@acdmail.com	(313) 884-072	Profit-motivated individual or organiz	X	9/2/16	9/2/16
ALL COUNTIES	Highland Property Development	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno	p.patierno@highlandcompanies.cc	(626) 698-636	Profit-motivated individual or organization			9/27/16

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ALL COUNTIES	GAL Affordable LP	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno		(626) 698-636	Profit-motivated individual or organization			10/24/16
ALL COUNTIES	Eden Housing, Inc.	22645 Grand Street	Hayward	CA	94541	(510) 582-1460	Andrea Osgood	aosgood@edenhousing.org	(510) 582-652	Local, regional, national nonprofit org	X		11/8/16
LOS ANGELES	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
ORANGE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
RIVERSIDE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN BERNARDIN	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
VENTURA	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN DIEGO	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/7/17
ALL COUNTIES	Lincoln Avenue Capitol, LLC	680 5th Avenue, 17th Floor	New York	NY	10019	(646) 585-5524	Andrew Mika	andrew@lincolnavecap.com		Profit-motivated individual or organiz	X	8/30/19	5/3/17
LOS ANGELES	Community Development Comm	700 W. Main Street	Los Angeles	CA	91801	(626) 586-1812	Larry Newnam	larry.newnam@lacdc.org	(626) 943-381	Loca., regional, national public agency		11/6/17	8/17/17
FRESNO	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org.		4/10/18	4/10/18
ALL COUNTIES	Colrich Multifamily Investments,	444 West Beach St.	San Diego	CA	92101	(858) 490-2300	Danny Gabriel	dannyg@colrich.com	(858) 490-026	Profit-motivated individual or organization			4/16/18
ALL COUNTIES	Standard Property Company, IN	1901 Avenue of the Stars, Suite 3	Los Angeles	CA	90067	(310) 553-5711	Brad Martinson	bmartinson@standard-companies.	(310) 551-166	Profit-motivated individual or organization			6/4/18
ALL COUNTIES	Jonathon Rose Companies	551 Fifth Ave, 23rd Floor	New York	NY	10176	(917) 542-3600	Nathan Taft	nathan@rosecompanies.com	(917) 542-360	Profit-motivated individual or organization			6/27/18
ALL COUNTIES	JEMCOR Development Partners	1700 El Camino Real Suite #400	Sna Mateo	CA	94402	(415) 941-5847	Michael McDermott	mmcdeormott@jemcorpartners.com		Profit-motivated individual or organization			8/8/18
ALL COUNTIES	Catalyst Housing Group, LLC	21 Ward Street, Suite 2	Larkspur	CA	94939	(415) 205-4702	Jordan Moss	Jordan@CatalystHousing.com		Profit-motivated individual or organization			12/11/18
LOS ANGELES	Los Angeles County Developme	700 W. Main Street	Alhambra	CA	91801	(626) 586-1816	KeAndra Cylear-Dod	keandra.cyleardodds@lacda.org		Local, regional, national public agency			4/18/19
ALL COUNTIES	Veritas Urban Properties LLC	2050 Hancock Street, Suite B	San Diego	CA	92110	(619) 746-5191	Gilman Bishop	gbishop@bishopventures.com		Profit-motivated individual or organization			4/24/19
LOS ANGELES	Santa Fe Art Colony Tenants As	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	CA	90058	(310) 663-6665	Sylvia Tidwell	sylvia@sylviatidwell.net		Tenants' Association			5/2/19
SANTA CLARA	Silicon Valley at Home	350 West Julian Street, Building 5	San Jose	CA	95110	(669) 254-1009	Mathew Reed	mathew@siliconvalleyathome.org		Local, regional, national nonprofit org.			7/10/19
LOS ANGELES	San Gabriel Valley Habitat for H	400 S Irwindale Ave	Azusa	CA	91702	(626) 709-3277	Mark Van Lue	mvanlue@sgvhabitat.org		Local, regional, national nonprofit org.			8/12/2019

Appendix E: Accessory Dwelling Unit Projection Methodology

Analysis for projecting accessory dwelling units as part of meeting South Pasadena's Regional Housing Needs Allocation (*Revised: September 2022*)

As part of the Housing Element Update for the City of South Pasadena (City) and to ensure that the City is able to meet the Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments (SCAG), the City may project the number of Accessory Dwelling Units (ADUs) that is expected to be built over the course of the 6th Round Housing Element Cycle. The California Department of Housing and Community Development (HCD) recognizes that ADUs have become more popular in recent years and expects the trend to continue. ADUs are seen as an attractive option for developing housing given their affordability to lower-income renters, relatively low cost to construct, and their ability to provide income and alternative housing options to homeowners.

Assuming a certain number of ADUs will be developed over the course of housing element implementation has been acceptable to the State of California since ADU law was instituted in 2003. These projections are based on recent past ADU development trends in the jurisdiction and the current market rents for ADUs in the jurisdiction. State law regulating ADUs has changed significantly since 2016, requiring local jurisdictions to allow ADUs more broadly across a jurisdiction and with development standards and other regulations that reduce cost and other barriers to ADU development. This includes changes to require less on-site parking, allow fewer fees to be charged related to ADUs, and allow conversion of existing structures to ADUs.

<u>HCD "Safe Harbor" Calculation</u>

HCD's Housing Element Site Inventory Guidebook, finalized in June 2020, has clarified parameters for analyzing ADU past performance and using it to project the number of ADUs expected to be developed as part of meeting the City's RHNA. HCD has explained that the quantity of ADU building permits issued in previous years, particularly since 2018 as effects of the changes to the law began having more impact, may be used as a baseline for making the calculations. According to HCD, to project the number of ADUs expected, there are two methods that are acceptable to arrive at a 'safe harbor' number for projected ADUs. Both are based on past approvals of ADUs in a jurisdiction. Based on preliminary discussions with HCD for South Pasadena, the safe harbor number can be relied on in the 6th Round Housing Element in combination with programs to comply with state ADU regulations and monitor ADU production. The two options for 'safe harbor' analysis are described here:

- Use the number of ADU building permits in the jurisdiction since January 2018 to estimate new production. Take the average number of ADUs that have received building permits per year since the beginning of 2018. That average number can be assumed to be the average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029). The 6th Cycle RHNA projection period begins June 30, 2021.
- Assume an average increase of five times the previous planning period ADU construction trends prior to 2018. Take the average number of ADUs with building permits issued per year between January 1, 2014, and December 31, 2017, which is the part of the 5th Housing Element RHNA projection period occurring before January 1, 2018, when many of the new ADU laws began to take effect. Multiply that average by five. That average number can be assumed to be the

average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029).

A jurisdiction may choose to use one or the other of these approaches if better data is available for one of the timeframes. Before 2018, South Pasadena had only approved one ADU (during the 5th Cycle). During that time, the ADU regulations in the City were much more limiting and ADUs were only allowed on parcels larger than 12,000 square feet. Once the new state laws took effect, the ADU numbers began to increase. Between January 1, 2018, and the present (mid-2022), an average of 16 ADUs received planning permits per year with an increase every year.

Four ADUs received building permits in 2018, seven in 2019, eight in 2020, 19 in 2021 and 38 during the first two-thirds of 2022 (by August 31), for an average of over 16 ADUs per year receiving building permits during that timeframe.

When 16 ADUs per year on average are projected through the end of the projection period, the City estimates a safe harbor number of 148 ADUs between June 30, 2021, and October 15, 2029.

Projection Based on Data Reflecting South Pasadena's Specific Circumstances

If a jurisdiction expects a higher number of ADU approvals in the 6th Cycle than what is projected using one of the safe harbor options, additional data, analysis of trends, and supporting programs, including a monitoring program, must be included in the Housing Element. The City of South Pasadena does expect a higher number of ADUs will be permitted than the safe harbor number of 148 ADUs, because of the recent upward trajectory following updates to the City's ADU zoning regulations that went into effect in early June and December 2021, and based on the results of other ADU programs and initiatives that have been implemented or are planned at the City.

Over five years, ADU building permit activity has increased as follows:

- 2017 to 2018 – increase from 1 to 4 ADUs that received building permits
- 2018 to 2019 – increase from 4 to 7 ADUs that received building permits
- 2019 to 2020 – increase from 7 to 8 ADUs that received building permits
- 2020 to 2021 – increase from 8 to 19 ADUs that received building permits
- 2021 to June 30, 2022 – increase over 6 months to 29 ADUs (or 58 ADUs projected to an annualized number) that received building permits

The 19 permits issued in 2021 and 29 permits issued in the first half of 2022 far exceeded the City's earlier (Public Review Draft) projection of 12 ADU permits. The increase can be attributed to two important policy actions taken by the City Council:

Adoption in December 2021 of an urgency ordinance with standards for constructing ADUs on historic properties, along with comprehensive design guidelines that pave an administrative (by-right) path for owners of historic properties to build an ADU. Council adopted the same ordinance permanently into the Municipal Code on February 2, 2022. These changes to the code resolved issues that have delayed approval of ADUs and reduced application submittals. Staff immediately noticed an increase in interest and new applications with approval of the new standards. Additionally, the City streamlined the application process with new forms and electronic submittal. Accordingly, more complete applications have been received and approved more quickly.

Additionally, at the end of 2021, the City added four new Planning staff to increase permit processing

capacity, including ADU applications.

With increased staffing and clear, objective Code standards, the City has increased confidence in the projections provided in the first two public drafts. The City has already initiated several of the programs in this 2021-2029 Housing Element, including homeowner education and assistance and the ADU amnesty program for property owners with an existing unpermitted ADU on their property to legalize based on compliance with the Building Code. A list of the programs and initiatives the City is undertaking related to ADUs is included at the end of this memo.

The trend in ADU application submittals since the Code was amended, documented above, supports an assumption that the "safe harbor" is far below reasonably projected numbers, and given the City's RHNA, it is important to use a projection that is reflective of the permit activity experienced since conditions changed starting in June 2021. As the third Public Review Draft is released, data through August 2022 shows a sharp increase in applications and building permits, and the City expects to issue 58 ADU building permits in 2022. To maintain a conservative forecast, this sharp increase will be considered to 8 represent a "bubble" due to pent-up demand, with future years of the planning period remaining as forecast earlier (39 annually) as shown in Table 1. In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts.

Table 1. Accessory Dwelling Unit Projection

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29
2023	55	39
2024	55	39
2025	55	39
2026	55	39
2027	55	39
2028	55	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	**470**	**320**

It is quite possible that the projection in Table 1 is too low, as market trends show growing popularity for ADU construction. Applications on historic properties in particular are just beginning to be submitted. For informational purposes, a second, more robust, scenario is included in Table 3 that assumes that 2022 was a bubble, but which projects a stronger growth trend throughout the planning period, with 75% of applications moving forward to building permit issuance.

ADU Affordability Analysis

SCAG prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for

South Pasadena. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that do not reach the rental market. ADU research conducted by the University of California, Berkeley's Center for Community Innovation[i] indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or below-market rental rates. SCAG conservatively estimated that 15 percent of the ADUs in their region would be in this category and thus rented to the extremely low-income category of households. Table 2 lists the projected 297 ADUs by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena.

Table 2. Projected ADUs - Affordability

Percentage	Number of ADUs	Income Category Affordable To:
15%	45	Extremely Low Income
9%	27	Very Low Income
44%	131	Low Income
2%	6	Moderate Income
30%	89	Above Moderate Income
100%	**297**	**Total**

An Alternative Projection Based on the 2021-2022 ADU Permit Trend

As noted above, Table 3 presents a scenario that reflects the actual number of approved ADU Planning applications and building permits issued in 2021, accounts for 2022 ADU permits as a bubble, and assumes an increase in applications from 2021 to 2023 that continues for three years before leveling off. This scenario also assumes that 75 percent of approved Planning applications will receive building permits. Based on these assumptions, this more robust scenario projects a total of 403 ADUs between January 1, 2022, and October 15, 2029.

Table 3. Possible Higher Accessory Dwelling Unit Projection

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits.
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of applications for the remainder of 2022 (same as Table 1)
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	
2026	72	54	
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022-October 15, 2029	**560**	**403**	

Projections Relative to Existing Single-family Housing Stock

In 2019, South Pasadena's single-family housing stock consisted of 5,642 units. 30 ADU permits were issued in the previous housing element cycle, including the first half of 2021.

The projection of 297 units, which is used for RHNA and program purposes in this housing element and Table 3 both project many more ADUs, and for context, it is informative to consider the number of single-family properties within the city and whether those projections make sense within that context. Table 4 includes the 30 5th cycle ADUs, the 9 units permitted in the 2nd half of 2021, together with the actual and projected 2022-2029 ADUs for both projection scenarios and calculates them as a percentage of the 2019 housing stock. As shown, the more conservative projection would result in about 6 percent of single-family properties that have ADUs in 2029. The more aggressive scenario results in 7.8 percent. In either case, more than 92 percent of single-family properties remain unchanged.

Table 4: Percentage of ADUs Projected Relative to Housing Stock			
Housing Stock (5,642 units)	5,642	Additional ADUs as a % of housing stock	Total ADUs as a % of housing stock
297ADUs (+30+9)	336	5.4%	6.6%
Table 3 ADUs (+30+9)	442	7.3%	7.8%

Additionally, the estimate of ADUs as a percentage of single-family properties does not take into account that some ADUs will be constructed on multifamily properties. It is anticipated that these will become more popular as apartment building owners get savvier regarding ADU law. As of 2022, the City has already approved the first such applications. Furthermore, the City's program creating an amnesty process for illegal units, to recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on this information, it can be concluded that both of the ADU projection scenarios are realistic within the context of the overall existing housing stock in South Pasadena.

City of South Pasadena ADU Initiatives and Programs for 2021-2029

Program 3.f – Allow and Facilitate ADUs

Assumption of same level of applications and 75% moving forward to building permits

Program 3.i – ADU Amnesty Program

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Program 3.k – ADU Education and Promotion and Homeowner Outreach

[i] Chapple et al. 2017. *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver.* University of California, Berkeley's Center for Community Innovation.

Appendix F:
Realistic Capacity Analysis

Justification of the 95 percent Realistic Capacity Assumption Applied to Downtown and Mixed-Use Sites

Much of the City of South Pasadena's lower-income Regional Housing Needs Assessment (RHNA) is proposed to be accommodated in the Draft Downtown Specific Plan (DTSP) area and the mixed-use Neighborhood Centers proposed in the General Plan Update. These sites are included in the set of sites with detailed exhibits and descriptions in Appendix A. Where full redevelopment of a site or adding to existing structures is assumed for the Housing Element analysis, a realistic development capacity of 95 percent is assumed. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity and by new policies requiring inclusionary housing and providing design incentives, FAR bonuses, height concessions and other options to increase density (state density bonus) for projects on these sites. This appendix is included to provide the background and analysis to support that 95-percent assumption.

Multi-unit Housing: Trending Upward in South Pasadena and Regionally

The City of South Pasadena is nearly built out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of sites that include a portion or all of the site with new residential units.

After a hiatus following construction of South Pasadena's first new mixed-use, transit-adjacent development in 2005, several multiple-unit residential or mixed-use projects containing higher density housing have recently been constructed or approved in South Pasadena (see Table 1), demonstrating an increasing interest to construct multi-family housing in the city. These are all on sites that were previously developed. The Mission Bell Project, approved in 2020, includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was approved in 2020 under the City's first state density bonus application. The Seven Patios Project, with 60 housing units, was approved in 2021. All three projects were able to achieve higher densities with a range from 22 to 50 dwelling units per acre (du/ac) without accounting for removal of the nonresidential portions of the project from the total parcel or site in the case of the mixed-use projects. All three projects achieved higher than 95 percent of allowed development capacity and two achieved higher than 100 percent. While the trend toward higher density, mixed-use development in South Pasadena is more recent, it is consistent with what is happening in the region, where projects containing multi-family housing of various densities, unit sizes, and architectural styles are being developed at 100 percent or higher percent of allowed capacity on previously developed sites (See Housing Element Tables VI-44 and 42). Most are receiving the entitlements with the inclusion of dedicated affordable units as a prerequisite to receiving significant density bonuses that are attractive to developers and make the project feasible.

Table 1. Representative Projects on Non-Vacant Sites in South Pasadena

Address/ Project Name	Assessor's Parcel Numbers	Acres	Entitled, Under Construction, or Completed?	Zone	Previously Developed With/ Existing Uses	Project Description	Total Number of Dwelling Units	Density	Percentage of Allowed Capacity	Similar Sites in Table VI-46 (and Site ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; Construction anticipated in 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-use, transit-oriented development (TOD), multifamily housing (studios, lofts, flats, and townhomes), and street-fronting commercial uses (restaurant and retail).	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.45 FAR	Odd-shaped sites near transit: Gold Line Storage (10); North side of Mission (8, 11, 13, 14); Other sites near rail transit: City Yard (9); Fremont/Mission (13, 14), Arco (9)
Mission Bell 1101, 1107, 1115 Mission Street	5315-008-045 5315-008-043	0.72	Entitled in 2020; Construction anticipated in 2022	MSSP	A portion of the existing historic building to be demolished and the other portion adaptively reused Two parcels were consolidated	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.48 FAR	School Site -12 (historic resource); Site Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined);
Eight Twenty 820 Mission Street	5315-017-094 5315-017-082 5315-017-067 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses.	38	20	109% of allowed FAR (allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined)
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in spring 2020	CO	Commercial retail with underutilized parking lot No parcel consolidation for redevelopment	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (17, 18, 22, 23, 24)
Mission Meridian Village Meridian Avenue and Mission Street	5315-021-001 5315-021-079 5315-021-047	1.6	Built in 2005	MSSP	Lower-density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre.	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 11)

Source: PlaceWorks and City of South Pasadena, 2021

Why this trend will continue and likely increase: Inclusionary Housing and Density Bonus

Chapter 6.5 (Housing Development Resources) provides a full narrative of the inclusionary housing ordinance (see *Zoning Provisions to Encourage Affordable Housing*), which Council adopted in May 2021. The projects in Table 1 were developed prior to the City's adoption of this ordinance. Only one of them voluntarily included affordable units and received bonus density and height, achieving 138% of the underlying density (allowed capacity), the highest of the five projects. Now that the inclusionary units are required, coupled with by-right density bonus, this has become a central component of the strategy to build affordable units and forms an important component of the basis for anticipating the 95-percent realistic capacity.

Because the properties identified in the Sites Inventory (Appendix A) with a 95-percent realistic capacity assumption are eligible for the design incentives in the adopted Inclusionary Housing Ordinance and because the Inclusionary Housing regulations apply to all residential projects of more than three units, the realistic capacity on these sites takes the Inclusionary Housing regulations into consideration.

The inclusionary housing regulations streamline use of the State Density Bonus to increase the amount of affordable housing approved in the City. This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan, both currently being updated, to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. These changes will be adopted at or near the same time as Housing Element adoption. Zoning updates to codify those changes will occur shortly after the General Plan and Downtown Specific Plan are adopted. The City has been conducting outreach and gathering input from the community and decision makers since early 2019 and support has been expressed for the proposed increased density.

State and Local Regulations encourage full development of allowed capacity for project feasibility

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects with 20% affordable units as required by the ordinance. The City has not been made aware of any pending applications that were cancelled due to adoption of the inclusionary housing regulations. In fact, the effect thus far has been as anticipated; the City has received more inquiries from developers since adopting the inclusionary housing regulations.

In September 2021, the City received the first Design Review application subject to the inclusionary housing code, for 108 one- and two-bedroom condominium units in a mixed-use, 84,198 square-foot, 50-foot height project. The proposed project would include 20% of its base units as affordable. The applicant is requesting to comply with the streamlined density bonus provisions and receive Code-allowed concessions. However, staff understands that many developers need to wait for density increases in the forthcoming General Plan and Downtown Specific Plan before submitting applications.

Ongoing Analysis and Monitoring

In July 2021, the City contracted with EPS, an economics consultant firm, to prepare an Inclusionary Housing In-Lieu Fee Study and develop Affordable Housing Program Recommendations. This work will analyze the inclusionary housing regulations and make recommendations for the City's affordable

housing program or participation in a regional affordable housing production program. The analysis will also support the City's understanding of housing production trends and confirm the assumptions that it is realistic to anticipate that developments will be proposed at 95 percent of the zoning capacity. The City has committed in the programs section of this Housing Element to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if needed at that point.

Conclusion

Based on the trends and regulations analyzed, the assumption of 95 percent of realistic development capacity on the DTSP and mixed-use sites is reasonable and potentially conservative based on the fact that the most recently approved and developed multifamily and mixed-use with multifamily projects are developing at a higher percentage of allowed capacity. Table 2 shows the number of units on these sites at 95, 100, and 110 percent of allowed capacity under the proposed DTSP and General Plan. Note that the figures include the small number of sites that have a lower-capacity assumption in the DTSP and mixed-use areas. The realistic capacity percentages are lower on those sites because of existing uses that are anticipated to remain on part of the sites.

While 95 percent is the assumption used for this housing element, the number of units potentially possible at 100 and 110 percent of capacity are included in Table 2 to demonstrate what could easily happen if the recent trends to take advantage of state density bonus law for multifamily projects in South Pasadena continue.

Table 2. Capacity Assumption Alternatives

	95% Capacity	100% Capacity	110% Capacity
Units	1,545	1,623	1,781

ATTACHMENT 1 b

Initial Study

Draft Initial Study

2021–2029 Housing Element Project
City of South Pasadena, California

Prepared for
City of South Pasadena
Community Development Department
1414 Mission Street
South Pasadena, California 91030

Prepared by
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May 2023

TABLE OF CONTENTS

Section **Page**

Section 1.0 Project Information....1-1

Section 2.0 Environmental Checklist Form....2-1

2.1 Aesthetics....2-1
2.2 Agriculture and Forestry Resources....2-3
2.3 Air Quality....2-4
2.4 Biological Resources....2-6
2.5 Cultural Resources....2-9
2.6 Energy....2-10
2.7 Geology and Soils....2-11
2.8 Greenhouse Gas Emissions....2-14
2.9 Hazards and Hazardous Materials....2-15
2.10 Hydrology and Water Quality....2-18
2.11 Land Use and Planning....2-20
2.12 Mineral Resources....2-21
2.13 Noise....2-22
2.14 Population and Housing....2-23
2.15 Public Services....2-24
2.16 Recreation....2-25
2.17 Transportation....2-26
2.18 Tribal Cultural Resources....2-28
2.19 Utilities and Service Systems....2-29
2.20 Wildfire....2-31
2.21 Mandatory Findings of Significance....2-32

Section 3.0 References....3-1

TABLES

Table **Page**

1 2021–2029 Housing Element RHNA Allocation 1-4

EXHIBITS

Exhibit **Follows Page**

1 Regional and Local Vicinity 1-1
2 Existing Land Use Map 1-5
3 Citywide Sites Inventory Map 1-5

SECTION 1.0 PROJECT INFORMATION

1. Project Title:	2021–2029 Housing Element Project
2. Lead Agency Name and Address:	City of South Pasadena Community Development Department 1414 Mission Street South Pasadena, California 91030
3. Contact Person and Phone Number:	Alison Becker 626.403.7220
4. Project Location:	The approximate 2,772 acres encompassing the City of South Pasadena (see Exhibit 1)
5. Project Sponsor's Name and Address:	City of South Pasadena Community Development Department 1414 Mission Street South Pasadena, California 91030
6. General Plan Designation:	Various
7. Zoning:	Various

8. Description of the Project:

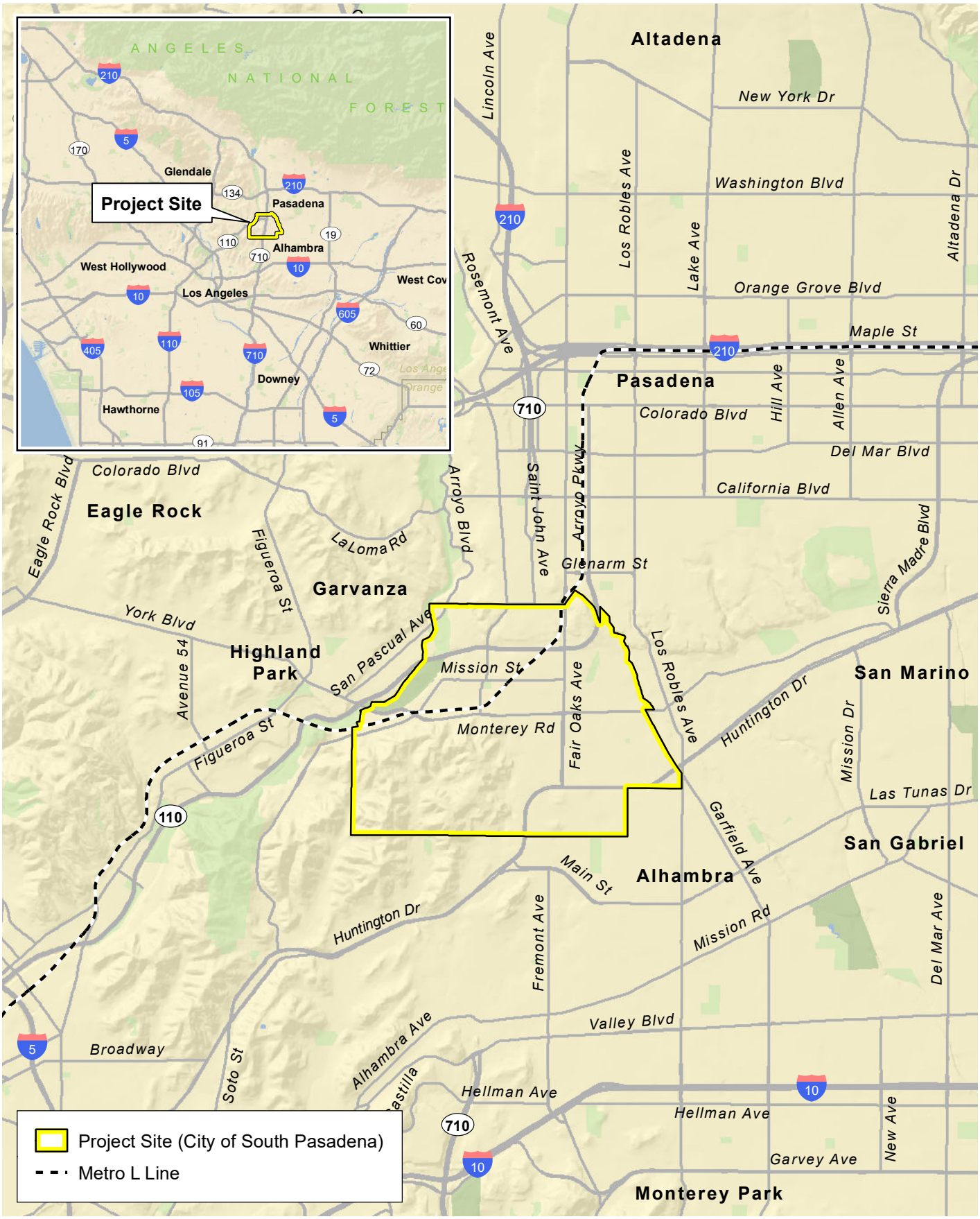
A general plan guides the physical, economic, social, and environmental well-being of a jurisdiction through establishing goals, policies, actions and/or programs for achieving the community's vision for its future. A housing element is one of the State-required general plan elements. The City of South Pasadena's (City) current General Plan, including the Housing Element, do not align with the City's vision for its future and with the need to provide housing in compliance with State law. Therefore, the City is undertaking the Project both to align goals, policies, and actions with the City's vision and respond to changing economic, environmental, legal, and social settings.

The most recent drafts of the General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element, respectively, are available online at the following two sites:

- General Plan & Downtown Specific Plan Update | South Pasadena, CA (https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update);
- Housing Element Update 2021-2029 | South Pasadena, CA (https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029).

The City is the subject of a Court Order[1] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. As part of this Court Order, pursuant to Government Code Section 65759(a), the City is required to prepare this Initial Study, with substantially the same information required pursuant to Section 15080(c) of Title 14 of the California Code of Regulations (State California Environmental Quality Act [CEQA] Guidelines). Should this Initial Study demonstrate that an action may have a significant effect on the environment, the City shall prepare an Environmental Assessment within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the

[1] *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)



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Regional and Local Vicinity

Exhibit 1

South Pasadena 2021-2029 Housing Element

(Rev: 4-25-2023 JVR) R:\Projects\SPA\3SPA010100\Graphics\Settlement_Agreement\ex_LV_RL.pdf

content required for a Draft Environmental Impact report set forth in Article 9 of the California Code of Regulations. All other provisions of CEQA, Division 13 of the Public Resources Code (commencing with Section 21000), do not apply to any action necessary to bring the general plan or relevant elements of the plan into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This Initial Study has been prepared in compliance with Government Code Section 65769 et. sec.

Background

All California jurisdictions are required by State law (Section 65300 of Government Code) to prepare and maintain a planning document called a General Plan. The City of South Pasadena (City) last comprehensively updated its General Plan in 1998. Since the adoption of the 1998 General Plan, several minor amendments have been adopted. The Mission Street Specific Plan (now referred to as the Downtown Specific Plan [DTSP]), part of the City's General Plan, was adopted in 1996. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element. However, a General Plan needs to be updated if it is to reflect community values and priorities as they change over time. General Plan updates typically range between every 20 to 30 years.

The Housing Element is one of the State-mandated elements of a General Plan. Unlike all other General Plan elements, State law requires each municipality to update its Housing Element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element was in effect through 2021. Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City of South Pasadena. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021, and has allocated a total of 2,067 dwelling units (DUs) to the City of South Pasadena at a range of affordability levels. Additionally, the California Department of Housing and Community Development (HCD) has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. Cities and counties are not responsible for building the target number of units, but rather are required to plan for them, by demonstrating the sufficiency of sites to accommodate the allocation and identifying specific Housing Element programs to provide capacity to meet the RHNA requirements with implementation dates, within three years. The Housing Element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA, including rezoning, if necessary.

Project Components

The Court Order requires that the City bring its Housing Element into compliance with State Planning Law. The changes in the draft 2021–2029 Housing Element is reflected in both the General Plan and DTSP Update, being prepared contemporaneously. This Initial Study, the NOP, and EA are based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). While the General Plan and DTSP Update remain in preparation, the maximum non-residential development capacity (i.e., 430,000 square feet) and distribution would be the same as contemplated in past drafts of these documents.

General Plan and Downtown Specific Plan Update

The comprehensive General Plan and DTSP Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community 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 and DTSP Update serve as long-term (through 2040) policy guides for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City.

Through the public visioning process that began in 2017, the community has identified the character, intensity, and scale of infill development desired for vacant and underutilized tracts in selected areas. Specifically, the community envisions new development to be respectful of the place and its historic resources; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. The central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to five focus areas including the Downtown area (i.e., DTSP), Ostrich Farm District, and three Neighborhood Centers on Huntington Drive, while providing housing opportunities for all. The General Plan and DTSP Update each include eight chapters, and each of the chapters features an overriding goal, with policies and actions based on the goal. The eight chapters, their guiding principles, and their contents (i.e., goals, policies, actions), reflect the public visioning process while balancing State-mandated legislative requirements (including the 2021–2029 Housing Element), the City's budget, and feasibility of future activities.

The DTSP Update has an accompanying hybrid form-based code (herein referred to as DTSP Code or Code) to guide the DTSP's implementation, providing all requirements for development and land use activity with the DTSP's boundaries. Form-based codes are an alternative to conventional zoning regulations and are purposeful place-based regulations with an increased focus on the design of the public realm–the public space defined by the exterior of buildings and the surrounding streets and open space.

2021–2029 Housing Element

The 2021-2029 housing element cycle for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. State requirements to boost housing production and provide more affordable housing units and justification for such are new additions. Accordingly, the proposed Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation, AFFH concerns, and introduces new policies and programs consistent with State law based on a comprehensive and inclusive strategy to encourage housing production and retention to serve the entire community. Per State requirements, the City's proposed Housing Element must include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics.
- An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element.

- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

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 (i.e., SCAG) requirements. SCAG has determined that the City's RHNA allocation is 2,067 DUs and the HCD-required RHNA surplus is 708 DUs (2,775 DUs in total). Table 2 summarizes the 6th Cycle RHNA allocation for the City of South Pasadena that the Project accommodates.

TABLE 1
2021–2029 HOUSING ELEMENT RHNA ALLOCATION

Income Group	Number of New Units Allocated to City[a]	Percentage	RHNA Surplus[b]
Extremely Low and Very Low Income	757	37%	177
Low Income	398	19%	
Moderate Income	334	16%	144
Above Moderate Income	578	28%	316
Total	**2,067**	**100%**	**708**
Total Dwelling Units	***2,775***		
Sources: [a] SCAG 2021; [b] South Pasadena 2023.			

The 2021–2029 Housing Element includes the following six overarching goals:

- **Goal 1.0–Conserve the existing housing stock and maintain standards of livability**: Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.
- **Goal 2.0–Encourage and assist in the provision of affordable housing**: Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.
- **Goal 3.0–Provide opportunities to increase housing production**: Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.
- **Goal 4.0–Compliance with State housing laws**: Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.
- **Goal 5.0–Promote fair housing while acknowledging the consequences of past discriminatory housing practices**: Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

- **Goal 6.0–Expand and strengthen tenant protections for South Pasadena's existing renters**: South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Each of these goals has supporting policies that guide decision-making. Several programs are identified to support the goals and policies, with an eight-year objective, funding source(s), responsible agency(ies), and timeframe presented for each program. The Housing Element goals, policies, and programs are intended to support and encourage housing construction to achieve the City's RHNA allocation. The housing plan includes measurable targets that are monitored on an annual basis through HCD's Annual Progress Reporting system. The 2021-2029 Housing Element is available under a separate cover from the General Plan and DTSP Update and will be incorporated by reference in these documents.

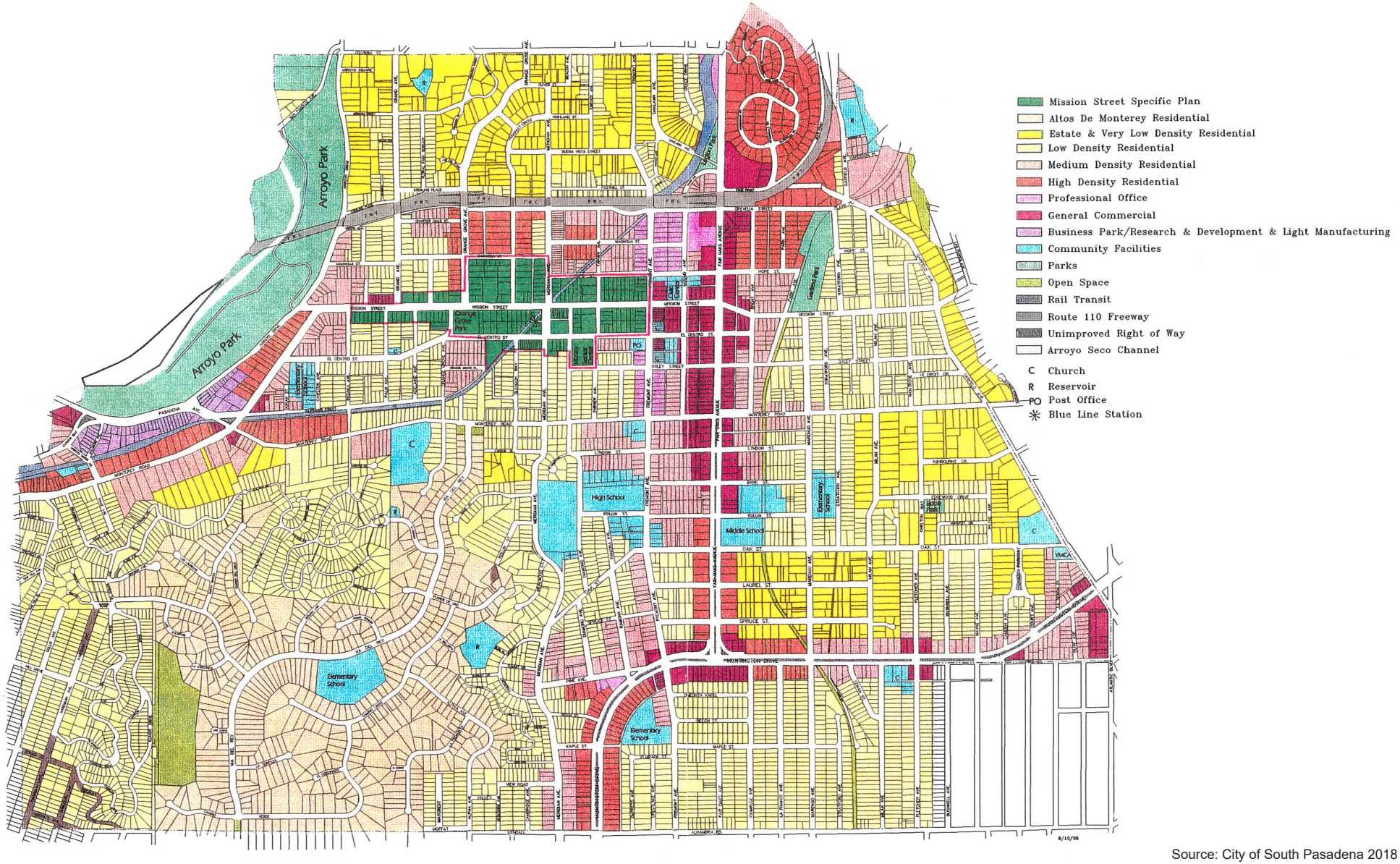
Project Development Capacity

Based on community input, a market study prepared as part of the General Plan and DTSP Update process, State requirements, and HCD feedback, the central strategy of the 2021-2029 Housing Element continues to be preservation of existing neighborhoods and directing calibrated growth. Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the housing element update relies on includes inclusionary housing requirements that the City Council adopted in 2020; encouraging Accessory Dwelling Units (ADUs) with simpler, objective requirements; and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units would follow the adoption of a revised General Plan Land Use Element together with the DTSP, an update and expansion of the 1996 Mission Street Specific Plan.

The plans encourage most of the new housing to be provided in walkable mixed-use environments in the Downtown and along major transit corridors and arterial roadways but also accommodate increased housing opportunities within existing residential neighborhoods. Exhibit 2, Existing Land Use Map, and Exhibit 3, Citywide Sites Inventory Map, depict the proposed distribution and extent of the categories of public and private uses of land. The Project analyzed herein would accommodate a maximum of 2,775 DUs and 430,000 square feet (sf) of non-residential uses–comprised of retail and office development–in addition to existing land uses.

The buildout of up to 2,775 DUs and 430,000 sf of retail/office is estimated to generate up to 1,978 additional jobs[2] and 6,882 more residents[3] in the City through 2040 compared to existing conditions. The maximum 6,882 residents equate with full occupancy of 2,775 units. However, based on a vacancy rate of 5.5 percent, the maximum 2,775 DUs in the 2021–2029 Housing Element would result in a resident population increase of approximately 6,503 persons occupying 2,622 DUs (i.e., households). Vacancy rates of 5.5 percent for the City and 6.4 for the County are applied in this

2 Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).
3 Based on a rate of 2.48 persons per household derived from the most recent California Department of Finance demographic data for the City (2022).



Source: City of South Pasadena 2018

Existing Land Use Policy Map

Exhibit 2

South Pasadena 2021-2029 Housing Element

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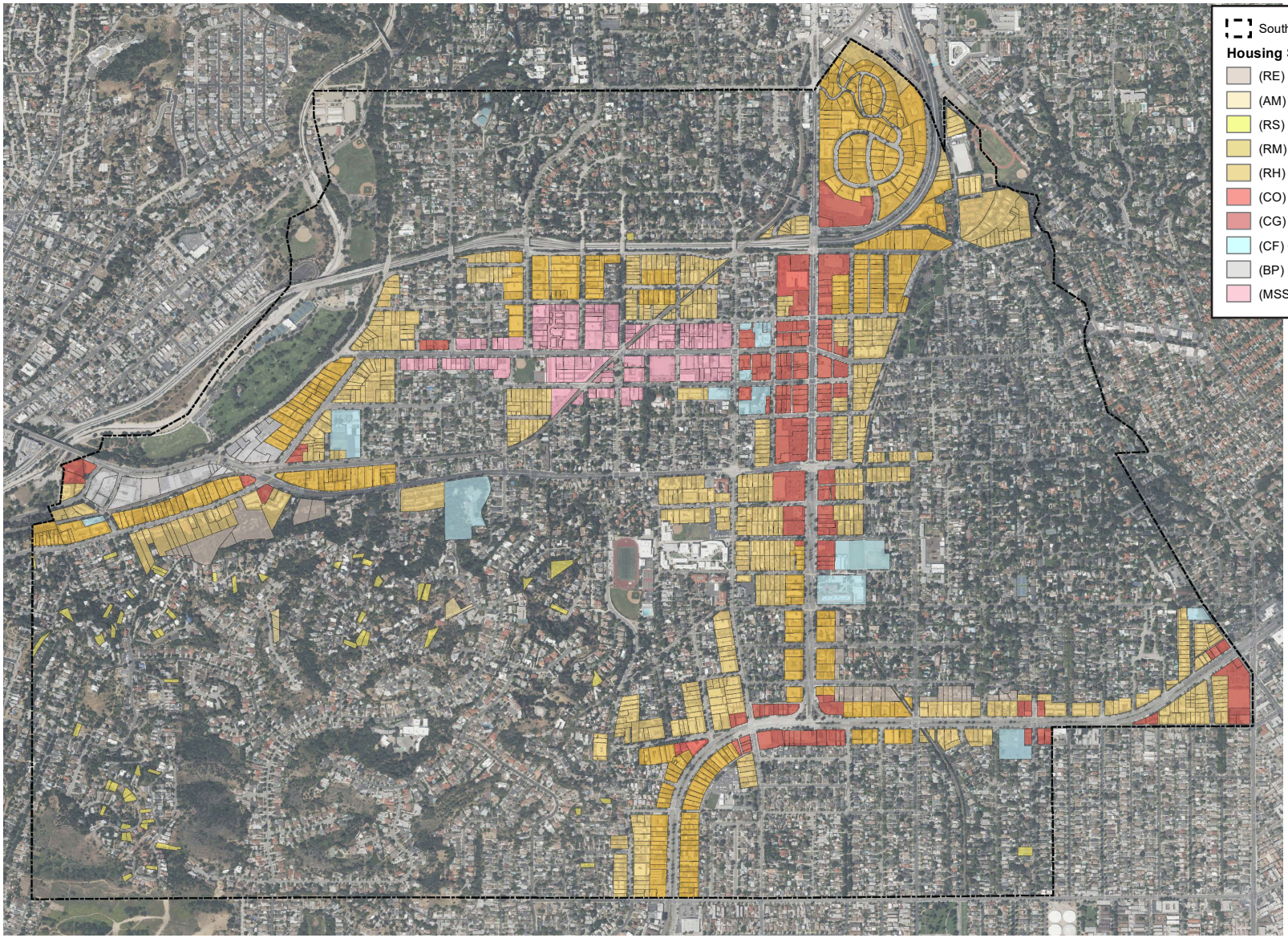

Source: City of South Pasadena 2023

Citywide Sites Inventory Map

Exhibit 3

South Pasadena 2021-2029 Housing Element

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analysis as they are the most recent prior to the COVID-19 pandemic and are expected to be more reflective of typical conditions over the longer-term planning periods of the Project. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development in the focus areas.

Discretionary Actions by the City

The primary discretionary action by the City supported by this Initial Study is adoption of the 2021–2029 Housing Element, as a policy document. It is important to note that the General Plan and DTSP Update (when adopted) and this proposed 2021–2029 Housing Element would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. New development would continue to be subject to the City's development review process. The proposed 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 (i.e., SCAG) requirements.

Probable Environmental Impacts of the Project

Based on the analysis presented in this Initial Study, the Project would have the potential to result in significant adverse impacts related to one or more environmental checklist questions in the environmental topics listed below. The relevant checklist questions for the following topics will therefore be carried forward for additional analysis in the Environmental Assessment:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Based on the analysis presented in this Initial Study, the Project would result in no impacts or less than significant impacts related to the environmental checklist questions for the topics listed below:

- Agriculture and Forestry Resources
- Mineral Resources

9. Surrounding Land Uses and Setting:

The City of South Pasadena is located on the western edge of the San Gabriel Valley area of Los Angeles County (County), approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and the City of Los Angeles neighborhoods, including Garvanza and Highland Park, to the west. The planning area for the proposed Project includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City limits. The City's estimated 11,156 residential dwelling units (DUs), housing the City's population of 25,580, are comprised of nearly equal number of single-family and multi-family units.

The City's land use pattern is well established and largely built out, with limited available vacant or underutilized land throughout the City. The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. The City's circulation network is largely a grid system of north/south and east/west roads. The exception to the grid system is the southwest quadrant of the City that has curvilinear streets developed to fit the topography of the area.

Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) L Line also provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1 above.

10. Other public agencies whose approval is required:

This question is not applicable to this Initial Study, as it is being prepared pursuant to Government Code Section 65759 as part of the Court Order (see above). There are no other agencies that would use this document as part of discretionary decision-making.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code Section 21080.3.1? If so, has consultation begun?

Consultation pursuant to Section 21080.3.1 of the *Public Resources Code* and Assembly Bill (AB) 52 and Senate Bill (SB) 18 with the California Native American tribes affiliated with the City of South Pasadena has been completed. Refer to Section 2.18, Tribal Cultural Resources, of this Initial Study for further information.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ Aesthetics	☒ Greenhouse Gas Emissions	☒ Public Services
☐ Agriculture and Forestry Resources	☒ Hazards and Hazardous Materials	☒ Recreation
☒ Air Quality	☒ Hydrology and Water Quality	☒ Transportation
☒ Biological Resources	☒ Land Use and Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☒ Utilities and Service Systems
☒ Energy	☒ Noise	☒ Wildfire
☒ Geology and Soils	☒ Population and Housing	☒ Mandatory Findings of Significance

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL ASSESSMENT is required.	X
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EA or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Prepared By	Date	Reviewed By	Date
	05/02/23		5/2/2023
Alison Becker, AICP		Angelica Frausto-Lupo	
Printed Name		Printed Name	

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SECTION 2.0 ENVIRONMENTAL CHECKLIST FORM

2.1 AESTHETICS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐

Discussion

The City's existing General Plan defines that the "hillsides and ridgelines of South Pasadena provide a scenic backdrop for the entire community". Additionally, the San Gabriel Mountains rise to heights over 6,000 feet above msl and would be expected to remain partially visible from most areas of the City. However, the Project would result in an intensification of land uses in portions of the City including buildings on selected parcels that may be taller than 45 feet. Therefore, potential impacts related to obstructions of scenic vistas will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐

Discussion

The nearest officially designated scenic highway under the State's Scenic Highways program is a segment of the I-210 located approximately 1.8 miles due north. Due to distance and intervening development, the City is not visible from this segment of I-210. However, the segment of SR-110 that traverses the northern portion of the City is designated as the Arroyo Seco Historic Parkway under the National Scenic Byway program. Views of the City from the SR-110 may change where intensified land uses that abut the freeway are potentially developed. Therefore, potential impacts related to scenic resources within view of SR-110 will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐

Discussion

The City is considered an urbanized area. However, the City considers visual character of high importance separate from the issue of consistency with applicable planning regulations. The assessment of the Project impacts related to visual character would consider both the context of public views in the City as well as planning regulations.

Future development would change the visual quality of individual development sites, as structures and site improvements are introduced on vacant lands and as older developments are replaced with newer structures and site improvements that would likely have a different architectural style and may be more intense than the pre-existing land use. Increased urbanization could be expected as properties are developed and/or redeveloped with higher intensity/density uses. Potential impacts related to visual quality will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Discussion

Future development under the proposed Project would be accompanied by new sources of light and glare. These would include exterior security lighting, lighted signs, parking lot lighting, and pedestrian pathway lighting. Newly constructed buildings could also create new sources of daytime glare in the form of glazed building surfaces, use of mirrors and glass as exterior building surfaces, and other reflective materials that would reflect the sun or light sources and create glare. Therefore, potential impacts related to light or glare will be further evaluated in the Environmental Assessment.

2.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.	**Potentially Significant Impact**	**Less than Significant with Mitigation**	**Less than Significant Impact**	**No Impact**
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

The City is a developed urban area surrounded by several municipalities that are also urbanized. The City contains no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the most recent maps prepared, pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP 2020). The City has no land zoned for agricultural use, nor is there land proposed to be zoned for agricultural use. Therefore, the Project would not impact agriculture resources. This issue will not be further evaluated in the Environmental Assessment. Accordingly, there are no conflicts with agricultural zoning, and Williamson Act contracts are not applicable to the City. Additionally, there is no forest land, timberland, or any Timberland Production Zones in the City; therefore, the Project would not result in the loss or conversion of forest land, timberland, or Timberland Production areas. Thus, agriculture and forest resources will not be further evaluated in the Environmental Assessment.

2.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐

Discussion

The City is within the South Coast Air Basin (SoCAB). On December 2, 2022, the South Coast Air Quality Management District (SCAQMD) adopted the 2022 Air Quality Management Plan (AQMP), which is a regional and multi-agency effort (SCAQMD, California Air Resources Board, Southern California Association of Governments [SCAG], and U.S. Environmental Protection Agency [USEPA]). The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy; updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts.

Short-term construction and long-term operation of the Project would result in a net increase in stationary and mobile source criteria air pollutants emissions in the SoCAB compared to the existing condition. Therefore, consistency with the 2022 AQMP will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐

Discussion

The SoCAB is an airshed that is designated a non-attainment area for selected criteria pollutants. As stated in Threshold 2.3(a), construction and operation of the Project would result in a net increase in air pollutants. The Project's potential to result in a cumulatively considerable increase in those pollutants for which the SoCAB is in non-attainment, when considered in combination with other development planned in the SoCAB, will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐

Discussion

As stated in Threshold 2.3(a), construction and operation of the Project would result in a net increase in air pollutants. Therefore, potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Discussion

According to the SCAQMD's *CEQA Air Quality Handbook,* land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse, which occurs in the existing condition. Additionally, short-term construction equipment and activities would generate odors, such as diesel exhaust emissions from construction equipment and paving activities. Therefore, potential impacts related to odors will be further evaluated in the Environmental Assessment.

2.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐

Discussion

The Project site is in a highly urbanized area and is largely built out. As such, habitat potentially suitable for native wildlife species in the City is limited to the ornamental vegetation in developed areas and the native soils and vegetation in the undeveloped open space areas. Habitat potentially suitable for native plant species is present in the undeveloped, naturally vegetated open space areas. Additionally, Cooper's hawk (*Accipiter cooperii*) and western mastiff bat (*Eumops perotis californicus*) are special status wildlife species with potential to occur in the large trees that are located throughout the City. Therefore, potential impacts related to special status biological resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐

Discussion

As discussed above in Threshold 2.4(a), the City is in a highly urbanized area. However, the Project may result in future development of vacant areas supporting native vegetation communities, potentially containing sensitive upland vegetation types. Therefore, potential impacts related to sensitive natural communities will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐

Discussion

As discussed above in Threshold 2.4(a), the Project site is in a highly urbanized area. Jurisdictional resources (i.e., under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Boards, and/or California Department of Fish and Wildlife pursuant to the Clean Water Act) within the City of South Pasadena are mostly confined to concrete-lined drainages with no associated vegetation. The concrete-lined drainages across the City are numerous and disperse. The vacant, naturally vegetated, open space areas are mostly located in steep, upland areas with little potential to support jurisdictional resources. However, potential impacts related to jurisdictional resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐

Discussion

Wildlife corridors and habitat linkages are features that promote habitat connectivity and are generally characterized as undisturbed canyon and riverine stream habitat areas. Wildlife movement is already greatly restricted within the City due to existing urban development in most areas. Wildlife movement is likely to be confined to the Arroyo Seco along the western boundary of the City and within the vacant, naturally vegetated open space areas in the southwestern portion of the City. Also, future development may involve clearing or removals of vegetation and trees used by migrating bird and bat species protected by State and/or federal regulations. Therefore, potential impacts related to wildlife movement will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐

Discussion

The City of South Pasadena has a detailed tree preservation ordinance defined under Chapter 34, "Trees and Shrubs", of the City of South Pasadena Municipal Code (SPMC). Future development may involve trimming or removals of trees. Therefore, potential impacts related to conflict with the City's tree preservation ordinance will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

Discussion

There are no adopted, approved, or proposed Habitat Conservation Plans (HCP); Natural Community Conservation Plans (NCCP); or other approved local, regional, or State habitat conservation plans that cover habitats located within the City of South Pasadena. However, this issue will be further evaluated in the Environmental Assessment as part of the biological resources analysis.

2.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☐	☐

Discussion

The City has numerous designated historic resources and many additional properties that have been identified as potentially eligible historical resources. Implementation of the proposed Project would involve redevelopment of existing properties. Therefore, potential impacts to historical resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐

Discussion

The City is almost built out and is in a highly developed, urban area of Los Angeles County. Because there are few vacant parcels in the City, future development would largely occur in areas of the City that are already developed and/or built out. However, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown/unrecorded archaeological resources. Therefore, potential impacts to archaeological resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

Discussion

As discussed under Threshold 2.5(b) above, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, may encounter unknown cultural resources, including previously undiscovered human remains, resulting in a potentially significant impact. Therefore, potential impacts to human remains will be further evaluated in the Environmental Assessment.

2.6 ENERGY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐

Discussion

The Project would result in a net increase in energy demand compared to the existing condition, and construction of the Project would require use of energy as fuel and electricity. The Project's short-term and long-term use of energy will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

Discussion

As discussed in Threshold 2.6(a), the Project would result in new demands for energy. The Project's consistency with applicable plans and policies related to renewable energy and/or energy efficiency will be further evaluated in the Environmental Assessment.

2.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐

Discussion

The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Geological Survey (CGS) for the Alquist-Priolo Earthquake Fault Zone Program. An active fault is defined as one that has had surface displacement within Holocene time (about the last 11,700 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive. The County of Los Angeles and the City of South Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones (Alquist-Priolo Zones). Specifically, the limits of the Alquist-Priolo Zone for the Raymond Fault run east-west through the northernmost portion of the City, largely overlying the SR 110 alignment. Therefore, potential impacts related to the surface fault rupture will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☒	☐	☐	☐
ii) Strong seismic ground shaking?				

Discussion

The Project site is located in the seismically active southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active or potentially active faults. Also, several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin. Consistent with its location in a seismically active region, the City may be subject to strong ground shaking resulting from a major earthquake on one or

more faults in the area in the future. Therefore, potential impacts related to strong seismic ground shaking will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?	☒	☐	☐	☐

Discussion

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Separate from the issue of liquefaction, the presence of groundwater or shallow, perched water or seepage can adversely affect new construction. Landslides typically consist of shallow failures involving surficial soils and the underlying highly weathered bedrock in moderate to steep terrain. The CGS broadly identifies areas of seismic-induced liquefaction risk pursuant to the Seismic Hazards Mapping Act. There are discrete areas designated as potentially susceptible to either liquefaction or landslide within the hilly area in the southwest portion of the City. Therefore, potential impacts related to liquefaction and landslides will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐

Discussion

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction activities. Construction activities produce loose soils, which would be subject to erosion if the surface areas were to be left uncovered and exposed to weather conditions. Grading, excavation, and trenching for construction may expose soils to short-term wind and water erosion, which could result in increased particulate matter (i.e., PM10) in the air and/or increased sediment runoff in surface waters. Therefore, potential impacts related to soil erosion will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐

Discussion

Secondary seismic hazards related to the underlying geologic unit include several types of ground failure that can occur because of severe ground shaking. These hazards include landslides, collapse, ground lurching, shallow ground rupture, and liquefaction. Liquefaction and landslides are addressed above under Thresholds 2.7(a)(iii) and 2.7(a)(iv). The probability for each type of ground failure depends on the severity of the earthquake, the site's distance from the fault, the local topography, and subsoil and groundwater conditions, among other factors. In addition, there can be soil engineering characteristics inherent in the underlying sediments on a site that can adversely affect structures if not appropriately managed during construction, including expansive soils, subsidence, hydroconsolidation, and other forms of collapse. Therefore, potential impacts related to location on an unstable geologic unit will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☒	☐	☐	☐

Discussion

The vast majority of the City is served by the municipal sewer system; however, there are septic tanks that remain in the Altos de Monterey area in the southwest portion of the City. Therefore, potential impacts related to alternative wastewater systems will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Discussion

Future development would largely occur in areas of the City that are already developed and/or built out. However, as with archaeological resources, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation into the native soil than in the past, could potentially cause the disturbance of previously unknown paleontological resources. Therefore, potential impacts related to archaeological resources will be further evaluated in the Environmental Assessment.

2.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

Discussion

The Project would result in a net increase in the generation of greenhouse gas (GHG) emissions associated with construction and operation of future development in the City. The Project's short-term and long-term GHG emissions will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Discussion

As discussed in Threshold 2.8(a), the Project would result in increased GHG emissions. The Project's consistency with applicable plans and policies related to reduction of GHG emissions,

including the City of South Pasadena's *Climate Action Plan*, will be further evaluated in the Environmental Assessment.

2.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐

Discussion

Construction activities associated with new development would commonly involve the use of hazardous materials for construction, such as paints, thinners, solvents, acids, curing compounds, grease, oils, and other chemicals, which could pose risks to construction workers or lead to soil and groundwater contamination, if not properly stored, used, or disposed. Operation of future development may involve use of common hazardous materials (e.g., paint, pesticides, cleansers, and solvents). These hazardous materials would be stored and used at individual sites and may create a public health and safety hazard through routine transport, use, or disposal. Therefore, potential impacts related to the transport, use, or disposal of hazardous materials will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐

Discussion

As discussed under Threshold 2.9(a), future development could involve the use of chemical agents, solvents, paints, fuel for equipment, and other hazardous materials that are associated with construction. Redevelopment activities that involve demolition or reuse of existing buildings may result in the need to remove and dispose of asbestos-containing materials and/or lead-based paint, dependent on the age of the structure. In addition to the identified hazardous materials sites, as discussed above, there may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases. Therefore, potential impacts related to hazardous materials release will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☒	☐	☐	☐

Discussion

All schools in the City are located near residential or civic land uses where hazardous materials use is limited. However, given the modest size of the City, some existing schools are within 0.25 mile of one or more focus areas, which would have a mixed-use land use designation and may include retail and office uses that could handle materials classified as hazardous. While these materials would not be considered acutely hazardous or unusual, potential impacts to existing schools due to hazardous emissions or handling of hazardous materials at future development sites will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐

Discussion

Based on review of the Cortese List data resources, there are a total of 18 (17 with status completed–case closed; 1 with status open, eligible for closure) sites in the City identified on the list of leaking underground storage tank (LUST) sites from the State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2023). The LUST sites are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive. There are no sites identified on the California Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Sites list via its EnviroStor database (DTSC 2023). While these findings are typical of urban environments, potential impacts related to sites identified on hazardous materials databases will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☒	☐	☐	☐

Discussion

The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the El Monte Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. However, this issue will be further evaluated in the Environmental Assessment as part of the hazards and hazardous materials analysis.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐

Discussion

The City has a developed roadway network that provides emergency access and evacuation routes to existing development. Evacuation routes include major roadways in the City, with the SR 110 and I 210 freeways serving as primary regional exit routes. Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. The potential impacts related to emergency response and evacuation will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☒	☐	☐	☐

Discussion

No portion of the City is identified by the California Department of Forestry and Fire Protection as a very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2023). However, the western and southwestern borders of the City are adjacent to VHFHSZs. The southwestern portion of the City, located west of Meridian Avenue and south of Monterey Road, is a hilly area that is defined as a high fire hazard area by the City. Therefore, potential impacts related to wildland fires will be further evaluated in the Environmental Assessment.

2.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☒	☐	☐	☐

Discussion

There are two major classes of pollutants: point source and non-point source. Point-source pollutants can be traced to their original source and are discharged directly from pipes or spills. Non-point-source pollutants cannot be traced to a specific original source. Non-point source pollution is caused by rainfall or snowmelt moving over and through the ground. Storm water runoff (i.e., non-point source) occurs when rainfall is collected by storm drains instead of being absorbed into groundcover or soil as is common in undeveloped and in landscaped areas. Storm water runoff from individual construction sites could contain pollutants such as soils and sediments that are released during grading and excavation activities and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Future development would have the potential to increase non-point-source runoff, and associated pollutants, from residential, office/retail, utility, and roadway uses. Therefore, potential impacts related to water quality will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

Discussion

A project can result in a significant impact on groundwater supplies if it causes a demonstrable and sustained reduction of groundwater recharge capacity or changes the potable water levels such that it reduces the ability of a water utility to use the groundwater basin for public water

supplies or storage of imported water, reduces the yields of adjacent wells or well fields, or adversely changes the rate or direction of groundwater flow. The Project would result in a net increase in potable water demand for indoor and outdoor use. Additionally, a finite amount of water would be used during construction for dust suppression. These water supplies may be in part derived from the City's groundwater sources. Therefore, potential impacts related to groundwater supplies and groundwater recharge will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	☒	☐	☐	☐
i) Result in substantial erosion or siltation on- or off-site?				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☒	☐	☐	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
iv) Impede or redirect flood flows?	☒	☐	☐	☐

Discussion

Changes in drainage patterns would be confined to individual development sites and would not affect major underground storm drain lines and concrete-lined drainages in the City. However, the construction of new impervious surfaces would reduce the amount of rainwater that could infiltrate the soils, potentially increasing storm water runoff due to reductions in infiltration. Therefore, potential impacts related to alteration in drainage patterns will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐

Discussion

No portions of the City are within a 100-year floodplain, as identified by the Federal Emergency Management Agency (FEMA 2023). Due to distance from the Pacific Ocean and absence of large

water bodies in or near the City, tsunamis or seiches would not affect the City. However, mountainous areas are susceptible to mudflows. Most of the City is relatively flat, with steeper hillside areas primarily in the southwest portion of the City. Therefore, the potential impacts related to inundation from mudflows will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Discussion

The San Gabriel Basin, the City's source of groundwater, is defined by the California Department of Water Resources as very low priority pursuant to the 2014 Sustainable Groundwater Management Act (DWR 2023). As such, there is currently no sustainable groundwater management plan applicable to the City. Regardless, as discussed under Threshold 2.10(b) above, the Project would result in an increased demand for water during construction and operation of future development, which may be in part derived from the City's groundwater sources. Therefore, potential impacts related to groundwater management will be further evaluated in the Environmental Assessment.

2.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☒	☐	☐	☐

Discussion

The City of South Pasadena is largely built out with established residential neighborhoods and commercial corridors. While this fact has contributed to difficulty in the City finding a feasible way to accommodate the high RHNA allocation, the focus of the 2021–2029 Housing Element is to conserve the stable and established neighborhoods and direct carefully calibrated growth. The planned development and redevelopment are meant to revitalize neighborhoods, rather than divide them, and would enable more residential development or mixed-use development (i.e., residential and commercial/office) than presently allowed. Regardless, potential impacts related to dividing an established community will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

Discussion

The primary land use planning documents that govern the City include the City's General Plan, Mission Street Specific Plan, and South Pasadena Municipal Code. Additionally, the SCAG's RHNA and RTP/SCS are regional planning documents relevant to the City's local planning, including the 2021–2029 Housing Element. Consistency with the applicable plans and policies of the City and the region (i.e., SCAG) will be further evaluated in the Environmental Assessment.

2.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

There are no known mineral resources or active mining operations in the City. Therefore, the proposed Project would not result in the loss of an available known mineral resource with value to the region. There will be no impact, and no mitigation is required. Therefore, mineral resources will not be further evaluated in the Environmental Assessment.

2.13 NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

Discussion

The Project would generate noise from construction activity and operational mobile (e.g., cars, trucks, ambulances) and stationary noise sources (e.g., idling vehicles and heating, ventilating, and air conditioning ([HVAC] equipment) associated with future development. Therefore, potential impacts related to noise generation will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

Discussion

Depending on the type of construction activities employed, construction activities could generate groundborne vibration that could affect nearby buildings. Therefore, potential impacts related to generation of vibration will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

Discussion

The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the El Monte Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. However, this issue will be further evaluated in the Environmental Assessment as part of the noise analysis.

2.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?	☒	☐	☐	☐

Discussion

Future development under the proposed Project would increase housing, population, and employment in the City. While buildout of a City under an adopted general plan, including its housing element, is not tied to a specific timeline, for the purposes of this Initial Study, development of the Project is assumed to occur by the horizon year of 2040 with the policies and associated programs of the 2021–2029 Housing Element being completed by the end of 2029. Therefore, potential impacts related to the direct and indirect generation of population in the City will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☒	☐	☐	☐

Discussion

The 2021–2029 Housing Element calls for the conservation of the City's established residential neighborhoods and transitions to higher densities within focused areas. Thus, most of the residential land uses in the City are expected to remain in place. New residential development on the limited number of vacant lots in the City would not involve any displacement of housing. However, transitions to higher densities within the focus areas or those lots outside the focus areas with potential for redevelopment that currently contain residential land uses could result in displacement. Therefore, potential impacts related to displacement of existing people or housing will be further evaluated in the Environmental Assessment.

2.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐
iii) Schools?	☒	☐	☐	☐
iv) Parks?	☒	☐	☐	☐
v) Other public facilities?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for fire protection and police protection services related to both the increased population and the increased scope of development. The Project's resident population would also generate an increased demand for parks, schools, and other public facilities, such as libraries. The increased demand for these public services may result in the need for new or expanded facilities whose construction could result in environmental impacts. Therefore, potential impacts related to public services will be further evaluated in the Environmental Assessment.

2.16 RECREATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. The Project's resident population would generate an increased demand for recreational facilities in the City and local region. The increased demand for these recreational facilities may result in the deterioration of these facilities. Therefore, potential impacts related to increased use of recreational facilities will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for recreational facilities related to both the increased population and the increased scope of development. The increased demand for recreation facilities may result in the need for expanded recreational facilities whose construction could result in environmental impacts. Therefore, potential impacts related to the demand for recreational facilities will be further evaluated in the Environmental Assessment.

2.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐

Discussion

The City adopted CEQA transportation analysis guidelines on May 20, 2020 (Resolution No. 7656), pursuant to SB 743. The guidelines outline screening criteria and significance thresholds for land use plans, land development projects, and transportation projects. For land use plans that would change population and/or employment, the SCAG model will be used to forecast the change in Vehicle Miles Traveled (VMT). The total VMT of the land use plan area will be divided by population (per capita) and service population (population plus employees). A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per population or service population of the baseline. A cumulative significant impact would be the same as the project-level impact since the analysis includes all regional land use and transportation cumulative conditions. The Project would generate increased vehicle trips and associated vehicle miles. Therefore, consistency of the Project with the City's plans, ordinances, and policies addressing the circulation system, specifically the City's General Plan and the City's transportation analysis guidelines will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☒	☐	☐	☐

Discussion

Section 15064.3(b)(1) of the State CEQA Guidelines refers to evaluating transportation impacts using the VMT metric for land use projects. As discussed above, the City's transportation analysis guidelines were prepared to reflect the requirements of SB 743, and potential impacts related to additional increased vehicle trips and associated vehicle miles will be presented for further evaluation in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐

Discussion

Roadway and other transportation improvements that may be implemented in the future would involve only existing streets, ramps, driveways, and sidewalks. No new major streets or other substantial alterations to the existing roadway network could be accommodated as the City is essentially built out. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure. Therefore, potential impacts related to traffic hazards will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in inadequate emergency access?	☒	☐	☐	☐

Discussion

The City has a developed roadway network that provides emergency access and evacuation routes to existing development. Evacuation routes include major roadways in the City, with the SR 110 and I 210 freeways serving as primary regional exit routes. The Project would result in a greater intensity of land uses on some parcels in the City. Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. Therefore, potential impacts related to emergency access will be further evaluated in the Environmental Assessment.

2.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

Discussion

The Project is subject to compliance with Assembly Bill (AB) 52, which requires consideration of impacts to "tribal cultural resources", defined in Section 21074 of the *Public Resources Code,* as part of the CEQA process. AB 52 requires the City to notify any groups (who have requested notification) who are traditionally or culturally affiliated with the geographic area of a project for which a Negative Declaration, Mitigated Negative Declaration, or an EIR is required pursuant to CEQA, on or after July 1, 2015. Senate Bill (SB) 18 (*California Government Code,* Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies. It establishes responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005.

Pursuant to AB 52 and SB 18, the City initiated government-to-government consultation with NAHC-identified California Native American tribes has been completed as part of ongoing preparation of the Program Environmental Impact Report (PEIR) for the General Plan and DTSP Update & 2021–2029 Housing Element. Tribes requested consultation to identify, protect, and/or mitigate potential impacts to cultural places/resources. The results of this consultation and the potential for the Project to cause a substantial adverse change to a listed or eligible tribal cultural resource will be further evaluated in the Environmental Assessment.

2.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐

Discussion

The Project would increase demand for potable water, electricity, natural gas, and telecommunications services and would increase the generation of wastewater. As discussed in Section 2.10, Hydrology and Water Quality, the construction of new impervious surfaces would reduce the amount of rainwater that could infiltrate the soils, potentially increasing storm water runoff due to reductions in infiltration. Therefore, potential impacts related to the need for new or expanded water, wastewater, storm water drainage, and dry utilities whose construction could result in environmental impacts will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐

Discussion

The Project would result in a net increase in potable water demand for indoor and outdoor use. Additionally, a finite amount of water would be used during construction for dust suppression. Therefore, potential impacts related to the sufficiency of water supplies will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐

Discussion

The Project would increase the generation of wastewater. Wastewater from the City of South Pasadena is treated by the Sanitation Districts of Los Angeles County (Sanitation Districts). Potential impacts to Sanitation Districts' facilities from the Project will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

Discussion

Construction of the Project would generate a finite volume of construction and demolition waste, and operation of the Project would result in increased long-term generation of municipal (non-hazardous) solid waste. Potential impacts related to landfill space and compliance with applicable solid waste regulations will be further evaluated in the Environmental Assessment.

2.20 WILDFIRE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☒	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☒	☐	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☒	☐	☐	☐

Discussion

No portion of the City is identified by the California Department of Forestry and Fire Protection as a (VHFHSZ) (CAL FIRE 2023). However, the western and southwestern borders of the City are adjacent to VHFHSZs. The southwestern portion of the City, located west of Meridian Avenue and south of Monterey Road, is a hilly area that is defined as a high fire hazard area by the City. Therefore, potential impacts related to wildfires will be further evaluated in the Environmental Assessment.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

Discussion

As discussed in Section 2.4, Biological Resources, the potential for the Project to impact special status biological resources, sensitive vegetation types, jurisdictional resources, wildlife movement, and conflict with the City's tree preservation ordinance or conservation plans will be further evaluated in the Environmental Assessment.

As discussed in Section 2.5, Cultural Resources, and Section 2.18, Tribal Cultural Resources, the potential for the Project to impact the on-site historic resources and unknown historic (buried), archaeological, tribal cultural, and/or paleontological resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐

Discussion

Within the City of South Pasadena and San Gabriel Valley, there are planned, ongoing, and proposed projects (not including the Project) that may cumulatively increase environmental impacts in the Project area. These impacts may be potentially significant and will be further evaluated in the Environmental Assessment. The Environmental Assessment will evaluate cumulative impacts for the Project based on the environmental impacts of the development associated with the Project in combination with the potential environmental impacts of regional growth in the San Gabriel Valley through the year 2040.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Discussion

Construction and operation of the Project could have the potential to generate significant adverse impacts on human beings, either directly or indirectly. The Environmental Assessment will provide analyses of the potential impacts related to aesthetics, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services and recreation, transportation, utility and service systems, and wildfire.

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ATTACHMENT 1 c

Environmental Assessment

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City of South Pasadena 2021–2029 Housing Element Environmental Assessment

Prepared for | City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Prepared by | Psomas
225 South Lake Avenue, Suite 1000
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May 2023

Section **Page**

Executive Summary **ES-1**

Introduction ES-1
Project Location and Setting ES-1
Project Description ES-2
Project Alternatives ES-3
Issues to be Resolved ES-4
Areas of Controversy ES-4
Summary of Significant Environmental Impacts ES-4

Section 1.0 Introduction **1-1**

1.1 Purpose and Type of Environmental Impact Report 1-1

1.1.1 Background *1-1*
1.1.2 Regulatory Framework *1-2*
1.1.3 Lead Agency *1-3*

1.2 Project Sponsor and Contact Person 1-4

Section 2.0 Environmental Setting and Project Description **2-1**

2.1 Project Location 2-1

2.2 Project Setting and Characteristics 2-1

2.2.1 Regional Setting *2-1*
2.2.2 Local Environmental Setting *2-2*
2.2.3 Relevant Planning Considerations *2-4*

2.3 Project Background 2-6

2.3.1 Existing General Plan and Housing Element *2-6*
2.3.2 Existing Mission Street Specific Plan *2-8*
2.3.3 Purpose and Use of the Project *2-9*
2.3.4 Planning Process *2-9*

2.4 Proposed Project Description 2-9

2.4.1 2021–2029 Housing Element *2-10*
2.4.2 Definition of Planning Components and Terms *2-13*
2.4.3 Project Development Pattern and Capacity *2-14*

2.5 Approach to Cumulative Impact Analysis 2-17

2.6 Project Objectives 2-18

2.7 Intended Uses of the EA 2-18

2.8 References 2-19

Section 3.0 Environmental Analysis **3-1**

3.0.1 Environmental Analysis Format *3-2*

3.1 Aesthetics 3.1-1

3.1.1 Methodology *3.1-1*
3.1.2 Existing Conditions *3.1-1*

3.1.3 Relevant Programs and Regulations 3.1-2
3.1.4 Thresholds of Significance 3.1-5
3.1.5 Proposed Housing Element Goals and Policies 3.1-5
3.1.6 Environmental Impacts 3.1-6
3.1.7 Cumulative Impacts 3.1-9
3.1.8 Mitigation Measures 3.1-10
3.1.9 Level of Significance After Mitigation 3.1-10
3.1.10 References 3.1-11

3.2 Air Quality 3.2-1

3.2.1 Methodology 3.2-1
3.2.2 Existing Conditions 3.2-1
3.2.3 Relevant Programs and Regulations 3.2-7
3.2.4 Thresholds of Significance 3.2-11
3.2.5 Proposed Housing Element Goals and Policies 3.2-13
3.2.6 Environmental Impacts 3.2-13
3.2.7 Cumulative Impacts 3.2-18
3.2.8 Mitigation Measures 3.2-19
3.2.9 Level of Significance After Mitigation 3.2-20
3.2.10 References 3.2-22

3.3 Biological Resources 3.3-1

3.3.1 Methodology 3.3-1
3.3.2 Existing Conditions 3.3-1
3.3.3 Relevant Programs and Regulations 3.3-6
3.3.4 Thresholds of Significance 3.3-9
3.3.5 Proposed Housing Element Goals and Policies 3.3-10
3.3.6 Environmental Impacts 3.3-11
3.3.7 Cumulative Impacts 3.3-14
3.3.8 Mitigation Measures 3.3-14
3.3.9 Level of Significance After Mitigation 3.3-15
3.3.10 References 3.3-16

3.4 Cultural and Tribal Cultural Resources 3.4-1

3.4.1 Methodology 3.4-1
3.4.2 Existing Conditions 3.4-1
3.4.3 Relevant Programs and Regulations 3.4-18
3.4.4 Thresholds of Significance 3.4-24
3.4.5 Proposed Housing Element Goals and Policies 3.4-25
3.4.6 Environmental Impacts 3.4-25
3.4.7 Cumulative Impacts 3.4-29
3.4.8 Mitigation Measures 3.4-30
3.4.9 Level of Significance after Mitigation 3.4-31
3.4.10 References 3.4-32

3.5 Energy 3.5-1

3.5.1 Methodology 3.5-1
3.5.2 Existing Conditions 3.5-1
3.5.3 Relevant Programs and Regulations 3.5-1
3.5.4 Thresholds of Significance 3.5-6
3.5.5 Proposed Housing Element Goals and Policies 3.5-6
3.5.6 Environmental Impacts 3.5-6

3.5.7 Cumulative Impacts 3.5-8
3.5.8 Mitigation Measures 3.5-8
3.5.9 Level of Significance After Mitigation 3.5-8
3.5.10 References 3.5-9

3.6 Geology and Soils 3.6-1

3.6.1 Methodology 3.6-1
3.6.2 Existing Conditions 3.6-1
3.6.3 Relevant Programs and Regulations 3.6-3
3.6.4 Thresholds of Significance 3.6-6
3.6.5 Proposed Housing Element Goals and Policies 3.6-6
3.6.6 Environmental Impacts 3.6-7
3.6.7 Cumulative Impacts 3.6-11
3.6.8 Mitigation Measures 3.6-12
3.6.9 Level of Significance After Mitigation 3.6-12
3.6.10 References 3.6-12

3.7 Greenhouse Gas Emissions 3.7-1

3.7.1 Methodology 3.7-1
3.7.2 Existing Conditions 3.7-1
3.7.3 Relevant Programs and Regulations 3.7-4
3.7.4 Thresholds of Significance 3.7-15
3.7.5 Proposed Housing Element Goals and Policies 3.7-15
3.7.6 Environmental Impacts 3.7-15
3.7.7 Cumulative Impacts 3.7-17
3.7.8 Mitigation Measures 3.7-17
3.7.9 Level of Significance After Mitigation 3.7-17
3.7.10 References 3.7-18

3.8 Hazards and Hazardous Materials 3.8-1

3.8.1 Methodology 3.8-1
3.8.2 Existing Conditions 3.8-1
3.8.3 Relevant Programs and Regulations 3.8-2
3.8.4 Thresholds of Significance 3.8-5
3.8.5 Proposed Housing Element Goals and Policies 3.8-6
3.8.6 Environmental Impacts 3.8-6
3.8.7 Cumulative Impacts 3.8-10
3.8.8 Mitigation Measures 3.8-11
3.8.9 Level of Significance After Mitigation 3.8-12
3.8.10 References 3.8-12

3.9 Hydrology and Water Quality 3.9-1

3.9.1 Methodology 3.9-1
3.9.2 Existing Conditions 3.9-1
3.9.3 Relevant Programs and Regulations 3.9-3
3.9.4 Thresholds of Significance 3.9-9
3.9.5 Proposed Housing Element Goals and Policies 3.9-10
3.9.6 Environmental Impacts 3.9-10
3.9.7 Cumulative Impacts 3.9-15
3.9.8 Mitigation Measures 3.9-16
3.9.9 Level of Significance After Mitigation 3.9-16
3.9.10 References 3.9-16

3.10 Land Use and Planning 3.10-1

3.10.1 Methodology 3.10-1
3.10.2 Existing Conditions 3.10-1
3.10.3 Relevant Programs and Regulations 3.10-2
3.10.4 Thresholds of Significance 3.10-11
3.10.5 Proposed Housing Element Goals and Policies 3.10-11
3.10.6 Environmental Impacts 3.10-12
3.10.7 Cumulative Impacts 3.10-17
3.10.8 Mitigation Measures 3.10-18
3.10.9 Level of Significance After Mitigation 3.10-18
3.10.10 References 3.10-19

3.11 Noise 3.11-1

3.11.1 Methodology 3.11-1
3.11.2 Relevant Programs and Regulations 3.11-4
3.11.3 Thresholds of Significance 3.11-7
3.11.4 Proposed Housing Element GOals and Policies 3.11-8
3.11.5 Environmental Impacts 3.11-8
3.11.6 Cumulative Impacts 3.11-14
3.11.7 Mitigation Measures 3.11-15
3.11.8 Level of Significance After Mitigation 3.11-17

3.12 Population and Housing 3.12-1

3.12.1 Methodology 3.12-1
3.12.2 Existing Conditions 3.12-1
3.12.3 Relevant Programs and Regulations 3.12-4
3.12.4 Thresholds of Significance 3.12-14
3.12.5 Proposed Housing Element Goals and Policies 3.12-14
3.12.6 Environmental Impacts 3.12-16
3.12.7 Cumulative Impacts 3.12-21
3.12.8 Mitigation Measures 3.12-21
3.12.9 Level of Significance After Mitigation 3.12-22
3.12.10 References 3.12-22

3.13 Public Services and Recreation 3.13-1

3.13.1 Methodology 3.13-1
3.13.2 Existing Conditions 3.13-1
3.13.3 Relevant Programs and Regulations 3.13-6
3.13.4 Thresholds of Significance 3.13-9
3.13.5 Proposed Housing Element Goals and Policies 3.13-9
3.13.6 Environmental Impacts 3.13-9
3.13.7 Cumulative Impacts 3.13-15
3.13.8 Mitigation Measures 3.13-17
3.13.9 Level of Significance After Mitigation 3.13-17
3.13.10 References 3.13-17

3.14 Transportation 3.14-1

3.14.1 Methodology 3.14-1
3.14.2 Existing Conditions 3.14-1
3.14.3 Relevant Programs and Regulations 3.14-4
3.14.4 Thresholds of Significance 3.14-10
3.14.5 Proposed Housing Plan Goals and Policies 3.14-10

3.14.6 Environmental Impacts 3.14-11
3.14.7 Cumulative Impacts 3.14-13
3.14.8 Mitigation Measures.....3.14-14
3.14.9 Level of Significance After Mitigation.....3.14-14

3.15 Utilities and Service Systems 3.15-1

3.15.1 Methodology 3.15-1
3.15.2 Existing Conditions 3.15-1
3.15.3 Relevant Programs and Regulations 3.15-4
3.15.4 Thresholds of Significance.....3.15-9
3.15.5 Proposed Housing Element Goals and Policies 3.15-10
3.15.6 Environmental Impacts 3.15-10
3.15.7 Cumulative Impacts 3.15-15
3.15.8 Mitigation Measures.....3.15-17
3.15.9 Level of Significance After Mitigation.....3.15-17
3.15.10 References.....3.15-17

3.16 Wildfire.....3.16-1

3.16.1 Methodology 3.16-1
3.16.2 Existing Conditions 3.16-1
3.16.3 Relevant Programs and Regulations 3.16-2
3.16.4 Thresholds of Significance.....3.16-6
3.16.5 Proposed Housing Element Goals and Policies 3.16-7
3.16.6 Environmental Impacts 3.16-7
3.16.7 Cumulative Impacts 3.16-9
3.16.8 Mitigation Measures.....3.16-9
3.16.9 Level of Significance After Mitigation.....3.16-9
3.16.10 References.....3.16-10

Section 4.0 Alternatives to the Proposed Project 4-1

4.1 Introduction.....4-1

4.1.1 Project Summary 4-1
4.1.2 Project Objectives.....4-2
4.1.3 Significant and Unavoidable Impacts.....4-3
4.1.4 Alternatives to the Proposed Project.....4-3

4.2 Alternatives Eliminated From Detailed Consideration 4-3

4.2.1 Alternative Site.....4-3
4.2.2 No Project/No Development 4-4

4.3 Alternatives Carried Forward for Detailed Consideration 4-4

4.3.1 Alternative 1: No Project/Existing General Plan.....4-5
4.3.2 Alternative 2: Reduced Development Capacity 4-13

4.4 Environmentally Superior Alternative.....4-21

4.5 References 4-23

Section 5.0 Other California Environmental Quality Act Required Considerations.....5-1

5.1 Significant Irreversible Environmental Changes.....5-1

5.2 Growth-Inducing Impacts.....5-3

TABLES

Table **Page**

2-1 2014–2021 Housing Element RHNA Allocation 2-7
2-2 1998 General Plan (2010 Forecast) and Existing Land Uses 2-8
2-3 2021–2029 Housing Element RHNA Allocation 2-11
2-4 Summary of Existing and Projected Demographics 2-16
3.2-1 California and National Ambient Air Quality Standards 3.2-5
3.2-2 Attainment Status of Criteria Pollutants in the SoCAB 3.2-6
3.2-3 Local Air Quality Monitoring Summary (2017-2019) 3.2-7
3.2-4 South Coast AQMD Air Quality Significance Thresholds 3.2-12
3.2-5 2040 Demographic Comparison Based on 2020–2045 RTP/SCS 3.2-15
3.2-6 California Air Resource Board Advisory Recommendations 3.2-17
3.4-1 Designated Individual Resources 3.4-5
3.4-2 Cultural Resources Studies Within the Project Site 3.4-7
3.4-3 Archaeological and Historical Resources Within the Project Site 3.4-10
3.5-1 South Pasadena Climate Action Plan Energy Sector Measures (Plays) and Actions (Moves) 3.5-3
3.6-1 Fossil Localities Within the City of South Pasadena 3.6-2
3.6-2 Additional Known Localities Near the City of South Pasadena 3.6-3
3.7-1 Comparison of Worldwide Greenhouse Gas Emissions 3.7-4
3.7-2 South Pasadena Climate Action Plan Measures (Plays) Summary 3.7-14
3.9-1 Beneficial Uses of Receiving Waters 3.9-7
3.10-1 SCAG 2020-2045 RTP/SCS Consistency Analysis 3.10-15
3.11-1 South Pasadena Municipal Code Operational Noise Standards 3.11-6
3.11-2 Significance Criteria Summary 3.11-8
3.11-3 Construction Reference Noise Levels 3.11-9
3.11-4 Future (2040) with Project Traffic Noise Levels by Focus Area 3.11-11
3.11-5 Vibration Source Levels for Construction Equipment 3.11-13
3.12-1 Historic Population Trends, 1990–2021 ....3.12-1
3.12-2 Historic Housing Trends, 1990–2022 ....3.12-2
3.12-3 Historic Employment Trends, 2000–2021 ....3.12-2
3.12-4 SCAG Growth Projections for South Pasadena 3.12-3
3.12-5 County of Los Angeles and City of South Pasadena Projected Jobs-Housing Ratios (2016–2040) 3.12-4
3.12-6 Comparison of Existing and Projected Conditions 3.12-17
3.12-7 Comparison of SCAG Projections and Project Buildout 3.12-18
3.13-1 South Pasadena Part One Crime Statistics – Years 2020 and 2021 ....3.13-3
3.13-2 SPUSD Schools and Enrollment For 2021-2022 School Year 3.13-3
3.13-3 South Pasadena Parks and Recreational Facilities 3.13-4
3.14-1 City of South Pasadena Baseline Daily VMT 3.14-2
4-1 Comparison of SCAG Projections and Alternative 1 Buildout 4-10
4-2 Alternative 2 Development Capacity (2040) 4-13
4-3 Comparison of SCAG Projections and Alternative 1 Buildout 4-18
4-4 Comparison of Impacts for Project Alternatives 4-22

EXHIBITS

Exhibit **Follows Page**

1 Regional and Local Vicinity 2-1
2 Existing Land Use Policy Map 2-7
3 Citywide Sites Inventory Map 2-15

APPENDICES

Appendix

A-1 Cultural Resources Record Search
A-2 Native American Consultation Records
B Paleontological Records Search

EXECUTIVE SUMMARY

INTRODUCTION

The City is the subject of a Court Order[1] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. Such action to comply with the Court Order by approving the Housing Element must be completed within the May 31, 2023, deadline timeframe stated within the Court Order. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City is required to prepare an initial study, with substantially the same information required pursuant to Section 15080(c) of Title 14 of the California Code of Regulations (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, the content of which substantially conforms to the required content for a draft environmental impact report set forth in Article 9 (commencing with Section 15140) of Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. All other provisions of CEQA, Division 13 of the Public Resources Code (commencing with Section 21000), do not apply to any action necessary to bring the general plan or relevant elements of the plan into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq. This EA has been prepared to identify, analyze, and mitigate, to the extent feasible, the potential environmental effects associated with implementation of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). This EA has been prepared pursuant to the requirements of CEQA and the Guidelines for the Implementation of CEQA (State CEQA Guidelines) (Title 14, *California Code of Regulations,* Chapter 3, Sections 15000 et. seq.).

PROJECT LOCATION AND SETTING

The City of South Pasadena is located on the western edge of the San Gabriel Valley area of Los Angeles County (County), approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and the City of Los Angeles neighborhoods, including Garvanza and Highland Park, to the west. The planning area for the proposed General Plan and DTSP Update & 2021–2029 Housing Element includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City limits. The City's estimated 11,156 residential dwelling units (DUs), housing the City's population of 25,580, are comprised of nearly equal number of single-family and multi-family units.

The City's land use pattern is well established and largely built out, with limited available vacant or underutilized land throughout the City. The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue,

[1] *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

Huntington Drive, Fremont Avenue, and Monterey Road. The City's circulation network is largely a grid system of north/south and east/west roads. The exception to the grid system is the southwest quadrant of the City that has curvilinear streets developed to fit the topography of the area.

Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) L Line also provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley.

PROJECT DESCRIPTION

Pursuant to State law, the City of South Pasadena has an approved General Plan. The *South Pasadena General Plan* was last updated and adopted by the City in 1998. Similarly, the City has an approved Specific Plan for a portion of the downtown area. The Mission Street Specific Plan (MSSP; now expanded to include a segment of Fair Oaks Avenue and referred to as the Downtown Specific Plan) was adopted in 1996. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element, which must be updated every five to eight years. However, a general plan needs to be updated if it is to reflect community values and priorities as they change over time.

Accordingly, a comprehensive General Plan and DTSP Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community 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 Housing Element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities and establishes the goals, policies, and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element was in effect through 2021. Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021 and has allocated 2,067 DUs to the City of South Pasadena. Additionally, the California HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. As discussed in Section 2.0. Environmental Setting and Project Description, the Court Order requires the City to place a ballot measure, by December 31, 2024, proposing the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre).

Based on research, community input, State requirements, and HCD feedback, the central strategy of the 2021-2029 Housing Element preserves existing housing stock and directs calibrated growth to identified growth areas while providing housing opportunities for all. The Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation and required surplus with the general pattern of the existing land use plan.

The Project would accommodate a total of 2,775 residential DUs, including the HCD-required surplus units, and 430,000 square feet (sf) of non-residential uses, comprised of retail and office development, in addition to both the existing land uses (see Table 2-2 in Section 2.0 of this EA). The full buildout of the Project, for purposes of this EA, would generate up to an additional 6,882 residents (assuming no residential vacancies) and additional 1,978 jobs in the City through 2040, compared to existing conditions.

It is important to note that the Project would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. New development would continue to be subject to the City's development review process. The proposed 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 (i.e., SCAG) requirements. EA

PROJECT ALTERNATIVES

Section 15126.6 of the State CEQA Guidelines requires an evaluation of the comparative effects of a reasonable range of alternatives to the proposed Project that would feasibly attain most of the proposed Project objectives and would avoid or substantially lessen any of the significant impacts of the proposed Project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking economic, legal, social, and technological factors into consideration. The range of alternatives is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasonable choice.

In accordance with Section 15126.6 of the State CEQA Guidelines, Section 4.0, Alternatives, of this EA addresses alternatives to the proposed Project. Section 4.0 provides a description of each alternative; a comparative analysis of the potential environmental effects of each alternative to those associated with the proposed Project; a discussion of each alternative's ability to meet the Project objectives; and a discussion of the environmentally superior alternative. The following is a summary description of the alternatives evaluated in this EA:

- **Alternative 1 – No Project/Existing General Plan.** This alternative addresses one of the two types of "No Project" alternatives identified by CEQA: the No Project/Existing General Plan Alternative, which assumes the 1998 General Plan and 2014–2021 Housing Element would remain as the adopted long-range planning policy document for the City of South Pasadena, with future development occurring pursuant to the City's current General Plan goals and policies and Land Use Map. Buildout under this alternative is estimated at 265 DUs and 66,124 sf of non-residential (i.e., commercial/office) development in the City over the next approximately 20 years (through 2040).
- **Alternative 2 – Reduced Development Capacity.** This alternative addresses buildout of the anticipated development capacity of the Project contemplated by the City prior to the inclusion of the 6th Cycle RHNA allocation. Buildout under this alternative assumes up to 589 DUs and 430,000 sf of non-residential (i.e., commercial/office) development in the City over the next approximately 20 years (through 2040).

ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the proposed Project, the key issues to be resolved include decisions by the City of South Pasadena, as Lead Agency, pertaining to:

- Whether this environmental document adequately describes the potential environmental impacts of the proposed Project;
- Whether the recommended mitigation measures and the design of the Project should be modified and/or adopted as proposed;
- Whether the Project benefits override those environmental impacts that cannot be feasibly avoided or mitigated to a less than significant level;
- Whether there are other mitigation measures that should be applied to the Project besides those identified in the EA; and
- Whether there are any alternatives to the proposed Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that a summary of areas of controversy known to the Lead Agency, including issues raised by the public agencies and the public, should be included. The primary environmental areas of controversy that have been raised to date related to implementation of the Project are: traffic, parking, water supply, and water and wastewater infrastructure.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Through preparation of an Initial Study, it was determined that, except for agricultural resources (farmland), forestry resources, and mineral resources, which do not exist in the City, implementation of the proposed Project could have potentially significant impacts for each of the remaining topical environmental issues identified in the environmental checklist, included in Appendix G to the State CEQA Guidelines. This EA analyzes the following environmental topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Based on the analysis presented in the EA, implementation of the proposed Project would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures:

- Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation, and Cumulative Air Quality Impacts);
- Greenhouse Gas Emissions (GHG Emissions, Plan Consistency);
- Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and
- Population and Housing (Population Growth).

Table ES-1 presents a summary of significant environmental impacts identified in Sections 3.1 through 3.16 of this EA; Mitigation Measures (MMs) that reduce any significant impacts; and the level of significance of each impact after mitigation. Significant irreversible environmental changes and growth-inducing impacts are addressed in Section 5.0, Other CEQA Considerations.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.2 – Air Quality		
Because the Project identify future land uses and do not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, air pollutant emissions for construction activity have not been quantified. Although all feasible mitigation measures must be applied to minimize regional and/or location construction emissions that exceed the South Coast Air Quality Management District (SCAQMD) thresholds, future development projects have the potential to result in significant and unavoidable impacts.	**MM AQ-1:** To assess regional air pollutant emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. Applicants/Developers shall also assess the localized emissions of NOx, CO, PM10, and PM2.5 from the construction of individual projects in proximity to sensitive receptors (e.g., residences, schools, hospitals), associated with the maximum daily construction activities for proposed individual developments. If project-specific mitigation is required for regional and/or localized emissions due to exceedances of any SCAQMD threshold, mitigation measures must include one or more of the following, or include equally effective measures, as follows: • For construction equipment greater than 150 horsepower (>150 HP), the Applicant/Developer shall require the construction contractor to use off-road diesel construction equipment that complies with minimum USEPA/CARB Tier 3 emissions standards during all construction phases. If the project-specific analysis indicates that Tier 3 off-road equipment would not reduce the impact to a less than significant level, off-road diesel equipment that complies with CARB Tier 4 (interim or final) emissions standards shall be used, as appropriate, or the best available emissions technology available at the time of project construction. • The Applicant/Developer shall require the construction contractor to ensure that all construction equipment be tuned and maintained in accordance with the manufacturer's specifications. • The Applicant/Developer shall require the construction contractor to use electricity to power on-site generators and other construction-related equipment and activities, if available and feasible, rather than using diesel-powered internal combustion engines. • The Applicant/Developer shall require the construction contractor to maintain all construction equipment in good operation condition and ensure that all construction equipment is being properly serviced and maintained as per the	Significant and unavoidable

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	manufacturer's specification. Maintenance records shall be available at the construction site for City verification.	
Operational activities associated with the Project (area sources, energy sources, mobile sources, and stationary sources) would result in emissions of CO, VOCs, NOx, SOX, PM10, and PM2.5. Estimated operational emissions from buildout of the Project would exceed the SCAQMD thresholds for VOC and NOx.	Refer to **MM AQ-1.**	Significant and unavoidable
The Project has the potential to conflict with the applicable 2016 Air Quality Management Plan (AQMP) because: 1) air emissions associated with buildout of the Project could create and increase in the severity of air quality violations within the air basin; and 2) buildout of the Project would exceed the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population, housing, and employment projections and consequently air emissions that are included in the 2016 AQMP.	Refer to **MM AQ-1.** There are no feasible mitigation measures to reduce or avoid the impact related to the inconsistency with the 2016 RTP/SCS.	Significant and unavoidable impact
Potential residential units that would be proposed near SR-110. The California Air Resources Board recommends site-specific evaluation prior to siting any sensitive land use near a source of toxic air contaminants (TACs).	**MM AQ-2** An Applicant/Developer for residential land use projects in the City within 500 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 100,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall conduct and submit a health risk assessment (HRA) to the City of South Pasadena Community Development Department. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 µg/m3, PM2.5 concentrations exceed 2.5 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the Applicant/Developer shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0),	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	including appropriate enforcement mechanisms, prior to issuance of a grading permit. Measures to reduce risk may include but are not limited to: • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 12 or better). If the HRA cannot demonstrate that the acceptable risk level can be achieved, then no residential land uses may be developed within 500 feet of the TAC source.	
Section 3.3 – Biological Resources		
Cooper's hawk and western mastiff bat are special status wildlife species with potential to occur in the large trees that are located throughout the City. Removal, trimming, or other disturbance of occupied trees may result in loss or harm to individuals of these species and may negatively affect the local population.	**MM BIO-1** A qualified biologist shall conduct nesting bird surveys in areas with potentially suitable habitat prior to all construction or site preparation activities that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). The survey area shall include all potential bird nesting areas within 200 feet of any disturbance. The survey shall be conducted no more than three days prior to commencement of activities (i.e., grubbing or grading). If active nests of bird species protected by the MBTA and/or the California Fish and Game Code (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer shall be placed a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the biologist and/or applicable regulatory agency permits. Clearing and/or construction within the buffer shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist shall serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. **MM BIO-2** Trimming or removal activities of mature or significant trees will be conducted between August 16 and February 28, outside of the breeding season for native bird and bat species. If activities trimming or removal activities must be conducted during the breeding season, a qualified biologist shall survey the tree to	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	be impacted to assess the presence or absence of any active bird nest or bat maternity roost. If either are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.	
Some properties adjacent to undeveloped or vacant open space areas that have potential to support various special status plant and wildlife species may be developed under the Project.	**MM BIO-3** Within three months of the adoption of the General plan and Downtown Specific Plan Update, the City shall develop a list of fire resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list shall be the basis of any requirements of recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping.	Less than significant
The undeveloped and vacant open space areas supporting stands of native vegetation have potential to support various special status plant and wildlife species. Although future development would be focused away from these areas, there may be direct impacts of projects and indirect impacts of activities occurring adjacent to these areas.	**MM BIO-4** If the disturbance limits of any future development project are within 500 feet of native vegetation located in the Arroyo Seco drainage corridor, the Applicant/Developer shall have a biological assessment conducted. A biological assessment shall also be conducted for all future development on or immediately adjacent to vacant, naturally vegetated parcels. All assessments shall be conducted by a qualified biologist and shall identify all potential sensitive biological resources and provide recommendations for focused surveys (if warranted) and/or avoidance or minimization conditions for project implementation. The assessment shall be reviewed and approved by the City prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all recommendations of the biological assessment such that project-level impacts are not expected to reduce regional populations of plant and wildlife species to below self-sustaining levels.	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
The Project would mostly direct future development to areas of existing development, limiting development of naturally-occurring drainage features. However, cement-lined drainage features that are jurisdictional under the Clean Water Act are dispersed across the City and impacts to those features may occur because of future development.	**MM BIO-5** If project construction activities of any future development project have the potential to impact (e.g., dredge and fill, demolition, dewatering or other discharge) a channel/drainage that conveys water during rainfall events, at a minimum, or as recommended by the qualified biologist conducting an assessment per MM BIO-4 above (if also applicable), shall conduct a jurisdictional delineation to determine if impacted channel/drainage meets definition of State and federal regulations. If the delineation report, prepared by a qualified biologist, indicates potential regulated drainage(s), subsequent consultation with appropriate regulatory agencies (depending on the agency jurisdiction[s]) and acquisition of permits, if required, prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all permit conditions.	Less than significant
Section 3.4 – Cultural and Tribal Cultural Resources		
Grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially encounter previously unknown/unrecorded archaeological resources, including tribal cultural resources.	**MM CUL-1** Prior to the issuance of a grading permit, Applicants for future development projects shall demonstrate to the City Community Development Department that a qualified Archaeologist has been retained by the applicant to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine when monitoring of grading activities is needed. If any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, or as determined by the Archaeologist, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a “Tribal Cultural Resources” pursuant to Section 21074 of the California Public Resources Code, or a “unique archaeological resource” pursuant to Section 21083.2(g) of the California Public Resources Code or a “historical resource” pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a “Tribal Cultural Resource”, “unique archaeological resource” or a “historical resource”, the Archaeologist shall formulate a Mitigation Plan in consultation with the Applicant and the City Community Development Department that satisfies the requirements of the above-listed Code sections. Upon	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	approval of the Mitigation Plan by the City, the Project shall be implemented in compliance with the Plan. If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the City and to the CHRIS at the SCCIC at the California State University, Fullerton.	
Section 3.6 – Geology and Soils		
Grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown paleontological resources.	**MM GEO-1** Should potential paleontological resources be found during ground-disturbing activities for any individual project implemented under the General Plan and DTSP Update & 2021–2029 Housing Element, ground-disturbing activity in the immediate vicinity of the find shall be temporarily halted and a qualified paleontologist will be hired to evaluate the resource. If the potential resource is found not to be significant by the paleontologist, construction activity in the area of the find can resume. If the resource is found to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. A Disposition of the Recovered Paleontological Resources and Mitigation Report shall be prepared by the qualified paleontologist and submitted to the City. Any recovered fossils shall be deposited in an accredited institution or museum, such as the Natural History Museum of Los Angeles County.	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 4.6 – Greenhouse Gas Emissions		
Because the Project identifies future land uses and does not contain specific development proposals, construction-related GHG emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, GHG emissions for construction activity have not been quantified. At the program level, operational GHG emissions must be considered potentially significant and the Project may generate GHG emissions that would have a significant impact on the environment.	**MM GHG-1** To assess GHG emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific GHG emissions analysis that includes mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible. Alternatively, the Applicant/Developer of future development projects shall demonstrate that the proposed Project is consistent with the South Pasadena 2020 Final Climate Action Plan. If consistency is demonstrated, the Project would have a less than significant GHG Emissions impact.	Significant and unavoidable
Section 3.8 – Hazards and Hazardous Materials		
There may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases.	**MM HAZ-1** Prior to the issuance of a grading permit, Applicants for future development projects shall: Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a Phase I Environmental Site Assessment, which shall be submitted to the City Community Development Department for review. If the Phase I ESA concludes there are recognized environmental conditions that indicate the potential for on-site contamination, the Applicant shall direct the performance of a subsurface investigation appropriate in scope to the likely contaminants (e.g., water, soil, soil vapor). The results of the investigation shall be submitted to the City. If contamination is identified on the site, the City, in accordance with appropriate regulatory oversight agencies (e.g., California Toxic Substances Control, Los Angeles Regional Water Quality Control Board), shall determine the need for further investigation and/or remediation of the site. If further investigation or remediation is required, it shall be the responsibility of the Applicant(s) to complete such investigation and/or remediation to the satisfaction of the City and the local oversight agency(ies).	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	Closure reports or other reports that document the successful completion of required remediation activities, if any, shall be submitted to and approved by acceptable to the City (as the Certified Uniform Program Agency) and the local oversight agency(ies) prior to the issuance of a grading permit for the proposed site development. **MM HAZ-2** In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction, construction activities in the immediate vicinity of the contamination shall cease immediately and the City shall be notified. If contamination is encountered, the Applicant for the proposed development shall be responsible for preparing and implementing a Risk Management Plan that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include, but not be limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate oversight agencies shall be notified. If determined necessary by the oversight agency(ies), a Site Health and Safety Plan that meets California Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.	
Section 3.11 – Noise		
The increase in traffic noise levels due to the Project would not be perceptible to the human ear. However, residential uses within the focus areas would experience future exterior noise levels greater than the *normally acceptable* compatibility criteria identified in the existing General Plan Safety and Noise Element.	**MM NOI-1** Prior to the issuance of a building permit for new residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the project will satisfy the 65 dBA CNEL exterior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.	Significant and unavoidable

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
The estimated traffic noise contours indicate some focus areas would experience exterior noise levels, which exceed 70 dBA community noise equivalent level (CNEL) at the building facade. With typical building construction and a windows-closed condition, a minimum 25 dBA CNEL reduction is achievable for residential dwelling units. However, the minimum 25 dBA CNEL with standard building construction may result in interior noise levels greater than 45 dBA CNEL.	**MM NOI-2** Prior to the issuance of a building permit for new residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the interior noise levels in all habitable rooms will satisfy the California Building Code 45 dBA CNEL interior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.	Less than significant
Project-related operational stationary source noise could be generated by the operation of future commercial/retail and office uses. Such noise sources could include HVAC units, loading dock activities, outdoor restaurant dining and music activities, and parking lot vehicle movements.	**MM NOI-3** Prior to the issuance of a building permit and/or certificate of occupancy for non-residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates: • Exterior noise levels at adjacent property lines will satisfy the South Pasadena Municipal Code Section s19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. The site-specific acoustical report shall identify the necessary measures, if any, required to reduce exterior noise levels to below the South Pasadena Municipal Code Section 19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. • Acoustical isolation between units has been included in the project design for residential dwelling units situated above non-residential uses.	Less than significant
Construction activities requiring pile driving are anticipated to exceed the applicable Federal Transit Administration (FTA) noise thresholds at distances of 200 feet or less.	**MM NOI-4** Prior to the issuance of a building permit for new development, the Project Applicant/Developer shall submit a final acoustical report to the City of South Pasadena Community Development Department, or designee, that demonstrates: • Exterior construction noise levels at the closest sensitive receiver locations will satisfy the FTA 80 dBA Leq residential and 85 dBA Leq commercial 8-hour construction noise level standards and the County of Los Angeles 0.01 in/sec root-mean-square velocity (RMS) vibration standard. The site-specific report shall identify the necessary reduction measures, if any, required to reduce	Significant and unavoidable

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation

	exterior noise and vibration levels to below FTA noise and County of Los Angeles vibration thresholds.
	• Measures to reduce construction noise and vibration levels, such as but not limited to those provided below, shall be incorporated in the final acoustical report:
	  ○ Install temporary construction noise barriers at the project site boundary that break the line of sight for occupied sensitive uses for the duration of construction activities. The noise control barrier(s) must provide a solid face from top to bottom and shall:
	  ▪ Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;
	  ▪ Be properly maintained with any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.
	• Install sound dampening mats or blankets to the engine compartments of heavy mobile equipment (e.g., graders, dozers, heavy trucks). The dampening materials must be capable of a 5 dBA minimum noise reduction, must be installed prior to the use of heavy mobile construction equipment, and must remain installed for the duration of the equipment use.
	• Construction activities requiring pile driving within 400 feet, large bulldozers within 100 feet, loaded trucks within 50 feet, or jackhammers within 25 feet of nearby sensitive land uses (e.g. residential, school) shall be minimized, or alternative equipment or methods shall be used, unless the vibration levels are shown to be less than the County of Los Angeles RMS threshold of 0.01 in/sec.
	MM NOI-7 The Project Applicant/Developer for new development shall be responsible for ensuring that following requirements are implemented by the contractor throughout the construction period. Construction contractors shall be	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	required to implement the following measures to reduce noise levels from construction activity: • Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity; • Locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity; and • Limit haul truck deliveries to the same hours specified for construction equipment by Section 19A.13(a) of the South Pasadena Municipal Code. The contractor shall design delivery routes to minimize the exposure of sensitive land uses to delivery truck noise.	
Typical construction activities (i.e., non-pile-driving) associated with future development projects would exceed the County of Los Angeles vibration standard at receiver locations within 25 feet for jackhammers, 50 feet of loaded trucks, and 100 feet of large bulldozers, if used. Pile driving vibration levels would exceed the County construction vibration standard at receiver locations within 400 feet of the pile locations, if impact pile drivers are used during Project construction.	Refer to **MM NOI-4**	Less than significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Vibration levels during construction exceeding standards have the potential to damage fragile historic structures.	**MM NOI-5** The Project Applicant/Developer of any site-specific development within 25 feet of an extremely fragile historic building, as defined by the South Pasadena Historic Resources Survey, shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and, prior to the issuance of a building permit, submit evidence to the City of South Pasadena Community Development Department, or designee, that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, ground borne vibration monitoring of nearby historic structures shall be required.	Less than significant
Some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro L Line railroad tracks and may experience vibration levels than can exceed the residential and non-residential vibration criteria for frequent rail events.	**MM NOI-6** Prior to the issuance of a building permit for new development projects within 50 feet of the Metro L Line, the Project Applicant/Developer shall submit a final vibration study to the City of South Pasadena Community Development Department, or designee, which shall identify and require implementation of reasonable and feasible vibration reduction measures to avoid exceeding the 72 VdB residential and 75 VdB non-residential vibration level standards.	Less than significant
Section 3.12 – Population and Housing		
Buildout of the Project would exceed the housing and population growth projections presented in the Southern California Association of Governments (SCAG) 2020-2045 RTP/SCS. This is solely because the 2020-2045 RTP/SCS projections are inconsistent with the 6th Cycle Regional Housing Needs Assessment.	There are no feasible mitigation measures to reduce or avoid this impact, because any such mitigation would reduce the potential housing stock to be constructed and thereby place the City in violation of State law and susceptible to a variety of penalties, including monetary fines.	Significant and unavoidable

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SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND TYPE OF ENVIRONMENTAL IMPACT REPORT

1.1.1 BACKGROUND

Sections 65300 et. seq. of the *California Government Code* requires that 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 2021–2029 Housing Element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the policies and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its Housing Element on a prescribed schedule (most commonly every eight years).

The comprehensive General Plan and DTSP Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community 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 and DTSP Update serve as long-term policy guides for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential 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.

The City is the subject of a Court Order[1] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. Such action to comply with the Court Order by approving the Housing Element must be completed within the May 31, 2023, deadline timeframe stated within the Court Order. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City is required to prepare an initial study, with substantially the same information required pursuant to Section 15080(c) of Title 14 of the California Code of Regulations (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, the content of which substantially conforms to the required content for a draft environmental impact report set forth in Article 9 (commencing with Section 15140) of Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. All other provisions of CEQA, Division 13 of the Public Resources Code (commencing with Section 21000), do not apply to any action necessary to bring the general plan or relevant elements of the plan into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq.

[1] *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). While the General Plan and DTSP Update remain in preparation, the maximum non-residential development capacity (i.e., 430,000 square feet) and distribution would be the same as contemplated in past drafts of these documents.

1.1.2 REGULATORY FRAMEWORK

This EA has been prepared to evaluate the potential environmental impacts associated with the City of South Pasadena General Plan and DTSP Update & 2021–2029 Housing Element (proposed Project or Project), as required under the California Environmental Quality Act (CEQA) of 1970, as amended, (*California Public Resources Code,* Section 21000 et seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations,* Chapter 3, §§15000 et seq.).

An action that has the potential for causing a physical change in the environment is considered a "project" under Section 21065 of CEQA and Section 15378 of the State CEQA Guidelines. A "project" is required to go through an environmental review process in accordance with CEQA and the State CEQA Guidelines. While the revision/update of a policy document (such as the 2021–2029 Housing Element) does not directly lead to environmental impacts or changes to the environment, future development in the City, would potentially result in environmental impacts. Thus, the proposed Project update is considered a "project" and is subject to the provisions of CEQA. Since the proposed Project has the potential for indirect environmental impacts, this EA has been prepared at a programmatic level.

The purpose of this EA is to inform the City, trustee and responsible agencies, the general public, and other interested parties of the environmental effects anticipated with the approval and implementation of the Project, as well as the environmental effects associated with future development that would be allowed under the Project. This EA (1) discloses information regarding potential significant adverse environmental impacts; (2) identifies measures that would be effective in reducing or avoiding any identified significant adverse impacts; (3) analyzes feasible alternatives to the Project and to future development in the City; and (4) fosters interagency coordination and public review.

This EA analyzes potential impacts from implementation of the Project, but not any individual development project. Therefore, with the absence of more detailed information regarding future development projects as they may be proposed, this EA cannot and does not evaluate detailed, site-specific, and/or project-specific impacts associated with the development of each parcel in the City. The environmental analysis in this EA is broader in scope than found in project-level environmental analysis and seeks to identify the general and cumulative impacts of future development and the evaluated maximum buildout and allows the City to develop area-wide mitigation and other programs to address these impacts.

1.1.3 LEAD AGENCY

Section 15051 of the State CEQA Guidelines identifies the lead agency as the public entity with the greatest responsibility for carrying out or approving the Project as a whole. The City has the primary authority to approve and adopt and subsequently implement the Project. As such, the City is serving as the Lead Agency and is responsible for preparing this EA.

The City determined that implementation of the proposed Project has the potential to impact the following environmental topics:

- Aesthetics (Section 3.1),
- Air Quality (Section 3.2),
- Biological Resources (Section 3.3),
- Cultural and Tribal Cultural Resources (Section 3.4),
- Energy (Section 3.5),
- Geology and Soils (Section 3.6),
- Greenhouse Gas Emissions (Section 3.7),
- Hazards and Hazardous Materials (Section 3.8),
- Hydrology and Water Quality (Section 3.9),
- Land Use and Planning (Section 3.10),
- Noise (Section 3.11),
- Population and Housing (Section 3.12),
- Public Services and Recreation (Section 3.13),
- Transportation (Section 3.14),
- Utilities and Service Systems (Section 3.15), and
- Wildfire (Section 3.16).

The City determined there would be no impacts to the following environmental topics: Agriculture and Forestry Resources and Mineral Resources. There are no agriculture, forestry, or mineral resources existing in the City. These topics are not separately addressed in Section 3.0 of this EA.

The EA analyzes the effects of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress. Refer to Section 2.0, Environmental Setting and Project Description, for further details.

1.2 PROJECT SPONSOR AND CONTACT PERSON

The Project is a City-sponsored endeavor. All inquiries regarding the Project and the EA should be directed to:

Ms. Alison Becker, AICP
Deputy Director –Community Development Department
1414 Mission Street
South Pasadena, California 91030
GeneralPlan@SouthPasadenaCA.gov
Phone: 626.403.7220

A hard copy of the EA, including any technical appendices, is available at each of the following locations during regular business hours:

City of South Pasadena
Community Development Department
1414 Mission Street
South Pasadena, California 91030
626.403.7220

South Pasadena Public Library
1100 Oxley Street
South Pasadena, California 91030
626.403.7340

SECTION 2.0 ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of South Pasadena (City) is located on the western edge of the San Gabriel Valley area of Los Angeles County (County), approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and the City of Los Angeles neighborhoods, including Garvanza and Highland Park, to the west. Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) L Line also provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley. The City's location and regional setting is shown on Exhibit 1, Regional and Local Vicinity.

2.2 PROJECT SETTING AND CHARACTERISTICS

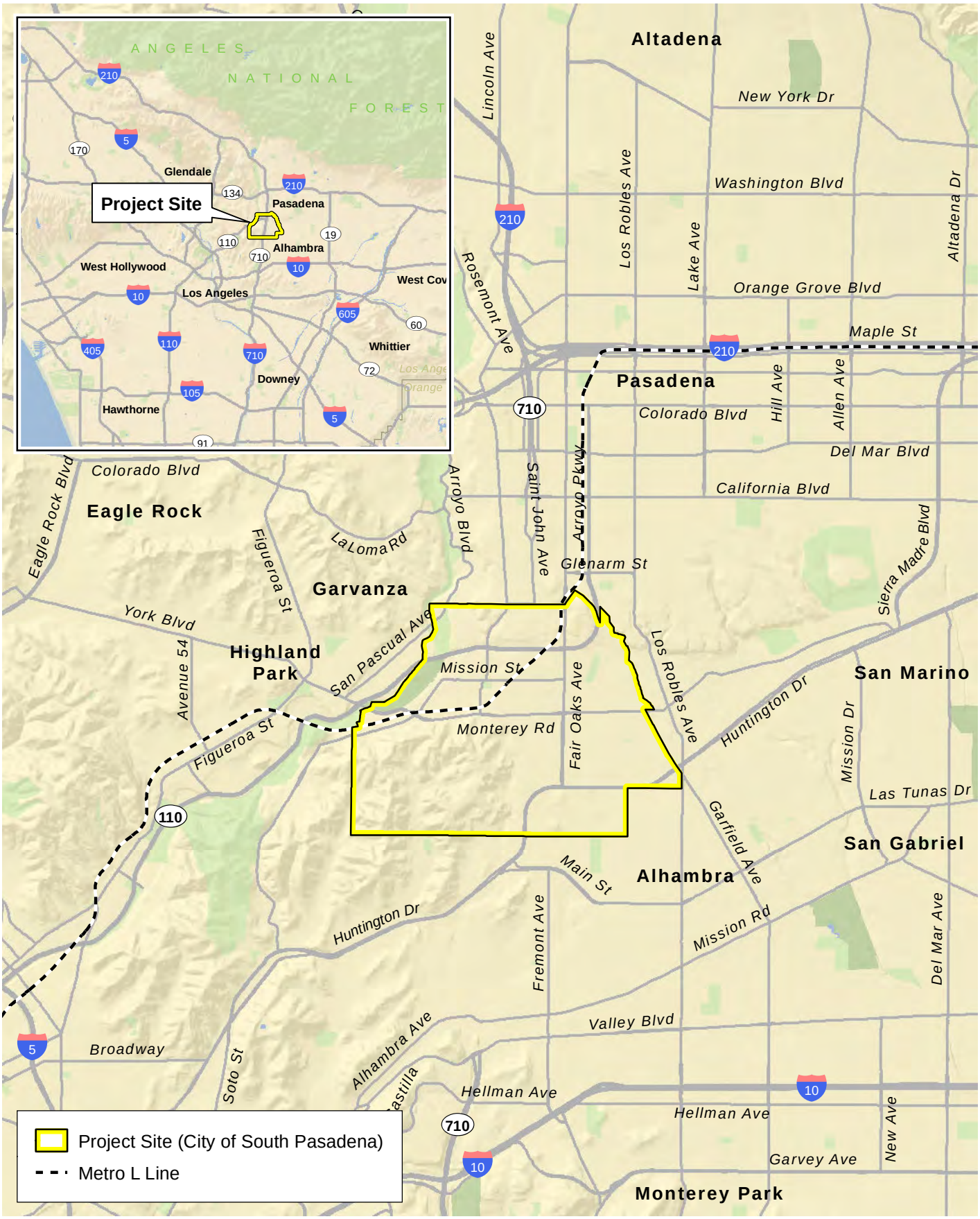
The planning area includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City of South Pasadena limits.

Unless otherwise specified, proposed Project or Project refers to both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and Downtown (DTSP) Update still in progress and applies to all properties within the planning area.

2.2.1 REGIONAL SETTING

The City is located within the County of Los Angeles, which occupies a 4,084-square-mile area in the Southern California region and consists of 88 incorporated cities and scattered unincorporated communities. The total population in the County is estimated at 9,649,779 persons within a housing stock of 3,635,915 units, according to the most recent California Department of Finance demographic data (DOF 2022). Based on employment estimates from the most recent California Employment Development Department data, show the County's labor force at 4,960,500 persons and a 5.2 percent unemployment rate (EDD 2022).

The San Gabriel Valley (Valley) is an approximately 400-square-mile area at the eastern portion of Los Angeles County. It is home to approximately 1.8 million persons living in 31 cities and 5 unincorporated communities (LAEDC 2018). The Valley is bound on the north by the San Gabriel Mountains, on the west by the Repetto Hills, on the south by the Puente Hills, and on the east by the San Jose Hills. The Rio Hondo and San Gabriel Rivers flow from the San Gabriel Mountains on the north through the San Gabriel Valley, toward the Pacific Ocean on the south. Regional access in the Valley is provided by the I-210, I-10 and SR 60 Freeways, which run east-west through the Valley, and by the I-605, SR-57 and SR-710 freeways, which run north-south through the Valley.



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Regional and Local Vicinity

Exhibit 1

South Pasadena 2021-2029 Housing Element

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2.2.2 LOCAL ENVIRONMENTAL SETTING

City Characteristics

The City of South Pasadena's land use pattern is well established and largely built out, with limited available vacant or underutilized land throughout the City. The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road/Pasadena Avenue.

The City's circulation network is largely a grid system of north/south and east/west roads. The exception to the grid system is the southwest quadrant of the City that has curvilinear streets developed to fit the topography of the area. From a regional transportation perspective, the City lies at the crossroads of several regional transportation facilities. Regional facilities that traverse the City include SR-110 (Pasadena Freeway), Huntington Drive (regional arterial), Monterey Road (regional arterial), and Fair Oaks Avenue (regional arterial) (South Pasadena 2001). The northwesterly extension of the County of Los Angeles Metropolitan Transportation Authority (Metro) Light Rail Line, the L Line, passes through the City of South Pasadena, with a station at the intersection of Mission Street and Meridian Avenue. Both fixed-route bus transit service and paratransit service operate within the City. Demand-responsive transit service is provided by South Pasadena Senior Ride. This Dial-A-Ride service provides transportation for local trips and medical appointments primarily to senior citizens and is also available to persons with a disability.

The City's estimated 11,156 dwelling units (DUs), that house the City's population of 25,580 (DOF 2022), are comprised of nearly equal number of single-family and multi-family units. The City's existing characteristics and land use are discussed further below and in Section 3.10, Land Use and Planning, of this Environmental Assessment (EA).

Air Quality and Climate

The City is located in the South Coast Air Basin (SoCAB) within the jurisdiction of South Coast Air Quality Management District (SCAQMD). The distinctive climate of the Project area and the SoCAB is determined by its terrain and geographical location. The SoCAB in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Regional air quality is defined by whether the area has attained State and federal air quality standards, as determined by air quality data from various monitoring stations. All of the County is designated as a nonattainment area for O_3, PM10, and PM2.5; portions of the County, not including the City, are designated nonattainment for NO_2 and lead.

Air quality in the City may be characterized by readings at the Pasadena–South Wilson Avenue monitoring station, located approximately 1.8 miles to the northeast. Pollutants measured at this monitoring station include O_3, $PM_{2.5}$, and NO_2. The 2019 (most recent data available) readings show that the federal 1-hour standard for O_3 was exceeded a total of 11 days, while the State 8-hour standard was exceeded 29 days; and the 1-hour standard was exceeded a total of 12 days. There are no federal or State standards for NO_2 or PM2.5. Air quality is discussed in Section 3.2 of this EA.

Biological Resources

Vegetation within the City consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. The City of South Pasadena contains a high percentage of tree canopy cover, and many areas with a native tree canopy due to the presence of a large number of Coast live oak (*Quercus agrifolia)* trees, which are protected by City ordinance Chapter 34 of the South Pasadena Municipal Code. Other vegetated or otherwise open areas include parks distributed throughout the City, along the Arroyo Seco, and undeveloped land along steep hillsides in residential areas of the southwestern portion of the City. The Arroyo Seco generally runs from north to south along the northwestern boundary of the City. This portion of the stream is concrete lined with no native substrate. The vegetation along the Arroyo Seco route is mostly comprised of ornamental trees, which are located above the manufactured, reinforced banks of the stream.

Most of the drainage features within the City do not contain water year-round, with the occasional exception of the Arroyo Seco. Jurisdictional resources (i.e., drainages under the jurisdiction of a resources agency, such as California Department of Fish and Wildlife) within the City of South Pasadena are mostly confined to concrete-lined drainages with no associated vegetation. The concrete-lined drainages across the City are numerous and disperse. Biological resources are discussed in Section 3.3 of this EA.

Cultural Resources

The City experienced substantial development activity in the 1880s, upon the arrival of railroad lines to the area, and was incorporated in 1888. Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel, and the Monterey Hills area near the southwest corner of the City, which were both then targeted for development. Since the City is an established community that was largely built out by World War II, the number of properties dating to the post-war era and more contemporary periods of history is generally less than other municipalities in Southern California, and as such there is an abundance of historic properties. Based on the survey of historic resources compiled in 2017, there are 61 designated individual resources, 10 designated historic districts containing a collective total of 236 contributing properties, and 2,257 additional properties that have been identified as potentially eligible historical resources (HRG 2017). There are no known archaeological resources in the City. Cultural resources and tribal cultural resources are discussed in Section 3.4 of this EA.

Geology and Topography

The City is located along the west-central boundary of the San Gabriel Valley, which is bound on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills. Erosion of the San Gabriel Mountains has formed fan-shaped alluvial wedges that fill the San Gabriel Valley. Accordingly, the majority of the City is underlain by Pleistocene- and Holocene-age alluvial deposits comprised primarily of sand, silt, and gravel. The City is relatively flat with a gentle slope to the south, with steeper hillside areas primarily in the southwest portion of the City. Elevations within the City range from approximately 530 feet above mean sea level (amsl) to 910 feet amsl.

The east-west trending Raymond Fault passes through the northern portion of the City, as well as the cities of San Marino, Pasadena, Arcadia, and Los Angeles. This fault is considered active, and the California Geological Survey (CGS) has established an Alquist-Priolo Earthquake Fault Zone on the entire segment. Other faults that may affect the City include the Upper Elysian Park

blind thrust, the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults, and other regional active faults. Fault rupture, strong ground shaking, liquefaction, and landslide are potential geotechnical hazards present in the City. Geology is discussed in Section 3.6 of this EA.

The setting of all other environmental topics is discussed under the header "Existing Conditions" in Sections 3.1 through 3.16 of this EA.

2.2.3 RELEVANT PLANNING CONSIDERATIONS

Regional Plans

South Pasadena is within the boundaries of several regional plans and policies. These include the Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); and the Regional Water Quality Control Board's (RWQCB) *Water Quality Control Plan for the Los Angeles Region*. These plans are discussed within each applicable topical issue in Section 3.0 of this EA.

Local Plans

A number of plans and policies adopted by South Pasadena regulate development in the City. The most applicable of these are discussed below.

South Pasadena General Plan

The State's Planning, Zoning, and Development Laws (Section 65000-66037 of the *Government Code*) call for the preparation, review, and revision of a General Plan for each county and city. Section 65300 of the *Government Code* states:

> Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. Chartered cities shall adopt general plans which contain the mandatory elements specified in Section 65302.

For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence (SOI). The City of South Pasadena SOI is coterminous with its corporate boundaries, as its jurisdictional boundaries align with and abut adjoining cities.

The *City of South Pasadena General Plan* (General Plan) was last updated in 1998, with the Housing Element last updated in 2014 to address the City's future housing needs for the 2014 to 2021 planning period. The General Plan sections each contains an overarching goal with supporting policies and actions as well as programs for the development and conservation of land within the City and regulates all development within the City's incorporated area. The City's existing General Plan is described further below in Section 2.3.1.

Mission Street Specific Plan

Under State law (Section 65450 et. seq. of the Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. The Mission Street Specific Plan (MSSP) was adopted in 1996 (South Pasadena 1996). The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include:

- Provide a central parking facility to serve the Blue Line (now L Line) station;
- Establish a Business Improvement District (BID) to help finance parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area;
- Increase the water pressure so that on-site pumps are not required for second and third story uses.

The existing MSSP is described further below.

South Pasadena Municipal Code

The *South Pasadena Municipal Code* (SPMC) regulates the operations and activities in the City. Chapter 36 “Zoning” of the SPMC, or the Zoning Code, contains development standards and design regulations for new development in the City to assist in the implementation of the City’s General Plan and to protect and promote the City’s public health, safety, comfort, convenience, prosperity, and general welfare. Applicable portions of the SPMC are discussed under the header “Relevant Programs and Regulations” in Sections 3.1 through 3.16 of this EA.

Design Guidelines

In 2009, the City adopted the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines* (South Pasadena 2009a, 2009b). The City’s design guidelines increase the awareness of building owners and designers to the architectural, historic, and site planning features that are traditional to the City and emphasize the importance of preserving and maintaining those features when making alterations or designing new construction.

Cultural Heritage Ordinance

The City’s Cultural Heritage Ordinance has been utilized since 1992 as a tool for implementing the City’s preservation efforts. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the ordinance in place at that time and replaced it with a new ordinance (SPMC Section 2.61) that helps property and business owners gain a clear understanding of the Cultural Heritage Commission’s (CHC) purpose and processes, assists the CHC with its decision making, and strengthens the City's legal framework to assure continued protection of its historic character and scale. The purpose of the Cultural Heritage Ordinance “is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, signs, objects, features, sites, places, landscapes, and areas representing the City’s architectural, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage” (South Pasadena 2017).

Green Action Plan

On November 20, 2019, the City Council approved the *South Pasadena Green Action Plan* (Green Plan) (South Pasadena 2019). To further strengthen the City's commitment to sustainability, City staff, with the help of South Pasadena residents and businesses, and the Natural Resources and Environmental Commission (NREC), gathered and prioritized five sustainability initiatives that comprise the Green Plan. The short-term initiatives in this plan are intended as steppingstones for the Climate Action Plan (CAP). The CAP is a longer-term sustainability plan that will aim to reduce the City's greenhouse gas (GHG) emissions.

Climate Action Plan

The City adopted its first CAP on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The City's Public Works Department has the primary responsibility to implement the CAP. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's 2030 target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. The CAP also establishes a framework for implementation and monitoring of reduction activities, and further promotes adaptation and preparedness actions. The plan is intended to be a qualified GHG Reduction Plan and meets the requirements of Section 15183.5(b) of the State CEQA Guidelines (South Pasadena 2020a). The CAP states, "In the City of South Pasadena, the most pronounced effects of climate change will be increased average temperature, more days of extreme heat, and elevated drought risk, all of which may lead to increased wildfires."

Neighborhood Traffic Management Program

The City of South Pasadena Neighborhood Traffic Management Program (NTMP) is a citywide initiative to empower citizens to address traffic calming concerns. The need for the program stemmed from the City's desire for an equitable, systematic, and easily accessible approach to handling neighborhood traffic calming requests. The NTMP provides a framework for the selection, application, and implementation of traffic calming improvement measures, contingent upon available funding, in the City of South Pasadena. Annually, the City Council designates funding for the NTMP to allow data collection, traffic studies, and implementation of traffic calming features.

2.3 PROJECT BACKGROUND

2.3.1 EXISTING GENERAL PLAN AND HOUSING ELEMENT

The City is a general-law city[1], incorporated in 1888, with its first General Plan adopted in 1963 (except the first Housing Element, which was adopted in 1984). The *South Pasadena General Plan* has been amended over the years; the current General Plan was adopted by the City in 1998, and the *2014–2021 Housing Element* was adopted in 2014, in accordance with State laws (South Pasadena 1998, 2014). State law requires the Housing Element to be updated every

[1] A city that is organized under, and bound by, the general laws of the State (California Government Code), regardless of whether the subject concerns a municipal affair.

eight years to align with SCAG's adoption of its RTP/SCS. The currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);
- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing housing issues);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2, Existing Land Use Policy Map, depicts the current land use plan for the City. The expected level of development represented by the adopted General Plan is also quantified in the existing Land Use Element, reflecting the building intensity and population density standards for various areas set forth at the time of adoption.

The 5th Cycle (2012) RHNA indicated that the City had a need for 63 DUs to be provided, distributed across the four income levels established by the California Department of Housing and Community Development (HCD), and shown in Table 2-1.

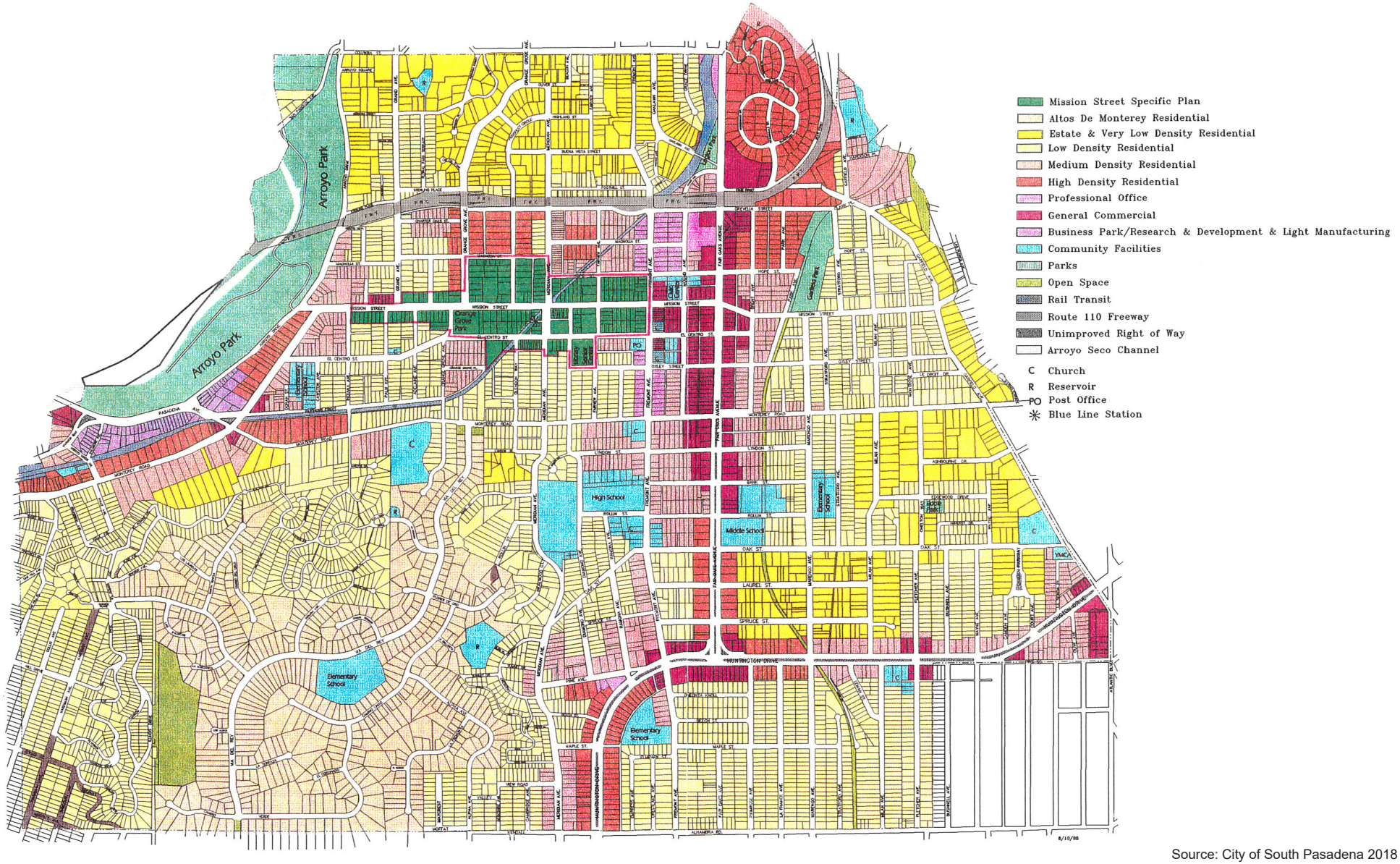
TABLE 2-1
2014–2021 HOUSING ELEMENT RHNA ALLOCATION

Income Group	Number of New Units	Percentage
Very Low Income	17*	27%
Low Income	10	16%
Moderate Income	11	17%
Above Moderate Income	25	40%
Total	**63**	**100%**

*Includes 9 units (approximately 50%) of Extremely Low Income group units
Source: South Pasadena 2014.

Environmental Baseline

Pursuant to CEQA and the State CEQA Guidelines, the assessment of environmental impacts from buildout of the City pursuant to the Project is compared to land uses under existing conditions at the time the Recirculated Notice of Preparation (RNOP) was distributed (i.e., April 2021), unless otherwise noted, rather than the increase in development proposed in the 1998 General Plan. The latter is referred to as "plan to plan" analysis and is not permitted under CEQA and the State CEQA Guidelines. However, for informational purposes only, Table 2-2, 1998 General Plan (2010 Forecast) and Existing Land Uses, presents the 1998 General Plan's anticipated 2010 development capacity and existing land uses in terms of total residential and non-residential acres within the City.



Source: City of South Pasadena 2018

Existing Land Use Policy Map

Exhibit 2

South Pasadena 2021-2029 Housing Element

N W E S

0 500 1000 2000 Feet

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TABLE 2-2
1998 GENERAL PLAN (2010 FORECAST) AND EXISTING LAND USES

Land Use Category	1998 General Plan (Acres)	Existing (2018) (Acres)[a]
Residential		
Altos de Monterey	236.3	234.2
Estate/Very Low Density	214.8	215.6
Low Density	624.9	645.9
Medium Density	168.0	173.0
Medium-High Density	0.0	0.0
High Density	129.7	117.8
Subtotal	*1,373.7*	*1,386.3*
Commercial		
Neighborhood	0.0	0.0
General	83.4	64.8
Subtotal	*83.4*	*64.8*
Office		
Professional	17.0	16.9
Other	0.0	0.0
Subtotal	*17.0*	*16.9*
Other Land Uses		
Mission Street Specific Plan	40	40
Mixed Use	0.0	0.0
Light Industrial	13.0	12.2
Community Facilities	80.4	85.0
Other[b]	6513.5	667.0
Total All Land Uses	***2,221***	***2,272***

Note: Some totals may not add due to rounding.

[a] City-wide acreage updated from the numbers provided in the 1998 General Plan based on the results of a Geographic Information System (GIS) assessment of City lands. Over time, GIS technology becomes more sophisticated and allows a higher degree of accuracy.

[b] Includes open space, parks, utility, and right-of-way.

Source: Inloes 2018.

2.3.2 EXISTING MISSION STREET SPECIFIC PLAN

The Mission Street Specific Plan (MSSP) was adopted in 1996 and is now expanded to include a segment of Fair Oaks Avenue and the name changed to the Downtown Specific Plan (DTSP). As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations are equivalent to Zoning Code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area. The City-wide growth projections shown in Table 2-2 above include the MSSP area.

2.3.3 PURPOSE AND USE OF THE PROJECT

This EA evaluates the environmental impacts of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress. City of South Pasadena decision-makers will use the Project documents, in combination with the SPMC and other City plans and programs, for direction when making land use and public service decisions.

The environmental analysis in this EA is based on the content of the Fifth Draft Housing Element (May 5, 2023 version) demonstrating capacity for up to 2,775 DUs as well as buildout of 430,000 sf of non-residential development with a baseline of April 2021 (distribution of the RNOP of the EA), unless otherwise noted (some analyses consider 2022 and 2023 conditions, dependent on public data availability).

2.3.4 PLANNING PROCESS

The Project represents the culmination of a comprehensive community outreach and involvement process that began in January 2017 to re-envision land use and community space in South Pasadena and continued through Fall 2019. After a pause in preparation of the General Plan and DTSP Update documents, a series of three 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.

The Housing Element process included several virtual public workshops, multiple presentations to Planning Commission and City Council on the housing element, feedback from HCD reviewers, and related revisions to strategies and development of new program proposals from July 2020 through May 2023. In March 2021, the City participated in HCD's informal review process, presenting the State agency with a conceptual strategy for the housing element to comply with the RHNA. A Planning Commission study session was held in June 2021, which included discussion of HCD feedback about this approach. Input from these workshops and presentations was combined with the requirements of State housing law to develop the Project.

The City's civic engagement process continued during preparation of public drafts of the Project, through online distribution and subsequent Planning Commission hearings, public meetings, and formal public comment periods where comments were received and considered in subsequent revisions to the draft planning documents.

2.4 PROPOSED PROJECT DESCRIPTION

This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). While the General Plan and DTSP Update remain in preparation, the maximum non-residential development capacity (i.e., 430,000 square feet) and distribution would be the same as contemplated in past drafts of these documents.

As noted above, pursuant to State law, the City of South Pasadena has an approved General Plan. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element. However, a General Plan needs to be updated if it is to reflect community values and priorities as they change over time. General Plan updates typically range between every 20 to 30 years. In 2017, the comprehensive update to the General Plan and DTSP

Update was initiated to refresh City policies, with a commitment to protecting the characteristics that make South Pasadena a desirable place to live while addressing the continued growth pressures in the San Gabriel Valley, the demand for more diverse mobility and housing choices, and evolving regional and environmental issues.

The General Plan and DTSP Update each include eight chapters, and each of the chapters features an overarching goal, with policies and actions based on the goal. The eight chapters, their guiding principles, and their contents (i.e., goals, policies, actions), reflect the public visioning process while balancing State-mandated legislative requirements (including the 2021–2029 Housing Element), the City's budget, and feasibility of future activities. The General Plan and DTSP Update in progress would serve as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City through the year 2040. As part of this effort, the City's existing General Plan has been reorganized and reformatted to reflect both current State regulations and the community's vision for the City.

The DTSP Update has an accompanying hybrid form-based code (herein referred to as DTSP Code or Code) to guide the DTSP's implementation, providing all requirements for development and land use activity with the DTSP's boundaries. Form-based code is an alternative to conventional zoning regulations and are purposeful place-based regulations with an increased focus on the design of the public realm–the public space defined by the exterior of buildings and the surrounding streets and open space.

Please refer to the entirety of the proposed General Plan and DTSP Update, available online at: General Plan & Downtown Specific Plan Update | South Pasadena, CA (southpasadenaca.gov), for further details.

The 2021–2029 Housing Element is being analyzed in this EA. The components of the 2021–2029 Housing Element are prescribed by State law and include a housing needs assessment, constraints analysis, review of past performance, and a housing plan. The housing plan includes goals, policies, and programs to support and encourage housing construction to achieve the RHNA allocation. The housing plan includes measurable targets that are monitored on an annual basis through HCD's Annual Progress Reporting system.

Please refer to the entirety of the proposed 2021–2029 Housing Element, available online at: Housing Element Update 2021-2029 | South Pasadena, CA (southpasadenaca.gov), for further details.

2.4.1 2021–2029 HOUSING ELEMENT

South Pasadena remains a highly desirable place to live and includes a community with a strong interest to preserve its historic neighborhoods. The continuing high cost of housing in South Pasadena amplifies the need for providing affordable housing at all income levels. The provision of adequate affordable housing continues to be a high priority for South Pasadena.

The 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. State requirements are intended to boost housing production and provide more affordable housing units and justification for such new additions. Accordingly, the proposed Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation, Affirmatively Furthering Fair Housing (AFFH) concerns. It also introduces new policies and programs consistent with State law based on a comprehensive and inclusive strategy to

encourage housing production and retention to serve the entire community. Considering both community feedback and State and regional requirements, the central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to five focus areas including the Downtown area (i.e., DTSP), Ostrich Farm District, and three Neighborhood Centers on Huntington Drive, while providing an enhanced variety of housing opportunities. In summary, the Project encourages the majority of new housing to be provided in walkable mixed-use environments in the downtown and along major transit corridors and arterial roadways, while accommodating increased housing opportunities within existing residential neighborhoods. The 2021-2029 Housing Element provides a framework for meeting the housing goals of the City and serves as an informational document for current and prospective residents of the community, businesses, and developers.

The Housing Element is required to include an assessment of housing needs of all economic segments of the community and an implementation program formulated to meet those needs. Local governments should consider economic, environmental, and fiscal factors as well as community goals in preparing a Housing Element and should cooperate with other local governments and the State in addressing regional housing needs. Housing Elements are also required to address the local government's "fair share of regional housing need" as reflected in the RHNA and as determined by the local Metropolitan Planning Organization (MPO). The MPO for the Southern California region, including South Pasadena, is the Southern California Association of Governments (SCAG). For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units, almost 33 times more than the last cycle. A local government's identified RHNA includes both the existing and projected housing needs of the locality. Additionally, HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. Table 2-3 summarizes the 6th Cycle RHNA allocation for the City of South Pasadena that the Project accommodates.

TABLE 2-3
2021–2029 HOUSING ELEMENT RHNA ALLOCATION

Income Group	Number of New Units Allocated to City[a]	Percentage	RHNA Surplus[b]
Extremely Low and Very Low Income	757	37%	177
Low Income	398	19%	
Moderate Income	334	16%	144
Above Moderate Income	578	28%	316
Total	**2,067**	**100%**	**708**
Total Dwelling Units	***2,775***		
Sources: [a] SCAG 2021; [b] South Pasadena 2023.			

As part of the proposed 2021-2029 Housing Element, the City must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the City's proposed Housing Element Update includes the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics.
- An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.

- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element.
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

Because of the unusually high RHNA allocation plus required surplus, built-out condition of the City, small size of the City, rapidly evolving legislative landscape, and controversy regarding the Suitable Sites Inventory, it has been arduous for the City to prepare a Housing Element that HCD finds in compliance with State law and implement required zoning modifications within the statutory time limits. Therefore, this EA has been prepared based on the *Fifth Draft 2021–2029 Housing Element* dated March 2023.

The City is the subject of a Court Order[2] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. Such action to comply with the Court Order by approving the Housing Element must be completed within the May 31, 2023, deadline timeframe stated within the Court Order. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City is required to prepare an initial study, with substantially the same information required pursuant to Section 15080(c) of Title 14 of the California Code of Regulations (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, the content of which substantially conforms to the required content for a draft environmental impact report set forth in Article 9 (commencing with Section 15140) of Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. All other provisions of CEQA, Division 13 of the Public Resources Code (commencing with Section 21000), do not apply to any action necessary to bring the general plan or relevant elements of the plan into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq.

Height Limits

In April 2022, during preparation of the 2021-2029 Housing Element and this EA, a lawsuit was filed alleging that the City was in violation of State Planning Law because the City had not adopted a 6th Cycle Housing Element by the State's statutory deadline of October 15, 2021. The lawsuit was titled *Californians for Homeownership V. City of South Pasadena, LASC Care Nos. 22STCP01388.* It is noted that by October 15, 2021 none of the 197 jurisdictions within SCAG had adopted a housing element that HCD found to be in compliance with State law. As of August 2022, a total of 25 SCAG jurisdictions have adopted a State-law-compliant housing element (HCD 2022). This reflects the difficulties most municipalities are facing with preparing a 6th cycle housing element that accommodates the high RHNA allocations throughout the SCAG region.

In August 2022, as discussed above, a Court Order was entered on the lawsuit requiring certain actions by the City within certain timeframes to bring the Housing Element into compliance with

[2] *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

Section 65754 of the Government Code. One of these required actions is to seek, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre). If an initiative is not adopted by that deadline, the Court Order requires the City to complete a mid-cycle revision of the 2021-2029 Housing Element to reduce all sites with a base density in excess of 50 DU/acre to an assumed maximum density of 50/DU/acre within nine months.

This requirement to place a ballot initiative stems from the lawsuit questioning whether a density of 50 DU/acre, as proposed for some areas in the Housing Element, could be constructed under a height limit of 45 feet. As noted above, the City has a high RHNA allocation. To meet this allocation, higher density residential or mixed-use with residential is needed, particularly near transit (including both light rail and bus). What height(s) new development could be, under this scenario, if the ballot initiative passes, is not resolved at this time. It could be dependent on what height would be necessary to achieve density proposed on a given site (e.g., a one-acre site of 70 DU/acre would be taller than a one-acre site of 60 DU/acre, assuming all other variables are the same). Precisely what the content of this ballot measure will be is not settled, apart from being applicable only where a density of more than 50 DU/acre is proposed and will not be settled until City Council considers the issue in the future. The measure will have two variables: (1) height above 45 feet and (2) the footprint of where that piercing of the 45-foot limit will be allowed.

Once the language of the measure is finalized, environmental review would be presented to the City Council for formal action to place such measure on the ballot. After environmental review is complete, it could be presented for vote via a special election or at the November 2024 general election. The deadline for council action to place the matter on the November 20204 election is August 9, 2024. Nevertheless, because the 45-foot height limit was imposed by a 1983 voter initiative, a program to develop and place a measure on the ballot before December 31, 2024, is included as a program in the 2021-2029 Housing Element. Accordingly, the potential for projects with buildings greater than 45 feet in height is addressed as a potential impact in this EA.

Additionally, the State's Density Bonus Law provides an avenue for development projects meeting specific requirements related to affordable housing to supersede a local height limit to meet the maximum density limits implemented by the Project. The State's Density Bonus Law and related housing legislation is discussed further in Section 3.10, Land Use and Planning, and Section 3.12, Population and Housing, of this EA.

2.4.2 DEFINITION OF PLANNING COMPONENTS AND TERMS

Goals and policies as used in the Project are defined below:

- **Goals** are long-range, broad, and comprehensive targets. Goals are not necessarily measurable or achievable; rather, they describe a desired end-state condition for South Pasadena.
- **Policies** describe a commitment to a particular course of action in place or to be put in place that will help achieve an associated goal. Policies are specific statements that guide decision-making.

The 2021–2029 Housing Element includes the following six overarching goals:

- **Goal 1.0–Conserve the Existing Housing Stock and Maintain Standards of Livability**: Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.
- **Goal 2.0–Encourage and Assist in the Provision of Affordable Housing**: Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.
- **Goal 3.0–Provide Opportunities to Increase Housing Production**: Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.
- **Goal 4.0–Compliance with State Housing Laws**: Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.
- **Goal 5.0–Promote Fair Housing While Acknowledging the Consequences of Past Discriminatory Housing Practices**: Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.
- **Goal 6.0–Expand and strengthen tenant protections for South Pasadena's existing renters**: South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Each of these goals has supporting policies that guide decision-making. Several programs are identified to support the goals and policies, with an eight-year objective, funding source(s), responsible agency(ies), and timeframe presented for each program. The goals and policies from the 2021–2029 Housing Element applicable to each environmental topic are provided for the topical analysis in Sections 3.1 through 3.16 of this EA.

2.4.3 PROJECT DEVELOPMENT PATTERN AND CAPACITY

Through the public visioning process that began in 2017, the community has identified the character, intensity, and scale of infill development desired for vacant and underutilized tracts in selected areas. Specifically, the community envisions new development to be respectful of the place and its historic resources; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. Therefore, based on this community input, a market study prepared as part of the General Plan and DTSP Update

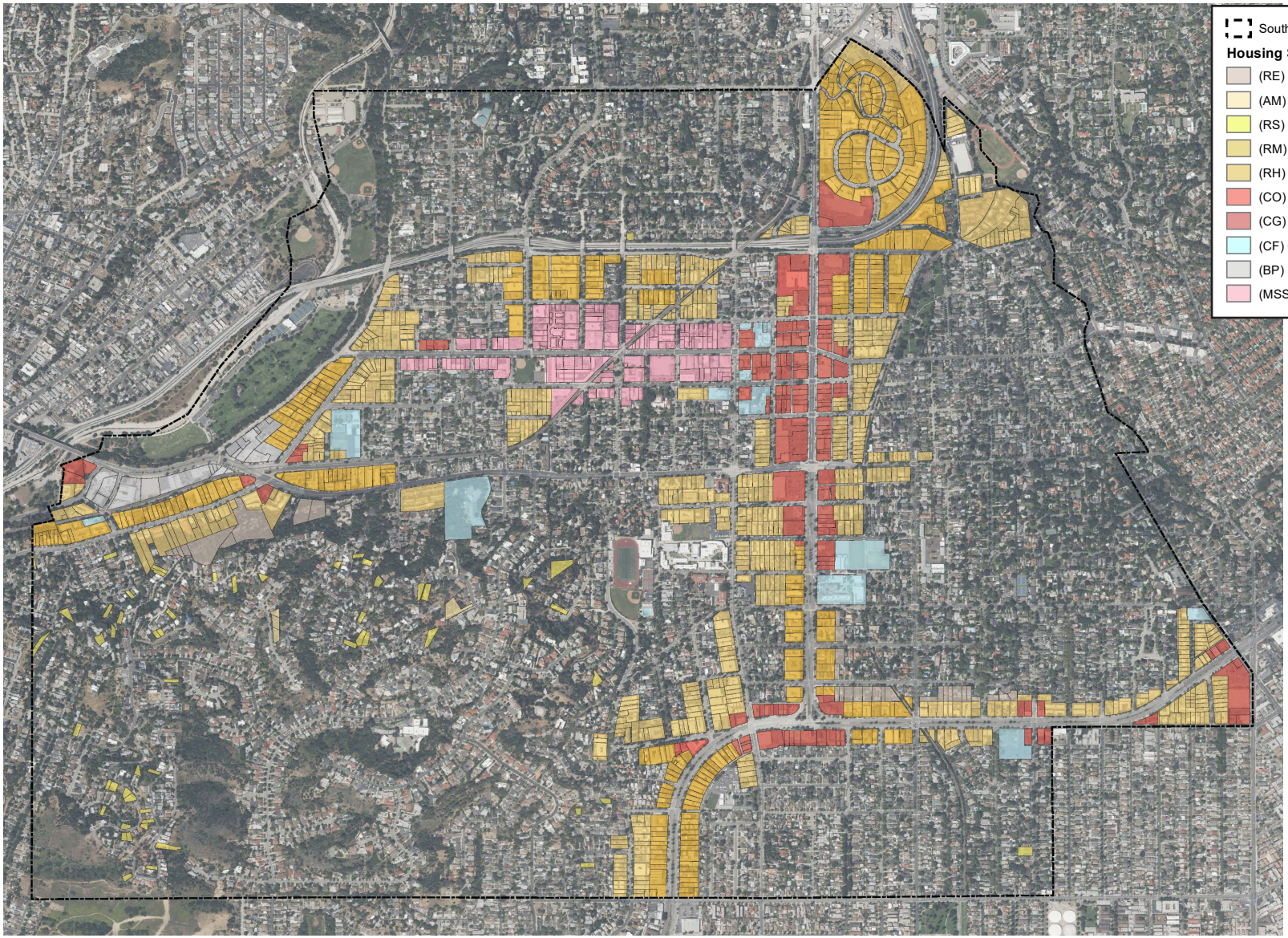
process, State requirements, and HCD feedback, the central strategy of the 2021-2029 Housing Element continues to be preservation of existing housing stock and directing calibrated growth.

Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the housing element update relies on includes inclusionary housing requirements that the City Council adopted in 2020; encouraging Accessory Dwelling Units (ADUs) with simpler, objective requirements; and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units would follow the adoption of a revised General Plan Land Use Element together with the DTSP, an update and expansion of the 1996 Mission Street Specific Plan.

The Project encourages most of the new housing to be provided in walkable mixed-use environments in the Downtown and along major transit corridors and arterial roadways but also accommodates increased housing opportunities within existing residential neighborhoods. In addition, the Project introduces an affordable housing overlay district to allow projects with affordable housing to be distributed across the City on appropriate sites. The Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation with the existing pattern of the land uses outside of the focus areas. Exhibit 2, Existing Land Use Policy Map, and Exhibit 3, Citywide Sites Inventory Map, depict the proposed distribution and extent of the categories of public and private uses of land.

The Project does not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements at this time. Individual projects would continue to be subject to the City's development review process and the CEQA process, as applicable. Therefore, this EA considers the environmental impacts associated with the reasonably foreseeable direct and indirect physical changes in the environment that would occur due to land use and infrastructure development, and from the associated population and employment growth in the City, due to buildout as projected. It is noted that buildout of a city under an adopted general plan is not tied to a specific timeline. For the purposes of this EA, development of the proposed growth identified in the General Plan is assumed to occur by the horizon year of 2040.

The Project analyzed herein would accommodate a maximum of 2,775 DUs (i.e., the 6th Cycle RHNA allocation and HCD-required surplus) and 430,000 sf of non-residential uses, comprised of retail and office development, in addition to existing land uses. It is noted, there would be a separate environmental review process when the next housing element update is prepared. Table 2-4, Summary of Existing and Projected Demographics, presents the existing and buildout residential, non-residential, and population figures.



Source: City of South Pasadena 2023

Citywide Sites Inventory Map

Exhibit 3

South Pasadena 2021-2029 Housing Element

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TABLE 2-4
SUMMARY OF EXISTING AND PROJECTED DEMOGRAPHICS

	Size (acres)	Residential (DU)	Non-Residential (sf)		Population
			Commercial	Office	
Existing Citywide Totals	2,272	11,156[a]	866,000[b]	390,000[b]	25,580[a]
Proposed Citywide Totals	2,272	13,931	996,000	690,000	32,462
Difference	–	**2,775 (25%)**	**130,000 (15%)**	**300,000 (77%)**	**6,882 (27%)**

DU: dwelling units; sf: square feet; N/A: not available

Note: The estimated population increase in this table assumes full occupancy of 2,775 DUs at the average household size of 2.48 based on 2022 California Department of Finance demographic data.

Sources:
[a] DOF 2022
[b] HR&A 2017

The buildout of up to 2,775 DUs and 430,000 sf of retail/office is estimated to generate up to 1,978 additional jobs[3] and 6,882 more residents[4] in the City through 2040 compared to existing conditions. The maximum of 6,882 residents equates with full occupancy of 2,775 units; however, the City had a vacancy rate of 5.5 percent in both 2017 and 2018, and the County's vacancy rate was 6.3 percent in 2017 and 6.4 percent in 2018 (DOF 2021). Vacancy rates of 5.5 percent for the City and 6.4 for the County are applied in this analysis as they are the most recent prior to the COVID-19 pandemic and are expected to be more reflective of typical conditions over the longer-term planning periods of the Project. Based on this vacancy rate (5.5 percent), the maximum 2,775 DUs in the 2021–2029 Housing Element would result in a resident population increase of approximately 6,503 persons occupying 2,622 DUs (i.e., households). Also, this approach likely overestimates the total population increase even with a reasonable vacancy rate because some of the new dwelling units would replace dwelling units removed as part of a redevelopment project. Additionally, the Project would be expected to develop mainly multi-family residential at varying densities, and the average household size for these types of units is less than the average for the City. This is because this figure represents a housing stock almost evenly split between single-family and multi-family. This conservative approach to potential growth would ensure all potential environmental impacts were captured in this EA.

The maximum 2,775 DUs would represent an approximate 25 percent increase–or about 1.25 percent per year–in the City's households. In terms of population, the increase would be about 6,503 persons or an 25 percent increase–or about 1.25 percent per year. If all potential homes were occupied, the City's population would increase to approximately 32,462 persons (6,882 additional persons). However, no municipality experiences full occupancy of all housing units.

The maximum 430,000 sf of non-residential uses represent an approximate 34.2 percent increase–or about 1.7 percent per year–in the City's commercial and office space and would generate an approximate 14.4 percent increase–or about 0.7 percent per year–in the number of jobs within the City. The annual increase rates are based on 20 years and assume maximum buildout of all development capacity in the City by 2040.

3 Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).
4 Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

The majority of existing land uses in the City are not expected to change, and new development is anticipated to occur largely as infill redevelopment or development in the strategic growth areas.

2.5 APPROACH TO CUMULATIVE IMPACT ANALYSIS

Section 15130 of the State CEQA Guidelines states that cumulative impacts shall be discussed in an EIR where identified environmental impacts are potentially "cumulatively considerable", which is defined in Section 15065(a)(3) as "significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects". Section 15130(b)(1) states that the cumulative impact discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone and should focus on the cumulative impact to which the identified other projects contribute.

Section 15130(b)(1) of the State CEQA Guidelines describes two allowable methods to determine the scope of projects considered in the cumulative impact analysis, as follows:

> (1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
>
> (2) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analysis contained in this EA uses the second method, which focuses on regional projections, assuming future growth and development reflects these projections. The proposed Project establishes goals and policies to guide long-term (year 2040) development within the City. Similarly, SCAG's growth projections (population, housing, and employment), prepared as part of the RTP/SCS, provide estimates of long-term development within the region where the City is located. The RTP/SCS also provides goals and direction for regional development patterns. The current RTP/SCS was adopted by SCAG in 2020 (2020–2045 RTP/SCS).

The cumulative impact analysis in this EA considers the environmental impacts of the development associated with the proposed Project in combination with the potential environmental impacts of regional growth in the San Gabriel Valley through the year 2040. In compliance with Section 15130(b)(1)(B) of the State CEQA Guidelines, this approach provides for the consideration of the combined effect of similar impacts (e.g., growth-focused, long-term, and program-level for the San Gabriel Valley) based on regional projections within the same time frame as buildout of the City (through the year 2040) that could be cumulatively considerable, when evaluated with the impacts of the proposed Project. Each environmental topic in Section 3.0 of this EA provides a "cumulative impacts" subsection that includes the topic-specific cumulative impact analysis.

As noted above, the geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley. The six-county SCAG region is too large of a geographic area to assess the Project's cumulative impacts effectively or reasonably from the .

Section 15130(b)(3) of the State CEQA Guidelines states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used". Unless otherwise indicated in each topical

analysis in Section 3.0, the geographic scope used in the cumulative analysis includes the San Gabriel Valley, as discussed above. However, there are environmental topics whose relevant geographic scope for purposes of cumulative impact analysis may be larger or smaller than this area, and may be defined by local, regional, or State agency jurisdiction or by environmental factors. One example is the geographic scope of cumulative air quality impacts, defined by the SCAQMD to encompass the SoCAB. SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. This air basin is larger than the San Gabriel Valley and is noted in the analysis of cumulative air quality impacts. Conversely, the geographic scope of cumulative aesthetic impacts is limited to anticipated growth within immediately adjacent jurisdictions that share viewsheds or lines of sight with the City.

Finally, this EA considers regional programs directed at mitigating cumulative impacts of development, such as those instituted for urban runoff related to water quality impacts. Where there is a topic-specific geographic scope or an applicable regional program, these are discussed within the cumulative impact analysis of each environmental topic addressed.

2.6 PROJECT OBJECTIVES

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of the proposed project's objectives. The proposed Project seeks to achieve the following key 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. 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.
4. Develop clear and precise standards that offer predictable outcomes and processes.
5. 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.
6. 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.

2.7 INTENDED USES OF THE EA

The primary discretionary action by the City supported by this EA is adoption of the 2021–2029 Housing Element, as a policy document. It is important to note that the General Plan and DTSP Update (when adopted) and this proposed 2021–2029 Housing Element do not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements at this time. New development would continue to be subject to the City's development review process. The proposed 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 (i.e., SCAG) requirements.

2.8 REFERENCES

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SECTION 3.0 ENVIRONMENTAL ANALYSIS

This section analyzes the potential environmental impacts associated with approval and implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). While the revision/update of a policy document does not directly lead to environmental impacts or changes to the environment, future development in the City would lead to physical changes that could, in turn, potentially result in environmental impacts. Therefore, the environmental analyses within this section of the Environmental Assessment (EA) focus on the potential environmental impacts of future development and redevelopment that would be allowed with implementation of the Project.

Section 15126.4(a) of the State CEQA Guidelines requires lead agencies to consider feasible mitigation measures (MMs) to avoid or substantially reduce a project's significant environmental impacts. MMs are required when a potentially significant environmental effect has been identified that cannot be reduced to a level considered less than significant through the implementation of the policies and actions, as well as any applicable regulations required separate from the CEQA process.

If determined necessary in the future during consideration of proposed programs or developments, the City may substitute, at its discretion, any mitigation measure (and timing thereof) that has (1) the same or superior result as the original mitigation measure and (2) the same or superior effect on the environment (Section 21080[f] of CEQA). The City of South Pasadena, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed "environmental equivalent/timing" and, if determined necessary, may refer said determination to the Planning Commission and/or City Council.

In Sections 3.1 through 3.16, this EA addresses the Project's potential impacts on the following environmental topics:

- Aesthetics (Section 3.1),
- Air Quality (Section 3.2),
- Biological Resources (Section 3.3),
- Cultural and Tribal Cultural Resources (Section 3.4),
- Energy (Section 3.5),
- Geology and Soils (Section 3.6),
- Greenhouse Gas Emissions (Section 3.7),
- Hazards and Hazardous Materials (Section 3.8),
- Hydrology and Water Quality (Section 3.9),
- Land Use and Planning (Section 3.10),
- Noise (Section 3.11),
- Population and Housing (Section 3.12),
- Public Services and Recreation (Section 3.13),
- Transportation (Section 3.14),

- Utilities and Service Systems (Section 3.15), and
- Wildfire (Section 3.16).

As discussed in Section 1.0, Introduction, the City determined there would be no impacts to the following environmental topics: Agriculture and Forestry Resources and Mineral Resources. There are no agriculture, forestry, or mineral resources in the City.

3.0.1 ENVIRONMENTAL ANALYSIS FORMAT

To facilitate the analysis of each topic presented in Section 3.0, a standard format was developed. This format is presented below, with a brief discussion of the information included within each heading.

Methodology

This section describes the methods that were used in the process of analyzing impacts related to the implementation of the proposed Project in relation to that environmental topic.

Existing Conditions

This section describes the existing environmental conditions related to each topic analyzed. This section provides the baseline conditions with which environmental changes associated with the Project have been compared and analyzed.

Relevant Programs and Regulations

This section includes a summary of the existing federal, State, regional, County, and local laws, regulations, and ordinances that directly relate to the environmental topic being analyzed. These are summarized to provide background information and to establish the current regulatory setting under which future development would occur. Some of these are regulations that serve to reduce or avoid a potential impact that would otherwise occur; these will be noted in the analysis. It is noted that the regulatory setting changes over time, and different or additional regulations may be in place when individual future projects are developed in the City.

Thresholds of Significance

Section 15126.2 of the State CEQA Guidelines requires an Environmental Impact Report to "identify and focus on the significant environmental effects of the proposed project". "Effects" and "impacts" mean the same under CEQA and are used interchangeably in this EA. A "significant effect" or "significant impact" on the environment is "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (Section 15382 of the State CEQA Guidelines).

Proposed Housing Element Goals and Policies

While the 2021–2029 Housing Element allows future developments that could adversely affect the environment, it also seeks to preserve and protect the existing environment and resources in the City. Similarly, the non-residential development capacity envisioned in the General Plan and DTSP Update would allow future development that could adversely affect the environment. However, this EA is prepared solely in support of the 2021–2029 Housing Element and thus the applicable Housing Element goals and policies are identified in this section.

Environmental Impacts

The analysis of environmental impacts presented in this EA identifies direct and indirect, as well as short-term and long-term environmental impacts of the Project. While adoption of the 2021–2029 Housing Element itself would not result in direct or immediate changes to the environment, implementation of future development that would be allowed under the Project could result in environmental changes and potential impacts. These impacts are indirectly attributable to the Project and thus, are analyzed in this EA as "impacts" to the extent feasible, without the availability of specific development concepts at this time.

The thresholds of significance (discussed above) provide the basis for distinguishing between impacts that are determined to be significant (i.e., impact exceeds the threshold of significance) and those that are considered less than significant. The analysis is structured to address each threshold, while considering any residual impact after implementing the proposed Project policies and actions, as well as any required regulatory compliance.

Where the impact analysis demonstrates that a potential environmental effect is too speculative or subjective for evaluation, or that the effect is beneficial, that conclusion is noted. Where the impact analysis demonstrates that a potential environmental effect could have a substantial or potentially substantial and adverse impact on existing physical conditions within the City, that conclusion is noted and followed by a discussion of how the proposed mitigation would address the potential impact.

Cumulative Impacts

While the extent of environmental changes that would occur with individual projects that are proposed, planned, or under construction in the City may not be significant, the sum of the impacts of these cumulative projects and the proposed Project may be cumulatively considerable, as defined in Section 15065(c) of the State CEQA Guidelines. Section 2.5, Approach to Cumulative Impact Analysis, of this EA contains a discussion of the overall methodology to determine the scope of projects and/or regional growth considered in the cumulative impact analysis. A discussion of the anticipated environmental changes resulting from the cumulative projects, from implementation of anticipated development under the proposed Project on a cumulative level, are addressed in each topical analysis presented in Section 3.0 of this EA, which contains a more detailed discussion of the cumulative impact analysis methodology for each environmental topic.

Mitigation Measures

The MMs under each topic, as determined necessary, have been developed to reduce potentially significant adverse impacts after relevant policies and any applicable regulatory requirements are implemented. Consistent with Section 15126.4 of the State CEQA Guidelines, MMs must be feasible and fully enforceable by the lead agency.

Level of Significance After Mitigation

This section identifies the level of significance of the identified impacts after the implementation of the recommended MMs, where applicable. Unavoidable significant adverse impacts are those effects that either cannot be mitigated or that remain significant even with a reduction in severity of the impact after mitigation.

References

Documents and other sources that have been used in the preparation of the analyses of each topical issue are identified in this section.

3.1 AESTHETICS

3.1.1 METHODOLOGY

This section describes the existing aesthetic character of the City of South Pasadena (City) and views of and from the City. It also analyzes the potential aesthetic impacts that may occur with future development projects under the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

Aesthetics generally refer to the identification of visual resources, the quality of one's view, and/or the overall visual perception of the environment. The issue of light and glare is related to both the creation of daytime glare due to the reflection of the sun (such as on glass surfaces) and/or an increase in nighttime ambient lighting levels (such as from building lights, street lights, and vehicle headlights). The information presented in this section is based on field reconnaissance, review of City design and development requirements and processes, and the proposed Project.

3.1.2 EXISTING CONDITIONS

Visual Characteristics

The City is relatively small, occupying approximately 3.4 square miles, and has a population of approximately 26,580 persons (DOF 2022). Although situated about 5 miles from downtown Los Angeles, the City maintains a small-town atmosphere. Known as the City of Trees, the South Pasadena area is known for its residential neighborhoods and unique small businesses, and top-quality schools. More than 90 acres of parks and playgrounds are located throughout the City and more than 21,000 trees line its streets. The City has been designated a "Tree City USA" by the Arbor Day Foundation for 23 years, or every consecutive year since 1999 (Arbor Day Foundation 2023), and the abundance and well-maintained condition of mature trees throughout the City that is necessary to maintain this designation is a major contributing factor to the visual character experienced by residents and visitors.

Visual character is descriptive and not evaluative, which means that the development traits described for a given area are neither good or bad in and of themselves. The City contains several distinct areas that have common distinguishing characteristics that make them identifiable as places unique from other areas of a community. For instance, the area surrounding the Mission Street and Meridian Avenue intersection is unique in its development pattern, architectural styles, and presence of nightlife compared to the residential areas. In turn, the residential area in the southeast portion of the City is contrasted from the residential area in the Altos de Monterey area in the southwest of the City, both in topography and development style. A community's visual character can be defined by the historical development pattern, architectural styles, and design elements that have been implemented in the built environment over time. A discussion of the City's development history, and relationship to architectural styles, follows below.

The population of Southern California grew steadily in the early decades of the 20th century, and many newcomers were attracted to the suburban setting and bucolic atmosphere afforded by the City of South Pasadena. By the 1920s, the City's subdivisions and neighborhoods were almost entirely developed with detached, single-family dwellings predominantly designed in the Craftsman and Period Revival styles that were popular at the time. New businesses and institutions also arose to meet the day-to-day needs of the growing city, with most commercial development concentrated along Mission Street and Fair Oaks Avenue. The City also made notable improvements to its infrastructure and increased the scope of its civic resources during

this period. Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel and the Monterey Hills area near the southwest corner of the City. Both were targeted for development after World War II, at which time Southern California experienced a sudden and substantial population increase and a corresponding shortage of housing. The Raymond Hotel site was rezoned to accommodate mid-rise multi-family residential development, and the Monterey Hills were subdivided and developed predominantly with single-family houses.

The City's existing development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses primarily, though not solely, located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. In 1983, voters approved a ballet measure to adopt a Citywide 45-feet building height limit. As noted above, the City is known for its neighborhoods, and residential uses cover approximately 63.4 percent (1,386.3 acres) of the City's land area. Section 3.4 presents a detailed discussion of the numerous existing designated and eligible historic resources, which also contribute to the City's visual character. Overall, the City hosts a wide range of architectural styles and eras.

The City is relatively flat with a gentle slope to the south, with steeper hillside areas primarily in the southwest portion of the City (the Altos de Monterey area). Elevations within the City range from approximately 530 feet above mean sea level (msl) to 910 feet above msl. Most of the City occupies the valley floor emanating from erosion of the San Gabriel Foothills located approximately five miles to the north. As a result, public views of the San Gabriel Mountains, as well as the Repetto Hills to the west-southwest, are available and a prominent component of the background viewshed throughout much of the City. Within the City, views are generally short range, due to the density of urban development, other structures, and mature trees/vegetation.

Light and Glare

Artificial lighting is widely utilized in most urban and suburban areas to provide visibility for both traffic and security. The City has nighttime illumination typical of any urban area, which is attributable to urban land use developments (e.g., commercial, recreational, residential), street and highway lighting, and parking lot lighting throughout the City. Transient lighting from vehicular headlights also contributes to nighttime illumination in urban areas. Generally, the most prominent sources of existing nighttime light and glare are vehicular traffic and commercial land uses along the primary thoroughfares (e.g., Fair Oaks Avenue, Mission Street, Fremont Avenue, Huntington Drive, and Pasadena Avenue), traffic along SR-110 where it traverses the City, and parks with nighttime lighting and/or sports fields (i.e., Orange Grove Park). Daytime glare can also be caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces.

3.1.3 RELEVANT PROGRAMS AND REGULATIONS

State

Scenic Highways Program

The California Department of Transportation's (Caltrans) Scenic Highways Program (as contained in Sections 260 to 263 of the *California Streets and Highways Code,*) recognizes the visual resources and natural scenic beauty of California highways and adjacent corridors. These highways are designated based on the natural landscape seen by travelers, the scenic quality of

the landscape, and the extent to which development is kept away from the corridor to preclude intrusion on the traveler's enjoyment of the view.

The program includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a scenic highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval and adopts a Corridor Protection Program that (1) regulates land use and density of development along the highway; (2) controls outdoor advertising; (3) provides guidelines for site planning; (4) controls earth-moving and landscaping activities; and (5) provides design guidelines for the appearance of structures and equipment. Caltrans approval leads to official designation and inclusion in the list of the State's Scenic Highways. The nearest officially designated scenic highway under the Scenic Highways program is Interstate (I) 210, starting at the I-210/SR-134 split and headed northwest, located approximately 1.8 miles due north of the City of South Pasadena. Additionally, the segment of SR-110 extending from East Colorado Boulevard in the City of Pasadena and continuing southwest to its intersection with US-101, which traverses through the northern portion of the City of South Pasadena, is also identified as the Arroyo Seco Historic Parkway under the National Scenic Byway program (Caltrans 2023).

Housing Legislation

The California legislature has passed numerous bills related to housing in the last few years. The following discussion briefly describes housing laws that may affect the scale, height, and/or density of housing developed pursuant to the City's planning documents and policies. It is anticipated that further legislation will be passed in coming years considering the continuing housing shortage in the State.

Density Bonus Laws

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of Assembly Bill (AB) 1763, projects qualifying for a density bonus were entitled to one to three "incentives" and "concessions" to help make the development of affordable and senior housing more economically feasible, such as reduced setback and minimum square footage requirements as requested by the developer. AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If a project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet. The Density Bonus Law was further amended by Senate Bill (SB) 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses, or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of eight to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

City

2009 Design Guidelines

In 2009, the City adopted the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines* (South Pasadena 2009a, 2009b). The City's design guidelines increase the awareness of building owners and designers to the architectural, historic, and site planning features that are traditional to the City and emphasize the importance of preserving and maintaining those features when making alterations or designing new construction. Design guidelines assist in determining acceptable alterations, repairs, and additions to existing buildings and appropriate design criteria for new buildings. However, they are not meant to dictate specific design solutions or stifle creative design. The guidelines do not substitute for case-specific analysis and thoughtful input from designers, project sponsors, City employees and volunteer design review participants. These guidelines were intended to update the City's then-existing design guidelines to provide clear and explicit guidance to all review agencies and City departments to facilitate reasonable, efficient, and fair review of proposed projects.

The design guidelines are applicable to most construction within the City. They apply to any project that requires a building permit and/or change of use approval, but, for residential projects, do not apply to signage approvals. The guidelines supplement, but do not override, those found in the City's Zoning Code and serve as the basis for decisions by the Design Review Boards and by City staff. In addition, the guidelines for historic residences assist the Cultural Heritage Commission in making the required findings under the City's Cultural Heritage Ordinance and the California Environmental Quality Act (CEQA).

Municipal Code

Zoning Code

Chapter 36, Zoning Code, of the South Pasadena Municipal Code (SPMC) implements the policies of the South Pasadena General Plan by classifying and regulating the uses of land and structures within the City in a manner consistent with the General Plan.

Section 36.300 et. seq. of the SPMC describes general property development and use standards, includes several sections that affect the visual quality of a property. These include standards for height (Section 36.300.040), screening (Section 36.300.070), either between land uses or of unsightly features on a property; placement of mechanical equipment (Section 36.300.080); outdoor lighting requirements (Section 36.300.090); and detailed performance standards to promote land use compatibility (Section 36.300.110).

Section 36.320, Signs, regulates the placement, type, size, and number of signs allowed within the City, and requires the proper maintenance of signs. Section 36.330 provides landscape standards for proposed development to improve the livability and attractiveness of South Pasadena, and to protect public health, safety, and welfare. Section 36.340, Hillside Protection, provide development standards intended to preserve the City's scenic resources by encouraging retention of natural topographic features and vegetation.

Section 36.350.200 et. seq. of the SPMC presents the City's Accessory Dwelling Unit (ADU) Ordinance, which permits ADU's in compliance with State law and became effective June 4, 2021. The ADU Ordinance defines the standards that apply for properties containing single-family or multi-family housing within all zoning districts that allow residential uses and are in addition to all

other applicable standards found in the Zoning Code. The ADU Ordinance describes design and development standards for all ADUs and additional standards for units in front on a primary dwelling, on an historic property, and in the City-designated high risk fire area (refer to Section 3.16, Wildfire, of this EA for more information).

Section 36.375 et. seq. of the SPMC presents the City's current Inclusionary Housing Ordinance, which became effective June 4, 2021. Inclusionary housing promotes the inclusion of housing units that are affordable for moderate- and low-income households in new residential projects by providing incentives and cost offsets to developers. The City's Inclusionary Housing Ordinance applies to all residential development of three or more dwelling units, including residential portions of mixed-use developments. Section 36.375.080 of the SPMC describes design incentives as an alternative and more streamlined State density bonus review process specific to South Pasadena. The design incentives are intended to encourage architectural designs that are well-conceived, thoughtfully detailed, consistent with the character of the City, and compatible with the zoning district in which they are located.

Tree Protection

The Public Works Department is responsible for streets, public buildings, water, sewer systems, street lighting and park maintenance. The City Council amended the SPMC to further regulate removal of trees of 12 inches in diameter or larger on any property within the City. In addition, regulations have been added to protect mature heritage, native, and oak (*Quercus* sp.) trees (4 inches in diameter at breast height or larger) on any property, public or private, within the City. Chapter 34, Trees and Shrubs, of the SPMC defines the regulations for the protection (during development activity), trimming, and/or replacement of protected trees in the City.

3.1.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse aesthetic impact if it would:

Threshold 3.1a: Have a substantial adverse effect on a scenic vista;

Threshold 3.1b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;

Threshold 3.1c: Substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and/or

Threshold 3.1d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

3.1.6 ENVIRONMENTAL IMPACTS

Threshold 3.1a: Would the Project have a substantial adverse effect on a scenic vista?

The City's existing General Plan defines that the "hillsides and ridgelines…provide a scenic backdrop for the entire community". Therefore, protection of the City's hillside areas is a matter of ensuring that development minimizes severe alteration of landform, flood problems, soil erosion, and landslide damage. It is also a matter of protecting the viewshed, both from and to these hillsides, and retaining as much natural vegetation as possible. The City's zoning code includes hillside development standards to guide development and protect this natural resource. The existing General Plan's Open Space and Resource Conservation Element includes goals and policies to preserve scenic resources, which focus on the hillsides and native vegetation (South Pasadena 1998).

The City as a whole, as well as the focus areas, is a developed, urban landscape consisting of a mix of residential, commercial, mixed use, civic/public, open space, and some light industrial land uses. The proposed land use plan assumes that the existing, established development pattern would stay essentially the same, with an incremental intensification of existing and new land uses, where future development and redevelopment would be designed and scaled to complement surrounding uses. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development. Most future development is anticipated to occur in focus areas, in particular in the Ostrich Farm area and along Mission Street, Fair Oaks Avenue, and Huntington Drive.

The sites identified for housing would experience additional development due to future population growth, natural demographic changes, and revitalization needs. Development standards, such as building separation, height, and setback requirements for individual structures would lead to the development of projects that are sensitive to distant and near hillside and mountain. The maximum height proposed under the General Plan Update would remain at the limit of 45 feet for most of the City. However, as discussed in Section 2.0, Environmental Setting and Project Description, the City is subject to a Court Order that requires certain actions by the City within certain timeframes to bring the Housing Element into compliance with Section 65754 of the Government Code. One of these required actions is to seek, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre). If an initiative is not adopted by that deadline, the Court Order requires the City to complete a mid-cycle revision of the 2021-2029 Housing Element to reduce all sites with a base density in excess of 50 DU/acre to an assumed maximum density of 50/DU/acre within nine months.

Additionally, the AB 1763 (amendment to the State's Density Bonus Law) supersedes the City's voter approved height limit and enables affordable housing projects to exceed any locally established height limit by up to 3 stories or 33 feet under specific circumstances, as discussed above. Other housing legislation that relates to the Density Bonus Law does not expressly pertain to height limits. However, increased density pursuant to any density bonus has the potential to result in a development project that exceeds the City's current height limit.

However, the San Gabriel Mountains rise to heights over 6,000 feet above msl and would remain partially visible from most areas of the City and from many north-south public streets, despite any intensification of land uses and/or increased height from future development pursuant to the proposed Project. Although there would be an intensification of uses in some areas of the City and some would consider the proposed land use plan to be transformational, it is expected that

the existing level of visual obstruction by intervening development in the City would be overall similar to the existing condition. The number of projects that would elect to meet the density bonus requirements that would enable a height increase are not expected to be numerous enough to result in a substantial increase in obstructions. Overall public views of the hillsides and mountains would not appreciably change with implementation of the Project. Implementation of the Project would result in less than significant impacts related to scenic vistas, and no mitigation is required.

Threshold 3.1b: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As noted above, the nearest officially designated scenic highway under the State's Scenic Highways program is a segment of the I-210 located approximately 1.8 miles due north. Due to distance and intervening development, the City is not visible from this segment of I-210. Additionally, the segment of SR-110 that traverses the northern portion of the City is designated as the Arroyo Seco Historic Parkway under the National Scenic Byway program. Views of the City from the SR-110 may change where the northernmost portion of the Downtown Specific Plan area abuts the freeway, as intensification of land uses could be developed under the proposed land use plan. This segment of the SR-110 is situated approximately 15 feet below the City's land area. Because of these factors, properties in the City generally have limited visibility from the freeway. However, the Fair Oaks Avenue off-ramp rises to meet the elevation of the Fair Oaks Avenue and Grevalia Street intersection. Motorists leaving SR-110 at this location would briefly have greater visibility of any new, potentially more intensive, land uses developed pursuant to the DTSP, situated immediately south of this intersection. However, the existing land uses on the south side of Grevalia Street would not be considered scenic resources, as the buildings are not historic resources, nor do they exemplify a unique form of architecture. Further, as discussed below under Threshold 3.1c, the overriding intent of the Project is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. Development that would have the potential to occur along an area abutting a segment of the SR-110 that traverses the City, would be designed to be visually pleasing in terms of massing, fenestration, color palette, landscape and hardscape, and other myriad standards.

The most notable scenic resource in the City visible from SR-110 is the City of South Pasadena "rock sign" situated on a grassy slope in Arroyo Park next to Arroyo Drive, near the western portal of the SR-110 into the City. This sign and the surrounding area would not be altered because of the Project. As such, the potential change in land uses from the limited portion of SR-110 that would be visible to passing motorists within the northern portion of the City, would not be considered substantially damaging to a scenic resource. Therefore, implementation of the Project would not adversely affect any scenic resources within a State scenic highway. Implementation of the Project would result in less than significant impacts related to scenic highways, and no mitigation is required.

Threshold 3.1c: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Future development pursuant to the Project would change the visual quality of individual development sites, as structures and site improvements are introduced on vacant lands and as older developments are replaced with newer structures and site improvements that would likely

have a different architectural style and may be more intense than the pre-existing land use. Increased urbanization could be expected as properties are developed and/or redeveloped with higher intensity/density uses.

The determination of whether the changes in the visual quality of a site would degrade an area or its surroundings, and thus be significant and adverse, is dependent upon the perspective of the viewer. Preferences for one architectural style over another and issues related to the preservation of existing structures versus renovation/redevelopment render a determination of impacts to visual character a relatively subjective endeavor. However, except in cases where local design discretion is superseded by State law, all proposed development would be subject to the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines*, and related design review process. The design guidelines are applicable to most construction within the City. It is noted the guidelines supplement, but do not override, those found in the City's Zoning Code and serve as the basis for decisions by the Design Review Board and by City staff members. The Design Review Board is a five-member body that is advisory to the Planning Commission and represents the professions of architecture, landscape architecture, interior design, graphics, or related fields. Design Review Board meetings are held monthly. For proposed future developments that may affect a designated or potential historic resource, that project would additionally be subject to the City's Cultural Heritage Ordinance and related Cultural Heritage Commission review process. The Cultural Heritage Commission is a five-member body that is advisory to the City Council on all issues relating to the identification, retention, and preservation of landmarks and historic districts. Cultural Heritage Commission meetings are held monthly. Also, the City administers a strict tree protection policy that contributes to the maintenance of the City's Tree City USA designation and the associated aesthetic and environmental benefits of a substantial tree canopy.

It is acknowledged that the future change in visual character in the City may be considered adverse to some segments of the community. As discussed under Threshold 3.1a, although there would be an intensification of uses in some areas of the City that some would consider to be transformational, the overriding intent of the Project is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. To balance preservation of existing uses and land use transitions where development or redevelopment occur, the potential housing and mixed-use or non-residential sites are primarily situated in those portions of the City where change is desired to both diversify land uses and take advantage of proximity to the Metro L Line Station. Also, the potential housing sites are identified where needed to meet the State's mandate. Implementation of the Project would result in less than significant impacts related to visual character, and no mitigation is required.

Threshold 3.1d: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Future development under the proposed Project would be accompanied by new sources of light and glare. These would include exterior security lighting, lighted signs, parking lot lighting, and pedestrian pathway lighting. These new light sources would result in an increase in the lighting levels of individual sites and the surrounding areas, which have the potential to impact adjacent land uses, especially residences. Newly constructed buildings could create new sources of daytime glare in the form of glazed building surfaces, use of mirrors and glass as exterior building surfaces, and other reflective materials that would reflect the sun or light sources and create glare.

The proposed development areas are situated along major arterial corridors with both vehicular and light rail and are already subject to the most intensive light and glare from existing land uses. Proposed land uses that would be particularly light- or glare-intensive (such as a sports arena)

are not planned in the City. Additionally, most of the land area in the City is currently developed. Any new light sources would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting, which require a lighting plan to be submitted to the City and defines that lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Because both the geographic extent and physical scale of proposed land use changes with the Project are limited, a substantial increase in nighttime light and glare over the existing ambient levels is not anticipated. There would be less than significant impacts related to substantial new sources of light and glare, and no mitigation is required.

3.1.7 CUMULATIVE IMPACTS

The geographic context for cumulative visual impacts is generally the City of South Pasadena and those areas within adjacent jurisdictions that share viewsheds or lines of sight with the City, such as continuous arterial corridors between one city and another and hillside areas of the San Gabriel Mountains to the north.

Regarding scenic vistas, as discussed above, views of the San Gabriel Mountains in the distance to the north or nearby views of the Repetto Hills would not appreciably change with implementation of the Project. As discussed above, the geographic scope and scale of proposed land use changes associated with implementation of the Project, while it would be noticeable would maintain the overall land use pattern of the City. Based on this, development under the Project would not incrementally contribute to a significant cumulative impact related to substantial adverse effects on a scenic vista.

As discussed above, views of the City from SR-110, a designated National Byway, may change with future development under the proposed Project. However, because implementation of the Project would not adversely affect visual character and quality of the City, views from the SR-110 would not be considered substantially damaged. As such, development under the Project would not incrementally contribute to a significant cumulative impact related to scenic highways.

As discussed, the proposed development areas are all located along arterial corridors, such as Fair Oaks Avenue, Mission Street, Huntington Drive, and Pasadena Avenue, which connect adjacent jurisdictions. As such, land use development within the focus areas would lead to visual changes within the City that would occur in the context of future growth and development in adjacent jurisdictions that would be visible by residents and visitors traveling between South Pasadena and surrounding cities. Additionally, the 2021–2029 Housing Element identifies potential housing sites outside of the focus areas. As discussed above, due to State-mandated housing-related programs and regulations, including the RHNA allocation and density bonus laws, and court-ordered ballot initiative to repeal the height limit on selected sites, the future change in visual character in the City may be considered adverse to some segments of the community. As discussed previously, redevelopment would be subject to City design guidelines and associated review processes. These requirements are intended to ensure a high level of design quality. The overriding intent of the Project is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. As such, development under the Project would not incrementally contribute to a significant cumulative impact related to visual quality.

Existing sources of light and glare in the City and surrounding area generate ambient lighting levels that define nighttime light intensities. With limited development in the City and the surrounding area, coupled with the City's policies to limit light spillover, development under the Project would not incrementally contribute to a significant cumulative impact to light and glare in the region.

3.1.8 MITIGATION MEASURES

No significant adverse impacts related to aesthetics have been identified with implementation of the Project. Therefore, no mitigation is required.

3.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

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3.2 AIR QUALITY

3.2.1 METHODOLOGY

This section addresses air quality emissions associated with the implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

3.2.2 EXISTING CONDITIONS

South Coast Air Basin

The City of South Pasadena (City) is located in the South Coast Air Basin (SoCAB) within the jurisdiction of SCAQMD. The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards, discussed further below. The SoCAB is a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SoCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The larger SCAQMD boundary includes 10,743 square miles.

Regional Climate

The regional climate has a substantial influence on air quality in the SoCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality.

The annual average temperatures throughout the SoCAB vary from the low to middle 60s (degrees Fahrenheit). Due to a decreased marine influence, the eastern portion of the SoCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SoCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SoCAB have recorded maximum temperatures above 100°F.

Although the climate of the SoCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SoCAB climate. Humidity restricts visibility in the SoCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SoCAB is 71 percent along the coast and 59 percent inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90 percent of the SoCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SoCAB with frequency being higher near the coast.

Due to its generally clear weather, about three-quarters of available sunshine is received in the SoCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are

approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14.5 hours of possible sunshine.

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SoCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed “Santa Anas” each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SoCAB is the “Catalina Eddy,” a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections.

In the SoCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SoCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as NOx and CO from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

Wind Patterns and Project Location

The distinctive climate of the City and the SoCAB is determined by its terrain and geographical location. The SoCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter.

Wind patterns across the south coastal region are characterized by westerly and southwesterly on-shore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season.

Criteria Pollutants

A criteria pollutant is an air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. A description of each criteria pollutant is provided below:

- ***Ozone (O_3):*** A highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NOx), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- ***Carbon Monoxide (CO):*** A colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the SoCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- ***Particulate Matter less than or equal to 10 microns (PM10):*** A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. PM10 also causes visibility reduction.
- ***Fine Particulate Matter less than or equal to 2.5 microns (PM2.5):*** A similar air pollutant to PM10 consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NOx release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions.
- ***Nitrogen Dioxide (NO_2):*** NO_2 may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors.
- ***Sulfur Dioxide (SO_2):*** A colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SOx).
- ***Lead (Pb):*** A heavy metal that is highly persistent in the environment. In the past, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the SCAQMD's regular air monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters and automobile battery manufacturing and processing. It should be noted that the Project is not anticipated to generate a quantifiable amount of lead emissions.

Related Pollutants

- ***Volatile Organic Compounds (VOC):*** Hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O3, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- ***Nitrogen Oxides (NOx):*** NOx consists of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Air Quality Standards

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect, are presented in Table 3.2-1, California and National Ambient Air Quality Standards.

TABLE 3.2-1
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	National Standards	
			Primary[a]	Secondary[b]
O_3[c]	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM10	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
SO_2	24 Hour	0.04 ppm (105 µg/m^3)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	**No National Standards**	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)		

O_3: ozone, ppm: parts per million, µg/m^3: micrograms per cubic meter, –: No Standard; PM10: respirable particulate matter with a diameter of 10 microns or less, AAM: Annual Arithmetic Mean, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, CO: carbon monoxide, mg/m^3: milligrams per cubic meter, NO_2: nitrogen dioxide, SO_2: sulfur dioxide, km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016

Regional Air Quality

The SCAQMD monitors levels of various criteria pollutants at 38 permanent monitoring stations and 5 single-pollutant source Lead (Pb) air monitoring sites throughout the air district. In 2019, both the NAAQS and CAAQS for O_3 were exceeded for more than 100 days in the SoCAB; exceedances of PM10, and PM2.5 also occurred but less frequently. Table 3.2-2, Attainment Status of Criteria Pollutants in the SoCAB, summarizes the attainment designations for the SoCAB. All of the County of Los Angeles (County) is designated as a nonattainment area for O_3, PM10, and PM2.5; portions of the County, not including the City are designated nonattainment for NO_2 and lead.

TABLE 3.2-2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOCAB

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No standards
O_3 (8 hour)	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	No Standard	Nonattainment/Attainment[*]
All others	Attainment/Unclassified	No standards

O_3: ozone; $PM_{2.5}$: respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; SoCAB: South Coast Air Basin.

[a] Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

Source: CARB 2021a, USEPA 2021

Local Air Quality

The nearest long-term air quality monitoring site to the City of South Pasadena is the Pasadena–South Wilson Avenue monitoring station, located approximately 1.8 miles to the northeast. Pollutants measured at this monitoring station include O_3, $PM_{2.5}$, and NO_2.The most recent three years of data available at the time the air quality modeling was conducted is shown on Table 3.2-3, Local Air Quality Monitoring Summary (2017-2019), and identifies the number of days ambient air quality standards were exceeded, which is considered to be representative of the local air quality in the City.

TABLE 3.2-3
LOCAL AIR QUALITY MONITORING SUMMARY (2017-2019)

Pollutant	California Standard	National Standard	Year	Max. Level[a]	State Standard Days Exceeded[b]	National Standard Days Exceeded[b, c]
O_3 (1 hour)	0.09 ppm	None	2017	0.139	18	NA
			2018	0.112	8	NA
			2019	0.120	11	NA
O_3 (8 hour)	0.070 ppm	0.070 ppm	2017	0.100	38	36
			2018	0.091	20	19
			2019	0.098	29	24
NO_2 (1 Hour)	0.18 ppm	0.100 ppm	2017	0.072	0	0
			2018	0.068	0	0
			2019	0.059	0	0
NO_2 (AAM)	0.030 ppb	0.053 ppb	2017	0.015	No	No
			2018	0.014	No	No
			2019	0.013	No	No
$PM_{2.5}$ (24 Hour)	None	35 µg/m^3	2017	22.8	N/A	0/0
			2018	32.5	N/A	0/0
			2019	41.8	N/A	1/3.1
$PM_{2.5}$ (AAM)	12 µg/m^3	15 µg/m^3	2017	9.7	No	No
			2018	10.3	No	No
			2019	8.7	No	No

O_3: ozone; ppm: parts per million; µg/m^3: micrograms per cubic meter; AAM: annual arithmetic mean; NO_2: nitrogen dioxide.

"–" indicates that the data are not reported or there is insufficient data available to determine the value. N/A indicates that there is no applicable standard.

State and national data may differ because of differing methods for selecting hours for averaging.

[a] California maximum levels were used.
[b] For annual averaging times, a "Yes" or "No" response is given if the annual average concentration exceeded the applicable standard.
[c] PM is measured once every 6 days. Where 2 values are shown for $PM_{2.5}$, the first is for the measured value, and the second is the estimated number of days.

Source: CARB 2021b

3.2.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

U.S. Environmental Protection Agency

The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments made by Congress were in 1990. The USEPA is responsible for setting and enforcing the NAAQS for criteria pollutants, which are shown above in Table 3.2-1. Regional air quality is defined by whether the area has attained or not attained State and federal standards, as determined by monitoring. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution by using a combination of performance standards and market-based programs within the SIP-identified timeframe.

State

California Clean Air Act (CCAA)

The California Clean Air Act of 1988 provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS must prepare attainment plans that identify air quality problems, causes, trends and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Air Resources Board (CARB)

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research; sets the California Ambient Air Quality Standards (CAAQS), as shown in Table 3.2-1; compiles emission inventories; develops suggested control measures; oversees local programs; and prepares the SIP. For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the State SIP. CARB establishes emissions standards for (1) motor vehicles sold in California; (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid); and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Section 2485 of the California Code of Regulations (CCR)) places restrictions on vehicular idling. It requires that on or after February 1, 2005, any person that owns, operates, or causes to operate any diesel-fueled commercial motor vehicle with gross vehicular weight ratings of greater than 10,000 pounds must prohibit vehicle idling for more than five consecutive minutes at any location. Additionally, diesel-fueled internal combustion engine auxiliary power systems (APS) must be prohibited from operating for greater than 5 minutes at any location when within 100 feet of any property zoned for individual or multi-family housing units, schools, hotels, motels, hospitals, senior care facilities or childcare facilities.

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the CCR) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current applicable standards are the 2022 Standards, effective January 1, 2023. The 2022 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Since using natural gas produces criteria pollutant emissions, a reduction in natural gas consumption results in a related reduction in air quality emissions. Additional discussion of the Title 24 energy efficiency standards is included in Section 3.7, Greenhouse Gas Emissions, of this Environmental Assessment (EA).

Title 24 Green Building Standards

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential

and non-residential buildings (including buildings for retail uses, office uses, public schools, and hospitals) throughout California. The 2022 CALGreen Code was effective January 1, 2023. Development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The CALGreen Code was established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

Regional

South Coast Air Quality Management District (SCAQMD)

In the SoCAB, the SCAQMD is the agency responsible for protecting public health and welfare through the administration of federal and State air quality laws, regulations, and policies. Included in the SCAQMD's tasks are the monitoring of air pollution, the preparation of the AQMP) for the SoCAB, and the promulgation of rules and regulations.

The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization and the State-designated transportation planning agency for six counties: Riverside, San Bernardino, Los Angeles, Ventura, Imperial, and Orange.

The SCAQMD and SCAG are jointly responsible for formulating and implementing the AQMP for the SoCAB. SCAG's Regional Mobility Plan and Growth Management Plan form the basis for the land use and transportation control portion of the AQMP Air Quality Management Plan

The Federal CAA requires states to prepare SIPs to demonstrate attainment of the NAAQS for which an area is designated as being in nonattainment. Furthermore, the CCAA requires the revision of these plans every three years to address reducing pollutant concentrations that exceed the CAAQS. The SCAQMD and Southern California Association of Governments (SCAG), in coordination with local governments and the private sector, develop the AQMP for the SoCAB to satisfy these requirements. The AQMP is the most important air management document for the SoCAB because it provides the blueprint for meeting State and federal ambient air quality standards.

The current regional plan applicable to the Project is the SCAQMD's 2022 AQMP. The SCAQMD is responsible for ensuring that the SoCAB meets the NAAQS and CAAQS by reducing emissions from stationary (area and point), mobile, and indirect sources. To accomplish this goal, the SCAQMD prepares AQMPs in conjunction with the SCAG, County transportation commissions, and local governments; develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

The 2022 AQMP was adopted on December 2, 2022, by the SCAQMD Governing Board. The 2022 AQMP evaluates integrated strategies and measures to meet the following NAAQS (SCAQMD 2022):

- 8-hour O_3 target of 80 parts per billion (ppb) by 2024, 75 ppb by 2032, 70 ppb by 2038;
- Annual PM2.5 (12 micrograms per cubic meter [$\mu g/m^3$]) by 2025;
- 1-hour O_3 (120 ppb) by 2023; and
- 24-hour PM2.5 (35 $\mu g/m^3$) by 2023.

SCAQMD Rules and Regulations

The SCAQMD adopts rules and regulations for maintaining clean air in the region. All projects are subject to SCAQMD rules and regulations in effect at the time of construction. Specific rules applicable to future development pursuant to the proposed Project may include, but are not limited to:

SCAQMD Rule 201 requires a "Permit to Construct" prior to the installation of any equipment "the use of which may cause the issuance of air contaminants . . ." and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate. Rule 219, Equipment not Requiring a Written Permit Pursuant to Regulation II, identifies "equipment, processes, or operations that emit small amounts of contaminants that shall not require written permits . . .".

SCAQMD Rule 402, Nuisance states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

SCAQMD Rule 403, Fugitive Dust requires actions to prevent, reduce, or mitigate fugitive particulate matter emissions. These actions include applying water or chemical stabilizers to disturbed soils; managing haul road dust by applying water; covering all haul vehicles before transporting materials; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, Rule 403 requires that vegetative ground cover be established on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

SCAQMD Rule 445 has been adopted to reduce the emissions of particulate matter from wood-burning devices and prohibits the installation of such devices in any new development.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the VOC content in paints and paint solvents. Although this rule does not directly apply to the proposed Project, it does dictate the VOC content of paints available for use during building construction and ongoing maintenance.

SCAQMD Rule 1401 under Regulation XIV requires new source review of any new, relocated, or modified permit units that emit TACs. The rule establishes allowable risks for units requiring permits pursuant to Rules 201 and 203, discussed above.

SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

Southern California Association of Governments (SCAG)

SCAG is the regional planning agency for Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to

transportation, the economy, community development, and the environment. SCAG serves as the federally designated MPO for the Southern California region. On June 5, 2020, SCAG's Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources in order to improve public health and to meet the NAAQS as set forth by the CAA.

3.2.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse air quality impact if it would:

Threshold 3.2a: Conflict with or obstruct implementation of the applicable air quality plan;

Threshold 3.2b: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;

Threshold 3.2c: Expose sensitive receptors to substantial pollutant concentrations; and/or

Threshold 3.2d: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the State CEQA Guidelines states that the significance criteria established by the applicable air quality management district may be relied upon to make significance determinations. The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions; Table 3.2-4 presents the current significance thresholds applicable to the proposed Project. A project with daily emission rates below these thresholds is generally considered to have a less than significant effect on air quality.

TABLE 3.2-4
SOUTH COAST AQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds[a]		
Pollutant	**Construction**	**Operation**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TACs, Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO_2e for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[b, c]		
NO_2 1-hour average annual arithmetic mean	The South Coast AQMD is in attainment; the Project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	 10.4 µg/m^3 (construction)[c] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
PM2.5 24-hour average	 10.4 µg/m^3 (construction)[c] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (State) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	 25 µg/m^3 (State)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20.0 ppm (State) and 35 ppm (federal) 9.0 ppm (State/federal)	
Lead 30-day average Rolling 3-month average	 1.5 µg/m^3 (State) 0.15 µg/m^3 (federal)	

NOx: nitrogen oxides, lbs/day: pounds per day, VOC: volatile organic compound, PM10: respirable particulate matter with a diameter of 10 microns or less, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, SOx: sulfur oxides, CO: carbon monoxide, TACs: toxic air contaminants, GHG: greenhouse gases, MT/yr CO_2e: metric tons per year of carbon dioxide equivalents, NO_2: nitrogen dioxide, ppm: parts per million, µg/m^3: micrograms per cubic meter; South Coast AQMD: South Coast Air Quality Management District

[a] Source: South Coast AQMD CEQA Handbook (South Coast AQMD 1993)
[b] Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated
[c] Ambient air quality threshold is based on South Coast AQMD Rule 403

Source: SCAQMD 2019

3.2.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.2.6 ENVIRONMENTAL IMPACTS

Threshold 3.2a: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Pursuant to the SCAQMD's CEQA Air Quality Handbook, a project would be inconsistent with the AQMP if it would:

- Create an increase in the frequency or severity of air quality violations, cause or contribute to new violations, delay attainment of air quality standards; or
- Exceed the assumptions of the AQMP.

For the first criterion, the analysis below demonstrates that construction-source and operational-source emissions have the potential to exceed the applicable regional significance thresholds for criteria pollutants.

Construction

Regional Emissions

During construction activities associated with individual projects, emissions of CO, VOCs, NO_x, SO_X, PM10, and PM2.5 would likely be released through the burning of fossil fuels in construction equipment, grading fugitive dust, asphalt paving, and the application of architectural coatings during painting activity. Because only future land uses have been identified and this EA does not address specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Additionally, due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours), it would be speculative to state conclusively that construction activity associated with the project would cause a significant air quality impact. Construction-related pollutant emissions would instead be quantified in future air quality analyses to be conducted for individual projects. In addition, for projects that are estimated to exceed the SCAQMD construction emissions significance thresholds (Table 3.3-4), all feasible mitigation measures shall be applied to minimize construction-related air quality impacts, including one or more of the measures identified in MM AQ-1, based on project-specific air quality modeling. Even with incorporation of MM AQ-1, future construction of development projects have the potential to result in significant and unavoidable impacts.

Local Emissions

To assist lead agencies, SCAQMD developed screening-level Localized Significance Thresholds (LSTs) in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to exceeding the most stringent applicable federal or State ambient air quality standard at the nearest residence

or sensitive receptor (SCAQMD 2008). The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. SCAQMD developed LSTs to determine if emissions of NO_2, CO, PM10, and PM2.5 generated at a project site (off-site mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants. LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. An LST analysis would be performed, if needed, for individual development projects, as required by MM AQ-1. Because the results of the LST analyses are not known at this time, implementation of future projects have the potential to result in significant impacts with respect to construction activity, even with implementation of MM AQ-1. This would also be a significant and unavoidable impact.

Operational Emissions

Operational activities associated with the Project would result in emissions of CO, VOCs, NOx, SO_X, PM10, and PM2.5. Operation-related emissions are expected from the following sources: area sources (architectural coatings, consumer products, hearths/fireplaces, landscape maintenance equipment), energy sources, mobile sources (vehicles), and stationary sources. The estimated operational-source regional (mass) emissions for the proposed Project are expected to exceed SCAQMD thresholds (see Table 3.2-4 above), particularly for VOCs and NOx.

This is because the primary source of VOCs would be consumer products and the primary sources for NOx would be fireplace combustion products and vehicle emissions. Therefore, operational emissions would be potentially significant. As required by MM AQ-1, the Applicant/Developer of future projects would provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. However, it cannot be established at this time that implementation of MM AQ-1 would reduce the significant impact to a less than significant level. As such, this would be a significant and unavoidable impact.

CO Hotspots

It has long been recognized that adverse localized CO concentrations (“hot spots”) are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentrations in the Project vicinity have steadily declined.

To establish a more accurate record of baseline CO concentrations affecting the SoCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. The busiest intersection evaluated for the 2003 “hot spot” analysis was at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the

most stringent 1-hour CO standard (20.0 ppm).[1] At buildout of the General Plan Update, none of the study area intersections would come close to the highest daily traffic volumes generated at the busiest intersection in the CO "hot spot" analysis. Also, based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. The proposed Project considered herein would not produce the volume of traffic required to generate a CO "hot spot". There would be no impact related to CO hotspots.

Summarizing the above analyses, the Project would have the potential to create an increase in the frequency or severity of air quality violations, cause or contribute to new violations, delay attainment of air quality standards during construction and operation during construction and operation. Therefore, the Project would have the potential to conflict with the first criterion for consistency with the 2022 AQMP.

For the second criterion, the 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. The AQMP is based on projections in population and employment within the SoCAB region projected by the SCAG, which are in turn based on data provided by cities and counties. Table 3.2-5, 2040 Demographic Comparison Based on 2020–2045 RTP/SCS, shows the differences between the 2020–2045 RTP/SCS and buildout of the Project. The SCAG-provided forecast included the years 2016, 2020, 2040, 2035, and 2045, but not 2040; however, SCAG indicated the year 2040 projections could be calculated by using a linear interpolation between 2035 and 2045 data sets (Aguilar 2021).

TABLE 3.2-5
2040 DEMOGRAPHIC COMPARISON BASED ON 2020–2045 RTP/SCS

	2040 Population	2040 Households	2040 Employment
2020-2045 RTP/SCS	27,004	11,109	11,984
Project Buildout	32,462	13,245	15,678
Difference	**+5,458**	**+2,136**	**+3,694**
Sources: SCAG 2020, Aguilar 2021			

As shown in Table 3.2-5, the estimated population, household, and employment growth with buildout of the Project would exceed the projections of the 2020–2045 RTP/SCS. Therefore, the Project has the potential to conflict with the second criterion for consistency with the AQMP.

In summary, the Project has the potential to conflict with the applicable 2020 AQMP because: 1) air emissions associated with buildout of the Project could create and increase in the severity of air quality violations within the SoCAB; and 2) buildout of the Project would exceed the 2020–2045 RTP/SCS population, housing, and employment projections and consequently air emissions that are included in the 2020 AQMP.

Despite inconsistency with the 2020–2045 RTP/SCS growth projections, the proposed Project would support implementation of the 2020–2045 RTP/SCS goals by facilitating infill and mixed-use development and focusing growth along transportation/transit corridors. However, since the additional growth may generate emissions that would cumulatively contribute to the

[1] Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

nonattainment designations, the Project would have the potential to conflict with the AQMP. There are no additional feasible mitigation measures to reduce this impact at the programmatic level of analysis provided in this EA. Therefore, this would be considered a significant and unavoidable impact.

Threshold 3.2b: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As shown in Table 3.2-2, the SoCAB is in nonattainment for PM10, PM2.5, and O_3. The Project would contribute PM10, PM2.5, and O_3 precursors (i.e., VOC and NOx) to the region during short-term construction and long-term operational activities. As discussed above under Threshold 3.2a, construction emissions have not been quantified because the Project does not propose any specific development projects; therefore, construction-level analyses would be speculative. As such, implementation of the Project has the potential to result in significant direct impacts with respect to construction activity, even with implementation of MM AQ-1.

SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003). Conversely, impacts that would be directly significant would also be cumulatively significant. Because the Project's construction emissions would potentially be directly significant, construction emissions would also be potentially cumulatively considerable, and the impact would be significant and unavoidable even with implementation of MM AQ-1.

As discussed above, the Project would be expected to exceed SCAQMD thresholds, particularly for VOC and NOx, which are O_3 precursors, and would be directly significant. Therefore, the proposed Project would also result in a cumulatively considerable increase in a criteria pollutant for which the SoCAB is in non-attainment and there would be a significant and unavoidable cumulative impact associated with estimated VOC and NOx emissions.

Threshold 3.2c: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Toxic Air Contaminants

To assist the Project in the analysis of health risks associated with exposure to toxic air contaminants (TACs)—specifically diesel particulate matter (DPM)—an evaluation of health risks consistent with guidance provided by the California Air Resources Board (CARB) in their Diesel Risk Reduction Plan is utilized. It should be noted that CARB has issued advisory recommendations for siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, in proximity to sources associated with Toxic Air Contaminants (TACs), these are shown in Table 3.2-7, California Air Resource Board Advisory Recommendations.

TABLE 3.2-6
CALIFORNIA AIR RESOURCE BOARD ADVISORY RECOMMENDATIONS

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.
Note: These recommendations are advisory. Land use agencies must balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues. Source: CARB 2005	

CARB recommends performing site-specific evaluations when possible; however, since specific information regarding building locations, loading docks, and other uses is not currently available, it should be noted that a more detailed evaluation of health risks associated with specific land uses for this project would be speculative at this time. It is recommended that when such information is available, a more detailed environmental assessment should be prepared to determine the precise buffer zones necessary.

With respect to TAC exposure from vehicles on the SR-110 freeway, the 2019 annual average daily traffic volumes (AADT) on SR-110 in South Pasadena ranged from 43,500 to 80,000 vehicles (Caltrans 2021). The average number of trucks on SR-110 ranged from 331 to 935, or 0.76 percent of the total volume (Caltrans 2021). The USEPA transportation conformity procedures require PM2.5 and PM10 hot-spot analyses to be performed for projects of air quality concern (POAQC). A POAQC would be a facility with 125,000 AADT and where at least 8 percent of the traffic is comprised of diesel trucks, i.e., at least 10,000 trucks per day (USEPA 2015). The current total and truck volumes are substantially less than those indicated by the USEPA as a trigger for detailed analysis.

Consistent with CARB guidance, it is recommended that site-specific evaluation be conducted prior to the siting of any sensitive land use in proximity to a land use that has the potential to emit TACs. Potential residential units that would be proposed in parcels located along the SR-110 where it traverses the City. Although not required under CEQA, the City shall require that the Applicants/Developers of individual future projects that would include sensitive land uses within 500 feet of SR-110 have a health risk assessment (HRA) prepared and that measures are included in the project design to ensure the project achieves the incremental risk thresholds; and if the HRA cannot demonstrate that the acceptable risk level can be achieved, then no residential

land uses may be developed within 500 feet of the TACs source. With implementation of MM AQ-2, there would be a less than significant impact related to TACs.

Threshold 3.2e: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming),
- Wastewater treatment plants,
- Food processing plants,
- Chemical plants,
- Composting operations,
- Refineries,
- Landfills,
- Dairies, and
- Fiberglass molding facilities.

The Project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse, which occurs in the existing condition. Consistent with City requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, the Project would not create or result in objectionable odors affecting a substantial number of people. There would be no impact, and no mitigation is required.

3.2.7 CUMULATIVE IMPACTS

Cumulative air quality impacts are considered in terms of project contributions to air pollution levels in the San Gabriel Valley and the SoCAB. As stated above, SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003). Conversely, impacts that would be directly significant would also be cumulatively significant.

Construction-related (Short-Term) Cumulative Impacts

As analyzed in Threshold 3.2b, which addresses cumulative impacts, construction activities resulting from the implementation of the Project would have the potential to be cumulatively significant. Implementation of MM AQ-1 would determine the impact of each project and potentially reduce impacts to less than significant. However, until individual projects are analyzed, construction emissions are determined to be cumulatively significant and unavoidable.

Operational (Long-Term) Cumulative Impacts

As analyzed in Threshold 3.2b, which addresses cumulative impacts, future development pursuant to the proposed Project would result in direct and cumulatively significant and unavoidable long-term regional air quality impact related to CO emissions.

Sensitive Receptors

Future development pursuant to the proposed Project would not create CO hotspots but may locate TACs near sensitive receptors, specifically, the potential housing and development sites proximate to the SR-110. MM AQ-2 requires the preparation of an HRA if individual future projects that would include sensitive land uses within 500 feet, and, if necessary, the inclusion of design features that reduce the exposure to DPM by future residents to a less than significant level. Thus, the proposed Project would have a less than significant impact related to TACs. However, the geographic extent of the area in the City that has the potential for sensitive land uses near the SR-110 is small, particularly in comparison to the geographic coverage of land near freeways throughout the SoCAB. Also, with MM AQ-2, the Project-related potential for TAC exposure would be less than significant. Thus, the proposed Project would not have a cumulatively considerable contribution to exposure of sensitive receptors to TACs in the San Gabriel Valley and SoCAB.

Objectionable Odors

Future development pursuant to the proposed Project would not create or expose people to significant objectionable odors. Thus, the proposed Project would not contribute to cumulative odor impacts.

3.2.8 MITIGATION MEASURES

MM AQ-1 To assess regional air pollutant emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. Applicants/Developers shall also assess the localized emissions of NOx, CO, PM10, and PM2.5 from the construction of individual projects in proximity to sensitive receptors (e.g., residences, schools, hospitals), associated with the maximum daily construction activities for proposed individual developments.

If project-specific mitigation is required for regional and/or localized emissions due to exceedances of any SCAQMD threshold, mitigation measures must include one or more of the following, or include equally effective measures, as follows:

- For construction equipment greater than 150 horsepower (>150 HP), the Applicant/Developer shall require the construction contractor to use off-road diesel construction equipment that complies with minimum USEPA/CARB Tier 3 emissions standards during all construction phases. If the project-specific analysis indicates that Tier 3 off-road equipment would not reduce the impact to a less than significant level, off-road diesel equipment that complies with CARB Tier 4 (interim or final) emissions standards shall be used, as appropriate, or the best available emissions technology available at the time of project construction.

- The Applicant/Developer shall require the construction contractor to ensure that all construction equipment be tuned and maintained in accordance with the manufacturer's specifications.
- The Applicant/Developer shall require the construction contractor to use electricity to power on-site generators and other construction-related equipment and activities, if available and feasible, rather than using diesel-powered internal combustion engines.
- The Applicant/Developer shall require the construction contractor to maintain all construction equipment in good operation condition and ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification.

MM AQ-2 The Applicant/Developer for residential land use projects in the City within 500 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 100,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall conduct and submit a health risk assessment (HRA) to the City of South Pasadena Department of Planning and Building. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 µg/m_3, PM2.5 concentrations exceed 2.5 µg/m_3, or the appropriate noncancer hazard index exceeds 1.0, the Applicant/Developer shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms, prior to issuance of a grading permit. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 12 or better).

If the HRA cannot demonstrate that the acceptable risk level can be achieved, then no residential land uses may be developed within 500 feet of the TAC source.

3.2.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

AQMP Consistency

Significant and unavoidable.

Construction Emissions (Regional and Local)

Significant and unavoidable.

Operational Emissions

Significant and unavoidable.

CO Hotspot

Less than significant.

Toxic Air Contaminants

Less than significant.

Odors

No impact.

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3.3 BIOLOGICAL RESOURCES

3.3.1 METHODOLOGY

This section analyzes potential impacts to biological resource associated with implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). The Project would apply to the entire City of South Pasadena (City); however, the majority of projected growth is within the focus areas (in particular in the Ostrich Farm area and along Mission Street, Fair Oaks Avenue, and Huntington Drive), as described in Section 2.0, Environmental Setting and Project Description. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development.

This section concentrates on these areas of the City that would be most affected by the Project, although effects on the City as a whole are also considered. Information in this section is based primarily on review of literature, existing regulations, and current aerial photographs of the City. Based on a literature review and through regional familiarity with the natural resources within the study area, Psomas biologists provided the impact analysis and proposed mitigation set forth in this section. Specific sources of information used are cited within the analysis below.

3.3.2 EXISTING CONDITIONS

Environmental Setting

The City of South Pasadena is nearly built out; thus, the majority of plant and animal habitats are located within urban environments with non-native and ornamental landscaping. Other vegetated or otherwise open areas include parks distributed throughout the City, along the Arroyo Seco (drainage feature), and large tracts of vacant land along steep hillsides in residential areas. The Arroyo Seco generally runs from north to south along the northwestern boundary of the City. This portion of the stream is concrete-lined with no native substrate. The vegetation along the Arroyo Seco is mostly comprised of ornamental trees, which are located above the manufactured, reinforced banks of the stream. Elevations within the City range from approximately 530 feet above mean sea level (amsl) to 910 feet amsl.

Open Space Areas

Outdoor recreation areas in the City are concentrated along the Arroyo Seco, including the Arroyo Park, Arroyo Woodland and Wildlife Nature Park, and the Arroyo Seco Golf Course. Additional outdoor recreation areas include Garfield Park in the northeastern portion of the City, and other smaller parks located elsewhere throughout the City. Although the vegetation in these areas consists mainly of non-native ornamental landscaping, many native trees exist including coast live oaks (*Quercus agrifolia*) and western sycamores (*Platanus racemosa*). These outdoor recreation areas are part of the City's network of open space; however, they have been specifically developed for public access and public use, such as for organized sporting activities, bike riding, or bird watching. Other portions of the City contain areas of open space not explicitly designated for public access. These areas are vacant, naturally-vegetated, and mainly found in the southwestern portion of the City, including the large area referred to as Altos de Monterey. The vacant, naturally-vegetated open space areas generally support a variety of both native vegetation, such as sugarbush (*Rhus ovata*) and California buckwheat (*Eriogonum fasciculatum*), and non-native vegetation, such as pepper tree (*Schinus* spp.) and eucalyptus (*Eucalyptus* spp.).

Wildlife

While the majority of the City is developed, the local parks and vacant parcels provide some patches of wildlife habitat. The following discussion is intended to provide a general description of wildlife species that may be expected to occur within the City, particularly the collective developed and undeveloped open space areas.

It is noted that although urban environments typically offer less suitable habitat for wildlife compared to undeveloped areas, they do offer foraging and cover resources and are thus not always unsuitable for all species (Melles et. al. 2003). A few studies on birds in low-density residential areas have shown that these areas may have potential for land management practices enhancing the value of these areas for birds (DeGraaf 1991; Blair 1996). However, vegetation is invariably altered with urbanization. Suburban areas rarely include the full complement of vertical strata found in natural forests (Beissinger and Osborne 1982), and native plant species are often removed or replaced by exotic ornamentals (Rosenberg et. al. 1987, Blair 1996). In these environments, canopy cover becomes an important factor in biodiversity (Johnson 1988). The presence and patch size of remnant native vegetation is another important factor (Chace and Walsh 2004, Emlen, 1974; Mills et. al. 1989). There is often a strong positive correlation between the volume and structure of native vegetation and native bird diversity and species richness (Emlen 1974; Mills et. al. 1989). Native birds respond positively with native vegetation density, while non-native species respond positively to exotic plant biomass (Mills et. al. 1989).

The City of South Pasadena contains a high percentage of tree canopy cover, and many areas with a high percentage of native tree canopy due to the presence of a large number of coast live oak trees. In addition, the City's tree preservation ordinance ensures the persistence of tree canopy through impact avoidance and tree replacement requirements. As a result, urban canopies of the City are expected to support local populations of many native bird species.

Most of the drainage features within the City do not contain water year-round, with the occasional exception of the Arroyo Seco. No native fish species are expected to reside in the Arroyo Secoproximate to the City because of lack of suitable habitat; however, the introduced western mosquitofish (*Gambusia affinis*) is expected to occur.

One common amphibian species expected to occur in the Arroyo Seco is the Pacific treefrog (*Pseudacris regilla*). Undeveloped, naturally-vegetated open space areas are expected to support common reptile species, including, but are limited to, western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), southern alligator lizard (*Elgaria multicarinata*), western skink (*Plestiodon* [*Eumeces*] *skiltonianus*), gopher snake (*Pituophis catenifer*), coachwhip (*Masticophis flagellum*), common kingsnake (*Lampropeltis getula*), and western rattlesnake (*Crotalus oreganus*).

Various bird species are expected to occur in the trees and open space areas throughout the City, including, but are limited to, native species such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), barn owl (*Tyto alba*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), black phoebe (*Sayornis nigricans*), western scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), spotted towhee (*Pipilo maculates*), California towhee (*Pipilo crissalis*), song sparrow (*Melospiza melodia*), house finch (*Carpodacus mexicanus*), lesser goldfinch (*Carduelis psaltria*), dark-eyed junco (*Junco hyemalis*), Cooper's hawk (*Accipiter cooperii*), great horned owl (*Bubo virginianus*), and band-tailed pigeon (*Patagioenas fasciata*). Introduced bird species expected to occur in the City include, but are limited to, rock pigeon (*Columba livia*), European starling (*Sturnus vulgaris*),

house sparrow (*Passer domesticus*), red-whiskered bulbul (*Pycnotus jocosus*), parrots (*Amazona* sp.), and parakeets (*Brotogeris chiriri* and *Psittacara* sp.). These non-native species were introduced into the region many years ago and have developed stable breeding populations. Native and non-native bird species are also expected to occur within developed areas of the City specially where trees are abundant. Mammal species expected to occur in most open space areas of the City include, but are not limited to, desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), canyon bat (*Parastrellus hesperus*), and coyote (*Canis latrans*). Mammal species expected to occur throughout much of the City, including the more developed areas, include introduced species such as Virginia opossum (*Didelphis virginiana*), fox squirrel (*Sciurus niger*), and black rat (*Rattus rattus*); and native species such as raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and Yuma bat (*Myotis yumanensis*).

Wildlife Movement

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas or individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (e.g., foraging for food or water, defending territories, or searching for mates, breeding areas, or cover). A number of terms such as "wildlife corridor", "travel route", "habitat linkage", and "wildlife crossing" have been used in various wildlife movement studies to refer to areas in which wildlife move from one area to another.

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, transitions in vegetation, or human disturbance. This is exacerbated by fragmentation of undeveloped, naturally vegetated open spaces due to urbanization that creates isolated "islands" of wildlife habitat. In the absence of linkages that allow movement between areas of suitable habitat, various studies have concluded that some wildlife species—especially larger and more mobile mammals—will not likely persist over time in fragmented or isolated habitat because the fragmentation prohibits the immigration of new individuals and genetic information (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990).

Corridors mitigate the effects of this fragmentation by (1) allowing animals to move between areas of remaining habitat, thereby permitting depleted populations to be replenished and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events, such as fire or disease, will result in population or local species extirpation; and (3) serving as travel routes for individual animals as they move in their home ranges in search of food, water, mates, and other necessary resources (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

The City does not border any large, naturally vegetated open space area, such as the San Gabriel Mountains or other portions of the Angeles National Forest, and the City consists mostly of developed areas. Small areas of vacant, naturally vegetated open space occur in the southwestern portion of the City, which has some connectivity to additional open space areas located further to the south. However, collectively these open space areas are not substantial in size and are enclosed on all sides by urban development. Therefore, these open space areas are not part of a larger, regional network of connected habitats or wildlife corridor.

The Arroyo Seco is a linear drainage feature that extends from the Los Angeles River to the San Gabriel Mountains; however, it does not consistently contain suitable vegetation, cover, or food resources typical of wildlife movement corridors. The Arroyo Seco is likely to support local movement for local populations of common wildlife and may still provide limited passage for

regional movement of some urban-tolerant wildlife species, such as coyotes. Therefore, although the drainage may allow for some limited regional wildlife movement, it does not constitute high quality travel routes, wildlife corridors, or wildlife crossings.

Special Status Biological Resources

Special status biological resources include plant and wildlife species that have been afforded special status and/or recognition by federal and State resource agencies, as well as private conservation organizations. In general, the principal reason an individual taxon (i.e., species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size, geographic range, and/or distribution resulting in most cases from habitat loss. In addition, special status biological resources include jurisdictional drainages and their riparian vegetation. Sources used to determine the special status of biological resources are as follows:

- ***Plants:*** the California Native Plant Society's (CNPS') Electronic Inventory of Rare and Endangered Vascular Plants of California (CNPS 2021a); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (CDFW 2021a); various Federal Register notices from the U.S. Fish and Wildlife Service (USFWS) regarding listing status of plant species; and the CDFW's List of Special Vascular Plants, Bryophytes, and Lichens (CDFW 2021b).
- ***Wildlife:*** the CNDDB (CDFW 2021a); various Federal Register notices from the USFWS regarding listing status of wildlife species; and the CDFW's List of Special Animals (CDFW 2021c).

A federally listed Endangered species is a species facing extinction throughout all or a significant portion of its geographic range. A federally listed Threatened species is a species likely to become Endangered within the foreseeable future throughout all or a significant portion of its range. The presence of any federally listed Threatened or Endangered species on an area proposed for development leads to a California Environmental Quality Act (CEQA) determination of "significance" and, for wildlife or where there is a federal nexus, for plants, requires consultation with USFWS, particularly if development would result in "take" of the species or its habitat.

Federally listed "Proposed" species are those officially proposed by the USFWS for addition to the federal Threatened and Endangered species lists. Because species may become listed as Threatened or Endangered prior to or during implementation of a project, they are treated here as though they are listed species.

The State of California considers an Endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A Threatened species is a species in such small numbers throughout its range that it is likely to become an Endangered species in the near future in the absence of special protection or management. A Rare species is one present in such small numbers throughout its range that it may become Endangered if its present environment worsens. The Rare species designation applies to California native plants listed prior to the California Endangered Species Act (CESA). State-listed Threatened and Endangered species are protected against take unless an incidental take permit is obtained from the resource agencies.

California Species of Special Concern is an informal designation used by the CDFW for some declining wildlife species that are not State candidates for listing. This designation does not provide legal protection but signifies that these species are recognized as special status by the CDFW. In recent years, the CDFW has downgraded some species into the Watch List category.

Species that are California Fully Protected and Protected include those protected by special legislation for various reasons, such as the mountain lion and white-tailed kite. Fully Protected species may not be taken or possessed at any time. California Protected species include those species that may not be taken or possessed at any time except under special permit from the CDFW issued pursuant to the *California Code of Regulations* (Title 14, Sections 650 and 670.7) or Section 2081 of the *California Fish and Game Code*.

Special Plant and Special Animal are general terms that refer to all the species the CNDDB is interested in tracking, regardless of their legal or protection status. This term includes species designated as any of the above terms but also includes species that (1) may be considered biologically rare, restricted in distribution, and/or declining throughout their range; (2) are on the periphery of their range and are threatened with extirpation in California; (3) are associated with special status habitats; or (4) are considered by other State or federal agencies or private organizations to be sensitive or declining.

Species of Local Concern are those that have no official status with the resource agencies but are being watched because there is either a unique population in the region or the species is declining in the region.

The California Rare Plant Rank (CRPR), formerly known as CNPS List, is a ranking system by the Rare Plant Status Review group (which consists of over 300 botanical experts from the government, academia, non-governmental organizations, and the private sector) and is managed by the CNPS and the CDFW (CNPS 2021b). A CRPR summarizes information on the distribution, rarity, and endangerment of California's vascular plants. Plants with a CRPR of 1A are presumed extinct because they have not been seen in the wild for many years. Plants with a CRPR of 1B are Rare, Threatened, or Endangered throughout their range. Plants with a CRPR of 2A are presumed extirpated from California but are more common elsewhere. Plants with a CRPR of 2B are considered Rare, Threatened, or Endangered in California, but are more common elsewhere. Plants with a CRPR of 3 require more information before they can be assigned to another rank or rejected; this is a "review" list. Plants with a CRPR of 4 are of limited distribution or are infrequent throughout a broader area in California; this is a "watch" list. The Threat Rank is an extension that is added to the CRPR to designate the plant's endangerment level. An extension of .1 is assigned to plants that are considered "seriously threatened" in California (i.e., over 80 percent of the occurrences are threatened or have a high degree and immediacy of threat). Extension .2 indicates the plant is "fairly threatened" in California (i.e., between 20 and 80 percent of the occurrences are threatened or have a moderate degree and immediacy of threat). Extension .3 is assigned to plants that are considered "not very threatened" in California (i.e., less than 20 percent of occurrences are threatened or have a low degree and immediacy of threat or no current threats are known). The absence of a threat code extension indicates that this information is lacking for the plant(s) in question.

Habitat suitable for native wildlife species in the City is limited to the native vegetation and soils in the undeveloped open space areas, and the primarily ornamental vegetation in developed areas. While native vegetation, most notably oak trees, is present within developed areas, non-native ornamental species predominate. Habitat suitable for native plant species is restricted to the undeveloped, naturally-vegetated open space areas. Two special status wildlife species, Cooper's hawk (a Watch List species) and western mastiff bat (*Eumops perotis californicus*)(a California Species of Special Concern), have low potential to occur in large trees and dense ornamental woodland areas located throughout the City. No other sensitive or special status plant or wildlife species has potential to occur in the ornamental vegetation associated with the developed areas. The undeveloped, naturally-vegetated open space areas have potential to support various sensitive plant and wildlife species.

Jurisdictional Resources

Wetlands and permanent or intermittent drainages, creeks, and streams are generally subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA). By USACE definition, all aquatic or riverine habitats between the "ordinary high water mark" of rivers, creeks, and streams are considered "Waters of the U.S." and may fall under USACE jurisdiction. If adjacent wetlands occur, the jurisdictional limits extend beyond the ordinary high water mark to the outer edge of the wetlands. The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency or duration to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (Environmental Laboratory 1987). The presence and extent of wetland areas are normally determined by examining the vegetation, soils, and hydrology of a site. The USACE definition of wetlands requires that all three wetland identification parameters be met.

Streambeds are also subject to CDFW regulation under Sections 1600 et. seq. of the *California Fish and Game Code*. A stream is defined under these regulations as a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. This definition includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation. The CDFW jurisdiction typically extends to the edge of the riparian vegetation canopy. In addition, groundwater, surface water, and wetlands fall under Regional Water Quality Control Boards (RWQCB) jurisdiction.

Jurisdictional resources within the City of South Pasadena are mostly confined to concrete-lined drainages with no associated vegetation. The concrete-lined drainages across the City are numerous and disperse. The vacant naturally-vegetated open space areas are mostly located in steep, upland areas with little potential to support jurisdictional resources.

3.3.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) protects plants and animals that the government has listed as "Endangered" or "Threatened". A federally listed species is protected from unauthorized "take", which is defined in the FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or attempt to engage in any such conduct". All persons are presently prohibited from taking a federally listed species unless and until (1) the appropriate Section 10(a) permit has been issued by the USFWS or (2) an Incidental Take Statement is obtained as a result of formal consultation between a federal agency and the USFWS pursuant to Section 7 of the FESA and the implementing regulations that pertain to it (50 *Code of Federal Regulations* [CFR] 402). "Person" is defined in the FESA as an individual, corporation, partnership, trust, association, or any private entity; any officer, employee, agent, department or instrument of the Federal government; any State, Municipality, or political subdivision of the State; or any other entity subject to the jurisdiction of the United States. An Applicant for future development projects is a "person" for purposes of the FESA.

Section 401 and 404 of the Clean Water Act of 1972 (33 United States Code 1251 et seq.)

Section 404 of the Clean Water Act (CWA, 33 USC 1251 et. seq.) regulates the discharge of dredged or fill material into "Waters of the U.S.", including wetlands. "Waters of the U.S." include

certain inland waters, lakes, rivers, streams, and their tributaries under certain circumstances. The USACE is the designated regulatory agency responsible for administering the 404-permit program and for making jurisdictional determinations. This permitting authority applies to all "Waters of the U.S." where the material has the effect of (1) replacing any portion of "Waters of the U.S." with dry land or (2) changing the bottom elevation of any portion of "Waters of the U.S.". These fill materials would include sand, rock, clay, construction debris, wood chips, and materials used to create any structure or infrastructure in the "Waters of the U.S.". Dredge and fill activities are typically associated with development projects; water-resource related projects; infrastructure development and wetland conversion to farming; forestry; and urban development.

Under Section 401 of the CWA, an activity requiring a USACE Section 404 permit must obtain a State Water Quality Certification (or waiver thereof) to ensure that the activity will not violate established State water quality standards. The U.S. Environmental Protection Agency (USEPA) is the federal regulatory agency responsible for implementing the CWA. However, the SWRCB, in conjunction with the nine RWQCBs, has been delegated the responsibility for administering the Section 401 water quality certification program.

The RWQCB is the primary agency responsible for protecting water quality in California through the regulation of discharges to surface waters under the CWA and the California Porter-Cologne Water Quality Control Act, discussed further below. The RWQCB's CWA jurisdiction extends to all "Waters of the U.S.". Section 401 requires the RWQCB to provide "certification that there is reasonable assurance that an activity which may result in the discharge to 'waters of the U.S.' will not violate water quality standards". Water Quality Certification must be based on a finding that the proposed discharge will comply with water quality standards, which contain numeric and narrative objectives that can be found in each of the nine RWQCB's Water Quality Control Plans.

Migratory Bird Treaty Act

Pursuant to the Migratory Bird Treaty Act (MBTA) of 1918, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 *United States Code* Section 703), except as allowed by permit pursuant to 50 CFR 21. The statute states:

> Unless and except as permitted by regulations made as hereinafter provided in this subchapter, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill...any migratory bird, any part, nest, or egg of any such bird...included in the terms of the [Migratory Bird] conventions.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act provides for the protection of the bald eagle (*Haliaeetus leucocephalus*) and the golden eagle (*Aquila chrysaetos*) by prohibiting, except under certain specified conditions, the taking, possession, and commerce of such birds. The 1972 amendments increased penalties for violating provisions of the Act and strengthened other enforcement measures. A 1978 amendment authorized the Secretary of the Interior to permit the taking of golden eagle nests that interfere with resource development or recovery operations.

State

California Endangered Species Act

Pursuant to CESA and Section 2081 of the *California Fish and Game Code,* an incidental take permit from the CDFW is required for projects that could result in the take of a State-listed Threatened or Endangered species. Under the CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species, but the definition does not include "harm" or "harass", as the federal act does. As a result, the threshold for a take under the CESA is higher than that under the FESA. A CDFW-authorized Incidental Take Permit under Section 2081(b) is required when a project could result in the take of a State-listed Threatened or Endangered Species. The application for an Incidental Take Permit under Section 2081(b) has a number of requirements, including the preparation of a conservation plan, generally referred to as a Habitat Conservation Plan.

California Fish and Game Code

Section 1602

State law confers upon the CDFW the trustee responsibility and authority for the public trust resource of wildlife in California. The CDFW may play various roles under the CEQA process. By State law, the CDFW has jurisdiction over the conservation, protection, and management of the wildlife, native plants, and habitat necessary to maintain biologically sustainable populations. The CDFW shall consult with lead and responsible agencies and shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities.

As a trustee agency, the CDFW has jurisdiction over certain resources held in trust for the people of California. Trustee agencies are generally required to be notified of CEQA documents relevant to their jurisdiction, whether or not these agencies have actual permitting authority or approval power over aspects of the underlying project (14 *California Code of Regulations* Section 15386). The CDFW, as a trustee agency, must be notified of CEQA documents regarding projects involving fish and wildlife of the state as well as Rare and Endangered native plants, wildlife areas, and ecological reserves. Although, the CDFW cannot approve or disapprove a project since it is a trustee agency, lead and responsible agencies are required to consult with them. The CDFW, as the trustee agency for fish and wildlife resources, shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities and shall make recommendations regarding those resources held in trust for the people of California (*California Fish and Game Code*, Section 1602).

Sections 1600–1616

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFW regulations, pursuant to Section 1600 through Section 1603 of the *California Fish and Game Code*. Under Section 1602, it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream, or lake designated by CDFW as waters within their jurisdiction, nor can a person use any material from streambeds without first notifying the CDFW of such activity. For a project that may affect stream channels and/or riparian vegetation regulated under Sections 1600 through 1603, CDFW authorization is required in the form of a Streambed Alteration Agreement.

Birds of Prey and Migratory Birds

Sections 3503 and 3503.5 of the *California Fish and Game Code* makes it unlawful to take, possess, or destroy the nests and eggs of birds of prey.

Section 3513 of the *California Fish and Game Code* duplicates the federal protection of migratory birds and prohibits the taking and possession of any migratory nongame bird, as designated in the MBTA.

California Porter-Cologne Water Quality Control Act

Pursuant to the California Porter-Cologne Water Quality Control Act, the SWRCB and the nine RWQCBs may require permits (known as waste discharge requirements [WDRs]) for the fill or alteration of "waters of the State". The term "waters of the State" is defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]). The State and Regional Boards have interpreted their authority to require WDRs to extend to any proposal to fill or alter "waters of the State", even if those same waters are not under USACE jurisdiction. Pursuant to this authority, the State and Regional Boards may require the submission of a "report of waste discharge" under Section 13260, which is treated as an application for WDRs.

Local

City of South Pasadena Tree Ordinance

Chapter 34, "Trees and Shrubs", of the City of South Pasadena Municipal Code (SPMC) contains regulations protecting trees within the City, referred to herein as the tree ordinance or tree preservation ordinance. The SPMC regulates adverse effects to the following groups of trees once they are considered mature or significant: trees in the oak (*Quercus* spp.) genus, trees native to southern California, and heritage trees as determined by the tree's historical value. A mature tree has a trunk diameter (or collective diameter of multitrunked trees) of at least four inches where the trunk is four feet above grade. A significant tree has a diameter of at least one foot at four feet above grade. The City regulates effects on these trees by requiring a permit prior to any significant trimming, or prior to tree relocation or removal. Significant trimming is defined as removing greater than 20 percent (or greater than 10 percent of oak trees or native tree species) of the live foliage within one year. No new structure shall be located nor shall any construction requiring a permit occur within six feet of the trunk of a significant or heritage tree.

The SPMC further states that City permission must be granted prior to removal of any tree regardless of size or classification that is within a parkway, or part of a watershed, erosion control, or wildlife habitat. All applications for tree removal shall also include submission of a tree plan. Any subsequent approval by the City is discretionary and could be subject to conditional requirements, including planting of replacement trees, posting of bonds ensuring the success of replacement trees, and review of the tree plan by an International Society of Arboriculture certified arborist at the cost of the applicant.

3.3.4 THRESHOLDS OF SIGNIFICANCE

The criteria for determining significant impacts on biological resources were developed in accordance with the State CEQA Guidelines. Section 15065(a) of the State CEQA Guidelines states that a project may have a significant effect on the environment if "…the project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat

of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species". An evaluation of whether an impact on biological resources would be significant must consider both the resource itself and how that resource fits into a regional or local context. Significant impacts would be those that would diminish or result in the loss of an important biological resource or those that would obviously conflict with local, State, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally adverse but not significant because, although they would result in an adverse alteration of existing conditions, they would not substantially diminish or result in the permanent loss of an important resource on a population- or region-wide basis.

The following significant criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse biological resources impact if it would:

Threshold 3.3a: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

Threshold 3.3b: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

Threshold 3.3c: Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

Threshold 3.3d: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

Threshold 3.3e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or

Threshold 3.3f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

3.3.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to biological resources.

3.3.6 ENVIRONMENTAL IMPACTS

Sensitive Species

Threshold 3.3a: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Habitat potentially suitable for native wildlife species in the City is limited to the ornamental vegetation in developed areas and the native soils and vegetation in the undeveloped open space areas. Habitat potentially suitable for native plant species is restricted to the undeveloped, naturally vegetated open space areas. Cooper's hawk and western mastiff bat are special status wildlife species with potential to occur in the large trees that are located throughout the City. Removal, trimming, or other disturbance of occupied trees may result in loss or harm to individuals of these species and may negatively affect the local population. Potential impacts to Cooper's hawk and western mastiff bat would be avoided with implementation of mitigation measure (MM) BIO-1 and MM BIO-2. MM BIO-1 requires that a qualified biologist conduct nesting bird surveys prior to all construction or site preparation activities situated near potentially suitable habitat, such as trees and shrubs, that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). If an active nest is present, the biologist would place a temporary buffer around the nest site. MM BIO-2 requires that trimming or removal of mature or significant trees, as defined by the City, be conducted outside the breeding season for native bird and bat species (typically August 16 through February 28) whenever feasible, and if this activity must occur during the breeding season, a qualified biologist would survey the tree to assess the presence or absence of any active bird nest or bat maternity roost.

No other special status plant or wildlife species have potential to occur in the ornamental vegetation associated with the developed areas in the City of South Pasadena. The proposed Project would mostly direct future development to occur in areas of existing development, and implementation of the Project would limit development of otherwise undeveloped, naturally-vegetated open space that may be used by special status plant or wildlife species.

As discussed previously, the minimally developed, open space areas supporting stands of native vegetation have potential to support various special status plant and wildlife species. Although future development would be focused away from these areas, some potential housing and development sites include properties adjacent to undeveloped or vacant open space areas. Introduction of invasive plant species by future development near these undeveloped or vacant open space areas could result in the spread of the plant species to native habitats in the undeveloped, naturally-vegetated open space areas subsequently displacing potentially suitable or occupied habitat of special status plant and wildlife species. This would be considered a significant impact. Therefore, MM BIO-3 requires the City to develop a list of fire-resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list would be used for any requirements of recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping. MM BIO-3 would ensure that residents and other parties are not encouraged to plant exotic, invasive species for fire resistance, and would reduce the potential impact to less than significant.

As previously mentioned, the undeveloped and vacant open space areas supporting stands of native vegetation have potential to support various special status plant and wildlife species.

Although future development would be focused away from these areas, there may be direct impacts of projects and indirect impacts of activities occurring adjacent to these areas. Such activities may result in loss or harm of special status native species within these areas. MM BIO-4, which requires an applicant to conduct a biological resources assessment and appropriate surveys and implement any recommended avoidance measures prior to project initiation within or adjacent to native-vegetated open space areas, would reduce this potential impact to a less than significant level.

With implementation of MMs BIO-1 through BIO-4, impacts to special status species would be less than significant.

Threshold 3.3b: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The proposed Project would generally direct future development to areas of existing development, and limit development of otherwise undeveloped, native-vegetated open space, thereby limiting potential effects to sensitive natural communities. Regardless, the Project may result in future development of vacant areas supporting native vegetation communities, potentially containing sensitive upland vegetation types. Implementation of MM BIO-4, which requires the Applicant/Developer of future development projects to have a biological assessment conducted, would reduce potential impacts to sensitive upland vegetation types to a less than significant level. Furthermore, sensitive riparian vegetation types are typically associated with drainage features. As such, these communities are protected under State and federal law as discussed above in Section 3.3.3. Implementation of MM BIO-5, which requires the Applicant/Developer of future development projects to conduct a delineation, if recommended by a qualified biologist, and subsequent consultation with and acquisition of permits from the appropriate regulatory agencies prior to initiation of any site disturbance activities, would reduce this potential impact to a less than significant level.

Threshold 3.3c: Would the project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed Project would mostly direct future development to areas of existing development, limiting development of naturally-occurring drainage features, and therefore minimizing potential impacts to any vegetated riparian or wetland habitat. Furthermore, cement-lined jurisdictional drainage features are dispersed across the City and impacts to those features may occur as a result of the proposed Project.

As discussed in Section 3.3.3, Relevant Programs and Regulations, the CWA requires permits for activity involving jurisdictional waters. Prior to any impacts to the resources under the jurisdiction of the USACE, CDFW, or RWQCB, appropriate permits would have to be obtained from these resource agencies. These permits would identify necessary mitigation to reduce disturbance impacts and require appropriate replacement habitat to ensure no net loss in biological resource values. Compliance with the permit requirements would reduce potential impacts to wetlands and riparian communities to a less than significant. Also, implementation of MM BIO-3, discussed under Threshold 3.3a, would avoid impacts related to introduction of invasive plant species installed for the purpose of fire-resistant landscaping into riparian habitats. Furthermore, implementation of MM BIO-5, which requires the Applicant/Developer of future

development projects to conduct a delineation, if recommended by a qualified biologist, and subsequent consultation with and acquisition of permits from the appropriate regulatory agencies prior to initiation of any site disturbance activities, would reduce this potential impact to a less than significant level.

Threshold 3.3d: Would the Project interfere substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement is already greatly restricted within the City due to existing urban development in most areas. Wildlife movement is likely to be confined to the Arroyo Seco along the western boundary of the City and within the vacant, naturally-vegetated open space areas in the southwestern portion of the City. The proposed General Plan and DTSP Update would direct future development to occur in areas of existing development, and not to areas of undeveloped, naturally-vegetated open space. Therefore, implementation of the Project would not reduce the amount of available undeveloped, naturally-vegetated open space used by wildlife for migration.

Future development pursuant to the Project may involve vegetation clearing and tree removal that could also result in the direct loss of active bird nests, active bat maternity roosts, or the abandonment of active nests or roosts by adults. Bird nests with eggs or young are protected under the MBTA and the *California Fish and Game Code* and may be considered native wildlife nursery sites. Active bat maternity roosts are considered native wildlife nursery sites. Implementation of MMs BIO-1 and BIO-2 would reduce adverse impacts to nesting birds to a less than significant level by minimizing or avoiding disturbance through seasonal scheduling and/or pre-construction surveys and avoidance of designated active nesting areas. Implementation of MM BIO-2 would reduce impacts to an active bat maternity roost to a less than significant level through seasonal avoidance or pre-construction surveys and avoidance.

Threshold 3.3e: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City of South Pasadena has a detailed tree preservation ordinance. Because all development within the City would be required to comply with the policies and regulations set forth in the City's tree preservation ordinance, the proposed Project would not conflict with this local policy. There would be a less than significant impact, and no mitigation is required.

Threshold 3.3f: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

There are no adopted, approved, or proposed Habitat Conservation Plans (HCP); Natural Community Conservation Plans (NCCP); or other approved local, regional, or State habitat conservation plans that cover habitats located within the City of South Pasadena. There would be no conflict with any such provisions and no impact would occur with implementation of the Project. No mitigation is required.

3.3.7 CUMULATIVE IMPACTS

The cumulative impacts on biological resources are evaluated based on the potential impacts of growth and development in the City and in the San Gabriel Valley. Future development pursuant to the Project could contribute to the cumulative changes in plant and wildlife habitats in the San Gabriel Valley due to increasing urbanization and population growth in the region.

Development on disturbed lands and developed areas, which are likely to support non-native species or disturbed habitats, are less likely to have adverse impacts on special status plant and wildlife species. The proposed Project would mostly direct future development to occur in areas of existing development. With implementation of MMs BIO-1 and BIO-2, which reduce impacts related to the potential presence of special status bird and bat species in developed areas of the City; MM BIO-3, which reduce impacts related to invasive plant species for fire-resistant landscaping; and MM BIO-4, which requires an impact assessment for future development of vacant, naturally vegetated areas, the Project would not contribute to a significant cumulative impact to sensitive plant and wildlife species, riparian habitat, and jurisdictional resources. Compliance with the City's tree preservation ordinance would ensure that future development within the City would result in a less than significant cumulative impact on trees and associated policies protecting a biological resource. There is no adopted HCP/NCCP for the City or surrounding area.

Because potentially significant impacts to biological resources resulting from future development pursuant to the Project would be less than significant with MMs BIO-1 through BIO-5, future development under the Project is not expected to contribute to a cumulatively significant impact to biological resources.

3.3.8 MITIGATION MEASURES

MM BIO-1 A qualified biologist shall conduct nesting bird surveys in areas with potentially suitable habitat prior to all construction or site preparation activities that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). The survey area shall include all potential bird nesting areas within 200 feet of any disturbance. The survey shall be conducted no more than three days prior to commencement of activities (i.e., grubbing or grading).

If active nests of bird species protected by the MBTA and/or the *California Fish and Game Code* (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer shall be placed a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the biologist and/or applicable regulatory agency permits.

Clearing and/or construction within the buffer shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist shall serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

MM BIO-2 Trimming or removal activities of mature or significant trees will be conducted between August 16 and February 28, outside of the breeding season for native bird and bat species. If activities trimming or removal activities must be conducted during the breeding season, a qualified biologist shall survey the tree to be

impacted to assess the presence or absence of any active bird nest or bat maternity roost. If either are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.

MM BIO-3 Within three months of the adoption of the General plan and Downtown Specific Plan Update, the City shall develop a list of fire resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list shall be the basis of any requirements of recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping.

MM BIO-4 If the disturbance limits of any future development project are within 500 feet of native vegetation located in the Arroyo Seco drainage corridor, the Applicant/Developer shall have a biological assessment conducted. A biological assessment shall also be conducted for all future development on or immediately adjacent to vacant, naturally vegetated parcels. All assessments shall be conducted by a qualified biologist and shall identify all potential sensitive biological resources and provide recommendations for focused surveys (if warranted) and/or avoidance or minimization conditions for project implementation. The assessment shall be reviewed and approved by the City prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all recommendations of the biological assessment such that project-level impacts are not expected to reduce regional populations of plant and wildlife species to below self-sustaining levels.

MM BIO-5 If project construction activities of any future development project have the potential to impact (e.g., dredge and fill, demolition, dewatering or other discharge) a channel/drainage that conveys water during rainfall events, at a minimum, or as recommended by the qualified biologist conducting an assessment per MM BIO-4 above (if also applicable), shall conduct a jurisdictional delineation to determine if impacted channel/drainage meets definition of State and federal regulations. If the delineation report, prepared by a qualified biologist, indicates potential regulated drainage(s), subsequent consultation with appropriate regulatory agencies (depending on the agency jurisdiction[s]) and acquisition of permits, if required, prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all permit conditions.

3.3.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.3.10 REFERENCES

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3.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.4.1 METHODOLOGY

This section analyzes cultural resources (historic, archaeological, and tribal cultural) impacts with implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information in this section is derived from historic resources research and analysis conducted by Architectural Resources Group and based in part of the City's *Citywide Historic Resources Survey* prepared by Historic Resources Group (HRG) and dated June 20, 2017 (2017 Survey), a historic and archaeological records search conducted by the South Central Coastal Information Center (SCCIC) on August 17, 2020 (Appendix A-1), Senate Bill (SB) 18 and Assembly Bill (AB) 52 outreach records regarding tribal cultural resources conducted by the City (Appendix A-2), and review of recent California Environmental Quality Act (CEQA) documentation for City of South Pasadena projects.

3.4.2 EXISTING CONDITIONS

Ethnographic and Development History

The original inhabitants of the present-day City of South Pasadena (City) were members of the Hahamog'na tribe, a band of the native Tongva people, who settled along the banks of the Arroyo Seco (Pasadena Savings and Loan Association 1952). The tribe elected to settle in this area because of the plentiful water supplied by both the Arroyo Seco and a small brook located to the east of Raymond Hill. It also occupied a geographically strategic site that allowed them to control trade and access across the San Gabriel Mountains (HRG 2014). Like most of Southern California's indigenous populations, the Hahamog'na have been described in ethnographic accounts as a peaceful group of hunter-gatherers who subsided on small game as well as berries, seeds, roots, and nuts derived from native plants.

Circa 1770, Spanish explorer Gaspar de Portolá came upon the Hahamog'na's territory while embarking on an overland excursion between San Diego and Monterey that led to the Spanish colonization of California. Accompanying him was Father Junípero Serra, who was charged with founding a network of missions to spread the Catholic faith and cement Spain's stronghold in the region. In 1771 Father Serra founded the Mission San Gabriel Arcángel roughly five miles to the east of the City. The Hahamog'na peaceably received Portola and his entourage; and eventually they were assimilated into mission life. As neophytes, they were compelled to perform the unpaid labor that kept the mission running, including making bricks, tanning leather, tending vineyards, herding sheep, and working as lime burners (HRG 2014).

California remained a Spanish colony until 1822, when it was ceded to Mexico. Under Mexican rule the missions were secularized, and almost all of the land within California was divided into expansive land grants — or ranchos — that were given to those who were held in high regard with the Mexican government. An area comprising 14,000 acres and comprising the present-day cities of Pasadena, South Pasadena, and San Marino was given to Spanish lieutenant Juan Mariné and was known as Rancho San Pascual (HRG 2014). Rancho San Pascual passed through a succession of owners over time, and portions of it were eventually carved out and sold off. What is now the City of South Pasadena was primarily used for cattle grazing, dairy farming, and other types of agribusiness, and a handful of small adobe houses were erected in the vicinity.

The roots of the present-day City of South Pasadena are associated with those of the City Pasadena, its northern neighbor. In 1873 an area comprising nearly 4,000 acres was deeded to

the Indiana Colony (reorganized as San Gabriel Orange Grove Association) and was settled by a group of Indiana investors who sought better weather and fertile soil on which to cultivate citrus and other cash crops (HRG 2014, Creason 2016). Much of this area was subsequently named Pasadena. As the City of Pasadena began to grow into a vibrant community in the late nineteenth century, those who had settled in the southern reaches of the colony — the area south of Columbia Street — began to see themselves as a separate community. They chartered their own school district (1878) and post office (1882), and when the City of Pasadena incorporated in 1886 the southern area was not included within the Pasadena city limits (HRG 2014).

The City of South Pasadena witnessed a frenzy of development activity in the 1880s, upon the arrival of railroad lines to the area. In 1885, the Los Angeles and San Gabriel Valley Railroad arrived and connected the City with the cities of Pasadena and Los Angeles. A transcontinental railroad line to Los Angeles was also constructed at around the same time, which put Southern California squarely on the national radar and brought scores of visitors, settlers, and speculators to the region. In 1886, travel agent Walter Raymond opened the 200-room Raymond Hotel, a resplendent edifice that instantly became a tourist attraction (Thomas 2008). Also, that year, Edwin Cawston opened the Cawston Ostrich Farm, an equally popular tourist destination where guests could ride the birds, feed them oranges, and buy products that were made of their skin and feathers (HRG 2014). The City of South Pasadena incorporated in 1888 and became the County of Los Angeles' sixth city.

By the turn of the 20th century, the City boasted a population of 1,001 and had matured into an early residential suburb. Just ten years later, in 1910, its population had grown more than fourfold, to 4,600 (HRG 2014). Almost all of the development that took place during this early period of the City's history consisted of single-family houses that exhibited Arts and Crafts influences. A small, yet vibrant commercial node had also emerged along Mission Street, to the east of Meridian Avenue. Anchored by the local railroad depot, it consisted predominantly of one and two-story brick commercial buildings and resembled a typical, small-town business street complete with retail stores on the ground level and apartments and meeting halls up above (NRHP Inventory 1977).

The population of Southern California grew steadily in the early decades of the 20th century, and many newcomers were attracted to the suburban setting and bucolic atmosphere afforded by the City. By the 1920s, the City's subdivisions and neighborhoods were almost entirely developed with detached, single-family dwellings predominantly designed in the Craftsman and Period Revival idioms that were popular at the time. New businesses and institutions also arose to meet the day-to-day needs of the growing city, with most commercial development concentrated along Mission Street and Fair Oaks Avenue.[1] The City also made notable improvements to its infrastructure and increased the scope of its civic resources.

In 1923, amid this period of growth, the City implemented a zoning ordinance that regulated future development and notably permitted the construction of multi-family residences, primarily along major vehicular thoroughfares. By the end of the decade the City had the look and feel of a quintessential suburb. Far enough removed from, yet within a reasonable distance, to the City Los Angeles' central business district and other urban amenities, it appealed to commuters who relied upon Los Angeles but sought a living environment that, on the whole, was safer, more tranquil, and more bucolic. Though the City had a well-defined business district and a smattering of institutions and light industry, it was known as a residential community and was lauded for its tranquil, tree-lined streets and for the quality of its housing stock.

[1] Information relating to development patterns was derived from analysis of Sanborn Fire Insurance maps.

The Great Depression stymied development in the City, as it did throughout virtually all of Southern California. Though some new houses continued to be erected on vacant parcels within existing subdivisions, the pace of development paled when compared to the prosperous times of previous decades. New construction at this time was largely limited to institutional buildings and other public works endeavors that were funded by the array of federal programs associated with the New Deal. The Depression also spelled disaster for some of the City's most iconic and enduring institutions, chief among them being the Raymond Hotel. The hotel was foreclosed on in 1931; three years later, in 1934, it was demolished (HRG 2014).

Historically accessed and traversed primarily by rail, the City increasingly became the domain of the automobile as the 20th century progressed. Buses replaced trolleys on Mission Street in 1935 (HRG 2014). In 1938, ground was broken on the Arroyo Seco Parkway, the first high speed, limited access, divided lane highway in the western United States. Construction of the parkway — which provided a direct vehicular route between the cities of Pasadena and Los Angeles, and charted a course that passed through the City of South Pasadena — marked the first stretch of road in what would eventually develop into an expansive regional freeway network (i.e., State Route [SR] 110) (HRG 2014, NPS 2018). It also rendered it easier for the motoring public to access the suburban environment of the City by car.

Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel, and the Monterey Hills area near the southwest corner of the City (HRG 2014). Both were targeted for development after World War II, at which time Southern California experienced a sudden and substantial population increase and a corresponding shortage of housing. The Raymond Hotel site was rezoned to accommodate mid-rise multi-family residential development, and the Monterey Hills were subdivided and developed predominantly with single-family houses. Other development that took place at this time was limited to infill within existing neighborhoods. New commercial development was also pursued on an infill basis within existing commercial nodes. In 1983, voters approved a ballet measure to adopt a Citywide 45-foot building height limit.

In 1959, the State of California adopted its Master Plan of Freeways and Expressways, which included a northward extension of the Long Beach Freeway (then signed SR-7, and now as Interstate [I] 710) between the cities of Alhambra and Pasadena. In 1964, State transit officials formally adopted the "Meridian Route" as the alignment of this extension, which was to pass directly through the City and effectively divide the community in half (South Pasadena 2018). Due to its potential to alter the City's built landscape, these plans engendered a considerable amount of community opposition among City residents and emerged as one of the most divisive, controversial, and enduring planning issues affecting the City. For several successive years, the entire City was identified as one of the Eleven Most Endangered Places in the United States by the National Trust for Historic Preservation, as a result of the irreparable impact the proposed freeway would likely yield on historical resources within the City (South Pasadena 2018). In 2017, essential funding was pulled from the freeway project, which would have connected the I-710 to the I-210, which effectively terminated it (NTHP 2017). In October 2019, Senate Bill (SB) 7, Surplus Nonresidential Property and State Highway Route 710, was signed into law. Among other items, the bill removed, effective January 1, 2024, from the California freeway and expressway system the portion of I-710 between Alhambra Avenue in the City of Los Angeles and California Boulevard in the City of Pasadena.

Historical Resources

The City has an active historic preservation program that promotes and protects significant elements of its architectural and cultural heritage. The local historic preservation movement was

conceived in 1970, when South Pasadena Beautiful[2] created a subcommittee to study ways and means to promote historic preservation in the community. Eventually, the subcommittee became the Jean Driskel Foundation, later renamed the South Pasadena Preservation Foundation, a private non-profit organization. The City's first Historic Preservation Ordinance followed soon after in 1971, putting the City on the forefront of preservation planning.

In 1991, the City Council commissioned the first comprehensive, citywide historic resource survey. This survey generated an inventory of historic resources and also provided a foundation for their recognition and protection in future planning endeavors. The City updated its Cultural Heritage Ordinance in 1992, which included the then present-day criteria and mechanisms for designating individual resources and historic districts at the local level. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the current ordinance and replaced it with a new ordinance that was effective August 18, 2017 and addresses current preservation issues and strengthens the City's legal framework needed to assure continued protection of its historic character and scale.

In 1994, findings from the comprehensive historic resource survey were adopted by the City Council; the inventory that was generated from this exercise was known as the Historic Resources Survey: Inventory of Addresses; it included designated properties, as well as properties that appear eligible for federal, State, or local listing. The Inventory of Addresses was updated in 2002; and again in 2017 in the *Citywide Historic Resources Survey* (2017 Survey). The following analysis is based on information in the 2017 Survey.

The pool of known historical resources in the City can be classified in the following two categories: (1) designated historical resources and (2) potential historical resources. The former includes individual resources and concentrations of resources (historic districts) that have been formally designated at the federal (i.e., National Register of Historic Places [NRHP]), State (i.e., California Register of Historic Resources [CRHR]), and/or local level (i.e., City of South Pasadena). The latter consists of individual resources and historic districts that have been identified as potentially eligible for federal, State, and/or local listing through survey evaluation. The 2017 survey produced a comprehensive list of historical resources (designated and potential) within the City that were built through the year 1972. The 2017 Survey derived from the survey is considered to constitute a complete and authoritative list of known historical resources within the City (HRG 2017). The 2017 Survey comprises 2,718 entries and consists of designated individual properties, historic districts, and district contributors; eligible individual properties, historic districts, and district contributors; and properties that merit special consideration in the local planning process or require additional study. In accordance with Section 2.65(e)(3)(D)(ii) of the SPMC and the City's Cultural Heritage Ordinance, all properties in the 2017 Survey are considered historical resources for purposes of CEQA, and, therefore, the analysis in this Environmental Assessment (EA).

Designated Historical Resources

Per the 2017 Survey, 288 individual properties, districts (some of which include individual properties), and district contributors are designated as historic at the federal, State, and/or local level. Table 3.4-1, Designated Individual Resources, summarizes the 61 individual properties within the City that are designated as historic. This table only includes properties that have been individually designated, including individual resources that also fall within the boundaries of a designated historic district.

[2] A volunteer non-profit organization that partners with governmental, volunteer, philanthropic, and educational organizations to pursue sustainability and beautification projects in the City.

TABLE 3.4-1
DESIGNATED INDIVIDUAL RESOURCES

Address/Location	Year Built	Resource Name	Landmark Number	Status
1414 Alhambra Road	1923	Lloyd E Morrison Residence	24	City
425 Arroyo Drive	N/A	Garfias Spring	38	City
430 Arroyo Drive	N/A	Manuel Garfias Adobe Site	20	City
431 Arroyo Drive	1953	Cathedral Oak Monument	19	City
Ashbourne Drive	N/A	Ashbourne Drive and Chelton Way	12	City
2007 Ashbourne Drive	1917	Ashbourne/Chelton Hybrid Oak Tree	14	City
209 Beacon Avenue	1907; 1946; 1962	Whitney R Smith House and Studio	52	City
2031 Berkshire Avenue	1914	Mabel Packard House	39	City
816 Bonita Drive	1928	Grokowski House	28	CRHR; City
929 Buena Vista Street	1901	Torrance Childs House	11	City
1001 Buena Vista Street	1905	Garfield Residence	4	City
1005 Buena Vista Street	1897	Howard Longley Residence	17	City
1107 Buena Vista Street	1910	David M Rabb Family Homestead	53	City
1120 Buena Vista Street	1870	Knox-Merwin-Porter House	42	City
1243 Brunswick Avenue	1906	Single-Family Residence	N/A	CRHR
1301 Chelten Way	1911	Miltimore House	11	NRHP; City
919 Columbia Street	1885	Riggins House	48	CRHR; City
1109 Columbia Street	N/A	Single-Family Residence	N/A	CRHR
1127 Columbia Street	1908	Single-Family Residence	N/A	CRHR
1131 Columbia Street	N/A	Single-Family Residence	N/A	CRHR
1327 Diamond Avenue	N/A	School Administration Building	30	City
2017 Edgewood Drive	N/A	Eddie House and Memorial Park	32	City
1019 El Centro Street	N/A	South Pasadena Bank Building	8	CRHR; City
1115 El Centro Street	N/A	South Pasadena Library	10	NRHP; City
200 Fair Oaks Avenue	N/A	Raymond Hill Waiting Station	16	City
435 Fair Oaks Avenue	N/A	South Pasadena War Memorial Building	2	CRHR; City
435 Fair Oaks Avenue	N/A	Oaklawn Bridge and Waiting Station	3	CRHR; City
800 Fair Oaks Avenue	1911	Fair Hope Building	49	City
1019 Fair Oaks Avenue	1925	Rialto Theater	25	City
1414 Fair Oaks Avenue	1958	Smith and Williams Building	46	City
1804 Foothill Street	1919	Adobe Flores and Cactus Garden	1	NRHP; City
221 Fremont Avenue	1908	Single-Family Residence	N/A	CRHR
920 Fremont Avenue	1920	Grace Brethren Church	22	City
517 Garfield Avenue	1924	Adobe Eulalia Perez	35	City
1114 Garfield Avenue	1907	Chouinard House	44	City
225 Grand Avenue	1917	Dr John S Tanner Residence	23	City
1635 Laurel Street	1923	Clokey Oak Tree	13	City
851 Lyndon Street	1887	Wynyate	6	NRHP; City
909 Lyndon Street	1896	East Wynyate	43	CRHR; City
913 Meridian Avenue	N/A	Meridian Iron Works	5	City
636 Mission Street	1928	Markey Building	31	City

TABLE 3.4-1
DESIGNATED INDIVIDUAL RESOURCES

Address/Location	Year Built	Resource Name	Landmark Number	Status
729 Mission Street	1925; 1943; 1985	Baranger Studios	27	City
815 Mission Street	1939	Municipal Plunge Building	45	City
950 Mission Street	1923	Mission Arroyo Hotel	26	City
1000 Mission Street	1903	Century House	34	City
1501 Mission Street	1923	Pettee Building	37	City
237 Monterey Road	1887	Single-Family Residence	N/A	CRHR
309 Monterey Road	1889	Vivekananda House	29	City
323 Monterey Road	1947	Fleet House	51	City
355 Monterey Road	1986	Burwood House	47	City
844 Monterey Road	1908	Washburn House	40	City
911 Monterey Road	N/A	Single-Family Residence	N/A	CRHR
921 Monterey Road	1912	Single-Family Residence	N/A	CRHR
1103 Monterey Road	1885	Leo Longley Residence	21	City
1325 Monterey Road	1907	St James Episcopal Church	33	City
Oaklawn Avenue	N/A	Oaklawn Portals	9	City
201 Orange Grove Avenue	1887	Bissell House	36	City
215 Orange Grove Avenue	1875	Andrew O Porter Residence	15	City
220 Orange Grove Avenue	1913	Single-Family Residence	N/A	CRHR
1040 Stratford Avenue	1910	Huntzinger House	50	City
1010 Sycamore Avenue	1896	Cawston Ostrich Farm Site	18	City

N/A: not available; NRHP: National Register of Historic Places; CRHR: California Register of Historic Resources; City: designated by the City of South Pasadena

Source: Historic Resources Group (HRG). 2017 (Revised June). *City of South Pasadena Citywide Historic Resources Survey.* Pasadena, CA: HRG. 636721709083330000 (southpasadenaca.gov).

The 2017 Survey also identifies ten designated historic districts in the City, as follows:

- Arroyo Seco Parkway Historic District (NRHP);
- Buena Vista Historic District (City);
- El Centro/Indiana/Palm Historic District (City);
- Mission West/Historic Business District (NRHP);
- North of Mission Historic District (CRHR);
- Oak/Laurel Historic District (City);
- Oaklawn District/Oaklawn District Addition (NRHP);
- Prospect Circle Historic District (City);
- Ramona Craftsman District (City); and
- South of Mission Historic District (CRHR).

Collectively, there are 236 contributing properties within South Pasadena's ten historic districts.

Archaeological Resources

Based on review of recent CEQA documentation for projects within the City and consultation with the City, there are no known archaeological resource sites within the City of South Pasadena (South Pasadena 2012, 2016).

An updated cultural resources records search was conducted for the Project site at the SCCIC at California State University, Fullerton on August 19, 2020. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS) for the Project site and houses records concerning archaeological and historic resources in Los Angeles, Ventura, San Bernardino, and Orange Counties. The review consisted of an examination of the U.S. Geological Survey's Los Angeles and Pasadena, California 7.5-minute quadrangles to determine if any cultural resources studies have been conducted within the Project site. The records search provided data on recorded archaeological and built environment resources within the Project site. Sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility, historic maps, and the Historic Property Data File (HPDF) maintained by the California Office of Historic Preservation. The HPDF contains listings for the CRHR and/or the NRHP, California Historical Landmarks, and California Points of Historical Interest.

A total of 45 archaeological and/or historic studies have been conducted within the Project site, as shown in Table 3.4-2, Cultural Resources Studies Within the Project Site.

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE

Report No.	Year	Title	Author/Affiliation
LA-00112	1974	Impact on Archaeological Resources of Proposed Upgrading Ramps on the Pasadena Freeway	University of California, Los Angeles Archaeological Survey
LA-00115	1974	Evaluation of the Archaeological Resources and Potential Impact of Proposed Extension of the Long Beach Freeway (rt.7) North From Valley Blvd. to Rt. 210 (Colorado Freeway)	University of California, Los Angeles Archaeological Survey
LA-01319	1983	Archaeological Survey Report for Two Proposed Disposal Sites 07-la 7 Routes 10 to 210 07-204-020090	Caltrans
LA-03440	1994	Third Supplemental Historic Architectural Survey Report 710 Freeway Gap Closure Report (07-la 710, 26.5/r32.7 Ea 07-020090) Volume II: Pasadena Avenue District Reevaluation	Caltrans District 7: Environmental Planning Branch
LA-03497	1994	Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.
LA-03498	1994	Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.
LA-03498A	—	Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System	Harris Miller, Miller & Hanson Inc.
LA-04216	1900	Report of the US National Museum Under the Direction of the Smithsonian Institute for the Year Ending June 30, 1900	The Smithsonian Institute
LA-04386	1993	Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project	Caltrans
LA-04451	1993	Route 7 Environmental Impact Statement Supplement	Caltrans

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE

Report No.	Year	Title	Author/Affiliation
LA-04638	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 948-01, in the County of Los Angeles, California	LSA Associates, Inc.
LA-04890	2000	Negative Archaeological Survey Report, Highway Project Description	Caltrans District 7
LA-04909	2000	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California	Jones & Stokes
LA-05132	1999	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 1319 and 1921 Fremont Avenue, South Pasadena, Los Angeles County, California	McKenna et al.
LA-05421	2000	Negative Archaeological Survey Report: 07-la-110-07-174-965120	Caltrans District 7
LA-05434	2001	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 809 and 813 Meridian Avenue, South Pasadena, Los Angeles County, California	Mc Kenna et al.
LA-06334	2002	Below the Basketball Court: Burial Recovery at Arroyo Seco Park	Greenwood and Associates
LA-06362	1994	Finding of Effect on Historic Properties Arroyo Seco Parkway and Four Level Interchange	Caltrans District 7
LA-06385	2001	Section 106 Review for 5568 Via Marison Avenue Arroyo Seco Park Historic District Los Angeles, Ca	Historic Resources Group
LA-06835	2003	Cultural Resource Assessment Cingular Wireless Facility No. Vy311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.
LA-06839	2003	Burial Data Summary Arroyo Seco/San Pascual Park Los Angeles, California	Greenwood and Associates
LA-07426	2004	Caltrans Historic Bridges Inventory Update: Concrete Arch Bridges	JRP Historical Consulting
LA-07553	2004	Cultural Resource Assessment Cingular Wireless Facility No. Vy 311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.
LA-08526	2004	Historic Resources Report, 258-266 Monterey Road, South Pasadena, California	San Buenaventura Research Associates
LA-08542	2004	Cultural Resource Records Search Results and Site Visit for Cingular Wireless Facility Candidate Sb-390-01 (Bilicke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-08634	2007	Cultural Resources Study of the Arroyo Seco Park Project, Royal Street Communications Site No. La0108b, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates
LA-08928	2007	A Phase I (CEQA) and Class II (NEPA) Cultural Resources Investigation for the Lower Arroyo Seco Trail and Trailhead Improvements Project Area in the City of Pasadena, Los Angeles County, California	McKenna et al.
LA-08948	2007	Public Review Draft Environmental Impact Report, Downtown Revitalization Project, Sch No. 2007031024	RBF Consulting

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE

Report No.	Year	Title	Author/Affiliation
LA-09098	2006	Extended Phase I Testing for Cingular Wireless Facility Candidate 950-014 198e/lsanca0336 (Arroyo Park) Arroyo Seco Park, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-09099	2005	Cultural Resources Records Search Results and Site Visit for Cingular Wireless Site 950-014-198e (City Park) Arroyo Park, Near Intersection of Comet Street and Pasqual Avenue, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-09489	2003	Arroyo Seco Parkway Historic District	California Archives
LA-09601	2008	Cultural Resources Records Search and Site Visit Results for AT&T Candidate SV0061-01 (OG Park), 820 El Centro Street, South Pasadena, Los Angeles County, California.	Michael Brandman Associates
LA-10209	2004	Finding of Effect Report for the Raymond Ave. To SR110 Connector Project, Los Angeles County, CA	Myra L. Frank & Associates, Inc
LA-10388	2009	Direct APE Historic Architectural Assessment for Clearwire Candidate CALOS0099A/ LA03XC129A (S. Pasadena Water Tank), 700 S. La Portada, South Pasadena, Los Angeles County, California	MBA
LA-10541	2005	Finding of Effect for the Proposed Arroyo Seco Bike Path, Los Angeles County, California	EDAW, Inc.
LA-10541A	2003	Historic Property Survey Report Proposed Arroyo Seco Bike Path County Of Los Angeles, California	EDAW
LA-10541B	2003	Arroyo Seco Bike Path Historic Resources Evaluation Report HRER - Appendix 1	EDAW
LA-10541C	2004	HPSR / Determinations of Eligibility for Arroyo Seco Bike Path Project	Caltrans
LA-10576	2004	Historic Property Survey Report for the Raymond Avenue to SR 110 Connector Project for the Raymond Avenue to SR 110 Connector Project	Myra L. Frank & Associates, Inc.
LA-10866	2007	Cultural Resources Study of the Arroyo Seco Park Project Royal Street Communications Site No. LA0108B, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates
LA-11231	2009	Historic American Engineering Record Arroyo Seco Flood Control Channel, Los Angeles County, California	EDAW, Inc.
LA-11529	2008	Arroyo Seco Channel Project in the cities of Los Angeles and Pasadena, Los Angeles County, California	Department of the Army
LA-11554	2000	Historic Resources Evaluation Report and Finding of No Adverse Effect for Oaklawn Bridge, City of South Pasadena Seismic Retrofit and Historic Restoration Project	California Archives
LA-11650	2011	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate IE24844-G (Stein Rooftop), 1959 Huntington Drive, Alhambra, Los Angeles County, California	Michael Brandman Associates
LA-12060	2012	Cultural Resources Study of the South Pasadena Water Tank Project, MetroPCS California, LLC Site No. MLAX04166, 700 La Portdada Street, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE

Report No.	Year	Title	Author/Affiliation
LA-12221	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04862A (SB390 Billcke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	MBA
LA-12422	2013	Cultural Resources Assessment Arroyo Seco Pedestrian and Bicycle Path Project Cities of South Pasadena and Los Angeles Los Angeles County, California	LSA
LA-12423	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04948A (LA948 Sinclair) 1499 Huntington Drive, South Pasadena, Los Angeles County, California	MBA
LA-13148	2013	Initial Study/Mitigated Negative Declaration Sewer Rehabilitation and Replacement Project	DUDEK
SCCIC 2020			

Additionally, 108 cultural resources were identified within the Project site, as shown in Table 3.4-3, Archeological and Historical Resources Near the Project Site.

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-003057	Prehistoric	Site	Resource Name – Arroyo Seco/San Pascual Site	2002 (John M. Foster, Greenwood & Associates)
P-19-150039	Historic	Building	OHP Property Number – 116020; Resource Name – Whitney & Virginia Smith House	1993 (Anne Schield, Caltrans)
P-19-150040	Historic	Building	OHP Property Number – 102633; Resource Name – Warren D House	1994 (D. Kane, Caltrans)
P-19-150041	Historic	Building	OHP Property Number – 116021; Resource Name – East Wynyate	1993 (Anne Schield, Caltrans)
P-19-150042	Historic	Building	OHP Property Number – 116022; Resource Name – Otake/Nambu House	1994 (Anne Schield, Caltrans)
P-19-150075	Historic	District	OHP Property Number – 116029; Resource Name – Stimson Historic District; Voided – 19-185128	1994 (D. Kane, Caltrans)
P-19-150078	Historic	Building, Element of District	OHP Property Number – 030300; Resource Name – Stone/Brooks House; Voided – 19-179611	1993 (A. Scheid, Caltrans)
P-19-150079	Historic	Building, Element of District	OHP Property Number – 030301; Resource Name – Henry Stephen Boice House; Voided – 19-179612	1993 (A. Scheid, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-150080	Historic	Building	OHP Property Number – 030302; Resource Name – Frank P O'Connor House; Voided – 19-179613	1994 (A. Scheid, Caltrans)
P-19-179471	Historic	Building	OHP Property Number – 030160; Resource Name – Leo Longley House	1977 (Tom Sitton, Natural History Museum)
P-19-179472	Historic	Building	OHP Property Number – 030161; Resource Name – William Cooper House	1977 (Tom Sitton, Natural History Museum)
P-19-179473	Historic	Building	OHP Property Number – 030162; Resource Name – Anna B McKay House; Other – Marins S Daniels House	1977 (Tom Sitton, Natural History Museum)
P-19-179474	Historic	Building	OHP Property Number – 030163; Resource Name – Porter House	1977 (Tom Sitton, Natural History Museum)
P-19-179475	Historic	Building	OHP Property Number – 030164; Resource Name – South Pasadena School	1977 (Tom Sitton, Natural History Museum)
P-19-179476	Historic	Building	OHP Property Number – 030165; Resource Name – Raymond Hill Waiting Station; Other – SW Fair Oaks Ave & Raymond Hill Rd	1977 (Tom Sitton, Natural History Museum)
P-19-179477	Historic	Building	OHP Property Number - 030166; Resource Name - Kate Plumb House	1977 (Tom Sitton, Natural History Museum)
P-19-179478	Historic	Building	OHP Property Number – 030167; Resource Name – Kate A White House	1977 (Tom Sitton, Natural History Museum)
P-19-179479	Historic	Building, Element of District	OHP Property Number – 030168; Resource Name – A S Hoyt House	1977 (Tom Sitton, Natural History Museum)
P-19-179481	Historic	Building, Element of District	OHP Property Number – 030170; Resource Name – Williams-Perrin House; Other – Charles P Williams House	1977 (Tom Sitton, Natural History Museum)
P-19-179482	Historic	Building, Element of District	Resource Name – Garfield House; Other – Mrs. Lucretia R Garfield House; Other – Mrs. James A Garfield House	1973 (M L Fey, South Pasadena Cultural Heritage Commission)
P-19-179483	Historic	Building, Element of District	OHP Property Number – 030172; Resource Name – Howard Longley House	1973 (M L Fey, South Pasadena Cultural Heritage Commission)
P-19-179484	Historic	District	OHP Property Number – 030173; Resource Name – Buena Vista District	1976 (Lois M. Webb, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179486	Historic	Building, Structure, Element of District	OHP Property Number – 030175; Resource Name – Oaklawn Bridge & Waiting Station	1972 (M L Fey, South Pasadena Cultural Heritage Commission); 2000 (Daniel Abeyta, OHP); 2001 (Dan Peterson, Avila Tom Architects); 2001 (Glen Duncan, S. Pasadena Cultural Heritage Commission
P-19-179499	Historic	District	OHP Property Number – 030188; Resource Name – Oaklawn District; Other – Oak Lawn Place	1976 (L Webb, CA Department of Transportation); 2008 (Robert J. Magiligan)
P-19-179500	Historic	Building	OHP Property Number – 030189; Resource Name – Seymour House	1977 (T Sitton, Natural History Museum)
P-19-179501	Historic	Building	OHP Property Number – 030190; Resource Name – J R Riggins House, Gertmenian House	1977 (T Sitton, Natural History Museum; John W. Snyder, Caltrans)
P-19-179502	Historic	Building, Element of District	OHP Property Number – 030191; Resource Name – Alexander Block	1977 (T Sitton, Natural History Museum)
P-19-179503	Historic	Building, Element of District	OHP Property Number – 030192; Resource Name – Graham Block	1977 (T Sitton, Natural History Museum)
P-19-179505	Historic	Building, Element of District	OHP Property Number – 030194; Resource Name – Shapiro Block	1977 (T Sitton, Natural History Museum)
P-19-179506	Historic	Building, Element of District	OHP Property Number – 030195; Resource Name – Edwards & Faw Block	1977 (T Sitton, Natural History Museum)
P-19-179509	Historic	Building, Element of District	OHP Property Number – 030198; Resource Name – Herlihy Block; Other – South Pasadena Review Bldg	1977 (T Sitton, Natural History Museum)
P-19-179510	Historic	Building, Element of District	OHP Property Number – 030199; Resource Name – Taylor Block	1977 (T Sitton, Natural History Museum)
P-19-179516	Historic	Building, Element of District	OHP Property Number – 030205; Resource Name – Mission Hotel	1977 (T Sitton, Natural History Museum)
P-19-179518	Historic	District	OHP Property Number – 030207; Resource Name – South Pasadena Historic District; Resource Name – Mission West District	1976 (L Webb, CA Department of Transportation); 1977T (Sitton, Natural History Museum)
P-19-179519	Historic	Building	OHP Property Number – 030208; Resource Name – Jacobs Block	1977 (T Sitton, Natural History Museum)
P-19-179520	Historic	Building	OHP Property Number – 030209; Resource Name – Fremont Ave Brethren Church	1977 (T Sitton, Natural History Museum)
P-19-179521	Historic	Building, Element of District	OHP Property Number – 030210; Resource Name – Rialto Theater	1977 (T Sitton, Natural History Museum)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179522	Historic	Building	OHP Property Number – 030211; Resource Name – War Memorial Bldg	1977 (T Sitton, Natural History Museum)
P-19-179523	Historic	Building	OHP Property Number – 030212; Resource Name – South Pasadena High School Administration Bldg; Other – South Pasadena School District Office	1977 (T Sitton, Natural History Museum)
P–19–179524	Historic	Building	OHP Property Number – 030213; Resource Name – A Mitchell House, Dieterle House, Wilson House; Other – Albert A Mitchell House; Other – Wililam Dieterle House; Other – Wilson House	1977 (T Sitton, Natural History Museum)
P-19-179525	Historic	Building	OHP Property Number – 030214; Resource Name – A C Bilicke House; Other – South Pasadena Methodist Church	1977 (T Sitton, Natural History Museum)
P-19-179526	Historic	Building	OHP Property Number – 030215; Resource Name – St James Episcopal	1977 (T Sitton, Natural History Museum)
P-19-179527	Historic	Building	OHP Property Number – 030216; Resource Name – Tanner House	1977 (T Sitton, Natural History Museum)
P-19-179528	Historic	Building	OHP Property Number – 030217; Resource Name – Grokowsky House	1976 (L M Webb & A Cole, CA Department of Transportation)
P-19-179529	Historic	Building	OHP Property Number – 030218; Resource Name – Sherry House	1982 (J Snyder, DOTP Caltrans)
P-19-179530	Historic	Building	OHP Property Number – 030219; Resource Name – Kenneth W Joy House	1982 (J Snyder, DOTP Caltrans)
P-19-179531	Historic	Building	OHP Property Number – 030220; Resource Name – The Captain's House	1982 (J Snyder, DOTP Caltrans)
P-19-179561	Historic	District	OHP Property Number – 030250; Resource Name – North of Mission District; Voided – 19-179647	1982 (J Snyder, DOTP Caltrans)
P-19-179610	Historic	District	OHP Property Number – 030299; Resource Name – South of Mission District; Voided – 19-179648	1982 (J Snyder, DOTP Caltrans)
P-19-179614	Historic	Building	OHP Property Number – 030303; Resource Name – J G Pierce House	1982 (J Snyder, DOTP Caltrans)
P-19-179615	Historic	Building	OHP Property Number – 030304; Resource Name – Miltimore House	1970 (E McCoy, UCSB/UCLA)
P-19-179616	Historic	Building	OHP Property Number – 030305; Resource Name – Adobe Flores; Other – La Casa de Jose Perez	1972 (M Fay, South Pasadena Cultural Heritage Commission)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179617	Historic	Building	OHP Property Number – 030306; Resource Name – Wynyate; Other – Welsh for Vineyard	1973 (Margaret Leslie Fay, S. LA-12060, LA-12221 Pasadena Cultural Heritage Commission)
P-19-179618	Historic	Building	OHP Property Number – 030307; Resource Name – Tanner House	1982 (J Snyder, DOTP Caltrans)
P-19-179645	Historic	Structure, District	OHP Property Number – 030334; Resource Name – Arroyo Seco Parkway Historic District; Other – SR-110 Pasadena Freeway, Arroyo Seco Freeway; OHP Property Number – 177126; National Register – NPS-10001198-9999	1982 (Snyder, John W., Cal Trans); 2003 (David Greenwood, Myra L. Frank & Assoc.); 2008 (Janice Calpo, Cal Trans)
P-19-179649	Historic	Building	OHP Property Number – 030339; Resource Name – 1100 Loma Vista Ct; OHP Property Number – 064983	1986 (J. Triem, McClelland Engineers)
P-19-179650	Historic	Building	OHP Property Number – 030340; Resource Name – Swimming Pool Bldg; Other – Plunge	1986 (J Snyder, Caltrans)
P-19-179651	Historic	Building	OHP Property Number – 030342; Resource Name – Edward Hall House	1986 (J Snyder, Caltrans)
P-19-179652	Historic	Building	OHP Property Number – 030343; Resource Name – E C Emmons House	1986 (J Snyder, Caltrans)
P-19-179653	Historic	Building	OHP Property Number – 030344; Resource Name – 1002 Highland St	1986 (J Snyder, Caltrans)
P-19-179654	Historic	Building	OHP Property Number – 030345; Resource Name – 1004 Highland St	1986 (J Snyder, Caltrans)
P-19-179655	Historic	Building	OHP Property Number – 030346; Resource Name – Anna S Breed House	1986 (J Snyder, Caltrans)
P-19-179656	Historic	Building	OHP Property Number – 030347; Resource Name – Drachmann House	1986 (J Snyder, Caltrans)
P-19-179657	Historic	Building	OHP Property Number – 030348; Resource Name – Groetzinger House; Other – Ruddock House	1986 (J Snyder, Caltrans)
P-19-179658	Historic	Building	OHP Property Number – 030349; Resource Name – 629 Grand Ave	1986 (J Snyder, Caltrans)
P-19-179659	Historic	Building	OHP Property Number – 030350; Resource Name – Thomson House; Other – Garrison House; OHP Property Number – 064905	1986 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179660	Historic	Building	OHP Property Number – 030351; Resource Name – 400 Prospect Circle; OHP Property Number – 149742	1986 (J Snyder, Caltrans)
P-19-179661	Historic	Building	OHP Property Number – 030352; Resource Name – Mrs. E Ambrose House; OHP Property Number – 149744	1986 (J Snyder, Caltrans)
P-19-179662	Historic	Building	OHP Property Number – 030353; Resource Name – 420 Prospect Circle; OHP Property Number – 149747	1985 (J Snyder, Caltrans)
P-19-179663	Historic	Building	OHP Property Number – 030354; Resource Name – R L Gabriel House; Other – Percy & Emogene Griffin House; OHP Property Number – 149749	1985 (J Snyder, Caltrans)
P-19-179664	Historic	Building	OHP Property Number – 030355; Resource Name – 902 Buena Vista	1985 (J Snyder, Caltrans)
P-19-179665	Historic	Building	OHP Property Number – 030356; Resource Name – R L Spayde House	1985 (J Snyder, Caltrans)
P-19-179666	Historic	Building	OHP Property Number – 030357; Resource Name – Jessie Waterman House	1985 (J Snyder, Caltrans)
P-19-179667	Historic	Building	OHP Property Number – 030358; Resource Name – P A Reid House	1985 (J Snyder, Caltrans)
P-19-179668	Historic	Building	OHP Property Number – 030359; Resource Name – Donald E Marquis House	1985 (J Snyder, Caltrans)
P-19-179669	Historic	Building	OHP Property Number – 030360; Resource Name – Kenneth A Gabriel House	1985 (J Snyder, Caltrans)
P-19-179670	Historic	Building	OHP Property Number – 030361; Resource Name – P Tully House	1985 (J Snyder, Caltrans)
P-19-179671	Historic	Building	OHP Property Number – 030362; Resource Name – Stillman B Jameson House	1985 (J Snyder, Caltrans)
P-19-179672	Historic	Building	OHP Property Number – 030363; Resource Name – 310 Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179673	Historic	Building	OHP Property Number – 030364; Resource Name – D C Smith House	1985 (J Snyder, Caltrans)
P-19-179674	Historic	Building	OHP Property Number – 030365; Resource Name – 330 Orange Grove Ave	1985 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179675	Historic	Building	OHP Property Number – 030366; Resource Name – 340 Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179676	Historic	Building	OHP Property Number – 030367; Resource Name – 441 Prospect Circle; OHP Property Number – 149751	1985 (J Snyder, Caltrans)
P-19-179677	Historic	Building	OHP Property Number – 030368; Resource Name – Lucian M Williams House; OHP Property Number – 149750	1985 (J Snyder, Caltrans)
P-19-179678	Historic	Building	OHP Property Number – 030369; Resource Name – Percy & Emogene Griffin House; OHP Property Number – 149749	1985 (J Snyder, Caltrans)
P-19-179679	Historic	Building	OHP Property Number – 030370; Resource Name – A C Buttalph Jr House; OHP Property Number – 149748	1985 (J Snyder, Caltrans)
P-19-179680	Historic	Building	OHP Property Number – 030371; Resource Name – Edward Byrne House; OHP Property Number – 149743	1985 (J Snyder, Caltrans)
P-19-179681	Historic	Building	OHP Property Number – 030372; Resource Name – Marie Emry House; OHP Property Number – 149755	1985 (J Snyder, Caltrans)
P-19-179682	Historic	Building	OHP Property Number – 030373; Resource Name – H A Wilcox House; OHP Property Number – 149754	1985 (J Snyder, Caltrans)
P-19-179683	Historic	Building	OHP Property Number – 030374; Resource Name – 461 Prospect Circle; OHP Property Number – 149753	1985 (J Snyder, Caltrans)
P-19-179684	Historic	Building	OHP Property Number – 030375; Resource Name – 451 Prospect Circle; OHP Property Number – 149752	1985 (J Snyder, Caltrans)
P-19-179685	Historic	Building	OHP Property Number – 030376; Resource Name – T L Stearns House	1985 (J Snyder, Caltrans)
P-19-179686	Historic	Building	OHP Property Number – 030378; Resource Name – M Brokaw House	1985 (J Snyder, Caltrans)
P-19-179687	Historic	Building	OHP Property Number – 030378; Resource Name – C E Tracy House; OHP Property Number – 149737	1985 (J Snyder, Caltrans)
P-19-179688	Historic	Building	OHP Property Number – 030379; Resource Name – 430 S Orange Grove Ave	1985 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179689	Historic	Building	OHP Property Number – 030380; Resource Name – R L Langer House; OHP Property Number – 149738	1985 (J Snyder, Caltrans)
P-19-179690	Historic	Building	OHP Property Number – 030381; Resource Name – I F Gordon House; OHP Property Number – 149739	1985 (J Snyder, Caltrans)
P-19-179691	Historic	Building	OHP Property Number – 030382; Resource Name – J F Gordon House; OHP Property Number – 149740	1985 (J Snyder, Caltrans)
P-19-179692	Historic	Building	OHP Property Number – 030383; Resource Name – Prospect Circle District; OHP Property Number – 149735	1985 (J Snyder, Caltrans)
P-19-186859	Historic	Building	Resource Name – Arroyo Seco Flood Control Channel; OHP Property Number – 147051 status code (2S2); OHP Property Number – 173825 status code (6X); National Register – NPS – 08000579-0027	2003 (M. Strauss, EDAW)
P-19-187627	Historic	Building	OHP Property Number – 126436; Resource Name – El Centro Market	2000 (G. Duncan, South Pasadena Cultural Heritage Commission)
P-19-188513	Historic	Building	OHP Property Number – 147063; Resource Name – S Pasadena Water Tower; Other – Sprint CA –LOS0099A; Other – Bilicke Water Tank	2009 (K.A. Crawford, Michael Brandman Associates)
P-19-189325	Historic	Building	OHP Property Number – 177126; Resource Name – Arroyo Seco Park; Other – Art in the Park	2000 (Christy Johnson, Historic Resources Group)
P-19-190613	Historic	Building	Resource Name – Arroyo Seco Golf Course	2013 (Casey Tibbet, Associates, Inc)
P-19-190632	Historic	Building	Resource Name – Medical Offices; Other – T-Mobile West LLC IE04948A/LA948 Sinclair	2013 (K.A. Crawford, Michael Brandman Associates)
P-19-190788	Historic	Building	Resource Name – 1000 Block Fair Oaks District; OHP Property Number – 150988	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)
P-19-190789	Historic	Building	Resource Name – 1100 Block Fair Oaks District	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)
P-19-191944	Historic	District	Resource Name – Garfield Substation Property	2015 (Wendy L. Tinsley Becker, Urbana Preservation & Planning)
SCCIC 2020				

One known prehistoric archaeological resource (P-19-0003057) is within the City of South Pasadena (SCCIC 2020). The archaeological resource is a prehistoric archaeological site also known as the Arroyo Seco/San Pascual Site and was originally documented in 2002 when a human skull from a burial was identified during the trenching for an irrigation line. Upon discovery of the burial, the Los Angeles Police Department was notified, who retrieved the skull elements, and then turned over the remains to the Los Angeles Coroner, who notified the Native American Heritage Council (NAHC). Subsequent investigations with assistance of the Most Likely Descendent, Samuel Dunlap, revealed a rock cairn on the top of the human remains. Cultural constituents found with the burial included a chert projectile point base and marine shell (*Protothaca staminea*). A local informant claims that "milling tools" were found in his yard across the street from the discovery, but these items have yet to be verified to actual provenience. Additionally, the area where the discovery was made has been designated as an archaeological site because of the important information and lack of ground visibility for the entire area.

Sacred Lands File Search

An inquiry was made on of the NAHC on July 10, 2020, to request a review of the Sacred Lands File (SLF) database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its SLF search on July 15, 2020. The results from the NAHC Sacred Lands Files search for the Project site was positive, meaning one or more Native American sacred sites are documented within or near the City. The locations and other details of sacred sites are kept confidential in order to protect the sites.

3.4.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended, calls for the preservation of cultural resources through one of its implementing regulations (36 *Code of Federal Regulations* [CFR] Section 800, Protection of Historic Properties), as well as under the National Environmental Policy Act. Properties of traditional religious and cultural importance to Native Americans are protected under Section 101(d)(6)(A) of the NHPA.

Section 106 of the NHPA (16 *United States Code* [USC] Section 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed and mitigation measures are proposed to reduce the impacts to an acceptable level.

National Register of Historic Places

Significant cultural resources include resources that are listed in or are eligible for listing in the NRHP per the criteria listed at 36 CFR 60.4:

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that meet one or more of four established criteria:

(a) Are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) Are associated with the lives of persons significant in our past; or

(c) Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) Have yielded, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to National Register Bulletin No. 15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity”. Integrity is defined in National Register Bulletin No. 15 as “the ability of a property to convey its significance”. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define “integrity”. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by National Register Bulletin No. 15 as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

Historic Contexts

To be eligible for listing in the NRHP, a property must also be significant within a historic context. National Register Bulletin No. 15 states that the significance of a historic property can be judged only when it is evaluated in its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific . . . property or site is understood and its meaning . . . is made clear". A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the NRHP.

Historic Districts

The NRHP includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties".

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development. A district's significance and historic integrity should help determine the boundaries. Other factors include the following:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity or
- It independently meets the criterion for listing in the NRHP.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) (Secretary of the Interior's Standards) assist in the preservation of a property's historical significance by preserving historic materials and features of historic buildings of all materials, construction types, sizes, and occupancy. The standards include preservation of exterior and interior building components, related landscape features and the building's site and environment, as well as the compatibility of attached, adjacent, or related new construction.

Implementation of these "standards" is identified in the State CEQA Guidelines Section 15064.5(3) as generally resulting in the reduction of an impact on an identified historic resource to a less than significant level.

State

California Environmental Quality Act

Section 15064.5 of the State CEQA Guidelines requires a Lead Agency to determine whether a project would have a significant effect on one or more historical resources. A "historical resource" is defined as a resource listed in or determined to be eligible for listing in the CRHR (PRC 21084.1); a resource included in a local register of historical resources (14 *California Code of Regulations* [CCR] Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant (14 CCR 15064.5[a][3]). The definitions of "historic" for CEQA purposes have been summarized by the California appellate courts as including mandatory, presumptive, and discretionary categories.

Projects that affect the historical significance of a resource that is listed in or has been formally determined eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from a project are thus considered significant and adverse under Section 15064.5 (b) of the State CEQA Guidelines if the project (1) physically destroys, demolishes, relocates, or alters the resource or its immediate surroundings; or (2) materially impairs, demolishes or alters the physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; its inclusion in a local register of historical resources; its identification in an historical resources survey; or its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

California Register of Historical Resources

The Office of Historic Preservation (OHP) administers the CRHR, which was established in 1992 through Sections 5020 et seq. of the *California Public Resources Code* (PRC) to be "an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]).

The CRHR listing criteria focus on resources of State, rather than national, significance. The CRHR includes the following types of resources, either as an individual property or a contributor to a historic district: (1) properties listed in or determined eligible for listing in the NRHP (automatically included); (2) California Historical Landmarks numbered 770 and higher (automatically included); (3) California Points of Historical Interest recommended for listing by the OHP; and (4) resources nominated for listing and determined eligible by meeting one or more of the CRHR criteria.

The CRHR consists of properties that are listed automatically, as well as those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP and those formally Determined Eligible for the NRHP;

- California Registered Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP (per the criteria listed at 36 CFR 60.4), are stated below.

> The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and that:
>
> (1) Are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
>
> (2) Are associated with the lives of persons important to local, California, or national history; or
>
> (3) Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
>
> (4) Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. The minimum age criterion for the CRHR is generally 50 years. Under the Special Considerations provided in the California Code of Regulations (Title 14, Division 3, Chapter 11.5, 4852[d][2]), resources less than 50 years old may be eligible for listing if "it can be demonstrated that sufficient time has passed to understand its historical importance". Once listed, the historical resource is protected from any detrimental changes and any alterations, repairs, and additions must be reviewed and approved by the State Historical Resources Commission under the State Historical Building Code to ensure that the quality of the resource remains intact.

California Historical Building Code

The California State Historical Building Code (CHBC) (*California Code of Regulations*, Title 24, Part 8) is intended to save California's architectural heritage by recognizing the unique construction issues inherent in maintaining and adaptively reusing historic buildings. The CHBC's standards and regulations facilitate the rehabilitation or change of occupancy so as to preserve their original or restored elements and features; to encourage energy conservation and a cost effective approach to preservation; and to provide for reasonable safety from fire, seismic forces, or other hazards for occupants and users of such buildings, structures, and properties and to provide reasonable availability and usability by the physically disabled. The 2016 triennial edition of the CHBC, effective January 1, 2017, is the currently adopted code. The City has adopted the CHBC by reference (Section 9.50 of the South Pasadena Municipal Code).

Mills Act

Enacted in 1972, the Mills Act (*California Government Code*, Article 12, Section 50280-50290; *California Revenue and Taxation Code*, Article 1.9, Sections 4.9-439.4) grants participating local governments (cities and counties) the authority to enter into contracts with owners of qualified historic properties, pursuant to the CHBC, who actively participate in the restoration and maintenance of their historic properties while receiving property tax relief.

Senate Bill 18

SB 18 (*California Government Code,* Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies. It establishes responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the (NAHC's SB 18 Tribal Consultation List within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the *California Public Resources Code* that may be affected by the proposed adoption of or amendment to a general or specific plan. The Project is subject to SB 18. A description of the City's SB 18 process for the Project is provided in the analysis below.

Assembly Bill 52

AB 52 is applicable to projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or notice of a Negative Declaration (ND) or Mitigated Negative Declaration (MND) on or after July 1, 2015. AB 52 requires that the tribes ask the lead agency to be contacted for consultation. Then, the lead agency must contact the tribes to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project and have requested such consultation prior to determining the type of CEQA documentation that is applicable to the project (i.e., EIR, ND, MND). AB 52 allows Tribes 30 days after receiving notification to request consultation. The lead agency then has 30 days to initiate consultation. Significant impacts to Tribal cultural resources are considered significant impacts to the environment. The Project is subject to AB 52. A description of the City's AB 52 process for the Project is provided in the analysis below.

Discovery of Human Remains

Section 7050.5 of the *California Health and Safety Code* provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Section 5097.98 of the PRC states that, if the remains are determined by the Coroner to be of Native American origin, the Coroner must notify the NAHC within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descendant (MLD) from the deceased Native American. The MLD shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains

and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (*California Public Resources Code,* Section 5097.98).

City

Cultural Heritage Ordinance

The City's Cultural Heritage Ordinance has been utilized since 1992 as a tool for implementing the City's preservation efforts. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the ordinance in place at that time and replaced it with a new ordinance that helps property and business owners gain a clear understanding of the Cultural Heritage Commission's (CHC) purpose and processes, assists the CHC with its decision making, and strengthens the City's legal framework to assure continued protection of its historic character and scale. The purpose of the Cultural Heritage Ordinance "is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, signs, objects, features, sites, places, landscapes, and areas representing the City's architectural, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage" (South Pasadena 2017). The Cultural Heritage Ordinance also discusses the designation criteria for landmarks and historic districts in the City, and procedures for listing landmarks and districts on the South Pasadena Register of Landmarks and Historic Districts. Additionally, this ordinance mandates the establishment of a cultural resources inventory and defines the process for obtaining certificates of appropriateness, which authorize work that may affect cultural resources. The current Cultural Heritage Ordinance became effective August 2017.

3.4.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse cultural and tribal cultural resources impact if it would:

Threshold 3.4a: Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;

Threshold 3.4b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5;

Threshold 3.4c: Disturb any human remains, including those interred outside of dedicated cemeteries; and/or

Threshold 3.4d: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.4.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to cultural or tribal cultural resources.

3.4.6 ENVIRONMENTAL IMPACTS

Threshold 3.4a: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

As discussed above and articulated in the 2017 Survey, the City is a community that has numerous designated historical resources. At present there are 61 designated individual resources, 10 designated historic districts containing a collective total of 236 contributing properties, and 2,257 additional properties that have been identified as potentially eligible historical resources. In total, there are 2,718 properties (designated and potential resources at the federal, State, and/or local level) in the City that possess, or may possess, historical merit. All the five focus areas include one or more parcels that are designated or potentially historic, either as individual resources or contributors to a district.

The proposed Project would not directly cause a substantial adverse change in the significance of a historical resource. The policies and actions articulated in both documents represent broad, programmatic objectives, and as such they do not call for targeted demolition or substantial alteration of a known historical resource in the City. However, it is possible that the Project would indirectly facilitate development activities, which may in turn indirectly cause a substantial adverse change in the significance of an individual historical resource and/or a historic district.

Since the City is an established community that was largely built out by World War II, the number of properties dating to the post-war era and more contemporary periods of history is generally less than other municipalities in Southern California. The survey upon which the 2017 Survey is predicated accounted for resources that were constructed through the year 1972. It is possible that, over time, there will be additional resources within the City that possess potential historical significance but are not currently identified in the 2017 Survey. One of the new provisions in the Cultural Preservation Ordinance updated in 2017 is to allow the Cultural Heritage Commission to review any proposed demolition of structures not listed in the 2017 Survey and greater than 45 years old. Properties may be determined to be eligible for listing as a historic resource based on various criteria, including properties that:

- Are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
- Are associated with the lives of persons important to local, California, or national history; or
- Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
- Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

There are other elements of the City's architectural and cultural heritage that contribute to its significance but are not accounted for in the 2017 Survey or other repositories of information. This

includes trees and other landscape and hardscape features, and properties whose significance is derived primarily from their association with ethnic and cultural groups and is therefore somewhat intangible. These types of resources are often not accounted for in surveys and other conventional methods of inventorying historical properties. Like the contemporary resources discussed above, landscape features and resources with intangible significance may be adversely affected by the Project because they fall outside the purview of the City's policies and procedures related to historical resources.

The City's approach to future development has a focus on the preservation and maintenance of historical resources, balanced with required incorporation of housing opportunities . The approach includes awareness and understanding of the City's historical resources and best professional practices for managing said resources; encourage the designation of historical resources listed in the 2017 Survey; and ensure that development objectives are compatible with the character of the existing built environment. The City intends to preserve the integrity of historic districts, and to prevent infill development that is incongruent with the essential characteristics of historic districts. The importance of integrating new development with the historic character of neighboring historic buildings and districts; and preserving, enhancing, and building on existing downtown assets to harness the power of place-making in the Downtown area are integral to the City's approach. In doing so, it recognizes the importance of maintaining the historical character of the Downtown commercial core. The City's approach, in combination with the extensive regulatory framework of federal, State, and local regulations governing the treatment of historical resources, in particular the City's Cultural Heritage Ordinance, would contribute to the protection and maintenance of historical resources within the City.

The City's approach would facilitate the prevention of substantial alterations to historical resources. This includes developing and support an understanding among members of the community — including Cultural Heritage Commissioners, property owners, architects, contractors, and others — of how to apply the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). When a development project conforms to the Standards, it is generally considered to not have a significant adverse impact on historical resources. Increasing the public's understanding of the Standards and their proper application would reduce inappropriate and substantial alterations to historical resources.

The City intends to establish an updated inventory, in the future, to clarify which properties are considered to be resources. Updating the 2017 Survey would ensure that resources that come of age over time are accounted for; it also calls for the development of theme studies relating to the history of locally significant cultural groups. Enhancing awareness of local historical resources is anticipated to foster a sense of appreciation and civic pride, which in turn would aid in preventing their extensive alteration or demolition.

As discussed above, without safeguards it is possible that development under the Project could result in substantial adverse changes to historical resources. In the instance that a project results in the demolition of a historical resource, or substantial alterations to a historical resource that are not in conformance with the Standards, a significant impact would occur. Unless it is possible to relocate the resource in question to an appropriate receiver site, demolition is generally considered to be a significant unavoidable impact. However, the City's policies would facilitate the required increased hosing opportunities, while preventing adverse changes to and protection of historical resources. The City's established historic preservation policies and procedures, combined with existing State and local preservation laws and regulations, would adequately protect existing and future historical resources.

There would be a less than significant impact to historical resources, and no mitigation is required.

Threshold 3.4b: Would the proposed General Plan and Specific Plan cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

The results of the 2020 SCCIC records search indicate that one previously recorded prehistoric archaeological site, P-19-003057, has been identified within the City; however, the archaeological site would not be impacted by Project-related activities. The proposed Project would not directly cause a substantial adverse change in the significance of an archaeological resource. The City is almost completely built out and is in a highly developed, urban area of Los Angeles County. Because there are few vacant parcels and the projected growth is limited, future development would largely occur in areas of the City that are already developed and/or built out. As many of these sites are likely already disturbed, implementation of the Project is not anticipated to introduce a substantial amount of new development that would impact archaeological resources. However, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown/unrecorded archaeological resources. In general, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter unknown archaeological resources.

Review and protection of archaeological resources are afforded under CEQA for individual development projects that would be, the subject of discretionary actions that are implemented in accordance with the City's development review process. Per Section 21083.2(a) of the *Public Resources Code*, a lead agency is required to determine whether a development project may have a significant effect on archaeological resources. Specifically, pursuant to Section 15064.5(f) of the State CEQA Guidelines, should archaeological resources be found during ground-disturbing activities, a qualified archaeologist must make an immediate evaluation of the find to determine whether it is a "Tribal Cultural Resource" pursuant to Section 21074 of the *California Public Resources Code*, a "unique archaeological resource" pursuant to Section 21083.2(g) of the *California Public Resources* Code, or a buried "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. Tribal cultural resources are discussed further below under Threshold 3.4(d). If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the archaeologist shall formulate a mitigation plan in consultation with the City and the developer, when present, that satisfies the requirements of the above-referenced sections. If the archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he may record the site and submit the recordation form to the CHRIS at the SCCIC at California State University, Fullerton. However, while the above-described sections of the *California Public Resources Code* provide a process to manage unanticipated archaeological resources, they are not presented as a single, cohesive requirement. It is possible that the appropriate processes may not be implemented due to lack of awareness. Therefore, MM CUL-1 requires that future development projects retain a qualified archaeologist to monitor excavation activities and salvage any encountered resources as necessary and appropriate.

Although soil-disturbing activities associated with development in accordance with the Project could unearth previously unknown archaeological resources, compliance with existing regulations and MM CUL-1 would reduce potential impacts to archaeological resources to a less than significant level.

Threshold 3.4c: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

The proposed Project would not directly disturb any human remains, including those interred outside of dedicated cemeteries. As discussed under Threshold 3.4b, future development would largely occur in areas of the City that are already developed and/or built out. As many of these sites are likely already disturbed, implementation of the Project is not anticipated to introduce a substantial amount of new development that would potentially impact human remains. However, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter undiscovered unknown remains. Destruction of pre-historic or historic remains can result in the loss of information important to the history of the State, the region, or the immediate locality. Destruction of recent human remains could result in destruction of evidence associated with a crime.

If human remains are encountered, the discovery is required to comply with Section 5097.98 of the *California Public Resources Code* and Section 7050.5 of the *California Health and Safety Code*. This includes halting all work in the immediate vicinity of the discovery and notifying the County Coroner, who will determine whether the remains are of forensic interest. If it is determined that the remains are prehistoric, the NAHC will then be contacted to designate the MLD. Pursuant to Section 7050.5 of the *California Health and Safety Code*, the MLD will make their recommendation within 48-hours of being granted access to the site and is responsible for the ultimate disposition of the remains. The MLD's recommendation will be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner will rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance.

Although soil-disturbing activities associated with development in accordance with the Project could encounter undiscovered human remains, compliance with existing regulations would reduce potential impacts to human remains to a less than significant level, and no mitigation is required.

Threshold 3.4d: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Pursuant to SB 18 and AB 52, the City initiated government-to-government consultation with NAHC-identified California Native American tribes and those tribes that have requested such consultation in order to identify, protect, and/or mitigate potential impacts to cultural places/resources. On March 13, 2018, the City initiated the offer of consultation under SB 18 and AB 52 by sending a letter to the Gabrieleno/Tongva Tribe; Gabrieleno/Tongva San Gabriel Band of Mission Indians; Gabrieleno Band of Mission Indians, Kizh Nation; and Soboba Band of Luiseño Indians. No tribes had requested to be notified of projects in the City pursuant to AB 52; these were the tribes identified by the Cityas having requested notification.

On April 21, 2021, the City initiated consultation under SB 18 and AB 52, pursuant to the change in the Project and associated Recirculated NOP, by sending a letter to the Gabrieleno/Tongva San Gabriel Band of Mission Indians; Gabrieleno Band of Mission Indians, Kizh Nation; Gabrieleno/Tongva Tribe; Gabrieleno/Tongva Indians of California Tribal Council; and Soboba Band of Luiseño Indians. An inquiry was made to the NAHC by Psomas to request a review of the SLF database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its SLF search on July 15, 2020. The results of the SLF check conducted through the NAHC was positive. Additionally, the Native American tribes that received the 2021 consultation letter are all those that were identified by the NAHC. These tribes also received the Recirculated NOP dated April 20, 2021. One tribe, the Gabrieleno/Tongva San Gabriel Band of Mission Indians (Gabrielino Tongva Tribe), responded to the consultation request.

On June 10, 2021, a virtual consultation between the City and the Gabrieleno Tongva Tribe was conducted. The Gabrielino Tongva Tribe indicated they have ancestral ties (i.e., cultural affiliation) to the area within the jurisdiction of the City of South Pasadena and claim to any Tribal Cultural Resources that may be encountered during future development projects within the City's jurisdiction. The Gabrielino Tongva Tribe is aware that archaeological resources may not have been recorded during prior development within the City's jurisdiction; therefore, the possibility of new archaeological discoveries does exist. The Gabrielino Tongva Tribe wished to have the opportunity to participate in Native American monitoring if mitigation measures or conditions for monitoring for tribal cultural resources are incorporated into future development projects within the City's jurisdiction. The Gabrielino Tongva Tribe also indicated that they believe a project applicant has the right to contract with a tribal group of their choosing for the purpose of Native American monitoring and is opposed to measures or conditions designating one particular Gabrielino Tribal group for the purpose of Native American monitoring (Dunlap 2021). There were no tribal cultural resources known to the Gabrielino Tongva Tribe apart from the site(s) associated with the NAHC's Sacred Lands File.

Additionally, as discussed under Thresholds 3.4a and 3.4d, when excavating in native (i.e., undisturbed) soils, there is always the potential to encounter unanticipated archaeological resources, which may include Tribal Cultural Resources and/or Native American remains. As discussed above, with compliance with existing regulations potential impacts to human remains would be less than significant. Additionally, implementation of regulations and MM CUL-1 would reduce potential impacts to unknown archaeological resources, including tribal cultural resources, to a less than significant level. No further mitigation is required.

3.4.7 CUMULATIVE IMPACTS

Development pursuant to the Project has the potential to disturb or destroy historical resources associated with the City's history and local culture. Historic structures that may be altered or demolished in and near the City would affect the cultural significance of an individual site or the structure, as well as incrementally diminish the City's historical context. Similarly, growth and

development in the San Gabriel Valley may involve demolition of older structures that may be important to the valley's history. Demolition or alterations that do not follow the Secretary of the Interior's Standards would lead to the cumulative loss of historic resources in the San Gabriel Valley. Implementation of historic preservation ordinances by individual cities would preserve sites and structures of local importance. Compliance with the City's Cultural Heritage Ordinance and City policies pertaining to the preservation of historic resources by the City of South Pasadena would prevent significant adverse impacts on historical resources in the City and avoid a cumulative contribution to the loss of historical resources. There would be a less than significant cumulative impact, and no mitigation is required.

Direct impacts to cultural resources are generally site specific. Although a project, in conjunction with the effects of past projects, other current projects, and probable future projects, could potentially result in the disturbance of prehistoric archaeological resource sites (including Tribal Cultural Resources and Native American remains) throughout the region, the City requires the mitigation of impacts to these resources (i.e., MM CUL-1). Growth and development in the San Gabriel Valley would also lead to new development on vacant and undeveloped lots. Future development and public and infrastructure projects not subject to CEQA could adversely affect in-situ archaeological resources, and cumulative impacts may occur. However, implementation of MM CUL-1 would prevent significant adverse impacts on archaeological resources in the City and thus, would avoid a cumulative contribution to the loss of archaeological resources in the Valley. There would be a less than significant cumulative impact to archaeological resources with implementation of MM CUL-1, and no further mitigation is required.

3.4.8 MITIGATION MEASURES

MM CUL-1 Prior to the issuance of a grading permit, Applicants for future development projects shall demonstrate to the City Planning and Building Department that a qualified Archaeologist has been retained by the applicant to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine when monitoring of grading activities is needed. If any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, or as determined by the Archaeologist, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the Applicant and the City Planning and Building Department that satisfies the requirements of the above-listed Code sections. Upon approval of the Mitigation Plan by the City, the Project shall be implemented in compliance with the Plan.

If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any

study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the City and to the CHRIS at the SCCIC at the California State University, Fullerton.

3.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.4.10 REFERENCES

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3.5 ENERGY

3.5.1 METHODOLOGY

This section addresses energy use associated with the implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

Section 21100(b)(3) of the *California Public Resources Code* and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) Decreasing overall per capita energy consumption,
>
> (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
>
> (3) Increasing reliance on renewable energy sources.

Appendix F of the State CEQA Guidelines also identifies that "EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy".

3.5.2 EXISTING CONDITIONS

Global climate change and the importance of energy in the need to reduce greenhouse gas (GHG) emissions are discussed in Section 3.7, Greenhouse Gas Emissions, of this Environmental Assessment (EA). A 2016 analysis of the City of South Pasadena's (City) GHG emissions found that energy use is the second largest contributor, being approximately 39 percent of the total, with the energy use approximately equally divided between electricity and natural gas (South Pasadena 2020).

3.5.3 RELEVANT PROGRAMS AND REGULATIONS

State

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020". The current applicable standards are the 2019 Standards, effective January 1, 2020. Analysis by the California Energy Commission concludes that the 2019 energy efficiency standards are projected to result in a 30 percent improvement in energy efficiency for nonresidential buildings over the 2016 standards. The 2019 standards require photovoltaic solar systems on newly constructed single-family residences and on newly constructed multi-family residential structures of three stories or less. Single-family homes built to the 2019 standards will be about 7 percent more efficient than homes built to the 2016 standards; and about 53 percent more efficient after factoring in the required solar systems (CEC 2020).

The 2019 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California. The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others.

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill 1078. The RPS program required investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. The CPUC is required to provide annual progress reports regarding the State's progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the State. Based on the November 2019 annual report, most retail sellers procured at or above the 29 percent RPS annual target for 2018; and the large investor-owned utilities have executed renewable electricity contracts needed to meet the 2020 RPS requirement of 33 percent (CPUC 2020). Since 2003, the three large investor-owned utilities have contracted for over 21,000 megawatts (MW) of renewable energy capacity (CPUC 2020). Senate Bill 100 (California Public Utilities Code Sections 399.11 et seq.), enacted in 2018, updated the RPS, requiring electricity sales to California end-use customers to be 100 percent renewable energy and zero-carbon sources by the year 2045 (CEC 2020).

The California Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, the California Air Resources Board (CARB) has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75 percent less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with EPA and NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025. The Zero- Emissions Vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years. Technologies to achieve the new

standards include engine and emission control advancements, wider application of advanced hybrid technologies and greater use of stronger and lighter materials. These new standards will result in lower fuel use over the life of the vehicle. The automobiles used by workers and residents of the Project are currently fueled primarily by gasoline. However, projections indicate that there will be a transition to electric vehicles. It is estimated that by the year 2040, 57 percent of all passenger vehicle sales will be battery electric vehicles (BNEF 2020). It is also estimated within the same projection that by 2040, 70 percent of the global fleet of buses will also be electrically fueled. As 56 percent of commercial vehicle sales are anticipated for light and medium commercial vehicles in the U.S.; consequently, fuel use for transportation by workers and residents is anticipated to transition from gasoline to electricity.

City of South Pasadena

South Pasadena Municipal Code

Section 36.540.030(c) of the South Pasadena Municipal Code (SPMC) states that the design of a subdivision for which a Tentative and Final Map are required by the zoning code shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivisions, in compliance with Section 66473.1 of the Subdivision Map Act. Sections 9.20 et. seq. of the SPMC sets forth procedures for permitting small residential rooftop solar energy systems.

South Pasadena Climate Action Plan

The City of South Pasadena adopted its first Climate Action Plan (CAP) on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. Energy is one of seven sectors for GHG reduction action identified in the CAP. The GHG reduction measures and supporting actions (called Plays and Moves, respectively, in the CAP) are shown in Table 3.5-1.

TABLE 3.5-1
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR MEASURES (PLAYS) AND ACTIONS (MOVES)

Measures (Plays)	Actions (Moves)
E.1. Maximize the usage of renewable power within the community, by continuing to achieve an opt-out rate lower than 4% for the Clean Power Alliance.	E.1.a Monitor progress and perform public outreach and education campaigns highlighting the benefits of 100% renewable energy, including: • Monitoring opt-out rates on an annual basis • Tabling at community events • Establishing an informational resource page on the City website • Regular social media posts • Energy bill inserts
E.2. Electrify 100% of newly constructed buildings.	E.2.a. Develop a webpage and materials for display at City Hall promoting the benefits of electrification and resources that can assist with the fuel switching process.
	E.2.b Provide financial and technical resources, including hosting workforce development trainings for installers and building owners/operators to discuss benefits and technical requirements of electrification.
	E.2.c Perform regular internal trainings with planners and building officials on current state decarbonization goals and incentives available for electric homes.

TABLE 3.5-1
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR MEASURES (PLAYS) AND ACTIONS (MOVES)

Measures (Plays)	Actions (Moves)
	E.2.d Provide education around cooking with electric appliances, including demonstrations from chefs and/or local restaurants, as available.
	E.2.e Adopt an Electrification Readiness Reach Code per California Energy Commission (CEC) reach code requirements for all new buildings and accessory dwelling units which eliminates the piping of natural gas. In doing so the City will: • Engage with stakeholders, both internal stakeholders, such as City staff and officials, and external stakeholders, such as local developers regarding the purpose and impact of the reach code • Conduct a cost effectiveness study • Develop and draft an ordinance • Conduct public hearings, public notices, and formally adopt the ordinance • Submit the adopted ordinance to the California Energy Commission (CEC)
	E.2.f Adopt an ordinance that allows granting of minor allowances for certain site development standards when there is no practical ways to design a project to be all electric.
E.3 Electrify 5% of existing buildings by 2030 and 80% by 2045.	E.3.a Develop an existing building electrification permit tracking program to track annual progress in achieving the targeted electrification goal.
	E.3.b Keep an updated list of rebates and incentives available to residents who would like to convert their buildings to electric power.
	E.3.c Provide education on the potential energy savings and benefits of electric heat pumps for water heating and space heating when permits for replacement are obtained.
	E.3.d Work with Southern California Edison (SCE) and/or the Clean Power Alliance to provide rebates for residential replacement of natural gas powered air and water heating appliances with electric powered.
	E.3.e Promote water heater, space heating, and appliance (electric stoves/dryers) replacement programs and incentives (residential) at time of construction permit.
	E.3.f Perform an existing buildings analysis in order to understand the potential for electrification retrofitting in South Pasadena and establish a roadmap for eliminating natural gas from existing buildings.
	E.3.g Establish a comprehensive, coordinated education campaign focused towards property owners, landlords, property management companies, and occupants for reducing the use of natural gas in homes and businesses. Establish a shared understanding of existing incentives for electric appliances and upgrades, and how to access them, including SCE incentive programs and rebates.
	E.3.h Perform a cost effectiveness study for electrification retrofitting, including requirements for newly permitted HVAC/hot water heaters and other appliances to be electric.
	E.3.i Develop a best practices model based on the progress electrifying existing buildings in South Pasadena and outside of South Pasadena to significantly increase electrification post 2030.

TABLE 3.5-1
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR MEASURES (PLAYS) AND ACTIONS (MOVES)

Measures (Plays)	Actions (Moves)
E.4 Develop and promote reduced reliance on natural gas through increased clean energy systems that build off of renewable energy development, production, and storage.	E.4.a Conduct a Feasibility Study to assess cost and applicable locations for installation of battery back up systems or generators throughout the City.
	E.4.b Promote installation of storage technology in concert with renewable energy infrastructure through educational programs, outreach, and information provided via City platforms.
	E.4.c Conduct "micro*grid" Feasibility/Pilot Study in support of the General Plan.
	E.4.d In support of the General Plan, develop and implement a Solar Action Plan with a goal of meeting 50% of South Pasadena's power demand through solar by 2040.
	E.4.e In support of the 2018 2019 City Strategic Plan, develop a strategy and implementation schedule for the Renewable Energy Plan, after completion of the feasibility study.
	E.4.f Adopt a PV (Solar) Ordinance requiring newly constructed and majorly renovated multi family and commercial buildings to install PV systems with an annual output greater or equal to 25% of buildings electricity demand.
	E.4.g Require all new structures or major retrofits to be pre-wired for solar panels.
	E.4.h Work with various City departments to establish and streamline battery storage requirements to allow for easier implementation of these technologies throughout the City.
	E.4.i Work with home and business owners, including those in the historic districts, to identify and promote renewable energy demonstration projects to showcase the benefits.
	E.4.j Work with SCE and the CPA to develop a program and timeline for increasing resilience to power losses, including Public Safety Power Shutoffs (PSPS), and climate driven extreme weather events for low income, medically dependent, and elderly populations through installation of renewable energy and onsite energy storage with islanding capabilities, following appropriate project level environmental review.
Source: South Pasadena 2020	

Clean Power Alliance

The City is a member of Clean Power Alliance (CPA), which offers 100 percent renewable electricity as its default option to customers (South Pasadena 2020b). CPA, a community choice aggregator serving 32 member jurisdictions in Los Angeles and Ventura counties, buys electricity from Southern California Edison (SCE) and sells it to customers in its member jurisdictions (CPA 2020). The City has defaulted to 100 percent Green Power for residential uses and Clean Power for non-residential uses. A 100 percent Green Power source produces 100 percent carbon-free energy generation, whereas Clean Power has 50 percent carbon-free energy generation. Based on the CAP, approximately 4 percent of the electricity customers in the City have opted out of the CPA. Specifically, the total breakdown of residential and non-residential participation in this program is 82 percent with 100 percent Green Power, 10 percent Clean Power, 3 percent Lean Power with 40 percent carbon-free power generation, and 4 percent opting out. As such, most customers are choosing 100 percent carbon-free power.

3.5.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse energy impact if it would:

Threshold 3.5a: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Threshold 3.5b: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.5.6 ENVIRONMENTAL IMPACTS

Threshold 3.5a: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Demand

Future construction activities throughout the City are expected to require the use of construction equipment for grading, hauling and building activities; all off-road construction equipment is assumed to use diesel fuel. Construction also includes the vehicles of construction workers and vendors traveling to and from a particular project site and on-road haul trucks for the export of materials from site clearing and demolition and the export and import of soil for grading. Fuel would be consumed from construction worker, vendor, and delivery/haul trucks and light duty gasoline trucks. Fuel energy consumed during construction would be temporary in nature and there are no unusual development characteristics in the City that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the region or State. Construction equipment would conform to applicable CARB emissions standards, which promote equipment fuel efficiencies. Construction contractors would be required to comply with the provisions of Section 2485 the California Code of Regulations (CCR), which prohibits diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction activities would be required to comply with all applicable local and State regulations related to recycling of construction and demolition debris. Therefore, construction of future projects would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operational Transportation

The proposed Project would promote walking and biking as alternatives to automobile use through the goal of creating a multi-modal circulation network that is connected to available transit, which would provide convenient access to the employment centers in the City.

The northwesterly extension of the Metro Light Rail Line, the L Line, was established in 2003 and runs from East Los Angeles to the City of Azusa, via downtown Los Angeles. This light rail line passes through the City of South Pasadena, with a station at the intersection of Mission Street and Meridian Avenue. Metro is continuing to extend the Gold Line through the San Gabriel Valley, with the second phase of the Gold Line Foothill Extension Project running an additional 12 miles to a station in the City of Montclair.

There would be reduced vehicle miles traveled (VMT) per capita and VMT per service population (SP) when compared with the No Project (2040) scenario. Thus, vehicle operation would be more energy efficient with implementation of the Project.

When taking into consideration the City's compact land use pattern and the mixed-use nature of the proposed Project, as well as the proximity to transit, it is anticipated that both fuel efficiency and VMT would reduce over time. Independent projections of EV adoption for California show increases in EV utilization, with California leading in U.S. for Zero-Emission Vehicle (ZEV) sales.

Future project development would be required to comply with all applicable local and State regulations related to alternative vehicle charging availability and EV use would also grow in accordance with market factors that support the turnover of the existing vehicle fleet to accommodate hybrid, EV, and ZEV. This includes all applicable CALGreen Code requirements, which includes the installation of electric vehicle and plug-in hybrid vehicle charging stations to reduce fuel consumption from vehicle trips.

Because the Project would improve the VMT/capita and VMT/SP while accommodating anticipated growth, promote the use of multi-modal forms of transportation—which includes mass transit and non-automobile related transportation—accommodate alternative-fueled transportation options, as well as complementary mixed-use land use development, future use of energy due to increased traffic associated with Project buildout would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operational Energy Demand

The proposed Project's emphasis on redevelopment primarily targeted to the proposed focus areas, which are adjacent to existing employment opportunities, public transit, recreational amenities, and services, is representative of the efficient land use development that would reduce vehicle trips and their associated energy use. As discussed in Section 2.6, Project Objectives, development of pedestrian-oriented mixed-use land use patterns that maximize the use of transit are fully integrated into the Project.

The Project would develop new residential and non-residential buildings that would meet the current Title 24 Energy Efficiency Standards and CALGreen standards in effect at the time of construction. The Project would require or promote all-electric design and solar electric generation on all new construction and would further encourage conversion from natural gas to electric and added solar electric generation in existing buildings. In addition, as discussed above, residents and businesses in the City have adopted electricity generation from the Clean Power Alliance that is overwhelmingly carbon free.

In conclusion, implementation of the Project would result in less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources, during both construction or operation, and no mitigation is required.

Threshold 3.5b: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As described above, the would be required to comply with the State of California's Title 24 Building Standards and Title 24 Energy Efficiency Standards. Because the Project would comply with the latest energy efficiency standards and most local residential and non-residential uses would incorporate 100 percent renewable energy, the Project would not conflict with or obstruct a State plan for renewable energy or energy efficiency.

Table 3.5-1, above, presents the measures and actions from the City's adopted CAP. As discussed for the analysis of long-term energy demand, when taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, the Project would be consistent with the CAP and therefore would not conflict with or obstruct the local plan for renewable energy or energy efficiency.

3.5.7 CUMULATIVE IMPACTS

The cumulative impacts related to energy use and efficiency are analyzed within the San Gabriel Valley (Valley). Future development throughout the Valley would generate additional energy demand and construction and operational fuel energy demand. Future development projects in the Valley would also need to comply with all applicable local and State energy efficiency and electric vehicle/plug-in hybrid vehicle charging stations. The electrification of the transportation sector is anticipated throughout California and would contribute to reduced fuel energy use related to future development throughout the Valley. Also, regional (i.e., Southern California Association of Governments) planning documents support a denser land use pattern with a focus on proximity to transit. In addition, most residential and non-residential land uses have opted for 100 percent carbon-neutral Green Power. Therefore, the Project's contribution to cumulative impacts would be a less than significant related to the efficient use of energy.

3.5.8 MITIGATION MEASURES

No significant adverse impacts related to energy have been identified with implementation of the Project. Therefore, no mitigation is required.

3.5.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.5.10 REFERENCES

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3.6 GEOLOGY AND SOILS

3.6.1 METHODOLOGY

This section discusses the potential seismic and geologic hazards that may adversely be affected by implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information presented in this section was derived from the U.S. Geological Survey, California Geological Survey (CGS), the Natural Resources Conservation Service Web Soil Survey, the existing *City of South Pasadena General Plan*, a paleontological records search conducted by the Natural History Museum of Los Angeles County (NHMLA) on May 3, 2021 (Appendix B), and other publicly available resources, as cited below.

3.6.2 EXISTING CONDITIONS

Regional and Local Geology

The City is located near the boundary between the Peninsular Ranges geomorphic province (on the south) and the Transverse Ranges geomorphic province (on the north). The east-west trending San Gabriel Mountains, located approximately five miles to the north-northwest, are part of the Transverse Ranges. The City is located along the west-central boundary of the San Gabriel Valley, which is bound on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills.

Erosion of the San Gabriel Mountains due to water and gravity has formed fan-shaped alluvial wedges that fill the San Gabriel Valley, providing a basin for groundwater storage (i.e., the Raymond and San Gabriel Valley Basins). The majority of the City is underlain by Pleistocene- and Holocene-age alluvial deposits comprised primarily of sand, silt, and gravel. There are outcroppings of the Tertiary-age Topanga Formation, comprised of sandstone and siltstone, along the northern boundary and in the southwest portion of the City (CGS 1998).

Faults and Seismicity

Within Los Angeles County, numerous regional and local faults are capable of producing severe earthquakes (magnitude [M] of 6.0 or greater). Active and potentially active faults that cross the City include the Raymond fault (also known as the Raymond Hill fault) and the Upper Elysian Park blind thrust. Other faults located near the City (within approximately ten miles) include the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults.

Raymond (also Raymond Hill) Fault

The east-west trending Raymond Fault passes through the northern portion of the City of South Pasadena, as well as the cities of San Marino, Pasadena, Arcadia, and Los Angeles. This fault is considered active and the CGS has established an Alquist-Priolo Earthquake Fault Zone on the entire segment, which extends approximately 500 feet on each side of the fault.

The Raymond Fault is the easternmost section of the generally east-west trending Malibu Coast–Santa Monica–Hollywood–Raymond Fault System. To the east, near Monrovia, it appears to merge into the central part of the Sierra Madre Fault Zone; to the west, it may step over or merge with the Hollywood Fault (CGS 2017a,b). The Raymond Fault is predominantly a left-lateral fault and is thought to be capable of a 6.0 to 7.0 magnitude earthquake. The slip rate for the

Raymond Fault is between 0.10 to 0.22 millimeters per year and an average recurrence interval of about 4,500 years (Caltech 2018).

Elysian Park Blind Thrust

The Elysian Park Fault is a blind thrust fault that has been identified as a seismically active plane fault buried at a depth of approximately 10 kilometers beneath the City. It underlies most of the City, including the former 710 Freeway extension through South Pasadena. Because the Elysian Park Fault is buried and runs horizontally underground, it is not easily depicted on a map (South Pasadena 1998).

Paleontological Resources

Based on review of recent California Environmental Quality Act (CEQA) documentation for projects within the City and consultation with the City, there are no known paleontological resource sites within the City of South Pasadena (South Pasadena 2012, SPUSD 2016). According to the paleontological records search conducted by the NHMLA, three fossil localities were identified within the City, as shown in Table 3.6-1 below.

TABLE 3.6-1
FOSSIL LOCALITIES WITHIN THE CITY OF SOUTH PASADENA

Locality Number	Location	Formation	Taxa	Depth
LACM IP 2542	838 Lyndon Street, South Pasadena	Topanga Formation	Mantis shrimp (Squillidae)	Surface
LACM IP 23222	On Fair Oaks Avenue; north of the intersection of Fair Oaks and the Arroyo Seco Freeway	Unknown formation (Pliocene)	Invertebrates (unspecified)	Surface, along bluff next to sidewalk
LACM IP 24385	South Pasadena; on the east side of Fair Oaks Avenue just north the intersection of the Pasadena Freeway and Fair Oaks Avenue	Unknown formation (Pliocene)	Invertebrates (unspecified)	Unknown
Source: NHMLA 2021.				

The following table shows six additional known localities in the collection of the NHMLA that are near the City:

TABLE 3.6-2
ADDITIONAL KNOWN LOCALITIES NEAR THE CITY OF SOUTH PASADENA

Locality Number	Location	Formation	Taxa	Depth
LACM VP CIT424	Near the intersection of Burleigh Road and Avenue 64	Topanga Formation	Herring (*Ganolytes*), perch-like fish (*Thyrsocles*), ray-finned fish (*Etringus*), and other unspecified	Unknown
LACM VO CIT342	Sparkletts property near 45th and Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth (*Mammuthus*), Bison (*Bison*)	14 ft bgs
LACM VP 6934	Along the slope between Quail Drive and Pheasant Drive; East of Mt. Washington Elementary School	Monterey Formation (yellowish tan siltstone)	Baleen whale (*Mysticeti*)	found in hillslope rubble
LACM VP 7507	Near the intersection of San Fernando Road and Humbolt Street	Monterey Formation	Perch-like fish (*Thyrsocles kriegeri*)	31–32 meter bgs (collected during excavations of the Humboldt Street Sewer Shaft)
LACM VP 1023	Workman and Alhambra Streets	Unknown formation (Pleistocene)	Sabertooth cat (*Smilodon*), horse (*Equus*), deer (*Odocoileus*), Turkey (*Meleagris*)	Unknown (excavations for storm drains)
LACM VP 2032	Los Angeles Brickyard Mission Road and Daly Street	Unknown Formation (Pleistocene, silt & clay)	Mastodon (*Mammut*)	20–35 feet bgs

bgs: below ground surface
Source: NHMLA 2021.

3.6.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

International Building Code

The International Building Code (IBC) is the national model building code. The 2021 IBC is the most recent edition of the IBC, which was incorporated into the 2022 California Building Code, and currently applies to all structures being constructed in California. The national model codes are incorporated by reference into the California, County, and City building codes, discussed below.

State

California Building Code

The California Building Code is promulgated under Title 24 of the *California Code of Regulations*, Parts 1 through 12 (also known as the "California Building Standards Code" or CBC) and is administered by the California Building Standards Commission. The national model code standards adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The 2022 triennial edition incorporates the 2021 IBC, discussed above, and applies to all occupancies that apply for a building permit on or after January 1, 2023. The CBC may be adopted wholly or with revisions by local municipalities.

Alquist-Priolo Act of 1972

The Alquist-Priolo (AP) Earthquake Fault Zoning Act (AP Act) was adopted by the State of California in 1972 after the 1971 San Fernando Earthquake in order to mitigate the hazard of surface fault rupture along known active faults (California Public Resources Code [PRC], Section 2621 et. seq.). The purpose of the AP Act is to reduce the threat to life and property, specifically from surface fault rupture, by preventing the construction of buildings used for human occupancy on the surface trace of active faults. Under this Act, the State has defined an "active" fault as having had surface displacement during the past 11,000 years (Holocene time). This law directs the State Geologist to establish Earthquake Fault Zones (known as "Special Studies Zones" prior to January 1, 1994) in order to regulate development within designated hazard areas. City and County jurisdictions must require a geologic investigation to demonstrate that a proposed development project, which includes structures for human occupancy, is adequately set back (usually at least 50 feet) from an active fault prior to permitting. In accordance with the AP Act, the State has delineated "Earthquake Fault Zones" along identified active faults throughout the state.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (Act) was passed in 1990 and directs the State Department of Conservation to identify and map areas subject to earthquake hazards, such as liquefaction, earthquake-induced landslides, and amplified ground shaking (PRC 2690–2699.6). Passed by the State legislature after the 1989 Loma Prieta Earthquake, the Act was aimed at reducing the threat to public safety and minimizing potential loss of life and property in the event of a damaging earthquake event. Seismic Hazard Zone Maps are a product of the resultant Seismic Hazards Mapping Program and are produced to identify Zones of Required Investigation; most developments designed for human occupancy in these zones must conduct site-specific geotechnical investigations to identify the hazard and to develop appropriate mitigation measures prior to permitting by local jurisdictions.

Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act (effective June 1, 1998) requires that sellers of real property and their agents provide prospective buyers with a disclosure statement when the property is located within one or more State-mapped hazard areas, including a Seismic Hazard Zone. The disclosure can be made as a Local Option Real Estate Transfer Disclosure Statement or a Natural Hazard Disclosure Statement.

California Plumbing Code

Part 5 of the California Building Code (Title 24 of the Code of Regulations) is the California Plumbing Code, which provides standards for the design and construction of water and sewer systems, storm drains and recycled water system in buildings. It prohibits connection to a septic tank in areas served by a public sewer system and requires the proper abandonment of septic tanks, cesspools, and seepage pits.

City

Municipal Code

Building Regulations

The City of South Pasadena has adopted by reference the County of Los Angeles Building Code (which adopts the 2019 California Building Code) as the City's building code in Section 9.1 et. seq. of the *South Pasadena Municipal Code* (SPMC). This is herein referred to as the City Building Code. Certain chapters or sections of the SPMC specifically pertain to construction in areas that present seismic risks and would apply to the Project. These requirements are described below.

Section 110.2, "Geotechnical Hazards", of the SPMC restricts building and grading activities in areas where geotechnical hazards of landslide, settlement, and slippage may be activated or increased because of Project activities. The City Building Official has the authority to require that Project applicants submit an Engineering Geology and/or Soils Engineering Report to indicate how the hazard will be eliminated or mitigated prior to the use or occupancy of the land.

Section 111, "Engineering Geology and Soils Engineering Reports", of the SPMC gives the Building Official the authority to require an Engineering Geology Report, a Soils Engineering Report, or both, in cases where such reports are considered essential for the evaluation of the site's safety. The Engineering Geology and/or Soils Engineering Reports must be prepared by a California-certified engineering geologist or California-licensed civil engineer, respectively, and must contain a finding regarding the safety of the site of the proposed work against hazard from landslide, settlement, or slippage and a finding regarding the effect that the proposed work will have on the geotechnical stability of the area outside the proposed work.

Section 113, "Earthquake Fault Maps", of the SPMC defines the additional requirements for construction of a building or structure near a known active earthquake fault, including, but not limited to, those shown on the Alquist-Priolo Earthquake Zones Map. If a Project is proposed near the trace of a known active fault, the SPMC defines additional geologic investigations to confirm the presence or absence of active earthquake faults. The results of the investigations, conclusions, and recommendations shall be presented in a geology report prepared by a by a geologist licensed by the California State Board for Geologists and Geophysicists.

Hillside Protection

Section 36.340 et. seq. of the SPMC defines additional requirements, beyond the City Building Code, for development on sites with an average slope of 20 percent or greater, except parcels within the Altos de Monterey (AM) overlay zone situated along Via Del Rey and adjoining streets in the south-central portion of the City. These sites are instead subject to the AM Overlay District (Section 36.250.030 of the SPMC). There are parcels identified for potential housing in the Suitable Sites within the AM Overlay District. Development in hillside areas requires a Hillside

Development Permit as a discretionary zoning approval of the City. Procedures for Hillside Development Permits are established in Section 36.410.065 of the City Municipal Code.

3.6.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse geology and soils impact if it would:

Threshold 3.6a: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction.

iv) Landslides;

Threshold 3.6b: Result in substantial soil erosion or the loss of topsoil;

Threshold 3.6c: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

Threshold 3.6d: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; and/or

Threshold 3.6e: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

Threshold 3.6f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.6.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to geology and soils.

3.6.6 ENVIRONMENTAL IMPACTS

Threshold 3.6a: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

Surface Rupture

As discussed above, active and potentially active faults that cross the City include the Raymond fault and the Upper Elysian Park blind thrust. Other faults located near the City (within approximately 10 miles) include the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults. A potential for surface fault rupture hazard exists along the faults underlying the City. "Active" faults (demonstrated offset of Holocene materials [less than 10,000–12,000 years ago] or significant seismic activity) and "potentially active" faults (Pleistocene [greater than 12,000 but less than 1,600,000 years ago]), as defined by the CGS, must be considered as potential sources for fault rupture.

The CGS has identified an Alquist-Priolo Earthquake Fault Zone for the Raymond fault. The AP Zone runs east-west through the northernmost portion of the City, largely overlying the State Route 110 alignment. Surface rupture movements on the Raymond fault could cause damage to overlying structures, utility infrastructure, and streets. The surface rupture of the Raymond fault presents a seismic hazard to the developments situated near the fault. Fault rupture hazards do not change for existing land uses. However, future development may be exposed to these hazards if located on the fault traces.

The northern portion of the City includes parcels located within the AP Zone. This area is currently developed with commercial/retail land uses, residential, and surface parking. A number of existing regulations prevent development over a fault trace or protect structures and infrastructure from surface rupture hazards. Specifically, compliance with AP Act requirements for detailed fault investigations would identify the presence of a fault trace on a proposed development or redevelopment site. As discussed above, the AP Act states that all jurisdictions require a geologic investigation to demonstrate that a proposed development project that includes structures for human occupancy is adequately set back (usually at least 50 feet) from an active fault prior to permitting. The extent of an AP Zone is not the area wherein surface rupture would necessarily occur, but the area in which a proposed development with human occupancy must complete additional, specific geologic investigation. Also, compliance with seismic design criteria in the City Building Code would promote the structural integrity of structures and infrastructure near faults to the maximum extent feasible under current engineering practice at the time of design and construction within the AP Zone. Through compliance with existing regulations, impacts related to surface rupture of a known active fault would be less than significant, and no mitigation is required.

Strong Ground Shaking

As with all of southern California, the City is located in a seismically active region and is at risk of strong seismic ground shaking. Earthquake-related hazards have the potential to cause serious damage to people and/or structures, including the risk of loss, injury, or death if the seismic event is large enough to generate short-duration, high peak ground accelerations or long-duration, moderate to high ground accelerations. Potential earthquake effects on structures and facilities within the City would depend upon the size (amount of energy release) and relative location of the earthquake in relation to a specific structure, and its location and underlying geologic conditions.

Future development of the remaining capacity of the City or pursuant to the Project would be subject to ground shaking hazard during earthquake events. The severity of ground shaking would depend on the magnitude of the earthquake, its distance to the City, and site geologic conditions. Local differences in subsurface conditions (e.g., density, water content, grain size, subgrade soil profile classification) could increase or decrease the effective shaking compared to another location within the City. Therefore, site-specific geological, geotechnical, soil engineering, and earthquake engineering studies are mandatory for all proposed structures in accordance with the City Building Code.

Earthquake-resistant design and materials used in new construction or seismic retrofitting must meet the current seismic engineering standards of the California Building Code Seismic Zone 4 requirements, as incorporated by reference in the City Building Code, in effect at the time of design and construction. Buildings constructed or retrofitted according to newer/updated standards would have the highest level of resistance to building collapse during a seismic event compared to existing structures, in particular older structures and/or unreinforced masonry buildings that have not received retrofitting and/or were constructed in accordance with older building codes. Future development or redevelopment within the areas subject to a Hillside Development Permit, largely in the southwest portion of the City, would also be required to prepare site-specific geotechnical investigations that include analysis of slope stability, erosion, subsidence, groundwater effects, and earthquakes as it pertains to the site's unique topography, to identify these hazards and provide appropriate construction recommendations, as necessary.

Development in the City and in the hillside areas is subject to regulations related to grading and geotechnical study. The City also has a continuing program to require structural reinforcement of all inventoried unreinforced masonry structures, as these buildings are the most susceptible to damage during a major earthquake. Through compliance with existing regulations and application of requirements related to earthquake construction and retrofitting, there would be less than significant impacts related to strong ground shaking, and no mitigation is required.

Threshold 3.6a: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

The CGS broadly identifies areas of seismic-induced liquefaction and landslide risk pursuant to the Seismic Hazards Mapping Act. There are discrete areas designated as potentially susceptible to either liquefaction or landslide within the hilly area in the southwest portion of the City. These issues are discussed further below.

Liquefaction is defined as the transformation of a granular material from a solid state into a liquid state with vibration (most commonly seismic shaking) in the presence of water. It is a phenomenon that tends to occur in areas with shallow groundwater and where the soils are composed of loosely compacted granular materials. During an earthquake, saturated, cohesionless soil particles tend to decrease in volume (condense) because the vibration causes smaller particles to shift and fill in the voids (pores) between larger soil particles normally filled with water. As the soil condenses, less space is left for water, causing an increase in pore water pressure.[1] If the pore water pressure increases sufficiently, the soil loses its strength and transforms into a liquid state. This condition can lead to damage of overlying structures caused by loss of bearing, settlement, or subsidence of the soil; severe settlement of aboveground structures; and, in some cases, uplift of buried structures (e.g., large pipelines). Landslides typically consist of shallow failures involving surficial soils and the underlying highly weathered bedrock in moderate to steep terrain. Structures, roadways, utilities, and the general population located on or below these hazard areas could be subject to severe damage or injury.

These potential geotechnical risks would be addressed by the site-specific geotechnical report required pursuant to the City Building Code. Through compliance with existing regulations related to secondary seismic hazards, there would be less than significant impacts related to ground failure, and no mitigation is required.

Threshold 3.6b: Would the Project result in substantial soil erosion or the loss of topsoil?

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction activities. Construction activities produce loose soils, which would be subject to erosion if the surface areas were to be left uncovered and exposed to weather conditions. Grading, excavation, and trenching for construction may expose soils to short-term wind and water erosion, which could result in increased particulate matter (i.e., PM10) in the air and/or increased sediment runoff in surface waters.

For development or redevelopment projects over one acre, compliance with the current State Water Resources Control Board's National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Construction General Permit) would be required. Compliance with the Construction General Permit is also required pursuant to Section 23.12 of the SPMC. Section 23.13 of the SPMC requires that all construction activities not subject to the Construction General Permit comply with the requirements of the City's watershed management program, defined in Chapter 23, Stormwater and Urban Runoff Pollution Control, of the SPMC. Through compliance with State and local stormwater runoff permitting and management requirements, there would be less than significant impacts related to soil erosion, and no mitigation is required.

Threshold 3.6c: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Secondary seismic hazards related to the underlying geologic unit include several types of ground failure that can occur as a result of severe ground shaking. These hazards include landslides, collapse, ground lurching, shallow ground rupture, and liquefaction. The probability for each type of ground failure depends on the severity of the earthquake, the site's distance from the fault, the

[1] Pore water is the water existing in the pores or spaces between grains in sedimentary materials.

local topography, and subsoil and groundwater conditions, among other factors. In addition, there can be soil engineering characteristics inherent in the underlying sediments on a site that can adversely affect structures if not appropriately managed during construction, including subsidence, hydroconsolidation, and other forms of collapse.

Potential hazards to future development and redevelopment pursuant to the Project due to the characteristics of the underlying geologic unit or soils would be identified during the preparation of required geotechnical investigations and/or soils reports (Section 36.540.090 of the SPMC) for individual projects, with recommendations on the soil expansion index that needs to be considered in the design and construction of structures and infrastructure. Through compliance with existing regulations, there would be a less than significant impact related to location on expansive soils, and no mitigation is required.

Threshold 3.6d: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are generally associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic deposit, volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork.

Soil expansion hazards to future development and redevelopment pursuant to the Project would be identified during the preparation of required geotechnical investigations and/or soils reports (Section 36.540.090 of the SPMC) for individual, future projects. Specifically, recommendations on the soil expansion index that needs to be considered in the design and construction of structures and infrastructure would be part of these reports. Through compliance with existing regulations, there would be a less than significant impact related to location on expansive soils, and no mitigation is required.

Threshold 3.6e: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Most of the City is served by the municipal sewer system. Future development and redevelopment would be required to connect to the public sewer system where existing sewer lines are available, as required under the California Plumbing Code. While the majority of the City is served by the sewer system, there are septic tanks that remain in the Altos de Monterey area in the southwest portion of the City. Redevelopment of a site with a septic tank would require abandonment of the septic tank and connection to the public sewer system under the California Plumbing Code. Also, compliance with Order No. R4-2004-0146 of the Los Angeles Regional Water Quality Control Board (RWQCB) is required to regulate the type of discharge; surface overflows; disposal of wastes in geologically unstable areas; odors; and groundwater pollution, including annual inspections, connection to public sewer system within six months of availability, and monitoring. The regulations protect shallow groundwater and adjacent water bodies. Through compliance with regulations, no development or redevelopment under the Project would use septic tanks or alternative wastewater disposal systems. There would be no impact, and no mitigation is required.

Threshold 3.6f: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed Project would not directly destroy a unique paleontological resource or unique geologic feature. Future development would largely occur in areas of the City that are already developed and/or built out. However, as discussed above in Section 3.6.2, based on the records search conducted by the NHMLA, nine fossil localities have been identified within or near the City.

Therefore, as with archaeological resources, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown paleontological resources. In general, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter unknown paleontological resources.

Unlike archaeological resources, there are no provisions in CEQA to afford protection of paleontological resources for individual development projects that would be accommodated by the Project. Therefore, in the event an unanticipated paleontological resource is encountered, MM GEO-1 would require that ground-disturbing activities are halted, and a qualified paleontologist would be hired to evaluate the find. If the resource is determined to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. With implementation of MM GEO-1, there would be less than significant impacts to potential paleontological resources.

3.6.7 CUMULATIVE IMPACTS

Geology and soils impacts are generally site specific and there is typically little, if any, cumulative relationship between the development of individual projects on separate sites. As such, one development would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion) at another site, nor change geologic conditions or hazards at off-site locations.

Geological and seismic conditions are regional in nature and affect large areas, rather than individual parcels. Therefore, future development in the City, as well as development within the San Gabriel Valley, would be subject to geologic hazards including development potentially affected by faults, ground shaking, surface rupture, liquefaction, landslides, subsidence, soil collapse, expansive soils, and other geologic issues.

Compliance with applicable State and local regulations would be required of all development within the San Gabriel Valley. Individual projects would be designed and built in accordance with applicable standards in the CBC and the individual building regulations of local jurisdictions, including pertinent seismic design criteria. Site-specific geologic hazards would be addressed by the geotechnical investigation required by individual cities and the County for each development proposal. Geotechnical investigations would identify the geologic and seismic characteristics on a site and provide guidelines for engineering design and construction to provide for the structural integrity of proposed development. Compliance with applicable State and local regulations and standard engineering practices related to seismic and geologic hazard reductions would prevent significant adverse impacts associated with geologic hazards, and impacts associated with the Project would not be cumulatively considerable.

Development projects in the San Gabriel Valley would connect to the public sewer system where available but may utilize septic tanks or alternative wastewater disposal systems in areas without

sewer service. Compliance with the Los Angeles RWQCB regulations and the California Plumbing Code would prevent hazards associated with soils incapable of supporting septic systems. Therefore, compliance with applicable State and local regulations and standard engineering practices related to septic hazard reductions would prevent significant adverse impacts. Therefore, impacts associated with the Project would not be cumulatively considerable.

Direct impacts to paleontological resources are generally site specific. Although a project, in conjunction with the effects of past projects, other current projects, and probable future projects, could potentially result in the disturbance of paleontological resources throughout the region, the City requires the mitigation of impacts to these resources (i.e., MM GEO-1). Growth and development in the San Gabriel Valley would also lead to new development on vacant and undeveloped lots. Future development and public and infrastructure projects not subject to CEQA could adversely affect in-situ paleontological resources, and cumulative impacts may occur. However, implementation of MM GEO-1 would prevent significant adverse impacts on paleontological resources in the City and thus, would avoid a cumulative contribution to the loss of paleontological resources in the Valley. There would be a less than significant cumulative impact to paleontological resources with implementation of MM GEO-1, and no further mitigation is required.

3.6.8 MITIGATION MEASURES

MM GEO-1 Should potential paleontological resources be found during ground-disturbing activities for any individual project, ground-disturbing activity in the immediate vicinity of the find shall be temporarily halted and a qualified paleontologist will be hired to evaluate the resource. If the potential resource is found not to be significant by the paleontologist, construction activity in the area of the find can resume. If the resource is found to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. A Disposition of the Recovered Paleontological Resources and Mitigation Report shall be prepared by the qualified paleontologist and submitted to the City. Any recovered fossils shall be deposited in an accredited institution or museum, such as the Natural History Museum of Los Angeles County.

3.6.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than Significant.

3.6.10 REFERENCES

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3.7 GREENHOUSE GAS EMISSIONS

3.7.1 METHODOLOGY

This section addresses greenhouse gas (GHG) emissions associated with the implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)and their relationship to climate change.

3.7.2 EXISTING CONDITIONS

Global Climate Change and Greenhouse Gases

Climate change is a recorded change in the Earth's average weather measured by variables such as wind patterns, storms, precipitation, and temperature. Historical records show that global temperature changes have occurred naturally in the past, such as during previous ice ages. The year 2020 ranks as Earth's hottest year on record, tying 2016 (NASA 2021).[1] And the Earth's global average temperature in 2021 tied with 2018 as the sixth warmest on record. Collectively, the past eight years are the warmest years since modern recordkeeping began in 1880 (NASA 2022). Overall, Earth's average temperature has risen more than 2 degrees Fahrenheit since the 1880s. Continuing the planet's long-term warming trend, 2020's globally averaged temperature was 1.84 degrees Fahrenheit (1.02 degrees Celsius) warmer than the baseline 1951-1980 mean (NASA 2021).

The global atmospheric concentration of carbon dioxide (CO_2), the most abundant GHG, has increased from a pre-industrial (roughly 1750) value of about 280 parts per million (ppm) to a seasonally-adjusted 418.39 ppm in July 2022, primarily due to fossil fuel use, with land use change providing a significant but smaller contribution (ESRL 2022a). The National Oceanic and Atmospheric Administration (NOAA) Annual Greenhouse Gas Index (AGGI) for 2021 was 1.49, which means the warming influence of GHGs has increased 49 percent since 1990. It took about 240 years for the AGGI to go from zero to one, and 31 years to increase by another 49 percent (ESRL 2022b).

Greenhouse Gases

GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O_3), particulate matter (PM10 and PM2.5), and toxic air contaminants (TACs), which are pollutants of regional and local concern. While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

GHGs, as defined under California's Assembly Bill (AB) 32, include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, as CH_4 and N_2O are approximately 25 and 298 times (respectively) more powerful than CO_2 in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO_2 has a GWP of 1). Carbon

[1] A separate, independent analysis by the National Oceanic and Atmospheric Administration (NOAA) concluded that 2020 was the second-warmest year in their record, behind 2016 (NASA 2022).

dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

General Environmental Effects of Global Climate Change

Executive Order S-3-05 mandates the preparation of biennial science assessment reports on climate change impacts and adaptation options for California. Executive Order S-13-08 directs the California Natural Resources Agency (CNRA) to develop a State Climate Adaptation Strategy and to provide State land use planning guidance related to sea level rise and other climate change impacts. Current reports resulting from these directed actions are the *Climate Action Team Report to the Governor and Legislature* and the *California Climate Adaptation Strategy* (CalEPA 2010; CNRA 2009a). These studies report that global warming in California is anticipated to impact resources including, but not limited to, those discussed below.

- **Public Health.** Many Californians currently experience the worst air quality in the nation, and climate change is expected to make matters worse. Higher temperatures would increase the frequency, duration, and intensity of conditions conducive to air pollution formation. If global background O_3 levels increase as predicted under some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by more frequent wildfires, which emit fine particulate matter that can travel long distances. Rising temperatures and more frequent heat waves would increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress. Climate change may also increase asthma rates and the spread of infectious diseases and their vectors, as well as challenge food and water supplies. Children, the elderly, people with chronic heart or lung disease, outdoor workers, people who exercise outdoors and the economically disadvantaged would be particularly vulnerable to these changes. In addition, more frequent extreme weather events could also result in increased injuries and deaths from these phenomena.
- **Energy.** Increasing mean temperature and more frequent heat waves will drive up demand for cooling in summer; this new energy demand will only be partially offset by decreased demand for heating in winter. Hydropower, which currently provides 15 percent of in-state generation, would be threatened by declining snowpack, which serves as a natural reservoir for hydropower generation in the spring and summer. Winter storms, earlier snowmelt, and greater runoff may combine to cause flooding, which could, in turn, damage transmission lines and cause power outages.
- **Water Resources.** Rising temperatures, less precipitation, and more precipitation falling as rain instead of snow could severely diminish snowpack. Because the Sierra Nevada snowpack provides most of California's available water, this potential loss would increase the risk of summer water shortages and would hamper water distribution and hydropower generation. The diminished snowpack would also nearly eliminate all skiing and other snow-related recreation. Rising sea levels would push saltwater into California's estuaries, wetlands, and groundwater aquifers, threatening the water quality and reliability in the Sacramento/San Joaquin River Delta—a major California freshwater supply. Extreme precipitation and flooding could also damage water quality by creating sudden increases in runoff. Moreover, warming would increase evapotranspiration rates from plants, soil, and open water surfaces, which would result in greater demand for irrigation. Overall, climate change would reduce California's water supplies even as its growing population requires additional resources.

- **Sea Level and Flooding.** Sea level at California's coasts is expected to rise by 11 to 18 inches above 2000 levels by 2050 and by 23 to 55 inches by 2100. If realized, these increases would create more frequent and higher storm surges; would erode some coastal areas; and would increase pressure on existing levees. These increases would create a greater risk of flooding in previously untouched inland areas. Consequently, continued development in vulnerable coastal areas would put more people and infrastructure at risk.
- **Agriculture.** Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, in the long-term, climate change would reduce the quantity and quality of agricultural products statewide. As temperatures rise, farmers will face greater water demand for crops and a less reliable water supply, as well as increased competition from urban water users. Sea level rise may cause saltwater intrusion in the Delta region, making it difficult to raise certain crops. Rising temperatures will likely aggravate O_3 pollution, interfering with plant growth and making plants more susceptible to disease and pests. In addition, warming would reduce the number of colder hours needed for fruit and nut production; would shift pest and weed ranges; would alter crop-pollinator timing; and would increase the frequency of droughts, heat waves, and floods. Higher average temperatures would also increase mortality and decrease productivity in livestock.
- **Forestry.** California timber production has declined over the past few decades due, in part, to warming and increased wildfires. While further warming may increase production for some species in some locations, climate change is expected to reduce overall forest growth. Increasing average temperatures and drought frequency would result in more wildfires and greater burned areas, while less frequent and more intense rainfall would increase soil erosion and landslides. Higher temperatures and less water would force many tree species to shift their ranges; those that run out of livable habitat may die out. Pests, diseases, and invasive species may also colonize new areas, further challenging forest health and biodiversity.
- **Ecosystems.** Rising average temperatures would subject plants and animals to greater thermal stress, causing some species to adapt or shift their ranges, while others may face extinction. Invasive species may also shift their ranges, threatening native species. Changing temperatures would also alter the timing of plant flowering and insect emergence, damaging species' ability to reproduce. Changing precipitation patterns would impact aquatic and riparian ecosystems by reducing snowpack, stream flow, and groundwater, while increasing the frequency of droughts, floods, and wildfires. As sea levels rise, some coastal habitats may be permanently flooded or eroded, and saltwater intrusion into freshwater resources may threaten terrestrial species. Changes in ocean circulation and temperature, ocean acidification, and increased runoff and sedimentation would threaten pelagic species. In sum, continued global warming would alter natural ecosystems and threaten California's biological diversity.

Global, National, and State Contributions to Greenhouse Gas Emissions

Table 3.7-1 compares the magnitude of GHG emissions on the global, national and State scales. It shows the relative estimated quantities of GHG emissions from worldwide to California. CO_2e emissions are commonly expressed as metric tons of carbon dioxide equivalent ($MTCO_2e$). Larger quantities of emissions, such as on the State or world scale, are expressed as million metric tons of carbon dioxide equivalent ($MMTCO_2e$). Metric tons may also be stated as "tonnes".

TABLE 3.7-1
COMPARISON OF WORLDWIDE GREENHOUSE GAS EMISSIONS

Area and Data Year	Annual GHG Emissions ($MMTCO_2e$)
World (2019)	49,758
United States (2019)	5,771
California (2019)	418
SCAG region (2020)	216
South Pasadena (2016)	0.125
GHG: greenhouse gas; $MMTCO_2e$: million metric tons of carbon dioxide equivalent Source: Climate Watch 2022 (world & U.S.); CARB 2022 (California); SCAG 2020 (SCAG region); South Pasadena 2020 (City).	

As shown, the U.S. contributes approximately 11.6 percent of worldwide GHG emissions per year and California contributes approximately 0.8 percent. The SCAG region, which includes the counties of Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial contributes approximately 52 percent of California's GHG emissions. The City of South Pasadena's (City) GHG emissions are approximately 0.06 percent (1/17) of the SCAG region's emissions.

The most common GHG is CO_2, which constitutes approximately 80 and 83 percent of all GHG emissions in the U.S. and California, respectively. The primary contributors to California GHG emissions are (1) transportation; (2) industrial uses; and (3) electric power production from both in-State and out-of-State sources. The primary contributors to the City's GHG emissions are (1) transportation–54 percent and (2) energy–39 percent, approximately equally divided between electricity and natural gas.

3.7.3 RELEVANT PROGRAMS AND REGULATIONS

There are a multitude of federal and State regulations and programs related to GHG emissions, many of which overlap in goals and/or requirements. Those listed below most directly relate to emissions that would be expected to result from growth at the city and county level, primarily mobile (vehicle) emissions and building-related energy efficiency and alternative energy use.

Federal

U.S. Environmental Protection Agency Findings

On December 7, 2009, the U.S. Environmental Protection Agency (USEPA) Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act (CAA). The findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the USEPA's proposed GHG emission standards for light-duty vehicles (USEPA 2021). A light-duty vehicle is defined as any motor vehicle with a gross vehicle weight of 6,000 pounds or less (CARB 2021b).

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On

April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. On October 15, 2012, the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO_2 per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will occur due to air conditioning technology improvements (i.e., they will leak less) and due to the use of alternative refrigerants, which would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other States that have adopted the California standards (USEPA and NHTSA 2012).

On September 19, 2019, NHTSA and the USEPA issued a final action entitled the “One National Program Rule” to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas emission standards for automobile and light duty trucks. This action finalizes critical parts of the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule that was first proposed in August 2018. In this proposal, the agencies proposed new and amended greenhouse gas (GHG) and Corporate Average Fuel Economy (CAFE) standards for model year 2021 to 2026 light duty vehicles (USEPA and NHTSA 2019). In this action, USEPA withdrew the Clean Air Act waiver that had been granted to the State of California in January 2013 for the State’s Advanced Clean Car program with respect to GHG and Zero Emission Vehicle (ZEV) elements. In November 2019, California, 21 other states, the District of Columbia, and four California cities filed a petition for EPA to reconsider SAFE-1. A petition for recosideration was also files by several enviromental groups. On April 28, 2021, USEPA published a Notice of Reconsideration: California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment. The public comment period closes July 6, 2021 (USEPA 2021b). On March 25, 2022, after reviewing all the public comments, NHTSA finalized the CAFE Preemption rulemaking to withdraw its portions of the so-called SAFE I Rule (NHTSA 2022).

On March 31, 2022, NHTSA finalized CAFE standards that require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, the strongest cost savings and fuel efficiency standards to date. The new standards will increase fuel efficiency percent annually for model years 2024-2025 and 10 percent annually for model year 2026. They will also increase the estimated fleetwide average by nearly 10 miles per gallon for model year 2026, relative to model year 2021 (NHTSA 2022).

State

Assembly Bill 1493 (Mobile Source Reductions)

Assembly Bill (AB) 1493, adopted September 2002, also known as Pavley I, requires the development and adoption of regulations to achieve the maximum feasible reduction of GHGs emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. The emission standards have become increasingly more stringent through the 2016 model year. California is also committed to further strengthening these standards beginning in 2017 to obtain a 45 percent GHG reduction from 2020 model year vehicles

(CARB 2021c). Regulations to make California emissions standards for model year 2017 and beyond consistent with federal standards were adopted in 2012 and are discussed further below.

CARB's Advanced Clean Cars Program

In January 2012, the California Air Resources Board (CARB) approved the Advanced Clean Cars Program, an emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles. In March 2017, CARB adopted GHG standards for 2022 through 2025 model years and directed staff fo begin rule development for 2026 and subsequent model years (CARB 2021d).

Executive Order S-3-05 (Statewide GHG Targets)

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

However, executive orders do not have the same status as a law because in California's constitutional system, it is the Legislature, not the Governor, who is entrusted with the role of making statewide laws. The Legislature declined to include the Executive Order's 2050 goal in AB 32 (discussed below), and again declined to use the EO's 2050 goal in adopting Senate Bill (SB) 375 (discussed below), nor has it incorporated it in any implementing legislation or applicable plans. Additionally, although CARB has the requisite authority to adopt whatever regulations are necessary beyond the AB 32 horizon year 2020 to meet the target set forth in S-3-05, the agency has not done so. Since the Legislature has never enacted EO S-3-05's 2050 target, and no expert agency has interpreted CEQA to require it, the 2050 target has only the force and effect of an executive order issued by a former Governor. If the Legislature has delegated any of its authority to define CEQA's requirements, it delegated that authority to the Governor's Office of Planning and Research (OPR).

Senate Bill 97 and the State CEQA Guidelines

Pursuant to Senate Bill (SB 97), OPR developed proposed amendments to the State CEQA Guidelines (CEQA Amendments) for the feasible mitigation of GHG emissions and their effects, which it first submitted to the Secretary of the CNRA on April 13, 2009. After a public review and comment period, on December 30, 2009, the CNRA adopted the CEQA Amendments, which became effective on March 18, 2010.

The CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance based standards" (CNRA 2009b). Section 15064.4(b) of the State CEQA Guidelines provides that the lead agency should consider the

following when assessing the significance of impacts from GHG emissions on the environment (CNRA 2009b):

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

All of these are considered in the impact analysis presented in this section. In addition, the revisions to Appendix G, Environmental Checklist Form, of the State CEQA Guidelines, which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds. Rather, Appendix G asks whether the project would conflict with a plan, policy or regulation adopted to reduce GHG emissions or would generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency. Accordingly, the CEQA Amendments do not prescribe specific methodologies for performing an assessment; they do not establish specific thresholds of significance; and they do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009b).

The CEQA Amendments indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to the Project, these potential mitigation measures, set forth in Section 15126.4(c) of the State CEQA Guidelines, may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures (CNRA 2009b).

Among other things, the CNRA noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states (CNRA 2009):

> While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.

Thus, the CEQA Amendments continue to make clear that the significance of greenhouse gas emissions is most appropriately considered on a cumulative level.

Assembly Bill 32 (Statewide GHG Reductions)

In furtherance of the goals established in EO S-3-05, the California Legislature adopted the public policy position that global warming is "a serious threat to the economic well-being, public health,

natural resources, and the environment of California" (*California Health and Safety Code*, Section 38501). The public policy statements became law with the enactment of the California Global Warming Solutions Act of 2006 (AB 32) in September 2006, after considerable study and expert testimony before the Legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The scoping plan is described further below.

Executive Order B-30-15 (Statewide Interim GHG Targets)

California EO B-30-15 (2015) set an "interim" statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030, and directed State agencies with jurisdiction over GHG emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons.

Senate Bill 32/Assembly Bill 197

SB 32, signed September 8, 2016, implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature." AB 197, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.

California Air Resources Board Scoping Plan

On December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emission level would require a reduction of GHG emissions of approximately 28.5 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions; integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities; identifies additional measures to be pursued as regulations; and outlines the role of a cap-and-trade program.

<u>First Update to the Climate Change Scoping Plan</u>

CARB approved the final "First Update to the Climate Change Scoping Plan" on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32". Specifically, "if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050" (CARB 2014). Reducing the "business as usual" or NAT condition of 509 $MMTCO_2e$ to

the 1990 emissions level of 431 $MMTCO_2e$ will require a reduction of 78 $MMTCO_2e$, or approximately a 15.3 percent reduction (compared to a 28.5 percent reduction as set forth in the original Scoping Plan but not directly comparable because of the change in methodology).

Second Update to the Climate Change Scoping Plan

CARB prepared a second update to the Scoping Plan to reflect the 2030 target established in Executive Order B-30-15 and in Senate Bill 32 (discussed above). The Final Proposed 2017 Scoping Plan was published in November 2017, and the third public Board Meeting for the Proposed Scoping Plan was held on December 14, 2017, where the Final Proposed 2017 Climate Change Scoping Plan (Second Update to the Climate Change Scoping Plan, or 2017 Scoping Plan Update) was adopted.

The 2017 Scoping Plan Update includes new statutory GHG reduction requirements that were not included in the current Scoping Plan, including Senate Bill 32 (discussed below) which sets a 40 percent GHG reduction target below 1990 GHG levels to be achieved by 2030, SB 350 (which sets a 50 percent reduction in GHG emissions from electricity generation and other energy uses in existing structures, and a 50 percent renewable energy portfolio requirement), and SB 650 (which establishes priority GHG reduction targets for designated types of greenhouse gases such as methane). The key elements of the 2017 Scoping Plan Update proposal call for further GHG reductions from the refinery sector specifically, further reductions from other stationary sources through either a renewed and expanded cap-and-trade or carbon tax program, further reductions from other sectors such as transportation technologies and services, water and solid waste conservation and management, and land uses in both open space and urban areas (CARB 2017).

2022 Scoping Plan Update

The Draft 2022 Scoping Plan Update, dated May 2022, assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022b). This is the first Scoping Plan that adds carbon neutrality as a science-based guide beyond statutorily established emission reduction targets. It identifies a technologically feasible, cost-effective and equity-focused path to achieve carbon neutrality by 2045, or earlier, while also assessing the progress the state is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan (CARB 2022c).

Senate Bill 375 (Land Use Planning)

Signed September 30, 2008, SB 375 provides for a new planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), to incorporate a Sustainable Communities Strategy (SCS) in their regional transportation plans that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing vehicle miles traveled (VMT) and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from or streamlined CEQA review for projects classified as transit priority projects (SCAG 2016). See additional discussion of the SCAG plan under "Regional" regulations below.

Senate Bills 1078, 107, and SBX1-2 (Renewable Portfolio Standards)

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and again in 2011 under SBX1-2, California's Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Initially, the Renewable Portfolio Standard (RPS) provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

Senate Bill 350

SB 350, signed October 7, 2015, is the *Clean Energy and Pollution Reduction Act of 2015*. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are:

(1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.

(2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (CEC 2021a).

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions to increase of GHG emissions elsewhere in the western electricity grid (CEC 2021b). SB 100 also creates new standards for the RPS goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

Executive Order B-55-18

On September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05).

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the *California Code of Regulations* [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The currently applicable standards are the 2019 Standards, effective January 1, 2020. The 2019 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources (CEC 2021c). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas and electricity use produce GHG

emissions. The goal of the standards is to reduce energy use in new homes by more than 50 percent.The 2019 standards require that there is sufficient on-site electricity generation to meet the annual electricity usage for low rise residential buildings. A 30 percent reduction in energy uses is anticipated for nonresidential uses. The requirement for low-rise residential buildings to develop onsite electricity generation is consistent with the goal to develop renewable sources of energy.

The CEC adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) “Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy” and (2) “Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020”. Additionally, it has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the Title 24 energy efficiency standards and, the 2016 Title 24 Energy Efficiency Standards establish building design and construction requirements that move closer to achieving California’s ZNE goals. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas use and electricity generation result in GHG emissions.

California Green Building Standards Code

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California). The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

California Air Pollution Control Officers Association

The California Air Pollution Control Officers Association (CAPCOA) is the association of Air Pollution Control Officers representing all 35 local air quality agencies throughout California. CAPCOA is not a regulatory body, but has been an active organization in providing guidance in addressing the CEQA significance of GHG emissions and climate change as well as other air quality issues. The August 2010 CAPCOA publication entitled Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures provides guidance on the quantification of project-level mitigation of GHGs associated with land use, transportation, energy use, and other related project areas. The guidance includes detailed procedures about the approaches to assessing and calculating the GHG emissions reductions associated with project design features and mitigation measures (CAPCOA 2010). This publication’s methods are used in the CalEEMod computer model that is used to calculate GHG emissions.

Regional

South Coast Air Quality Management District

The City lies within the boundaries of the SCAQMD. SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino counties, including the Coachella Valley. The region is home to more than 17 million people–about half the population of the entire state of California. The mission of the SCAQMD is "To clean the air and protect the health of all residents in the South Coast Air District through practical and innovative strategies (SCAQMD 2021).

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 metric tons of CO2 equivalent per year (MTCO2e/year) for industrial projects where the SCAQMD is the lead agency. The policy objective for establishing this significance threshold is to capture projects that represent approximately 90 percent of GHG emissions from new sources and to avoid EIR-level analysis for relatively small impacts (SCAQMD 2008).

In September 2010, the Working Group proposed extending the 10,000 MTCO2e/year screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions, Tier 2 is consistency with a GHG reduction plan, Tier 3 is a screening value or bright-line[2], Tier 4 is a performance-based standard, and Tier 5 is GHG mitigation offsets. According to the presentation given at the September 28, 2010, Working Group meeting, SCAQMD staff proposed a Tier 3 draft threshold of of 3,000 MTCO2e per year for all non-industrial land use types (SCAQMD 2010). For the Tier 4 draft threshold, SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a numerical target; instead it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize efficiency targets: 2020 targets are 4.8 MTCO2e per year per service population (SP) for project-level thresholds where SP is project residents plus employees and 6.6 MTCO2e per year per SP for a plan-level threshold (SCAQMD 2010). Targets for 2035 are 3.0 MTCO2e per SP for project level thresholds and 4.1 MTCO2e per year per SP for plan level threshold. The Working Group has not convened since the fall of 2010. As of the publication of this EA, the proposal to establish a GHG threshold for developments like the Project (e.g., general plans, housing elements) has not been considered or approved for use by the SCAQMD Board but the methodology has been used by lead agencies to evaluate GHG impacts under CEQA.

[2] A bright-line is a single value, applicable to all projects of one type, regardless of size. Thus, a bright-line is different from performance standards or efficiency standards that are generally based on a per-unit basis.

Southern California Association of Governments

As previously discussed, SB 375 specifically required Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy (SCS) in their Regional Transportation Plan (RTPs) that will achieve GHG emission reduction targets set by CARB. SCAG's current SCS is included in its 2020–2045 RTP/SCS *Connect SoCal* (SCAG 2020).[3] The 2020 RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources. The 2020 RTP/SCS includes population, housing, and employment forecasts for the City. The document was adopted by SCAG on September 3, 2020. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035 relative to 2005.

Local

South Pasadena Climate Action Plan

The City of South Pasadena adopted its first Climate Action Plan (CAP) on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. The CAP also establishes a framework for implementation and monitoring of reduction activities, and further promotes adaptation and preparedness actions. The plan is intended to be a qualified GHG Reduction Plan and meets the requirements of Section 15183.5(b) of the State CEQA Guidelines (South Pasadena 2020). The CAP states, "In the City of South Pasadena, the most pronounced effects of climate change will be increased average temperature, more days of extreme heat, and elevated drought risk, all of which may lead to increased wildfires."

The CAP targets are to reduce the City's GHG emissions from a level of approximately 125,269 $MTCO_2e$/year in 2016, when the CAP was prepared, to approximately 75,000 $MTCO_2e$/year in 2030, 25,000 $MTCO_2e$/year in 2040, and zero in 2045. CAP emission reduction measures and actions are called Plays and Moves, respectively, in the CAP. The GHG emission reduction measures (Plays) are shown in Table 3.7-2.

[3] The 2020-2045 RTP/SCS succeeds the 2016-2040 RTP/SCS.

TABLE 3.7-2
SOUTH PASADENA CLIMATE ACTION PLAN
MEASURES (PLAYS) SUMMARY

Sector	Play		GHG Emissions Reduction Contribution
Cornerstone	C.1	Engage South Pasadena youth in climate action and provide education on ways to live a sustainable lifestyle.	2030: 25 MT CO_2e 2045: 78 MT CO_2e
Energy	E.1	Maximize the usage of renewable power within the community, by continuing to achieve an opt-out rate lower than 4% for the Clean Power Alliance.	2030: 13,408 MT CO_2e 2045: 0 MT CO_2e
	E.2	Electrify 100% of newly constructed buildings.	2030: 228 MT CO_2e 2045: 935 MT CO_2e
	E.3	Electrify 5% of existing buildings by 2030 and 80% by 2045.	2030: 1,184 MT CO_2e 2045: 19,355 MT CO_2e
	E.4	Develop and promote reduced reliance on natural gas through increased clean energy systems that build off of renewable energy development, production, and storage.	Supportive of 2030 and 2045 Goals
Transportation	T.1	Increase zero-emission vehicle and equipment adoption to 13% by 2030 and 25% by 2045.	2030: 3,774 MT CO_2e 2045: 6,629 MT CO_2e
	T.2	Implement programs for public and shared transit that decrease passenger car vehicle miles traveled 2% by 2030 and 4% by 2045.	2030: 807 MT CO_2e 2045: 1,399 MT CO_2e
	T.3	Develop and implement an Active Transportation Plan to shift 3% of passenger car vehicle miles traveled to active transportation by 2030, and 6% by 2045.	2030: 1,186 MT CO_2e 2045: 2,015 MT CO_2e
Water and Wastewater[1]	W.1	Reduce per capita water consumption by 10% by 2030 and 35% by 2045.	2030: 414 MT CO_2e 2045: 0 MT CO_2e
Solid Waste	SW.1	Implement and enforce SB 1383 organics and recycling requirements to reduce landfilled organics waste emissions 50% by 2022 and 75% by 2025.	2030: 1,702 MT CO_2e 2045: 1,764 MT CO_2e
	SW.2	Reduce residential and commercial waste sent to landfills by 50% by 2030 and 100% by 2045.	2030: 415 MT CO_2e 2045: 859 MT CO_2e
Carbon Sequestration	CS.1	Increase carbon sequestration through increased tree planting and green space.	2030: 19 MT CO_2e 2045: 39 MT CO_2e
Municipal	M.1	Reduce carbon intensity of City operations.	2030: 188 MT CO_2e 2045: 188 MT CO_2e
	M.2	Electrify the municipal vehicle fleet and mobile equipment.	2030: 23 MT CO_2e 2045: 23 MT CO_2e
	M.3	Increase City's renewable energy production and energy resilience.	Supportive of 2030 and 2045 Goals
		Totals	**2030: 22,959 MT CO_2e** **2045: 33,284 MT CO_2e**

"Note: South Pasadena would be required to reduce 18,578 MT CO_2e by 2030, 53,874 MT CO_2e by 2040, and 73,969 MT CO_2e by 2045 to meet the City's targets and state goals.

[1] There is risk of double counting emission reductions from Play W.1 with Play E.1. Play W.1 emission reductions totals are provided for informational purposes but are not added to the emission reduction totals."

Source: South Pasadena 2020

Gas-Powered Leaf Blower Ban

On September 1, 2020, the City Council passed an ordinance phasing out the use of gas-powered leaf blowers Citywide. There is a phase-in period for the gas-powered leaf blower ban, and the ordinance prohibits any person in the City from using a gas-powered leaf blower after October 1, 2022. As part of the Council consideration of the ban, the City allocated funding to engage in an

outreach program to ensure the public is aware of the obligations that they and their landscaping contractors face regarding gas-powered equipment. The ordinance also addresses restrictions on noise pollution and amended the fine structure for violations of the code, which includes anyone who authorizes the use of gas-powered leaf blowers, which was effective in Fall 2021.

3.7.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse greenhouse gas emissions impact if it would:

Threshold 3.7a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

Threshold 3.7b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Like most municipalities, the City of South Pasadena has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. Two suggested thresholds will be examined: bright-line and efficiency.

As discussed above, the SCAQMD recommended a 3,000 MTCO2e/yr threshold for all non-industrial projects. This threshold has been and continues to be used in CEQA project analysis. The threshold as a "bright-line" is not appropriate for use at the plan level but will be examined as guidance.

An efficiency screening threshold of 1.3 $MTCO_2e$ per service population (SP) per year is also used as guidance to a potential significant impact. The efficiency threshold for the Project's buildout year of 2040 was calculated using linear interpolation between the 2020 target of 6.6 MTCO2e/SP/yr and the 2045 target of 0 MTCO2e/SP/yr. The 2045 target is an 80 percent reduction in the 2020 target, consistent with the requirement of Executive Order B-55-18 to achieve carbon neutrality by 2045. The service population is the sum of residents and employees. This approach was a widely accepted screening threshold used by numerous cities in the SoCAB; however, its use to determine significant impact has been invalidated in court cases.

3.7.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.7.6 ENVIRONMENTAL IMPACTS

Threshold 3.7a: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction-related GHG emissions have been excluded from this GHG analysis. As the proposed Project only identifies future land uses and does not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, such impacts are too speculative to evaluate, consistent with Section 15145 of the State CEQA Guidelines. To the extent that specific projects

are known, those projects have already been or would be subjected to their own environmental analysis.

Operational emissions associated with buildout of the Project. would result in emissions of CO_2, CH_4, and N_2O from area sources (hearths/fireplaces, landscape maintenance equipment); energy sources, mobile sources (vehicles), solid waste, water usage, and stationary sources.

Estimated Emissions

As a conservative estimate, GHG emissions are expected to exceed both guidance thresholds (see Section 3.7.4, Thresholds of Significance, above). Regardless, at the program level, GHG emissions must be considered potentially significant, and the Project may generate GHG emissions that would have a significant impact on the environment. Therefore, mitigation measure (MM) GHG-1 requires project-level GHG analysis, and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impact would remain significant and unavoidable.

Threshold 3.7b: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

A lead agency may assess the significance of GHG emissions by determining a project's consistency with a local GHG reduction plan or Climate Action Plan (CAP) that qualifies under Section 15183.5 of the State CEQA Guidelines. A CAP is designed to ensure that development within a jurisdiction occurs in a manner that supports the goals of AB 32. The City adopted the South Pasadena 2020 Final CAP in December 2020. As described above, the CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's 2030 target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. Thus, the CAP is consistent with State plans, policies, and regulations, AB 32, the AB 32 scoping plan and updates, EO B-30-15, SB32, and EO B-55-18.

When taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, the Project would be consistent with the CAP and is therefore consistent with State plans, policies and regulations adopted for the purpose of reducing emissions of GHGs.

The Sustainable Development strategies of the SCAG 2020–2045 RTP/SCS include to: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region (SCAG 2020). As discussed related to the City's CAP, when taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, the Project would be consistent with all applicable RTP/SCS goals. Therefore, the Project is consistent with SB 375.

Based on the consistency demonstrations above, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant, and no mitigation is required.

3.7.7 CUMULATIVE IMPACTS

Because the magnitude of global GHG emissions is extremely large when compared with the emissions of typical development projects, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change. CAPCOA's *CEQA and Climate Change Report* states, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective" (CAPCOA 2008). As noted by the CNRA, "Due to the global nature of GHG emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis" (CNRA 2009b). Therefore, the analysis presented above represents the cumulative impact analysis for the Project related to GHG emissions. As discussed, there would be a significant and unavoidable impact even with implementation of MM GHG-1.

3.7.8 MITIGATION MEASURES

MM GHG-1 To assess GHG emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific GHG emissions analysis that includes mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible.

Alternatively, the Applicant/Developer of future development projects shall demonstrate that the proposed Project is consistent with the South Pasadena 2020 Final Climate Action Plan. If consistency is demonstrated, the Project would have a less than significant GHG Emissions impact.

3.7.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and unavoidable.

3.7.10 REFERENCES

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3.8 HAZARDS AND HAZARDOUS MATERIALS

3.8.1 METHODOLOGY

This section analyzes potential hazards from historic uses in the City, use and transport of hazardous materials, and wildfire hazards associated with implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information in this section was derived from the California Environmental Protection Agency (CalEPA), California Department of Forestry and Fire Protection, and City websites.

3.8.2 EXISTING CONDITIONS

Hazardous Materials

Hazardous materials[1] that may be commonly encountered in a typical urban environment generally include petroleum products (including oil and gasoline), automotive fluids (i.e., antifreeze, hydraulic fluid), paint, cleaners (i.e., dry cleaning solvents, cleaning fluids), and pesticides from current or historical agricultural uses (if in significant concentrations). By-products generated as a result of activities using hazardous materials (e.g., dry cleaning solvents, oil, and gasoline) are considered hazardous waste. Contamination, when present, often takes the form of a hazardous material or hazardous waste spill, which can penetrate soils and also potentially reach groundwater, resulting in the pollution of shallow groundwater and/or a local water supply. Commercial and industrial uses, including those that have underground storage tanks and/or use hazardous materials in their operations, are common sources of soils and/or groundwater contamination in urban areas.

The CalEPA has compiled the data resources that provide information regarding the facilities or sites identified as meeting the requirements of Section 65962.5 of the California Government Code, referred to as the Cortese List (CalEPA 2023a). No properties in the City of South Pasadena are identified on the following: the California Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Site List (DTSC 2023); the list of sites identified by the State Water Resources Control Board (SWRCB) with waste constituents above hazardous waste levels outside the waste management unit (CalEPA 2023b); the list of active Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB (CalEPA 2021c), or the list of hazardous waste facilities identified by DTSC as subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2023d). There are a total of 18 (1 open and eligible for closure, 17 closed) sites in the City identified on the list of leaking underground storage tank (LUST) sites from the SWRCB's GeoTracker database (SWRCB 2023). The LUST sites are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive.

In addition to the Cortese list resources, the SWRCB's GeoTracker identifies Cleanup Program Sites (CPS; formerly known as the Spills, Leaks, Investigations, and Cleanups database) and DTSC Cleanup Sites, which are separate from the sites listed on the Cortese List. The DTSC Cleanup Sites are also identified on DTSC's EnviroStor database. There are no sites identified on the California Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Sites list via its EnviroStor database (DTSC 2023).

[1] A hazardous material, as defined in the Section 25501 of the *California Health and Safety Code,* is "any material that, due to quantity, concentration, or physical or chemical characteristics, poses a significant potential hazard to public health and safety or to the environment, if released into the workplace or the environment".

Wildland Fire Hazards

No portion of the City is identified by the California Department of Forestry and Fire Protection as a very high fire hazard severity zone (VHFHSZ)(CAL FIRE 2023). However, the western and southwestern borders of the City are adjacent to VHFHSZs. The southwestern portion of the City, located west of Meridian Avenue and south of Monterey Road, is a hilly area that is defined as a high fire hazard area by the City within which the South Pasadena Fire Department (SPFD) enforces annual brush clearance requirements to reduce the risks associated with being located adjacent to a wildland interface.

3.8.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was authorized by Congress on October 21, 1976. This law creates the framework for the proper management of hazardous and nonhazardous solid waste. To achieve its goals, RCRA established the following programs:

- The Solid Waste Program encourages States to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste; sets criteria for municipal solid waste landfills and other solid waste disposal facilities; and prohibits the open dumping of solid waste.
- The Hazardous Waste Program establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal, in effect from “cradle to grave”.
- The Underground Storage Tank Program regulates underground storage tanks containing hazardous substances and petroleum products.

Emergency Planning and Community Right-To-Know Act

The Emergency Planning and Community Right-to-Know Act was enacted by Congress on October 17, 1986. This Act began as a grassroots right-to-know movement at the State and local levels. Labor unions and citizen activists initially worked together for a common goal: greater protection of the public from chemical emergencies and dangers through public disclosure by business and industry of the chemicals they store, use, and release. This law requires businesses to report on emissions of certain toxic chemicals, and that information is placed into the Toxics Release Inventory (TRI), a publicly accessible database. There are no records of businesses or sites in the City on the most recent TRI records dated 2016 (USEPA 2016).

Hazardous Materials Transportation Act

The main purpose of the Hazardous Materials Transportation Act is to provide adequate protection against risks to life and property inherent in the transport of hazardous materials by improving the regulatory and enforcement authority of the Secretary of Transportation. This Act contains requirements for hazardous materials classification, hazard communication, packaging requirements, operational rules, training and security, and registration.

State

California Hazardous Waste Control Act

The California Hazardous Waste Control Act (HWCA), as found in the *California Health and Safety Code* (Section 25100, et seq.), authorizes the DTSC and local Certified Unified Program Agencies (CUPA; i.e., the City of South Pasadena) to regulate facilities that generate or treat hazardous waste.

Certified Unified Program Agency

In 1993, Senate Bill 1082 created the CUPA to foster effective partnerships between local, State, and federal agencies. The program consolidated the administrative, permitting, inspection, and enforcement activities of the following environmental and emergency management programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- California Accidental Release Prevention Program;
- Underground Storage Program;
- Aboveground Petroleum Storage Act Program;
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs; and
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements.

CUPA is implemented at the local level by government agencies certified by the Secretary of the CalEPA. The City of South Pasadena is a CUPA.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) is a merging of the Federal Accidental Release Prevention Program and State programs for the prevention of accidental release of regulated toxic and flammable substances. Stationary sources exceeding a threshold quantity of regulated substances are evaluated under this program to determine the potential for and impacts of accidental releases from the source. Depending on the potential hazards, the owner or occupant of a stationary source may be required to develop and submit a risk management plan. The CalARP is administered by the CUPA.

Lead Abatement

Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a toxic air contaminant. In California, lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. In addition, the California Division of Occupational Safety and Health (better known as the California Occupational Safety and Health Administration [CalOSHA]) has adopted regulations to protect worker safety during potential exposure to lead under Title 8 of the *California Code of Regulations* (Section 1532.1 Lead). All demolition that could result in the release of lead must be conducted according to these standards, which were developed to protect the general population and construction workers from respiratory and other hazards associated with lead exposure.

Asbestos Abatement

Asbestos is a known human carcinogen and the United States Environmental Protection Agency and CalEPA have identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. Further, the California Air Resources Board has identified asbestos as a Toxic Air Contaminant pursuant to the *California Health and Safety Code* (Section 39650 et seq.). Asbestos is also regulated as a potential worker safety hazard under the authority of the CalOSHA. These rules and regulations prohibit emissions of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

In California, asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. In addition, CalOSHA has regulations to protect worker safety during potential exposure to asbestos under Title 8 of the *California Code of Regulations* (Section 1529 Asbestos). All demolition that could result in the release of asbestos must be conducted according to CalOSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials.

Wildland-Urban Interface Fire Area Building Standards

Title 24, Part 2 of *California Code of Regulations*, also known as the 2019 California Building Code, addresses building standards for new structures constructed in or near a designated fire hazard severity zone. New buildings located in any fire hazard severity zone must comply with all sections of the current building code. Specifically, minimum standards are established for materials and to provide a reasonable level of protection from wildfire exposure for buildings in Wildland-Urban Interface Fire Areas. Ignition-resistant materials and design are required to reduce the risk from flame or burning embers projected by a vegetation fire.

Regional

Asbestos Removal

The South Coast Air Quality Management District's (SCAQMD's) Rule 1403 provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, structures that may contain asbestos are required to be subject to an asbestos survey by a Certified Asbestos Consultant (certified by CalOSHA) to identify building materials that contain asbestos. Under this rule, removal of asbestos must include prior SCAQMD notification; compliance with removal procedures and time schedules; asbestos-handling and clean-up procedures; and storage, disposal, and landfilling requirements.

Countywide Household Hazardous Waste Program

The County Department of Public Works' Hazardous Waste Management Division organizes regular household hazardous waste "round-ups" for residents to discard refuse items such as paints, oils, or pesticides that require special handling. Household hazardous waste roundups are held nearly every week, typically on Saturdays, at various locations throughout the County. The County also provides information on the locations of motor oil recycling centers. The City hosts household hazardous waste (HHW) and electronic waste collection events, generally on an

annual basis in the fall, and provides information the on the City's website[2] regarding how and where to properly dispose of many categories of materials, including HHW, less hazardous products, and used motor oil.

City

Municipal Code

Article VI, Hazardous Materials, South Pasadena Certified Unified Program Agency

The City of South Pasadena has adopted by reference all applicable State statutes for implementation of Section 25404 et. seq. of the California Health and Safety Code with respect to formation and implementation of a CUPA. Sections 17.59 through 17.70 of the South Pasadena Municipal Code (SPMC) defines the roles and responsibilities of the City in maintaining a hazardous materials list (Sections 17.61 through 17.65). Section 17.61(a) of the SPMC states that: "Hazardous material shall mean any substance or product found on the California Occupational Safety and Health Administration list or which is listed as a radioactive material set forth in Chapter 1, Title 10, Appendix B, maintained by the Nuclear Regulatory Commission; and Section 17.61(b) states that "Hazardous waste shall mean hazardous or extremely hazardous waste as defined by Sections 25115 and 25117 of the California Health and Safety Code and as set forth in Sections 66680 and 66685 of Title 22 of the California Administrative Code". It also defines the authority of the SPFD Fire Chief to enforce the provisions of the CUPA, which may include the inspection of hazardous materials in use, storage, or disposal; review of hazardous material records; and the sampling and testing of hazardous materials. Section 17.70 of the SPMC states "The fire department is authorized to clean up or abate the effects of any hazardous material deposited upon or onto public or private property or facilities of the city, and any person or persons who intentionally or negligently caused such deposit shall be liable for the payment of all costs incurred by the fire department as a result of such clean up or abatement activity."

3.8.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse hazards and hazardous materials impact if it would:

Threshold 3.8a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold 3.8b: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

Threshold 3.8c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Threshold 3.8d: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;

[2] https://www.southpasadenaca.gov/government/departments/public-works/environmental-programs/waste-reduction/hazardous-waste.

Threshold 3.8e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

Threshold 3.8f: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or

Threshold 3.8g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.8.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to hazards and hazardous materials.

3.8.6 ENVIRONMENTAL IMPACTS

Threshold 3.8a: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities associated with new development pursuant to the Project, or public or infrastructure projects in the City, would commonly involve the use of hazardous materials for construction, such as paints, thinners, solvents, acids, curing compounds, grease, oils, and other chemicals, which could pose risks to construction workers or lead to soil and groundwater contamination, if not properly stored, used, or disposed.

Operation of future development pursuant to the Project is not expected to utilize or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public. The proposed increase in non-residential uses is limited to office and retail development, and no new industrial/manufacturing land uses that would more likely handle hazardous materials are proposed. The proposed dwelling units would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited household quantities. The proposed dwelling units would not utilize, store, or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public, similar to the existing conditions. These hazardous materials would be stored and used at individual sites and may create a public health and safety hazard through routine transport, use, or disposal. However, the Project would not substantively alter this risk when compared with the existing land uses in the City.

A number of existing regulations require that industrial and commercial users, generators, and transporters provide operational safety and emergency response measures, so that no major threats to public health and safety are created. Compliance with existing hazardous material regulations, described in Section 3.8.3 above, would prevent undue hazards. As discussed above, the City is a CUPA and maintains and enforces a hazardous material list[3].

[3] Section 17.61(a) of the SPMC states that: "Hazardous material shall mean any substance or product found on the California Occupational Safety and Health Administration list or which is listed as a radioactive material set forth in Chapter 1, Title 10, Appendix B, maintained by the Nuclear Regulatory Commission; and Section 17.61(b) states that "Hazardous waste shall mean hazardous or extremely hazardous waste as defined by Sections 25115 and 25117 of the California Health and Safety Code and as set forth in Sections 66680 and 66685 of Title 22 of the California Administrative Code".

Through compliance with existing regulations, impacts related to the routine transport, use and disposal of hazardous materials would be less than significant, and no mitigation is required.

Threshold 3.8b: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed under Threshold 3.8a, future development could involve the use of chemical agents, solvents, paints, fuel for equipment, and other hazardous materials that are associated with construction. These materials are common to typical construction activities, and compliance with existing hazardous material regulations on the storage, use, and disposal of hazardous materials at construction sites would prevent hazards to the public or environment through reasonably foreseeable upset or accident conditions. Construction activities in the City would also occur on a temporary and intermittent basis, and at staggered schedules as individual development projects are implemented throughout the planning period of the Project.

Redevelopment activities that involve demolition or reuse of existing buildings may result in the need to remove and dispose of asbestos-containing materials and/or lead-based paint, dependent on the age of the structure. Compliance with SCAQMD Rule 1403, the CalOSHA regulations on asbestos and lead abatement, would ensure that handling and disposal of these materials is conducted safely, and accident conditions would not be reasonably foreseeable.

In addition to the identified hazardous materials sites, as discussed above, there may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases. Therefore, MM HAZ-1 requires that a Phase I Environmental Site Assessment (ESA) be prepared by the Applicant for future development projects and submitted to the City. If the Phase I ESA identifies the potential for on-site contamination, MM HAZ-1 describes a series of actions required by the Applicant up to, if warranted, remediation of contaminated conditions and submittal of a closure report or equivalent documentation to the City and the assigned regulatory oversight agencies (e.g., DTSC, Los Angeles Regional Water Quality Control Board [RWQCB]). The final step is the process described in MM HAZ-1, as appropriate, for each proposed development site that shall be completed prior to issuance of a grading permit by the City. If, even with implementation of MM HAZ-1, unanticipated contamination is encountered during construction of a project, MM HAZ-1 requires that all activities in the immediate vicinity of the suspect contamination cease and the City is notified. The Applicant would be responsible for the preparation of a Risk Management Plan to identify the contaminants of concern and their risks and describes measures to protect workers and the public from exposure to potential site hazards. Depending on the nature of the contamination, appropriate regulatory oversight agencies shall be notified. Through compliance with MMs HAZ-1 and HAZ-2 and implementation of any necessary soil and/or water remediation under the RCRA, the HWCA, and CalARP, safe and appropriate remediation (i.e., cleanup) of affected sites prior to their redevelopment and reuse would be ensured. Thus, with mitigation, there would be a less than significant impact from the use and disposal of common, construction-related hazardous materials or encounter of hazardous materials during redevelopment activities due to accident conditions.

As discussed under Threshold 3.8a, the Project does not propose industrial/manufacturing land uses that would more likely handle hazardous materials. As discussed above, the proposed dwelling units would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited household quantities. The dwelling units would not utilize, store, or generate hazardous materials or hazardous wastes in quantities that would pose a significant hazard to the public, similar to the existing residential development in the

City. These users would be subject to various State and federal regulations on storage, use, handling, transport, or disposal of hazardous materials and hazardous wastes, as discussed in Section 3.8.3. Compliance with pertinent regulations would avoid the creation of a significant hazard to the public and reduce the potential for the release of hazardous materials into the environment.

Through compliance with MMs HAZ-1 and HAZ-2 and existing regulations, impacts related to the potential for accidental release of hazardous materials would be less than significant.

Threshold 3.8c: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

All schools in the City are located near residential or civic land uses where hazardous materials use is limited. However, given the modest size of the City, some existing schools are within 0.25 mile of one or more focus areas, which would have a mixed-use land use designation and may include retail and office uses that could handle materials classified as hazardous, as discussed under Thresholds 3.8a and 3.8b. However, no industrial/manufacturing land uses that would more likely handle hazardous materials are proposed. Proposed commercial/retail and office land uses would not be expected to result in hazardous emissions or handle acutely hazardous materials or substances that could pose hazards to nearby school children in the event of an accidental release or spill. These would be similar land uses to what are already present in portions of the City, and the proposed commercial/retail and office land uses would not present a new hazard to schools. Residential activities associated with occupancy of the proposed dwelling units would be similar to other residential uses in the area and would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste in quantities that may impact students at schools within 0.25 mile of the site. As with existing residential, commercial, and light industrial land uses in the City, compliance with existing regulations related to transport, use, and disposal of hazardous materials would ensure that any schools located within 0.25 mile of a proposed development that would have hazardous materials typical of urban environments would not be adversely affected.

Through compliance with existing regulations, impacts related to exposure of school-aged children to hazardous emissions, materials, substances, or wastes would be less than significant, and no mitigation is required.

Threshold 3.8d: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As discussed above, there are a total of 18 sites in the City identified on the list of leaking LUST sites from the SWRCB's GeoTracker database, which are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive. These sites are compiled as part of the Cortese List, compiled pursuant to Section 65962.5 of the Government Code. In addition, there are seven SWRCB CPS sites and five DTSC Cleanup Sites identified via the GeoTracker database, which is not part of the Cortese list. Of these, one CPS site is in the "site assessment" phase, and one DTSC site is "active" and undergoing a voluntary cleanup. The remaining CPS sites have a status of either "open-inactive" or "completed-case closed". The remaining DTSC sites have a status of "no further action", "certified O&M-land use restrictions only", or "refer: other agency" and are not undergoing cleanup activities (SWRCB 2022). These findings are typical of urban environments with uses such as gas stations, automotive repair facilities, dry cleaners, medical facilities, and

municipal facilities and do not ordinarily represent conditions that are hazardous to the general public. As discussed under Threshold 3.8b, MMs HAZ-1 and HAZ-2 require actions by the Applicant for future development projects to characterize the potential risk associated with historic and/or current land uses on the proposed project site such that the contamination, if any, is addressed prior to construction and occupancy of that project.

Through compliance with MMs HAZ-1 and HAZ-2 and existing regulations, impacts related to the potential location of a site of the Cortese list would be less than significant.

Threshold 3.8e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

The nearest airport is the El Monte Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. There would be no impact, and no mitigation is required.

Threshold 3.8f: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. As discussed above, compliance with Section 36.310.090 of the SPMC in the design and construction of future projects would always maintain emergency access to individual parcels. Impacts on traffic flows for emergency response or evacuation would be less than significant during construction activities, and no mitigation is required.

The City has a developed roadway network that provides emergency access and evacuation routes to existing development. Evacuation routes include major roadways in the City, with the State Route 110 and Interstate 210 freeways serving as primary regional exit routes. These freeways provide area-wide evacuation routes, with major north-south and east-west roadways in the City connecting to the freeways and adjacent cities. No major change to the existing roadway system serving the City is proposed. Access to individual development sites would be available through existing or planned on-site roadways/driveways, as required under Section 36.310.090 “Driveways and Site Access” of the SPMC. Section 36.310.090 of the SPMC defines requirements for all access from public streets to private property to ensure adequate and safe access by vehicular and other traffic. The plan check and building permit process by the SPFD includes review of access for emergency vehicles in accordance with the *California Fire Code*, as adopted by reference by the City (Chapter 14 of the SPMC). Compliance with the requirements for emergency lane width, vertical clearance, and distance would provide adequate emergency access to all new development pursuant to the Project and public and infrastructure projects. Continued implementation of State and City emergency access requirements would provide future development with adequate access for emergency response or evacuation.

Impacts related to emergency response and evacuation would be less than significant, and no mitigation is required.

Threshold 3.8g: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Individual development projects would be reviewed by the SPFD as part of the City's project review process and would be required to comply with all State (CBC) and City fire code standards in effect at the time the building permit is issued, pursuant to Chapter 14, Fire Prevention, of the SPMC. Section 14.4 of the SPMC includes requirements for building construction, fire flows and pressures, hydrant placement and other requirements that would reduce the creation of fire hazards and facilitate emergency response. In addition to City-wide fire code standards, Section 14.1 of the SPMC requires that development of any parcels in the High Risk Fire Area would be required to have Class A roof assemblies, which are effective against severe fire test exposures, with exceptions including, but not limited to, installation of an entirely non-combustible roof assembly, clay or concrete tile or ferrous or copper shingles or sheets on an entirely non-combustible substructure, and timing and amount of roof replacements.

Also, as discussed under Threshold 3.8f, the proposed General Plan Update includes actions to update the City's Hazard Mitigation Plan to address disaster recovery in the business community, explore the development of a Business Disaster Assistance Center, develop a rapid response team to support safe evacuation in the hillside areas, and periodically review and update the City's post-disaster recovery plan. Also, the City has an Emergency Management Program, which includes all elements necessary to respond quickly and effectively to major emergencies. These elements include: Emergency Operations Plan, Emergency Operations Center, Emergency Response Program, and Public Education Program.

While implementation of the Project would not exacerbate existing fire hazards in the area, the Project has the potential to introduce additional development and population into a wildfire hazard area. However, through compliance with State and local fire code requirements, continued implementation of the City's emergency response programs, and implementation of the policies and actions identified above, the Project would not directly or indirectly expose people or structures to a significant wildfire-related risks. There would be a less than significant impact related to wildfires, and no mitigation is required.

3.8.7 CUMULATIVE IMPACTS

The cumulative impacts related to hazards and hazardous materials are analyzed within the San Gabriel Valley (Valley). Existing developments in the Valley pose risks to public health and safety, as they relate to the use, storage, handling, generation, transport, and disposal of hazardous materials. Future development in the City and in the rest of the San Gabriel Valley would increase these risks as more facilities or operations utilize hazardous materials; are located near airports; and are developed in hillside areas identified as high risk fire areas by the City.

Existing regulations for a variety of activities and uses relate to the protection of public health and safety at all levels of government. Future development projects in the Valley would also need to be made part of emergency planning efforts for natural or manmade disasters that may occur in the area. Compliance of individual projects with pertinent regulations would preserve public health and safety and would prevent hazards to existing and future developments. Thus, future growth and development in the Valley is not expected to present significant risks to public health and safety with compliance with regulations. Future growth and development in the Valley would also be subject to review and approval by the SPFD, other jurisdictional fire departments/agencies, and the County Fire Department for fire safety and preparedness, as well as the provision of

adequate emergency access and evacuation. Compliance with pertinent requirements of the fire agencies would prevent the creation of fire hazards and would reduce wildland fire hazards.

The proposed Project's compliance with existing health and safety regulations, and MMs HAZ-1 and HAZ-2, outlined in this section would prevent the creation of health risks and public safety hazards. Therefore, the Project's contribution to cumulative impacts would be less than significant.

3.8.8 MITIGATION MEASURES

MM HAZ-1 Prior to the issuance of a grading permit, Applicants for future development projects shall:

1) Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a Phase I Environmental Site Assessment, which shall be submitted to the City Planning and Building Department for review. If the Phase I ESA concludes there are recognized environmental conditions that indicate the potential for on-site contamination, the Applicant shall direct the performance of a subsurface investigation appropriate in scope to the likely contaminants (e.g., water, soil, soil vapor). The results of the investigation shall be submitted to the City.
2) If contamination is identified on the site, the City, in accordance with appropriate regulatory oversight agencies (e.g., California Toxic Substances Control, Los Angeles Regional Water Quality Control Board), shall determine the need for further investigation and/or remediation of the site. If further investigation or remediation is required, it shall be the responsibility of the Applicant(s) to complete such investigation and/or remediation to the satisfaction of the City and the local oversight agency(ies).
3) Closure reports or other reports that document the successful completion of required remediation activities, if any, shall be submitted to and approved by acceptable to the City (as the Certified Uniform Program Agency) and the local oversight agency(ies) prior to the issuance of a grading permit for the proposed site development.

MM HAZ-2 In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction, construction activities in the immediate vicinity of the contamination shall cease immediately and the City shall be notified. If contamination is encountered, the Applicant for the proposed development shall be responsible for preparing and implementing a Risk Management Plan that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include, but not be limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate oversight agencies shall be notified. If determined necessary by the oversight agency(ies), a Site Health and Safety Plan that meets California Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.

3.8.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.8.10 REFERENCES

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3.9 HYDROLOGY AND WATER QUALITY

3.9.1 METHODOLOGY

This section describes the hydrology and water quality characteristics in the City of South Pasadena (City) and analyzes potential impacts on hydrology and water quality that may occur with implementation of the proposed2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information presented in this section was derived from the City's website, information from the City Public Works Department staff, the existing General Plan, Federal Emergency Management Agency (FEMA), California Department of Water Resources, Los Angeles Regional Water Quality Control Board (RWQCB), Los Angeles County Flood Control District, and the *City of South Pasadena Final Draft 2020 Urban Water Management Plan* dated September 2021 (South Pasadena 2021).

3.9.2 EXISTING CONDITIONS

Hydrology

Surface Water

The Los Angeles River drains an area of about 824 square miles along its 55-mile length. The main tributaries to the lower stretch of this river include the Arroyo Seco, the Rio Hondo, and Compton Creek. The City of South Pasadena is located within the watershed of the Los Angeles River, which drains through the Arroyo Seco tributary within the western portion of the City. This portion of the stream is concrete-lined with no native substrate, and it flows through the Lower Arroyo that provides both undisturbed open space and public recreation opportunities such as the Arroyo Park, Arroyo Woodland and Wildlife Nature Park, and the Arroyo Seco Golf Course.

Storm Drainage

Storm drainage in the City is provided by curbs and gutters along streets, which direct storm water into the catch basins, pipes, and washes that run southerly in or near the City and are maintained by the City's Department of Public Works. City-maintained storm water management facilities are present throughout the City, which connect to regional flood-control and runoff conveyance facilities. While the primary purpose of the storm drain system is to reduce or eliminate flood hazards, the system carries both dry and wet weather urban runoff[1] and the pollutants associated with activities from urban land that are transported by runoff.

Groundwater

The City is underlain by the Main San Gabriel Groundwater Basin (Basin). As shown, the City is situated in the northwest corner of the area encompassed by the Basin. The Main San Gabriel Basin includes the entire valley floor of San Gabriel Valley, with the exception of the Raymond Basin and Puente Basin. The boundaries of the Basin are the Raymond Basin on the northwest, the base of the San Gabriel Mountains on the north, the groundwater divide between the cities of San Dimas and La Verne and the lower boundary of the Puente Basin on the east, and Whittier Narrows on the southwest. Subbasins within the Basin include the Upper San Gabriel Canyon Basin, Lower San Gabriel Canyon Basin, Glendora Basin, Foothill Basin, Way Hill Basin, and

[1] Dry weather urban runoff, also referred to as nuisance runoff, occurs when there is no precipitation-generated runoff. Wet weather urban runoff refers collectively to diffuse source discharges that result from precipitation events.

San Dimas Basin. In addition, the Puente Basin is tributary to the Basin from the southeast, between the San Jose and Puente Hills (DWR 2004).

Pumping and recharge of the Basin is administered by the Main San Gabriel Basin Watermaster (Watermaster), as it has been an adjudicated water basin since 1973. The Basin has a freshwater storage capacity of about 8.7 million acre-feet (af), of which the top 125 feet of storage, or about 1.0 million af has been used for historic Basin operations. Local runoff is stored in a series of reservoirs operated by the Los Angeles County Department of Public Works and diverted into spreading grounds to replenish the groundwater supply. In addition to groundwater replenishment with local storm water runoff, the Watermaster maintains records of each producer's water rights and annual production. Although there is no limit on the quantity of water that may be produced, production in excess of a water right is subject to a Replacement Water assessment. The Watermaster uses funds collected from producers' overproduction to purchase imported water from municipal water districts. The Upper San Gabriel Valley Municipal Water District and the Three Valleys Municipal Water District (TVMWD) obtain their water from the Metropolitan Water District of Southern California (MWD). The San Gabriel Valley Municipal Water District has its own contract for State Water Project water. The Watermaster coordinates purchase and delivery of imported water to replenish the Basin, thus offsetting the producers' overproduction and making the Basin whole (South Pasadena 2021).

Water Quality

Surface Water Quality

Water bodies that do not meet water quality standards are deemed "impaired" and, under Section 303(d) of the federal Clean Water Act, are placed on a list of impaired waters for which a total maximum daily load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a "factor of safety"). Once established, the TMDL is allocated among current and future pollutant sources to the water body.

Runoff from the City of South Pasadena flows into the Alhambra Wash, to the southeast, and the Arroyo Seco, to the west. The Alhambra Wash is listed as "impaired" for ammonia; a TMDL for ammonia is expected to be completed in 2027 (SRWCB 2022). Reaches 1 and 2 of the Arroyo Seco is listed for indicator bacteria and trash; TMDLs have been established for both impairments for both Reach 1 and Reach 2 of the Arroyo Seco (SWRCB 2022). While the impairment listing of the Arroyo Seco is not directly attributable to pollutants and land uses in South Pasadena, discharges from the City are subject to the discharge limitations of the established TMDLs.

Groundwater Quality

The City has four wells located within the Main Basin: Graves Well No. 2, Wilson Well No. 2, Wilson Well No. 3, and Wilson Well No. 4 with approximate pumping capacities of 705 gallons per minute (gpm), 750 gpm, 1,960 gpm and 1,100 gpm, respectively. The City installed a volatile organic compound (VOC) treatment system (Granular Activated Carbon and Ion Exchange) at Graves Well No. 2 in 2020. Wilson Well No. 2 is inactive as of June 2018, but City staff indicated there are plans to rehabilitate the Wilson Well No. 2 by 2025. The City installed a VOC treatment system (Granular Activated Carbon treatment) at Wilson Wells No. 3 and No. 4 in December 2018. The current collective well capacity from Graves Well No. 2, Wilson Wells No. 3, and No. 4 is about 4,960 gpm or about 7.1 million gallons per day (mgd). By 2045, the collective capacity from Graves Well No. 2, Wilson Wells No. 2, No. 3, and No. 4 is anticipated to be about 4,500 gpm or about 6.5 mgd. Assuming the City wells were limited to 75 percent of capacity during

calendar years 2020 through 2045, the available pumping capacity would be about 5.3 mgd (about 5,900 af) in 2021 and about 4.9 mgd (5,500 af) in 2045.

Over the past 20 years, the City's groundwater production has ranged from approximately 1,950 afy to approximately 5,264 afy, with an average production of approximately 4,026 afy (Watermaster 2020).

Dam Inundation

Devil's Gate Dam is located approximately five miles north of the northwesterly City boundary. This dam is owned and operated by the Los Angeles County Flood Control District (LACFCD) and is a concrete gravity dam. Dam failure could lead to the sudden release of waters and the creation of inundation hazards to downstream areas. Extensive retrofitting was completed in early 1998 and approved by the California Department of Water Resources, Division of Safety of Dams (South Pasadena 1998). The LACFCD has recently removed 1.7 million cubic yards of accumulated sediment from the reservoir behind Devil's Gate Dam, which was adversely affecting its capacity and function as a flood control facility. Therefore, the capacity of the facility to accommodate future storm water flows and sediment has been restored.

3.9.3 RELEVANT PROGRAMS AND REGULATIONS

Sections 401 and 404 of the Clean Water Act

Section 401 of the Clean Water Act (CWA, *United States Code* [USC], Title 33, Sections 1251 et seq.) requires that any person applying for a federal permit or license that may result in a discharge of pollutants into "waters of the U.S." obtain a State water quality certification which concludes that the activity complies with all applicable water quality standards, limitations, and restrictions. Subject to certain limitations, no license or permit may be issued by a federal agency until a Section 401-required certification has been granted. Further, no license or permit may be issued if certification has been denied. The CWA Section 404 permits and authorizations, described in the next paragraph, are subject to Section 401 certification by the local RWQCBs.

Section 404 of the CWA is a program that regulates the discharge of dredged and fill material into "waters of the U.S.", including wetlands. Activities in "waters of the U.S." that are regulated under this program include fills for development (including physical alterations to drainages to accommodate storm drainage, stabilization, and flood-control improvements); water resource projects (e.g., dams and levees); infrastructure development (e.g., highways and airports); and conversion of wetlands to uplands for farming and forestry. The U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers have issued Section 404(b)(1) Guidelines (*Code of Federal Regulations*, Title 40, Section 230) that regulate dredge and fill activities, including water quality aspects of such activities. Subpart C of Sections 230.20–230.25 contains water quality regulations applicable to dredge and fill activities. Among other topics, these guidelines address discharges that alter substrate elevation or contours; suspended particulates and water clarity; nutrients and chemical content; current patterns and water circulation; water fluctuations (including those that alter erosion or sediment rates); and salinity gradients.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program is authorized by the federal CWA and regulates point sources that discharge pollutants into "waters of the U.S.". Point sources are discrete conveyances such as pipes or man-made ditches. Examples of pollutants include, but are not limited to, rock, sand, dirt as well as agricultural, industrial, and

municipal waste discharged into “waters of the U.S.”. Point sources that discharge into municipal sewer systems (e.g., residential wastewater conveyance pipes) do not require individual permits, but the sewer systems do require an NPDES permit.

In California, responsibility for implementing the NPDES program has been delegated to the State Water Resources Control Board (SWRCB) and the nine RWQCBs acting under the auspices of the state board. The State and regional boards typically issue NPDES permits that also include waste discharge requirements (WDRs) under State law. The Los Angeles County MS4 permit and the State General Construction Permit have been issued as NPDES permits and as WDRs and are discussed in more detail below. The City’s storm water permitting is discussed further below.

Federal Emergency Management Act- Executive Order 11198

In 1977, the President of the United States issued Executive Order 11198 to regulate impacts associated with development within a designated 100-year floodplain. This Executive Order is implemented through FEMA’s Floodplain Mapping Program and through federal agency review of projects that may require federal permits or approvals. Flood hazard areas identified on the Flood Insurance Rate Map are identified as Special Flood Hazard Area (SFHAs). SFHAs are areas that will be inundated by a flood event and have a one percent chance of being equaled or exceeded in any given year. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled “Zone C” or “Zone X”. The entirety of the City is designated “Zone X” (FEMA 2023).

State

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act)(*California Water Code,* Sections 13000 et. seq.) is California‘s primary statute governing water quality and water pollution issues, including sediment transport and protection of surface waters and groundwater. The Porter-Cologne Act provides the SWRCB and nine RWQCBs the authority to protect water quality and is the primary vehicle for implementing California’s responsibilities under the federal CWA. Each RWQCB must formulate and adopt a water quality control plan (commonly referred to as a basin plan) for the region within its jurisdiction. The basin plan must conform to the policies set forth in the Porter-Cologne Act and the State water policy established by the SWRCB. The basin plan establishes beneficial uses for surface and groundwaters in the region and includes narrative and numeric water quality standards to protect those beneficial uses. Each RWQCB is also authorized to include water discharge prohibitions applicable to particular conditions, areas, or types of waste within its jurisdiction. The Act requires that, unless otherwise authorized by a general or other permit, reports of waste discharges to regulated waters of the state must be provided to each RWQCB. The RWQCB may issue discharge permits under State law in response to a report of waste discharge. These permits are commonly referred to as “waste discharge requirements” and are issued by the RWQCBs for activities within each regional board’s jurisdiction.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, comprised of AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act. The act provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention

only if necessary, to protect the resource. The act requires the formation of local groundwater sustainability agencies that must assess conditions in their local water basins and adopt locally based management plans. The act provides a 20-year timeline for the groundwater sustainability agencies to implement the plans to achieve long-term groundwater sustainability. Further, the act protects existing surface water and groundwater rights and does not interfere with current drought response measures.

California Green Building Standards Code

In 2021, the State of California enacted the fourth revision of the California Green Building Standards Code (CALGreen Code) as part 11 of the California Building Standards Code (Title 24). CALGreen provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including but not limited to site drainage design, storm water management, and water use efficiency. Required measures are accompanied by a set of voluntary standards that are designed to encourage developers and cities to aim for a higher standard of development.

Under CALGreen, all residential and non-residential sites are required to be planned and developed to keep surface water from entering buildings and to incorporate efficient outdoor water use measures. Construction plans are required to show appropriate grading and surface water management methods such as swales, water collection and disposal systems, French drains, water retention gardens, and other water measures that keep surface water away from buildings and aid in groundwater recharge. Plans should also include outdoor water use plans that utilize weather- or soil moisture-controlled irrigation systems. Non-residential structures are also required to develop an irrigation water budget for landscapes greater than 2,500 square feet that conforms to a local water efficient landscape ordinance or to the state Model Water Efficient Landscape Ordinance, per Title 31, Green Building Standards Code, where no local ordinance is applicable.

Also, for construction activities that disturb less than one acre, a storm water soil loss prevention plan (also referred to as an erosion control plan) must be developed that prevents the pollution of storm water runoff (Section 4.106.2 and Section 5.106.2 of the 2021 California Green Building Standards Code). This can be achieved either through compliance with a storm water management and/or erosion control ordinance or implementation of best management practices (BMPs). The City has a storm water management ordinance, discussed below.

Construction General Permit

The NPDES program allows for the issuance of general permits that cover specific actions by multiple parties, such as construction activities. Dischargers covered under a general permit must comply with the permit terms and conditions. In 2009, the SWRCB issued the statewide Construction General Permit to regulate discharges or pollutants in storm water associated with construction activities (NPDES No. CAR000002, Water Quality Order 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ). Dischargers are required to obtain coverage under the Construction General Permit if a project disturbs one or more acres of soil or disturbs less than one acre but is part of a larger common plan of development that in total disturbs one or more acres. The Construction General Permit requires that projects implement a Storm Water Pollution Prevention Plan (SWPPP) that includes specific BMPs and establishes numeric effluent limitations to meet water quality and technology-based standards.

Discharges of Groundwater to Surface Waters

The Los Angeles RWQCB Order R4-2003-0111 contains the waste discharge requirements for discharges of groundwater from construction and project dewatering to surface waters in the coastal watersheds of Los Angeles and Ventura Counties (General NPDES Permit No. CAG994004). This order regulates the discharge of groundwater that may or may not be impacted by toxic compounds and/or conventional pollutants. It requires that dewatering activities prevent water quality degradation and protect beneficial uses of receiving surface water bodies. The order also includes discharge limitations and discharge prohibitions, as well as Total Maximum Daily Loads (TMDLs) for receiving water bodies.

Regional

Water Quality Control Plan for the Los Angeles Region

The *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) seeks to preserve and enhance water quality and protect the beneficial uses of water bodies in the region (LARWQCB 1994). The Basin Plan provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins within the Los Angeles Region. The Basin Plan (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's anti-degradation policy; and (3) describes implementation programs to protect all waters in the region. All applicable SWRCB and RWQCB plans and policies and other pertinent water quality policies and regulations are incorporated by reference into the Basin Plan.

Water quality objectives for ammonia, coliform bacteria, bioaccumulation, biochemical oxygen demand, biostimulatory substances, chemical constituents, total residual chlorine, color, exotic vegetation, floating material, methylene blue activated substances, mineral quality, nitrogen, oil and grease, dissolved oxygen, pesticides, pH, polychlorinated biphenyls, radioactive substances, suspended solids, taste and odor, temperature, toxicity, and turbidity are also included in the Basin Plan. Implementation of the Basin Plan occurs primarily through issuance of Waste Discharge Requirements, including regulatory enforcement action, as necessary. The existing, potential, or intermittent beneficial uses for the Alhambra Wash and the Arroyo Seco (Reach 1), where storm water runoff from the City is discharged and for the underlying groundwater basins in the City (Main San Gabriel Groundwater Basin), are summarized below in Table 3.9-1, Beneficial Uses of Receiving Waters. The beneficial uses defined in the Basin Plan identified for the receiving waters in the City include:

- ***Municipal and Domestic Supply (MUN):*** Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
- ***Industrial Service Supply (IND):*** Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well repressurization.
- ***Industrial Process Supply (PROC):*** Uses of water for industrial activities that depend primarily on water quality.
- ***Agricultural Supply(AGR):*** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigating, stock watering, or supporting vegetation for range grazing.

- ***Groundwater Recharge (GWR):*** Uses of water for natural or artificial recharge of groundwater for future extraction, to maintain water quality, or to halt saltwater intrusion into freshwater aquifers.
- ***Warm Freshwater Habitat (WARM):*** Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife (including invertebrates).
- ***Wildlife Habitat (WILD):*** Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- ***Rare, Threatened, or Endangered Species (RARE):*** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under State or federal law as rare, threatened, or endangered.

TABLE 3.9-1
BENEFICIAL USES OF RECEIVING WATERS

Water Body	Applicable Beneficial Uses							
	MUN	IND	PROC	AGR	GWR	WARM	WILD	RARE
Alhambra Wash	P*	—	—	—	I	P	P	E
Arroyo Seco (Reach 1)	P*	—	—	—	—	P	P	—
Main San Gabriel Groundwater Basin	E	E	E	E	—	—	—	—

MUN: Municipal and Domestic Supply; IND: Industrial Service Supply; PROC Industrial Process Supply; AGR: Agricultural Supply: GWR: Groundwater Recharge; WARM: Warm Freshwater Habitat; WILD: Wildlife Habitat; Rare: Rare, Threatened, or Endangered Species; E: Existing Beneficial Use; P: Potential Beneficial Use; I: Intermittent Beneficial Use

* Designated under State Water Quality Control Board Resolution No. 88-63 followed by Los Angeles RWQCB Resolution No. 89-03. Some designations may be considered for exemption at a later date.

Source: LARWQCB. 1994 (June). *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*.

Storm Water Permitting (Municipal Separate Storm Sewer System Permit)

In December 2012, the Los Angeles RWQCB reissued the "Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4" (Los Angeles County MS4 permit, MS4 permit) to the County of Los Angeles, 84 incorporated cities within Los Angeles County (including South Pasadena), and the Los Angeles County Flood Control District in accordance with the federal NPDES permit program and Waste Discharge Requirements (WDRs) under State law (CAS004001, Order No. R4-2012-0175) (MS4 Permit). The City of South Pasadena is a co-permittee to the County's MS4 permit. The City has developed a Low Impact Development (LID) ordinance and Green Streets policies in accordance with Los Angeles RWQCB requirements under the MS4 permit to ensure storm water runoff meets the WDRs; these are discussed further below.

Groundwater Rights

Groundwater pumping in the groundwater basin underlying the City is regulated by the Main San Gabriel Basin Watermaster. As noted above, adjudication of the water rights of the Main San Gabriel Groundwater Basin was entered in 1973. The Basin Judgment does not restrict the

quantity of water that parties may extract from the Basin. Rather, it provides a means for replacing all annual extractions in excess of a party's annual right to extract water with supplemental water. The Watermaster annually establishes an Operating Safe Yield for the Main Basin, which is then used to allocate its portion of the Operating Safe Yield to each party.

The City currently has a prescriptive pumping right of 1.80520 percent of the Basin's Operating Safe Yield. The Operating Safe Yield in the Basin has averaged about 150,000 af per year over the past five years (fiscal years 2015–2016 through 2019–2020) plus the surface water rights are fixed at about 10,500 af for a total of about 160,500 af of water rights. If the City pumps more water than the allowed amount, a Replacement Water Assessment is charged by the Watermaster that is used to purchase untreated imported water for replacement/recharge into the Basin (South Pasadena 2021).

City

Municipal Code

Chapter 23, Stormwater and Urban Runoff Pollution Control

Chapter 23 of the South Pasadena Municipal Code (SPMC) is defined as the "Storm Water and Urban Runoff Pollution Prevention Control Ordinance of the City of South Pasadena" and was enacted to ensure the City meets federal and State Clean Water Act requirements and complies with Los Angeles County MS4 permit requirements.

The purpose of this chapter is to protect and improve water quality of receiving waters by:

a) Reducing illicit discharges to the municipal storm water system to the maximum extent practicable;

b) Eliminating illicit connections to the municipal storm water system;

c) Eliminating spillage, dumping, and disposal of pollutant materials into the municipal storm water system;

d) Reducing pollutant loads in storm water and urban runoff from land uses and activities identified in the municipal NPDES permit; and

e) Reducing the contribution of pollutants from the MS4 through interagency coordination.

The intent of this chapter is to enhance and protect the water quality of the receiving waters of the United States in a manner that is consistent with the Clean Water Act and acts amendatory thereof or supplementary thereto; applicable implementing regulations, the MS4 permit and any amendment, revision, or reissuance thereof.

Section 23.12 et. seq. of the SPMC requires that for projects with construction activity subject to the Construction General Permit, proof of application for this permit would be required before the City issues a grading permit, and also requires that all records associated with coverage under the Construction General Permit be retained at the construction site. Section 23.13 et. seq. of the SPMC addresses construction activities not subject to the Construction General Permit (i.e., less than one acre of disturbance) but that would be subject to the MS4 requirements, which encompasses all anticipated development in the City. These projects would be required to comply with requirements contained in the MS4 permit, as specified in the City's watershed management program, defined in Section 23.14 et. seq. of the SPMC.

Section 23.14 et. seq. of the SPMC contains requirements for storm water pollution control measures in construction activities and facility operations of development and redevelopment projects to comply with the current MS4, lessen the water quality impacts of development by using smart growth practices, and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. LID, in simplest terms, consists of building and landscape features designed to retain or filter storm water runoff. The LID principles shall be inclusive of the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements under the MS4. This section authorizes the City to further define and adopt storm water pollution control measures, develop LID principles and requirements, including, but not limited to, the objectives and specifications for integration of LID strategies, and collect funds for projects.

Urban Water Management Plan

The City is a retail water supplier that serves the majority of the residents within South Pasadena. As its own water supplier, the City is required to prepare an Urban Water Management Plan (Plan) in accordance with the California Urban Water Management Planning Act (UWMP Act) which was established in 1983. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. Section 10621(a) of the California Water Code states, “Each water supplier shall update its plan at least once every five years on or before December 31, in years ending in five and zero.”

The *2020 Urban Water Management Plan* (UWMP), dated October 2021, for the City of South Pasadena was prepared to meet the mandates of the California Urban Water Management Planning Act. The UWMP identifies historic and projected water supplies available to the City of South Pasadena; existing and projected water demand; available water rights; and programs to meet demand during an average year, single-dry year, and a five-consecutive-year drought. The UWMP is the foundational document for compliance with both the *California Water Code* and SB 610 and SB 221 documentation for applicable development projects in the City.

3.9.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse hydrology and water quality impact if it would:

Threshold 3.9a: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

Threshold 3.9b: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold 3.9c: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; or

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Threshold 3.9d: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or

Threshold 3.9e: Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

3.9.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to hydrology and water quality.

3.9.6 ENVIRONMENTAL IMPACTS

Threshold 3.9a: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

There are two major classes of pollutants: point source and non-point source. Point-source pollutants can be traced to their original source and are discharged directly from pipes or spills. Non-point-source pollutants cannot be traced to a specific original source. Non-point source pollution is caused by rainfall or snowmelt moving over and through the ground. Storm water runoff (i.e., non-point source) occurs when rainfall is collected by storm drains instead of being absorbed into groundcover or soil as is common in undeveloped and in landscaped areas. Common pollutants associated with storm water runoff in urban areas include sediment, nutrients, bacteria and viruses, oil and grease, metals, organics, oxygen-demanding substances, pesticides, and trash and debris. Wet- and dry-weather runoff typically contain similar pollutants of concern; however, after long dry periods between rainfall events, the concentrations of pollutants in dry weather flows are higher and potentially more harmful. Sediments and contaminants may be transported through runoff to downstream drainages and ultimately into the receiving waterways, and potentially even into the Pacific Ocean, thereby affecting surface water and offshore water quality without appropriate management. In the City of South Pasadena, the Los Angeles RWQCB administers NPDES permitting and is responsible for issuance of Waste Discharge Requirements (WDRs).

Construction

Storm water runoff from individual construction sites could contain pollutants such as soils and sediments that are released during grading and excavation activities and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that may result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment. Construction activities could include demolition of existing structures for new development or replacement, new development, road improvements and realignments, installation and realignment of utilities, and the potential replacement of utilities. Construction runoff would flow into the storm drain inlets in the City or in the surrounding area and would enter receiving water bodies. As discussed above,

the City's receiving water (Arroyo Seco Reach 1 and Alhambra Wash) are considered impaired water bodies; pollutants in the storm water could add to further degradation of water quality and violation of TMDLs and affect the identified beneficial uses for these waters.

As discussed above, construction activities that disturb one or more acres of land are subject to the Construction General Permit (Order 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ). Compliance with the Construction General Permit would involve filing a Notice of Intent with the SWRCB, then preparing and submitting a SWPPP prior to construction activities. The SWPPP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment discharge and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is required to identify storm water discharge from the construction activity and to identify and implement controls where necessary. As noted above, the City requires proof of application for coverage under the Construction General Permit and retention of all associated documents on the construction site, pursuant to Section 23.12 of the SPMC.

The preparation of a SWPPP requires the individual developer to implement best management practices (BMPs) that are designed specifically to address the potential pollution risks that would be incurred during project construction. The BMPs set forth in the SWPPP and implemented during construction activities that are most often used include (1) erosion-control BMPs such as hydraulic mulch, soil binders, and geotextiles and mats to stabilize soils; (2) temporary drainage swales to divert runoff from exposed soils; (3) sediment controls such as fiber rolls along disturbed areas, temporary desilting basins, and gravel bags around storm drain inlets; (4) watering of exposed soils and covering stockpiles of soil; (5) stabilization of construction entrance/exit points to reduce tracking of sediments on vehicles; and (6) timing of grading to avoid the rainy season (i.e., November through April). Effective implementation of the project-specific measures in the SWPPP would comply with the Construction General Permit requirements, and, therefore, would not violate applicable waste discharge requirements.

As discussed, for construction activities that disturb less than one acre, CALGreen requires a storm water soil loss prevention plan (also referred to as an erosion control plan) to be developed that prevents the pollution of storm water runoff, and this can be achieved by through compliance with the City's storm water management ordinance (Chapter 23 of the SPMC).

Therefore, all construction activities would be required to meet permitting requirements, at either the State or local level, to effectively control storm water runoff pollution control and ensure applicable waste discharge requirements, pursuant to the SPMC, are not violated, which would reduce short-term, construction-related water quality impacts to surface water and groundwater to a less than significant level, and no mitigation is required.

Operation

Future development pursuant to the Project would have the potential to increase non-point-source runoff, and associated pollutants, from residential, office/retail, utility, and roadway uses. All proposed projects would be required to comply with applicable requirements of the Los Angeles County MS4 permit, implemented via the City's storm water management ordinance (Chapter 23 of the SPMC).

This includes preparation of a SUSMP, which must include a drainage concept and storm water quality plan that reduces peak storm water runoff discharge rates; conserves natural areas; minimizes storm water pollutants of concern; protects slopes and channels; provides storm drain

system stenciling and signage; properly designs outdoor material storage areas and trash storage areas; and provides proof of ongoing BMP maintenance through structural or treatment-control BMPs. Section 23.14 et. seq. of the SPMC contains requirements for storm water pollution control measures for both construction and operation of development/redevelopment projects to comply with the current MS4 permit. These requirements lessen the water quality impacts of development by using smart growth practices and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. The City's LID ordinance and Green Streets policies have been adopted in accordance with Los Angeles RWQCB requirements under the MS4 permit to ensure storm water runoff meets the WDRs.

Because most of the development that may occur pursuant to the Project would be redevelopment of existing, fully developed sites, buildout of the Project would result in a minimal increase in impervious surfaces. Also, replacement of existing land uses through redevelopment activities presents an opportunity to better control runoff through the implementation of current, mandated storm water management features.

Through compliance with State and local regulations by future development storm water runoff, impacts related to operational water quality standards and waste discharge requirements would be less than significant, and no mitigation is required.

Threshold 3.9b: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Groundwater Supplies

The City operates its own municipal water services, with water supplies from the underlying Main San Gabriel Groundwater Basins. The City obtains its groundwater supply through four wells, of which two are currently active.

Future development pursuant to the Project would create a long-term demand for water to be used for domestic purposes, landscape irrigation, and maintenance activities. This water demand would lead to an increase in groundwater pumping from local wells. As discussed above, groundwater pumping is regulated by the Watermaster. As discussed in Section 3.14, Utilities and Services Systems, the City complies with its pumping rights and the need to replenish groundwater when the City exceeds its allocation. Thus, groundwater pumping that may lead to the depletion of local groundwater resources is not expected to occur. Continued management of the groundwater basins by the Watermaster would also prevent overdraft conditions or other adverse impacts to local groundwater. Therefore, implementation of the Project would not substantially deplete groundwater supplies. There would be a less than significant impact, and no mitigation is required.

Groundwater Recharge

The City is largely built out and has an established land use pattern, with limited available vacant or underutilized land throughout the City. Groundwater recharge is accomplished through the infiltration of storm water and irrigation water runoff into pervious soils, whether through an engineered spreading ground facility, through creeks and drainages, and/or through vacant and vegetated (including landscaped) areas. The construction of new impervious surfaces, including roadways, building foundations, parking lots, and other concrete or asphalt surfaces, would prevent rainwater from infiltrating the soils, potentially reducing groundwater recharge.

As discussed above, because virtually all the development that may occur pursuant to the Project would be redevelopment of existing, fully developed sites, buildout of the Project would result in a minimal increase in impervious surfaces. The vacant parcels available for development occupy less than one percent of the City's land area (Inloes 2018). Also, not all vacant parcels are necessarily pervious. The development of this very small increment of land area would not result in the creation of substantial interference to groundwater recharge. There are no groundwater recharge facilities within the City, and existing parks and open space areas would not be altered as a result of the Project. Therefore, implementation of the Project would not interfere substantially with groundwater recharge. There would be a less than significant impact, and no mitigation is required.

Threshold 3.9c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

Changes in drainage patterns would be confined to individual development sites and would not affect major underground storm drain lines and concrete-lined drainages in the City. As discussed above, most development sites pursuant to the proposed Project would be redevelopment of existing, fully developed sites, the change in drainage patterns on these sites would be nominal. All development must be conducted in compliance with applicable State and local regulations, which prevent substantial alteration of site drainage patterns by controlling the volume and direction of runoff. Since drainages in the City are concrete-lined, no alteration in the course of these channels would occur from future development. Impacts would be less than significant, and no mitigation is required.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; or

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The construction of new impervious surfaces would reduce the amount of rainwater that could infiltrate the soils, potentially increasing storm water runoff due to reductions in infiltration. This would occur primarily through the introduction of new structures, driveways, parking lots, walkways, and other site improvements on vacant properties. As previously discussed, the City is largely built out and has an established land use pattern, with limited available vacant or underutilized land throughout the City. Less than one percent of the land available for development within the City is vacant, and not all vacant sites are necessarily pervious. Therefore, development pursuant to the Project would not appreciably increase the amount of impervious surface areas in the City. Further, the City's storm water management requirements (Section 23.14) state that projects shall be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use (i.e., LID features).

Therefore, due to the nominal potential for increased runoff volumes and the City's storm water management requirements, there would be less than significant impacts related to alternating the

drainage pattern, substantially increasing surface water runoff, or the capacity of the municipal storm drain system, and no mitigation is required.

Threshold 3.9d: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The City of South Pasadena is not located within the 100-year flood hazard area, as mapped by FEMA (FEMA 2023). Future development pursuant to the Project, including housing or other structures, would not be exposed to flood hazards. Structures that would be built as part of future development would not impede or redirect flood flows. Impacts would be less than significant, and no mitigation is required.

A seiche is the formation of large waves in landlocked bodies of water due to seismic activity. In the event of an earthquake, a seiche can occur and potentially cause major flooding and water inundation damage. There are no large open water bodies in or near the City that could be susceptible to seiche. There would be no impacts.

Tsunami (sea waves) hazards do not affect the City due to the City's elevation and distance from the ocean. The City is located outside the tsunami inundation areas in the Los Angeles County Tsunami Inundation Maps prepared by the California Department of Conservation (CGS 2021). There would be no impacts.

Mudflows are fluid masses of rock, earth, and other debris saturated with water and with the consistency of wet cement. They develop when water rapidly accumulates in the ground, such as during heavy rainfall or rapid snowmelt, changing the earth into a flowing river or slurry of mud. Mountainous areas are susceptible to mudflows. The foothills of the San Gabriel Mountains are located approximately five miles to the north-northwest. As such, there is no mudflow hazard from this area. Most of the City is relatively flat, with steeper hillside areas primarily in the southwest portion of the City.

As discussed in Section 3.5, Geology and Soils, of this EA, development in hillside areas (sites within an average slope of 20 percent or greater) requires a Hillside Development Permit as a discretionary zoning approval of the City. Future development or redevelopment within the areas subject to a Hillside Development Permit, largely in the southwest portion of the City, would also be required to prepare site-specific geotechnical investigations that include analysis of slope stability, erosion, subsidence, groundwater effects, and earthquakes as it pertains to the site's unique topography, to identify these hazards and provide appropriate construction recommendations, as necessary. Compliance with erosion-control measures required for a Hillside Development Permit would reduce the potential for mudflow from development sites with steep slopes. Therefore, mudflow hazards in the City would be less than significant levels, and no mitigation is required.

Threshold 3.9e: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under Threshold 3.9(a) above, implementation of the Project would not adversely affect water quality through compliance with the Construction General Permit, CALGreen, and the SPMC during construction and City LID and County MS4 permit requirements during operation.

The San Gabriel Basin, the City's source of groundwater, is defined by the California Department of Water Resources as very low priority pursuant to the 2014 Sustainable Groundwater Management Act (DWR 2023). As such, there is currently no sustainable groundwater

management plan applicable to the City. Regardless, as discussed under Threshold 3.9(b) above, the increase in demand for potable water associated with buildout of the Project is not expected to result in depletion of local groundwater resources because the Main San Gabriel Basin is managed by the Watermaster. Continued management of the groundwater basins by the Watermaster would also prevent overdraft conditions or other adverse impacts to local groundwater. Therefore, implementation of the Project would not obstruct implementation of groundwater management of the Basin. There would be a less than significant impact, and no mitigation is required.

3.9.7 CUMULATIVE IMPACTS

Water Quality

Cumulative water quality impacts are considered for the Los Angeles River Watershed, where the City of South Pasadena is located. Future development within the Los Angeles River Watershed, which includes the majority of Los Angeles County, would generate new sources for urban pollutants, which could impact water quality. However, construction activities throughout Los Angeles County are required to conduct all construction activities on one acre or more in compliance with the NPDES Construction General Permit, which would prevent short-term construction activities from resulting in significant water quality impacts; and construction activities on less than one acre in compliance with CALGreen.

Cities in the County have adopted programs for long-term storm water pollution mitigation through the requirement for SUSMPs for individual developments. Waste Discharge Requirements, defined by the Los Angeles RWQCB, also impose guidelines for individual developments that may lead to discharges into the storm drain system or surface water bodies. These regulations implement the Basin Plan for the Los Angeles region and help meet the established water quality objectives for both groundwater and surface water bodies.

Also, the Los Angeles River has an 824-square-mile watershed. Runoff originating within the City (3.4 square miles) represents a minor portion (0.4 percent) of the total runoff volume when compared to the water volumes handled by the Los Angeles River as a whole. Runoff from future development activity would be a minor amount of the total runoff from the City. Therefore, no cumulative adverse impacts related to water quality would occur.

Groundwater

Cumulative groundwater impacts are considered for the Main San Gabriel Groundwater Basin, from which the City provides the majority of its water supply. Increases in the resident population and intensity of development would translate to a greater demand for water and increased pumping of the groundwater basins, as well as greater use of imported water sources. Individual developments would coordinate with their respective water service providers to allow them to provide water service in a timely and adequate manner. The water service provider's groundwater supplies are controlled by the Main San Gabriel Basin Watermaster, who is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Continued management of the groundwater basin would prevent overdraft conditions, water quality problems, and other impacts on groundwater resources. Therefore, no cumulative impacts related to groundwater recharge or supplies would occur.

Hydrology and Drainage

Cumulative water quality impacts are considered for the Los Angeles River Watershed. Future growth and development within the watershed would increase impermeable surfaces and decrease water percolation areas. Increase in impervious surfaces would increase storm water volumes and flow rates in local and regional drainage channels. However, all development within Los Angeles County is subject to development in compliance with SUSMP and local municipal code standards for reducing storm drain capacity impacts. Storm drain infrastructure is incrementally improved with project-specific design plans that are subject to the review and approval of local jurisdiction. Project-specific design and utility improvements would prevent negative impacts to regional drainage channel capacity. Therefore, no cumulative impacts related to changes in drainage patterns or inadequate storm drainage would occur.

Inundation

Cumulative inundation impacts are considered for the San Gabriel Valley. Several dams at the foothills of the San Gabriel Mountains pose inundation hazards to development across the San Gabriel Valley in the event of dam failure. Failure of any dam could affect existing and future developments within identified inundation areas. The potential for property damage and personal injury is reduced by the construction of dams in accordance with State and federal dam safety regulations and the preparation of emergency action plans for individual dams, which include warning, evacuation, and post-disaster actions. Therefore, no cumulative impacts related to dam inundation would occur.

Seiche hazards would affect local areas downstream of a water body or reservoir and would not create cumulative impacts. The hazards associated with a tsunami are confined to the shoreline and coastal areas of Los Angeles County; the San Gabriel Valley is not susceptible to tsunami. Future development on steep hillside areas throughout the San Gabriel Valley may be exposed to potential mudflow hazards. The debris basins that have been constructed by the Los Angeles County Department of Public Works at the foothills of the San Gabriel Mountains are expected to reduce storm water flows and debris volumes, preventing mudflow hazards. Therefore, no cumulative impacts related to water retention facilities would occur.

3.9.8 MITIGATION MEASURES

No significant adverse impacts related to hydrology and water quality have been identified with implementation of relevant policies and actions . Therefore, no mitigation is required.

3.9.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.9.10 REFERENCES

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3.10 LAND USE AND PLANNING

3.10.1 METHODOLOGY

This section describes the existing land uses in the City and discusses the currently adopted General Plan and Mission Street Specific Plan (MSSP). It also discusses the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project), proposed changes in land uses with Project implementation, and consistency with regional plans and policies.

Land use impacts can be direct or indirect. Direct impacts result from land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, such as habitat conservation plans. This section of the Environmental Assessment (EA) focuses on direct land use impacts. Indirect land use impacts are secondary effects that may arise from land use policy implementation, such as an increased demand for public services and utilities, or increased traffic. Indirect impacts related to other environmental topics are addressed in the other topical sections in this EA.

3.10.2 EXISTING CONDITIONS

Existing Land Uses

The City of South Pasadena covers approximately 3.4 square miles, or 2,187 acres. Existing land use types in the City are shown in Exhibit 2-2, Existing Land Use Policy Map, Section 2.0, Environmental Setting and Project Description, of this EA.

The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. Residential uses cover approximately 63.4 percent (1,386.3 acres) of the City's land area. Commercial uses cover approximately 3.0 percent (64.8 acres) of the City's land area, office uses cover 0.8 percent (16.9 acres), and light industrial uses cover 0.6 percent (12.2 acres). Community facilities cover 3.9 percent of the City (85.0 acres). The MSSP area, parks and other open space, utility easements, and rights-of-way cover 32.3 percent of the City (707 acres).

The City of South Pasadena has an estimated 11,156 dwelling units, comprised of nearly equal amount of single- and multi-family units. The vast majority of housing units in the City were built prior to 1980, including a number of officially and unofficially designated historic structures. However, from 1980 to 1990 was the most significant decade of multi-family housing development in the City. Regardless, the City has added only 839 net new dwelling units in the last approximately 40 years (South Pasadena 2021.) Retail uses in the City are generally small-scale and neighborhood-oriented. Retail development over the past decade has been predominantly ground-floor space within transit-oriented mixed-use buildings with multi-family units on the floors above, primarily on or near Mission Street and close to the Metro Gold Line station. The City has a small share of the office space within the Pasadena/Arcadia/Monrovia submarket; however, the City contains a disproportionate share of creative office space[1] within its submarket, which is primarily located in the Ostrich Farm District (HR&A 2017).

[1] Creative office space typically refers to space that falls outside the traditional layout (such as cubicles and perimeter offices). This type of office space generally has more open, flexible-use space, and is intended to encourage creativity and collaboration. Often utilized by creative/design businesses, such as architecture, advertising, and production.

3.10.3 RELEVANT PROGRAMS AND REGULATIONS

State

Land Use Planning Law

The requirements and authority for local municipalities (i.e., counties and cities) in California to prepare and administer general plans are contained in Sections 65300 et. seq. of the *California Government Code.* A general plan is a regulatory document established by a city or county to provide a guide for the future physical, economic, social, and environmental well-being of the city or county. It generally consists of goals, policies, actions and/or programs that would achieve the community's vision for its future. For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence. The City of South Pasadena does not have a sphere of influence; its jurisdictional boundaries align with the City limits.

The housing element is one of the State-mandated elements of a general plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the programs that are the foundation of each municipalities housing strategy. However, unlike all other general plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element is in effect through 2021. State law required City Council adoption of the 2021–2029 Housing Element Update by October 15, 2021, with a 120-day grace period (i.e., February 15, 2022) after which cities and counties face statutory penalties. Additionally, if a city cannot identify sufficient sites adequate to accommodate its RHNA allocation, the Housing Element must commit to rezone properties within three years to allow "by right" development of 20 percent below market rate projects. Assembly Bill (AB) 398 also requires a locality that fails to adopt an HCD-compliant housing element within 120 days of the statutory deadline to complete this required rezoning no later than one year from the housing element adoption deadline. Also, AB 398 prohibits the Housing Element from being found in substantial compliance until that rezoning is completed. Previously, an agency had three years to rezone. AB 215 requires local agencies to make draft revisions of the housing element available for public comment for 30 days. The agency (i.e., City of South Pasadena) must consider and incorporate public comments prior to submission to the HCD for review. Because of legal action against the City related to its Housing Element preparation, the City is the subject of a Court Order[2] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. This Court Order supersedes the time limits discussed above. Legislation related to housing element content, rather than processing, is discussed further below.

The requirements for preparation and implementation of specific plans are contained in Sections 65450–65457 of the *California Government Code.* Specific plans are a tool for the systematic implementation of a general plan and establish a link between implementing policies of the general plan and the individual development proposals in a defined area. The provisions of Section 65450 et. seq. of the *California Government Code* require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. In turn, all development, all public works projects, and zoning regulations must be consistent with the specific plan. The requirements for the adoption and administration of zoning laws, ordinances, and other

[2] *Settlement Agreement (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

regulations by counties and cities is contained in Sections 65800–65912 of the *California Government Code.*

Additionally, on September 30, 2008, AB 1358, the California Complete Streets Act was signed into law and became effective on January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of a general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Assembly Bill 1233

Assembly Bill 1233, approved by the Governor in 2005, requires that housing elements analyze vacant sites, sites having potential for redevelopment, and the relationship of zoning, facilities, and services to these sites. AB 1233 requires that housing elements specify action programs that will be taken to make sites available during the 6th Cycle Housing Element planning period (2021-2029), as necessary to accommodate the Regional Housing Needs Assessment (RHNA) units assigned to each municipality, plus any additional actions that are necessary to make sites available to accommodate any RHNA units that were assigned during the 5th Cycle Housing Element (2013–2021) that were not accommodated.

If a jurisdiction fails to implement programs in its housing element to identify adequate sites or fails to adopt an adequate housing element, AB 1233 requires local governments to zone or rezone adequate sites by the first year of the new planning period. Specifically, AB 1233 applies to local governments that:

- Failed to adopt an updated Housing Element for the prior planning period;
- Adopted a Housing Element that the HCD found out of compliance due to failure to substantially comply with the adequate sites requirement;
- Failed to implement the adequate sites programs to make sites available within the planning period; or
- Failed to identify or make available adequate sites to accommodate a portion of the regional housing need.

The City of South Pasadena has reutilized rezoning and other strategies to identify adequate sites to meet the 6th Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5th Cycle Housing Element planning period (i.e., 63 du) were accommodated in the City's 2014–2021 Housing Element.

Senate Bill 375

Senate Bill (SB) 375, approved by the Governor in 2008, aligns land use and transportation planning to drive development towards transit-accessible places and reduce car dependency. SB 375 is the land use component of California's wider strategy to reduce greenhouse gas (GHG) emissions, codified by the 2006 Global Warming Solutions Act (Assembly Bill [AB] 32).

SB 375 also requires that housing elements identify the existing and projected housing needs of all economic segments of the community. In certain cases, the State requires rezoning actions to be included within the housing elements to accommodate 100 percent of the need for very low and low-income households. If a jurisdiction does not fulfill the housing element action programs that are tied to affordability levels (prior to the June 30, 2020, deadline for the 5th Cycle production period), then penalties may be incurred in accordance with SB 375 and AB 1233 (discussed above).

Housing Legislation

The California legislature has passed numerous bills related to housing in the last several years. The following discussion briefly describes housing laws applicable to the City's planning documents and policies and those that may affect future City decision-making. It is anticipated that further legislation will be passed in coming years in light of the continuing housing shortage in the State.

Assembly Bill 1397

AB 1397 made several changes to housing element law by revising what could be included in a municipality's inventory of land suitable for residential development. AB 1397 changed the definition of land suitable for residential development to increase the number of multi-family sites. Identified sites must be "available" and "suitable" for residential development and have a "realistic and demonstrated potential" for redevelopment during the planning period. In addition, AB 1397 requires housing element inventory sites to be 0.5 acre to 10 acres, have sufficient infrastructure, or to be included in a program to provide such infrastructure, to support and be accessible for housing development. Further, the municipality must specify the realistic unit count for each site and whether it can accommodate housing at various income levels.

If a community does not have enough sites to accommodate its housing need, it must adopt a program to make adequate sites available, including a program for rezoning sites to provide lower-income housing. Pre-SB 375 housing law, cities asserted they were only required to identify actions that would be undertaken to make sites available to accommodate various housing needs-that they were not mandated to adopt the rezoning included in the Housing Element programs. However, SB 375 provides that communities preparing an eight-year housing element must complete all required rezoning if the available housing sites inventory does not identify adequate sites to accommodate the RHNA allocation. The planned rezoning must include "minimum density and development standards" for all sites, and, for sites designated for very low and low-income housing, rezoning must provide for "by right" zoning at certain minimum densities, with no discretionary approvals allowed except design review and subdivision map approval. In these instances, CEQA review cannot be required unless a subdivision map is needed. Additionally, the programmed rezoning must be completed within certain time frames.

Housing Crisis Act of 2019 (Senate Bill 330) and Senate Bill 8

The California Housing Crisis Act (HCA, SB 330) was enacted by Governor Newson in 2019 to combat the State's growing housing crisis. This legislation's goal is to increase California's affordable housing stock by 3.5 million new units by 2025. To streamline residential development, a new preliminary development application process is required, which includes a staff-level review of basic information regarding a project such as:

- Site characteristics;
- The planned project;
- Certain environmental concerns;
- Facts related to any potential density bonus;
- Certain coastal zone-specific concerns;
- The number of units to be demolished; and
- The location of recorded public easements.

SB 330 further streamlines housing development by reducing the number of public meetings or hearings to five or less (e.g., workshops, design review board meetings, planning commission meetings, advisory committee meetings, and city council meetings). A shortened approval time of 90 days instead of 120 days from the time of certification for an EIR is also required to streamline the development approval process.

Local agencies are no longer able to remove or modify land use designations or allowances to inhibit the development of housing, unless the local agency replaces the lost housing potential; therefore, ensuring no net loss in housing availability. Further, local agencies will no longer be able to limit the annual number of housing-focused land use approvals, create caps on the amount of constructed housing units, or limit the population size of their city. Subjective design limitations on parcels where housing is an allowable use is also no longer permissible for projects that are subject to processing per SB 330 (any housing project).

SB 8 extends until 2034 the HCA provision that prohibits cities from conducting more than five hearings on an application as well as HCA provisions that provide vesting rights for housing projects that submit a qualifying "preliminary application." Applicants who submit qualifying preliminary applications for housing developments prior to January 1, 2030, can now invoke vesting rights until January 1, 2034. SB 8 extends until 2030 provisions that limit localities' authority to impose shifting requirements as part of application "completeness" review, as well as provisions that require localities to render any decision about whether a site is historic at the time the application for the housing development project is deemed complete. SB 8 also enacts a series of reforms intended to provide that HCA provisions apply to both discretionary and ministerial approvals as well as to the construction of a single dwelling unit and makes a series of revisions to the already complex replacement housing and relocation requirements.

Assembly Bill 345

AB 345 further facilitates ADUs by removing the requirement for a local agency to first pass an ordinance allowing the conveyance of an ADU separately from a primary residence (which can be an extended process) before such conveyance occurs and permits an ADU to be sold or conveyed separately from the primary residence to a qualified buyer (low- and moderate-income individuals and families as defined in California Health and Safety Code Section 50093) and if certain conditions are met, including that the primary residence or ADU was built by a qualified nonprofit corporation and that the property is held pursuant to a recorded tenancy in common agreement.

Assembly Bill 491

AB 491 requires that, for any residential structure with five or more residential dwelling units that include both affordable housing units and market-rate housing units, the BMR units must provide the same access to common entrances, areas, and amenities as non-BMR units, and the building "shall not isolate the affordable housing units within that structure to a specific floor or an area on a specific floor."

Assembly Bill 787

AB 787 expands existing law that permits jurisdictions to claim credit for up to 25 percent of their RHNA from the conversion of existing housing units for very low- and low-income households by also permitting cities and counties to satisfy up to 25 percent of the local agency's moderate-income regional housing need through RHNA by permitting the conversion of units in an existing multifamily building to be restricted for moderate-income households. To qualify, the conversion

1) must occur beginning January 1, 2022; 2) units may not be previously affordable to very low-, low-, or moderate-income households; 3) must be subject to a 55-year recorded agreement; and 4) the initial post-conversion rent for the unit must be at least 10 percent less than the average monthly rent charged during the 12 months prior to conversion.

State Density Bonus Law and Related Legislation

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of Assembly Bill (AB) 1763, projects qualifying for a density bonus were entitled to one to three "incentives" and "concessions" to help make the development of affordable and senior housing more economically feasible, such as reduced setback and minimum square footage requirements as requested by the developer. AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If the project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet.

The Density Bonus Law was further amended by SB 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. In connection with for-sale density bonus units that qualified a developer for an award of a density bonus under the Density Bonus Law, SB 728 requires that such unit be either 1) initially occupied by a person or family of the required income, offered at an affordable housing cost and subject to an equity sharing agreement, or 2) purchased by a qualified nonprofit housing organization receiving a property tax welfare exemption.

AB 571 prohibits agencies from imposing affordable housing impact fees, including inclusionary zoning fees and in lieu fees, on affordable units proposed as part of a Density Bous Law project.

The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of eight to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

Covenants, Conditions, and Restrictions Legislation

AB 721 makes recorded covenants that limit residential development unenforceable against qualifying affordable housing developments. The law builds on existing law that allows parties to eliminate unenforceable racially restrictive covenants from recorded documents–but goes further by making any recorded covenants, conditions, and restrictions (CC&Rs) that restrict the number, size, or location of residences that may be built on a property, or that restrict the number of persons or families who may reside on a property, unenforceable against the owner of a 100 percent below market rate housing development that is affordable to lower-income households. There are exceptions for certain conservation easements and covenants required to comply with State or federal law.

AB 1584, a housing omnibus bill, establishes a restriction on contractual development controls that mirrors AB 721 by declaring unenforceable any CC&R contained within a deed, contract, security instrument, or other instrument that prohibits, effectively prohibits, or restricts the construction or use of an ADU on a lot zoned for single-family use.

Existing law notifies a buyer of real property that recorded covenants on the property may contain racially restrictive or other unenforceable discriminatory provisions and informs buyers of their right to file a Restrictive Covenant Modification (RCM) form. AB 1466 aims to hasten the removal of these covenants by requiring all county recorders throughout the State to establish a program to identify and redact unlawfully restrictive covenants and easing restrictions on the ability of other parties to seek to remove such covenants.

SB 9 provides for the ministerial approval of converting existing homes occupied by a homeowner into a duplex if certain eligibility restrictions are satisfied. It also allows a single-family home lot to be split into two lots, and a duplex to be built on each lot, provided that the initial home is occupied by an owner who attests that the owner will continue to live in a unit on the property as their primary residence for at least three years. The most notable exceptions to duplex and lot split by right approvals are 1) the property could not have been used as a rental for the past three years, 2) the property cannot already have an accessory dwelling unit or junior ADU, 3) the new lot may not be less than 40 percent of the property and must be at least 1,200 square feet, 4) modifications to the existing home may not require the demolition of more than 25 percent of an exterior wall, and 5) neither the new duplex nor the lot split with up to four new units (a duplex on each) may not result in a significant adverse impact to the physical environment.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties, an area that encompasses more than 38,000 square miles. As the designated MPO, the federal government mandates that SCAG research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Among the leading activities SCAG undertakes are the following:

- Maintaining a continuous, comprehensive, and coordinated planning process resulting in a Regional Transportation Plan (RTP) and a Federal Transportation Improvement Program (FTIP);
- Developing a Sustainable Communities Strategy (SCS) to reduce greenhouse gas emissions as required by applicable State law (SB 375) as an element of the RTP;
- Developing demographic projections;
- Developing integrated land use, housing, employment, transportation programs, and strategies for South Coast Air Quality Management District (SCAQMD) planning purposes;
- Serving as co-lead agency for air quality planning in the Central Coast and Southeast Desert air basin districts;
- Developing and ensuring that the RTP and the FTIP conform to the purposes of the State Implementation Plans for specific transportation-related criteria pollutants, per the Clean Air Act;

- Serving as authorized regional agency for intergovernmental review of proposed programs for federal financial assistance and direct development activities;
- Reviewing environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans;
- Developing an area-wide, waste treatment management plan;
- Preparing the RHNA for review and approval by the State, including planning for future population, housing, and employment growth throughout the SCAG region; and
- Preparing the Southern California Hazardous Waste Management Plan with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council.

SCAG's 2020–2045 RTP/SCS and current RHNA allocation are discussed further below.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill SB 375.

On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS (RTC/SCS; also referred to as Connect SoCal) and the addendum to the *Connect SoCal Program Environmental Impact Report*. The 2020–2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020).

High-Quality Transit Areas

With adoption of the former 2012 RTP/SCS, the areas formerly known as 2% Strategy Opportunity Areas were replaced with what are now referred to as High-Quality Transit Areas (HQTAs). HQTAs are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. The one-half mile radius area around Metro's L (formerly Gold) Line Station at the Mission Street and Meridian Avenue intersection and Fair Oaks Avenue through the City are identified as a HQTAs.

Regional Housing Needs Assessment

Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the MPOs, including SCAG, through the RHNA process. The RHNA identifies the existing and projected housing needs of each municipality (city and county) within the SCAG region. Based on SCAG's 2020 RHNA, approved by HCD on March 22, 2021, the City's proposed 2021–2029 Housing Element has a

need for 2,067 new units to be provided, distributed across the four income levels established by HCD, including the following:

- Very Low Income (757),
- Low Income (398),
- Moderate Income (334), and
- Above Moderate Income (578) (SCAG 2021).

The above-moderate income units are considered market rate, while units for the remaining income levels are considered below market rate at a range of affordability levels. The current RHNA allocation of 2,067 units is almost 33 times higher than the last cycle (63 units). Additionally, the California Department of Housing and Community Development (HCD) has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. The surplus would be 708 DUs for a total of 2,775 DUs.

Cities and counties are not responsible for building the number of units specified in the RHNA, but rather are required to plan for them, by demonstrating the sufficiency of current land use and development standards and identifying specific housing element programs to provide capacity to accommodate the RHNA with implementation dates within three years. A municipality's housing element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA including rezoning, if necessary. Penalties, including fines and loss of local discretion, can be levied against cities and counties that fail to implement the housing element programs that are included to reach the required housing production capacity. Per State requirements, the City's proposed Housing Element Update will include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics;
- An analysis of the barriers to producing and preserving housing;
- A review of the City's progress in implementing current housing policies and programs;
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element; and
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

South Coast Air Quality Management District

The SCAQMD prepares an Air Quality Management Plan (AQMP) every four years to address State and federal ambient air quality standards within the South Coast Air Basin. The 2022 AQMP is the current management plan, and consistency with this plan is addressed in Section 3.2, Air Quality, of this EA.

City

Existing General Plan and Housing Element

The current *South Pasadena General Plan* (General Plan) was last updated and adopted by the City in 1998, with the 2013–2021 Housing Element last adopted in 2014 to address the City's future housing needs for the 2013–2021 planning period, in accordance with State laws (South

Pasadena 1998, 2014). The currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);
- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing RHNA allocation and housing issues for the 2013–2021 period);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2, Existing Land Use Policy Map, presented in Section 2.0 of this EA, depicts the current land use plan for the City.

Existing Mission Street Specific Plan

The MSSP was adopted in 1996 (South Pasadena 1996). Under State law (Section 65450 et. seq. of Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations equivalent to zoning code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area.

The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include the following:

- Provide a central parking facility to serve the Blue Line (now Gold Line) station;
- Establish a Business Improvement District (BID) to help finance parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area; and
- Increase the water pressure so that on-pumps are not required for second and third story uses (South Pasadena 1996).

Zoning Code

The City of South Pasadena Zoning Code (Chapter 36 of the South Pasadena Municipal Code [SPMC]) implements the policies of the General Plan by classifying and regulating the uses of

land and structures within the City in a manner consistent with the General Plan. South Pasadena has been divided into zoning districts that implement the General Plan.

3.10.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State California Environmental Quality Act (CEQA Guidelines). A project would result in a significant adverse land use and planning impact if it would:

Threshold 3.10a: Physically divide an established community; or

Threshold 3.10b: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.10.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Goal 3.0 Provide opportunities to increase housing production

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4 Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5 Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB9 and SB10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Goal 4.0 Compliance with State Housing Laws

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses

Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Policy 5.5 In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6 Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

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

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

3.10.6 ENVIRONMENTAL IMPACTS

Threshold 3.10a: Would the Project physically divide an established community?

The City of South Pasadena is largely built out with established residential neighborhoods and commercial corridors. While this fact has contributed to difficulty finding a feasible way to accommodate the high RHNA allocation, the central strategy of the Project is preservation of existing neighborhoods and directing calibrated growth. . The 2021–2029 Housing Element identifies developable vacant parcels and developed parcels with potential to be redeveloped to accommodate additional housing. Land uses would be intensified in selected areas to

accommodate growth and support economic development, but there would be no change in the general land use pattern throughout the City. The primary change would be the introduction of mixed residential/non-residential development and/or higher density residential development in more locations in the City, particularly along major thoroughfares.

The planned development and redevelopment is meant to revitalize neighborhoods, rather than divide them, and would enable more residential development or mixed-use development (i.e., residential and commercial) than presently allowed. The purpose of the Project is to locate carefully calibrated and designed growth that can accommodate the bulk of anticipated growth while conserving the established residential neighborhoods while meeting the City's required RHNA allocation and RHNA surplus while providing an enhanced variety of housing. The City's design guidelines and design review process and zoning regulations would help ensure that proposed intensification of land uses on selected parcels would not be of sufficient size, scale, and/or massing to divide the surrounding community. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure. However, any new streets would be necessary to create a greater sense of place and community, rather than dividing a community. As discussed, the existing development pattern in the City would not be substantively altered with implementation of the Project. Therefore, implementation of development pursuant to the Project would not result in division of any existing, established communities. There would be less than impact, and no mitigation is required.

Threshold 3.10b: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Consistency of the 2021–2029 Housing Element with regional and local land use planning documents and programs that apply to the City, as well as land use compatibility, is discussed below.

Consistency with State Land Use Planning Laws

The current statutory State planning priorities, as defined in Section 65041.1 of the Government Code, "which are intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including in urban, suburban, and rural communities, shall be as follows:

a) To promote infill development and equity by rehabilitating, maintaining, and improving existing infrastructure that supports infill development and appropriate reuse and redevelopment of previously developed, underutilized land that is presently served by transit, streets, water, sewer, and other essential services, particularly in underserved areas, and to preserving cultural and historic resources.

b) To protect environmental and agricultural resources by protecting, preserving, and enhancing the state's most valuable natural resources, including working landscapes such as farm, range, and forest lands, natural lands such as wetlands, watersheds, wildlife habitats, and other wildlands, recreation lands such as parks, trails, greenbelts, and other open space, and landscapes with locally unique features and areas identified by the state as deserving special protection.

c) To encourage efficient development patterns by ensuring that any infrastructure associated with development, other than infill development, supports new development that does all of the following:

1) Uses land efficiently;
2) Is built adjacent to existing developed areas to the extent consistent with the priorities specified pursuant to subdivision (b);
3) Is located in an area appropriately planned for growth;
4) Is served by adequate transportation and other essential utilities and services; and
5) Minimizes ongoing costs to taxpayers."

The proposed General Plan and DTSP Update & 2021–2029 Housing Element is consistent with all State planning priorities. The primary focus of the Project is to direct carefully calibrated growth to five focus areas within the City. These focus areas were selected in part to conserve the established residential neighborhoods, and also because they are the more urban areas of the City with existing infrastructure, near transit service, and are therefore appropriate for the greatest concentration of infill redevelopment, ensuring efficient use of land and environmental resources. As noted above, the 2021–2029 Housing Element identifies developable vacant parcels and developed parcels with potential to be redeveloped to accommodate additional housing both within and outside of the focus areas. The proposed General Plan and DTSP Update has been prepared in accordance with State requirements for General Plans and specific plans pursuant to Sections 65300 et. seq. of the Government Code. The proposed 2021–2029 Housing Element has been prepared in accordance with all current State requirements that apply specifically to housing elements, as one of the mandated General Plan elements, including but not limited to SB 375, SB 330, SB166, AB 1233, and AB 1397.

The provisions of Section 65450 et. seq. of the Government Code require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. As the General Plan and DTSP Update are being prepared contemporaneously with the 2021–2029 Housing Element, the documents would be internally consistent. There would be no impact, and no mitigation is required.

Consistency with SCAG 2020–2045 RTC/SCS

Table 3.10-1, SCAG 2020–2045 RTP/SCS Consistency Analysis, provides an assessment of the Project's consistency with the 2020-2045 RTP/SCS goals. As demonstrated through this analysis, implementation of the 2021–2029 Housing Element would be consistent with the goals of SCAG's RTP/SCS. Consistency with the SCAG and other applicable demographic projections are addressed separately in Section 3.12, Population and Housing.

TABLE 3.10-1
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS

RTP/SCS Plan Goals	Consistency Analysis
Goal 1: Encourage regional economic prosperity and global competitiveness.	**Consistent:** Encouraging regional economic development and competitiveness is not the purview of the City, but SCAG. However, providing affordable and quality housing, amenities, and services that make South Pasadena a desirable place for employees to work and live is a goal of the City.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent:** The transportation network in the City is well established; however, some improvements to the network could occur with implementation of the Project. As with the existing transportation network, any improvements proposed would be designed and maintained to continue to meet the needs of local and regional mobility. The Project supports development of a multi-modal transportation system integrated with the existing and proposed land uses, particularly along major thoroughfares and promotes pedestrian-oriented mixed-use development to reduce vehicle use.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent:** Enhancing the regional transportation system is not the purview of the City, but SCAG. However, all modes of travel, both motorized and non-motorized, and commercial transit throughout the City would be required to follow safety standards established by corresponding State, regional (i.e., SCAG, Caltrans), and local (i.e., County and City) regulatory standards.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	**Consistent:**, The local transportation system would continue to be improved and/or maintained to maximize circulation productivity with convenient accessibility to multiple travel modes within the City (pedestrian, bike, rail, bus, and auto).
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**Consistent:** The reduction of greenhouse gas (GHG) emissions and improvement of air quality would be encouraged through the development of green design techniques for buildings and other energy-reducing techniques. The expansion of the mixed-use development capacity in the in the City places emphasis on focusing new development capacity in established transit corridors incentivizes non-motorized transportation modes such as biking and walking. This strategy, which acknowledges the relationship between land use and mobility, would reduce vehicle miles traveled per capita and thereby reduce impacts related to air quality and GHG.
Goal 6: Support healthy and equitable communities.	**Consistent:** The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. The Project would also introduce a greater variety of housing types and serving all income levels, thereby supporting healthy and equitable communities.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent:** As discussed for Goal 4, the expansion of the mixed-use development capacity in the in the City places emphasis on focusing new development capacity in established transit corridors incentivizes non-motorized transportation modes such as biking and walking. This strategy, which acknowledges the relationship between land use and mobility, would reduce vehicle miles traveled per capita and thereby reduce impacts related to air quality and GHG emissions. The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. This densification with a mix of land uses accessible through multiple transportation modes contributes to climate change adaptation

TABLE 3.10-1
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS

RTP/SCS Plan Goals	Consistency Analysis
	and integrates into the regional development pattern proposed by SCAG.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent:** As transportation-related technologies develop that would be applicable at the scale of an individual city, the City Public Works Department would leverage these technologies where economically feasible.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent:** The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. The Project would also introduce a greater variety of housing types and serving all income levels, thereby supporting healthy and equitable communities.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent:** The City's existing parks and open space areas are not proposed to be converted to residential or non-residential (i.e., commercial, retail, office) land uses.

As shown in Table 3.10-1, the proposed 2021–2029 Housing Element is consistent with SCAG's 10 goals for the 2020–2045 RTC/SCS. This is because the Project promotes a land use pattern with increasing density, a mix of housing types and land uses, and places the highest density proximate to local and regional, multi-modal transportation systems. There would be no impact, and no mitigation is required.

Zoning Code

Whereas the 2021–2029 Housing Element is a policy document and sets forth direction for housing related development decisions, the Zoning Code in the SPMC is the regulatory "document" that establishes specific standards for the use and development of all properties in the City. The Zoning Code regulates development intensity using a variety of methods, such as setting limits on building setbacks, yard landscaping standards, and building heights; it also indicates which land uses are permitted in the various zones.

As a result of the 2021–2029 Housing Element, some portion of the City's Zoning Code would no longer be consistent with the goals, policies, and actions of the existing General Plan. If the 2021–2029 Housing Element is adopted, the City will subsequently need to review and update, as needed, its Zoning Code to make sure it is consistent with the land use policies in the planning documents.

Therefore, with the planned review and update of the Zoning Code, , subsequent to adoption of the 2021–2029 Housing Element, there would be no conflict between the City's Zoning Code regulations and the Project. There would be no impact, and no mitigation is required.

Land Use Compatibility

Future development pursuant to the proposed Project has been considered during the planning process to create a balance among land uses and promote land use compatibility within the City. Except for the Huntington Drive/Garfield Avenue and Huntington Drive/Fletcher Avenue intersections and some of the proposed housing sites, there would be no changes to existing and planned land uses along the boundaries of South Pasadena with the cities of Los Angeles, Pasadena, San Marino, and Alhambra with implementation of the Project. The compatibility of

proposed land uses in the two focus areas with boundaries along adjacent municipalities are discussed below:

- ***Huntington Drive and Garfield Avenue:*** Current land uses within this focus area include three commercial businesses and a vacant lot owned by the YMCA. The portion of this neighborhood center on the north of Huntington Drive abuts the City of San Marino on the east across Garfield Avenue, where a small office park is present. The portion on the south side of the street abuts the City of Alhambra of the east and the south across Garfield Avenue, Atlantic Boulevard, and Pine Street, where commercial, multi-family, and single-family land uses are present. The City of San Marino has designated the adjacent area as Commercial, and the City of Alhambra has designated the adjacent areas as General Commercial, and High, Medium, and Low Density Residential (San Marino 2016, Alhambra 2010). The proposed Mixed-Use designation for this Neighborhood Center would be consistent with these existing land uses and provide increased compatibility with the residential uses in the City of Alhambra compared to the existing conditions. There would be no land use incompatibility in this area.
- ***Huntington Drive and Fletcher Avenue:*** Current land uses within this focus area include five buildings with commercial and office uses. The southeastern portion of this neighborhood center abuts the City of Alhambra on the east, where similarly scaled commercial land uses are present. At present, the Eden Preschool is situated adjacent to the southeastern boundary of this neighborhood center. The City of Alhambra has designated the adjacent area as General Commercial (Alhambra 2010). The proposed Mixed-Use Designation for this Neighborhood Center would be consistent with these existing land uses. Residential land uses are situated to the south, in South Pasadena, and to the southeast, in Alhambra. The Mixed-Use Designation would provide an appropriate bridging of land uses. There would be no land use incompatibility in this area.

There is one vacant parcel identified in the northeastern corner and several parcels, both vacant and developed, identified along the western and southwestern boundaries of the City as potential housing sites. The parcel in the northeastern corner abuts the City of Pasadena where public facilities (Pasadena Water and Power and Blair Middle School and High School campuses) are present. Development of housing on this parcel would be consistent with the existing residential land uses located to the south and west within the City. The parcels within the westernmost portion of the City abut the City of Los Angeles where primarily single- and multi-family residential land uses and open space land uses are present. Development of housing on these parcels would be consistent with the existing residential land uses located both within the City of South Pasadena and the City of Los Angeles. Where parcels border the open space area off the southwestern corner of the City, allowable residential development would be of a type and scale appropriate to bridge between the existing residential and the open space.

As discussed above, the proposed Project would not result in land use incompatibilities, including with adjacent jurisdictions. Impacts would be less than significant, and no mitigation is required.

3.10.7 CUMULATIVE IMPACTS

The cumulative impacts related to demographic growth are analyzed within the County of Los Angeles, because County-wide demographic data is available from SCAG, Department of Finance, and Employment Development Department. Also, because of the interconnected of cities and unincorporated areas in the Los Angeles metropolitan area, due to roadways, increasing transit, and other sociological factors, demographic growth in a smaller sized City like South Pasadena cannot be treated like an “island” as it is part of the fabric of the region.

Growth and development in the City and surrounding jurisdictions would be accompanied by changes in existing land uses throughout the County and the SCAG region. New development on vacant areas and underutilized lots are anticipated to be developed in accordance with each local jurisdiction's respective general plan and associated housing element and would lead to intensification of housing, commercial, and industrial/manufacturing development, as well as public and institutional uses, throughout the region. SCAG estimates there could be as many as 11,423,962 persons, 4,002,104 households (not housing units), and 5,276,927 jobs throughout the County by 2040 (SCAG 2020; Aguilar 2021). This increasing urbanization and development in the County and throughout the SCAG region are a result of vacant lands being replaced with more urban land uses and underutilized lots being redeveloped into uses that are more intensive. The Project would not divide established communities or result in the introduction of incompatible uses in the area, provided compliance with the City's development standards and applicable regulations.

New development in adjacent jurisdictions would be evaluated for consistency with the local jurisdiction's land use policies, just as proposed projects in the City would be evaluated for consistency with the proposed Project. If discretionary actions are needed, individual projects would be subject to evaluation for potential environmental impacts as required by CEQA. This review process would address potential land use compatibility issues and planning policy conflicts. Future growth and development in the City and the surrounding areas would proceed in accordance with the applicable municipality's general plan and zoning code. Required review processes for new developments would analyze a project for conformity with applicable land use plans and policies, and within the context of existing and planned developments relative to the environmental goals and policies of the applicable general plan. Projects requiring general plan amendments or zone changes/variances would need to show consistency with the applicable goals, policies, and/or actions and thus are not expected to lead to land use incompatibilities or conflicts. Planned or required infrastructure and public facilities associated with individual projects would provide the necessary facilities and services to existing and future developments. Thus, these projects would complement the private development projects planned for the Valley. The cumulative land use impacts of growth and development in the San Gabriel Valley would be less than significant, and no mitigation is required.

3.10.8 MITIGATION MEASURES

No significant adverse impacts related to land use and planning have been identified with implementation of the Project. Therefore, no mitigation is required.

3.10.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.10.10 REFERENCES

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3.11 NOISE

3.11.1 METHODOLOGY

This section analyzes potential noise and vibration impacts associated with the implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Existing Conditions

Noise Background

Noise has been simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, when it has adverse effects on health, or, as stated in the South Pasadena Municipal Code (SPMC), is unnecessary, excessive, or annoying. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear.

Range of Noise

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent level (L_{eq}). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the “average” noise levels within the environment.

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 PM to 10:00 PM, and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 PM and 7:00 AM. These additions are made to account for the noise-sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City of South Pasadena relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors.

Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.

Ground Absorption

The propagation path of noise from a highway to a receptor is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source.

Atmospheric Effects

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects.

Shielding

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby resident. However, for vegetation to provide a substantial or even noticeable noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction.

Community Response to Noise

Community responses to noise may range from registering a complaint by telephone or letter, to initiating court action, depending upon everyone's susceptibility to noise and personal attitudes about noise. Approximately ten percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints will occur. Another 25 percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that about ten percent of the people exposed to traffic noise of 60 dBA will report being highly annoyed with the noise, and each increase of one dBA is associated with approximately two percent more people being highly annoyed. When traffic noise exceeds 60 dBA or aircraft noise exceeds 55 dBA, people may begin to complain. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels. An increase or decrease of 1 dBA cannot be perceived except in carefully controlled laboratory experiments, a change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible.

Land Use Compatibility with Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local governments to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that any noise impacts are minimized.

Vibration

Per the FTA, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

3.11.2 RELEVANT PROGRAMS AND REGULATIONS

Noise Standards

Public agencies have established noise guidelines and standards to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise.

California Noise Insulation Standards

Title 24 of the *California Code of Regulations*, also known as the California Building Standards Code or, more commonly, as the California Building Code (CBC), codifies the State's noise insulation standards applicable to all occupancies throughout the State. Section 1206.4, Allowable Interior Noise Levels, of the CBC states "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan."

The 2022 California's Green Building Standards Code, also known as CALGreen, contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA L_{eq} for any hour of operation, a wall and roof-ceiling combined STC rating of 45 and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1.1). Alternatively, if the interior noise levels of non-residential buildings satisfy the performance criteria of 50 dBA L_{eq} (1 hour), then the performance method to meet CALGreen standards defined in Section 5.507.4.2.2 has been met.

City of South Pasadena Safety and Noise Element

The existing Safety and Noise Element of the City of South Pasadena General Plan was adopted to address the health and well-being of its citizens and businesses. The Safety and Noise Element identifies goals and polices related to noise, including Policy 5.1 that defines a noise increase threshold as follows:

Policy 5.1: Consider the noise impacts of new projects involving increases in noisy activities or traffic. An increase of 3 dBA or noise in excess of 65 dBA in sensitive areas shall be considered significant.

In addition, the Safety and Noise Element identifies the following implementing policies and strategies to reduce noise levels in the City, including Strategy 5.5 that defines a sound insulation standard consistent with State standards as follows:

Strategy 5.5: Require sound insulation of all new development adjacent to high noise areas, including arterials and the freeway, to reduce interior noise levels to 45 dBA.

South Pasadena and Land Use Compatibility

The noise criteria identified in Table Viii-4 of the existing Safety and Noise Element are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria provide the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise environment.

Single-family residential uses are considered *normally acceptable* with exterior noise levels of up to 60 CNEL and *conditionally acceptable* up to 70 CNEL. Multi-family residential land use is considered *normally acceptable* in exterior noise environments up to 65 CNEL and *conditionally acceptable* up to 70 CNEL. Schools, libraries, and churches are considered *normally acceptable* up to 70 CNEL, as are office buildings and business, commercial and professional uses. Recreational uses are considered *normally acceptable* with exterior noise levels of up to 70 CNEL and *normally unacceptable* from 70 to 80 CNEL.

A *conditionally acceptable* designation indicates that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use type is made and needed noise insulation features are incorporated in the design. By comparison, a *normally acceptable* designation indicates that standard construction can occur with no special noise reduction requirements.

Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the retail and office uses that may be constructed pursuant to the Project, stationary-source (operational) noise is typically evaluated against standards established under a city's municipal code.

Chapter 19A, Noise Regulation, of the SPMC establishes exterior noise level limits for stationary noise sources in the City as measured at the adjacent property line. Sections 19A.7(b) and 19A.12 of the SPMC indicate that radios, television sets, machinery, equipment, fans, air conditioning units, and similar devices/equipment shall not generate exterior noise levels in excess of the ambient noise level by more than 5 dBA. Further, amplified sound (e.g., any machine or device for the amplification of the human voice, music, or any other sound) shall not generate noise levels in excess of the ambient noise level by more than 15 dBA. Table 3.11-1, South Pasadena Municipal Code Operational Noise Standards, summaries the exterior noise level standards.

TABLE 3.11-1
SOUTH PASADENA MUNICIPAL CODE OPERATIONAL NOISE STANDARDS

SMPC Section[1]	Title	Exterior Noise Level Standard (dBA)[2]
19A.7(b)	Radios, television sets and similar devices	Ambient + 5 dBA
19A.12	Machinery, equipment, fans, and air-conditioning	Ambient + 5 dBA
19A.21(c)	Regulations (Article 5. Amplified Sound)	Ambient + 15 dBA

SMPC: South Pasadena Municipal Code

[1] South Pasadena Municipal Code, Chapter 19A Noise Regulation
[2] These standards apply at the property line of the adjacent use.

Source: South Pasadena Municipal Code

Construction Noise Standards

Noise from construction activities are typically evaluated against standards established under a city's municipal code. Section 19A.13(a) of the SMPC indicates that within a residential zone or within 500 feet thereof, construction activities are limited to between 8:00 AM to 7:00 PM Monday through Friday; 9:00 AM to 7:00 PM Saturdays; and 10:00 AM to 6:00 PM Sundays and holidays. However, the City's General Plan and the SPMC do not establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes as "generation of noise levels in excess of standards or as a substantial temporary or periodic noise increase". The FTA *Transit Noise and Vibration Impact Assessment* identifies detailed assessment criteria including an eight-hour construction noise level threshold of 80 dBA L_{eq} during daytime at residential (noise-sensitive) uses, and 85 dBA L_{eq} during daytime hours at commercial uses.

Vibration Standards

The following vibration standards are used in the Noise Analysis to assess the potential vibration impacts of future Metro L Line operations on the future development within the focus areas or elsewhere in the City, and the potential operational and construction vibration levels generated by future land uses at adjacent, existing land uses.

<u>On-Site Rail Vibration</u>

The FTA *Transit Noise and Vibration Impact Assessment* identifies ground borne vibration levels for land use categories based on the frequency of rail events. For rapid-transit rail lines such as the Metro L Line, the *frequent event* vibration criteria for residential uses is 72 VdB, and for non-residential primarily daytime-only uses (e.g., office, retail) the vibration criterion is 75 VdB.

<u>Operational and Construction Vibration</u>

The City's General Plan or the SPMC do not identify specific vibration level standards; therefore, Section 12.08.350 of the Los Angeles County Code's root-mean-square (RMS) vibration perception threshold of 0.01 in/sec RMS is used in this analysis. Typically, the human response at the perception threshold for vibration includes annoyance in residential areas when vibration levels expressed in vibration decibels (VdB) approach 75 VdB. The County, however, identifies a vibration perception threshold of 0.01 in/sec RMS. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a one-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which

serves to reduce the range of numbers used to describe human response to vibration. Therefore, the County of Los Angeles standard of 0.01 in/sec in RMS velocity levels is most applicable to the Project. The Project is not expected to include any specific type of operational vibration sources.

3.11.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse noise impact if it would:

Threshold 3.11a: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

Threshold 3.11b: Result in generation of excessive groundborne vibration or groundborne noise levels;

Threshold 3.11c: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels;

Noise-Sensitive Receivers

Noise level increases resulting from the Project are evaluated based on the Appendix G of the State CEQA Guidelines described above at the closest sensitive receiver locations. Sensitive receiver locations, as defined by the adopted General Plan Safety and Noise Element, include residences, schools, libraries, hospitals and convalescent homes, and recreational uses. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. Unfortunately, there is no completely satisfactory way to measure the subjective effects of noise or of the corresponding human reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the ambient environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. As discussed previously, Policy 5.1 of the Safety and Noise Element identifies a 3 dBA increase (permanent) as significant at noise-sensitive land uses. In addition, Project-generated noise levels shall not exceed 65 dBA at noise-sensitive uses.

Significance Criteria Summary

The following summarizes the thresholds considered most applicable to the Project. Noise impacts shall be considered significant if any of the thresholds shown in Table 3.11-2, Significance Criteria Summary, occurs as a direct result of the construction or operation of future land uses pursuant to the Project.

TABLE 3.11-2
SIGNIFICANCE CRITERIA SUMMARY

Analysis	Receiving Land Use	Condition(s)	Significance Criteria
Traffic (Off-Site/ Existing Uses)[1]	Noise-Sensitive	Exterior Noise Level Standard	65 dBA CNEL
		Long-Term Noise Level Increase	≥ 3 dBA CNEL Project increase
Traffic (On-Site/ Proposed Uses)[2]	Residential	Exterior Noise Level Standard	65 dBA CNEL
		Interior Noise Level Standard	45 dBA CNEL
		On-Site Vibration Level Threshold[3]	72 VdB
	Non-Residential		75 VdB
Operational	All[4]	Exterior Noise Level Standard	Ambient + 5 dBA
		Amplified Sound	Ambient + 15 dBA
	Noise-Sensitive	Vibration Level Threshold[5]	0.01 in/sec RMS
Construction	Noise-Sensitive	Residential Noise Level Threshold[3]	80 dBA L_{eq} (8-Hour)
		Commercial Noise Level Threshold[3]	85 dBA L_{eq} (8-Hour)
		Vibration Level Threshold[5]	0.01 in/sec RMS

Sources:
1 City of South Pasadena General Plan Safety and Noise Element, Policy 5.1.
2 City of South Pasadena General Plan Safety & Noise Element, Policy 5.1 & Strategy 5.5.
3 Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.
4 City of South Pasadena Municipal Code, Sections 19A.7(b), 19A.12, and 19.21(c) (Appendix 3.1).
5 Los Angeles County Code, Section 12.08.350

3.11.4 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to noise.

3.11.5 ENVIRONMENTAL IMPACTS

Threshold 3.11a: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction (Short-term and Periodic Noise)

Noise generated by the construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. To describe the construction noise levels that may be generated by implementation of future development projects, measurements were collected for similar activities. Table 3.11-3, Construction Reference Noise Levels, provides a summary of construction reference noise level measurements. Since the reference noise levels were collected at varying distances, all construction noise level measurements were adjusted to describe a common reference distance of 50 feet. Noise levels generated by heavy construction equipment, not including pile driving equipment, can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. Hard site conditions are used in the construction noise analysis, which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e., construction equipment).

TABLE 3.11-3
CONSTRUCTION REFERENCE NOISE LEVELS

Noise Source	Reference Distance From Source (Feet)	Reference Noise Levels (dBA L_{eq})	
		@ Reference Distance	@ 50 feet[8]
Truck Pass-Bys & Dozer Activity[1]	30	63.6	59.2
Dozer Activity[1]	30	68.6	64.2
Construction Vehicle Maintenance Activities[2]	30	71.9	67.5
Foundation Trenching[2]	30	72.6	68.2
Rough Grading Activities[2]	30	77.9	73.5
Framing[3]	30	66.7	62.3
Water Truck Pass-By & Backup Alarm[4]	30	76.3	71.9
Dozer Pass-By[4]	30	84.0	79.6
Two Scrapers & Water Truck Pass-By[4]	30	83.4	79.0
Two Scrapers Pass-By[4]	30	83.7	79.3
Scraper, Water Truck, & Dozer Activity[4]	30	79.7	75.3
Concrete Mixer Truck Movements[5]	50	71.2	71.2
Concrete Paver Activities[5]	30	70.0	65.6
Concrete Mixer Pour & Paving Activities[5]	30	70.3	65.9
Concrete Mixer Backup Alarms & Air Brakes[5]	50	71.6	71.6
Concrete Mixer Pour Activities[5]	50	67.7	67.7
Forklift, Jackhammer, & Metal Truck Bed Loading[6]	50	67.9	67.9
Pile Driver (Impact)[7]	50	94.0	94.0

Sources:
1 As measured by Urban Crossroads, Inc. on 10/14/15 at a business park construction site located at the northwest corner of Barranca Parkway and Alton Parkway in the City of Irvine.
2 As measured by Urban Crossroads, Inc. on 10/20/15 at a construction site located in Rancho Mission Viejo.
3 As measured by Urban Crossroads, Inc. on 10/20/15 at a residential construction site located in Rancho Mission Viejo.
4 As measured by Urban Crossroads, Inc. on 10/30/15 during grading operations within an industrial construction site located in the City of Ontario.
5 Reference noise level measurements were collected from a nighttime concrete pour at an industrial construction site, located at 27334 San Bernardino Avenue in the City of Redlands, between 1:00 a.m. to 2:00 a.m. on 7/1/15.
6 As measured by Urban Crossroads, Inc. on 9/9/16 during the demolition of an existing parking lot at 41 Corporate Park in Irvine.
7 Source: FHWA Roadway Construction Noise Model, January 2006.
8 Reference noise levels are calculated at 50 feet using a drop off rate of 6 dBA per doubling of distance (point source).

Mobile construction equipment, such as the reference dozer pass-by, typically generates the highest construction noise levels during construction activities. As such, the highest construction reference noise level of 79.6 dBA L_{eq} is used in this program-level analysis to determine potential impacts at sensitive receiver locations adjacent to development within the focus areas. Pile driving activity is represented by the FHWA Roadway Construction Noise Model (RCNM) reference noise level of 94.0 dBA L_{eq} at 50 feet and is used in this analysis to determine potential impacts for future development that could require this construction method. Based on the reference construction noise levels, the estimated highest noise level generated by unmitigated typical

construction activity and pile driving activity would be expected to range from approximately 80 dBA L_{eq} at 50 feet and approximately 94 dBA L_{eq} at 50 feet, respectively.

The highest reference construction noise level of approximately 80 dBA L_{eq} at 50 feet for construction activity, not including pile driving, is expected to satisfy the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level thresholds at distances greater than 50 feet. However, at distances of 50 feet or less, Project construction noise levels could exceed the FTA thresholds at nearby receiver locations. Therefore, construction noise levels at receiver locations within 50 feet of construction activities, such as existing residential, retail, and office uses in the focus areas, are considered a potentially significant noise impact.

For development requiring pile driving, construction noise levels are anticipated to exceed the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level thresholds at distances of 200 feet or less. Therefore, pile driving construction noise levels at receiver locations within 200 feet of construction activities are considered a potentially significant noise impact. Therefore, MMs NOI-4 and NOI-7 prescribe several means to reduce noise level from both typical construction activity and pile driving activity during future development in the focus areas or elsewhere in the City. However, even with application of the construction noise reduction measures, it is anticipated the construction and/or pile driving noise levels at nearby receiver locations could exceed the FTA construction noise level thresholds. Therefore, construction-related noise levels for development requiring pile driving are considered a significant and unavoidable impact.

Operation (Long-Term Future Noise)

Traffic Noise

Noise contours represent the distance to noise levels of a constant value and do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they do not reflect noise contributions from the surrounding stationary noise sources within the area. These contours also do not take into account the effect of any noise barriers, topography, or final roadway grades that may reduce traffic noise levels, providing a conservative analysis.

The Project traffic noise levels at adjacent land uses are estimated to range from approximately 63 to 76 dBA CNEL. Although there would be additional traffic generated from the Project, because of the logarithmic nature of sound it requires a doubling or a halving of traffic levels to generate an audible (about 3 dBA) difference in noise levels. Also, as the Project would result generally in denser land uses, especially along arterial thoroughfares and near transit, vehicle miles traveled (VMT) per capita would decrease. As such, Project-generated noise level increases from traffic at existing adjacent receptors would not likely be perceptible to human hearing. Based on the significance criteria for off-site noise impacts), the Project-related increases in noise levels at the nearest sensitive receptors due to traffic noise alone represent a less than significant impact under the future (2040) with Project scenario, and no mitigation is required.

However, the worst-case exterior traffic noise level ranges for proposed residential uses in future development in some growth areas.

TABLE 3.11-4
FUTURE (2040) WITH PROJECT TRAFFIC NOISE LEVELS BY FOCUS AREA

Focus Area	Future CNEL (Worst-Case Transportation Noise Levels)
Corridors (Downtown Specific Plan)	
Mission Street and Fair Oaks Avenue	65 to 75
Districts	
Ostrich Farm	70 to 80
Neighborhood Centers	
Huntington Drive & Garfield Avenue	<70 to 75>
Huntington Drive & Fremont Avenue	<70 to 75>
Huntington Drive & Fletcher Avenue	65 to 75
Source: Psomas 2021, modeling inputs and results for this scenario are presented in Appendix E-2	

The proposed residential uses would be expected to be greater than the *normally acceptable* exterior noise level compatibility criteria identified in the existing General Plan Safety and Noise Element. Based on this and the proximity of future noise-sensitive land uses to SR-110 and the Metro L Line, the on-site transportation-related noise impacts at future uses within some growth areas would be expected to exceed 65 dBA CNEL, which would be a significant impact. Therefore, MM NOI-1 requires that prior to issuance of a building permit the Project Applicant/Developer of future projects with residential units submit an acoustical report to the City, which identifies reasonable and feasible measures to achieve a 65 dBA CNEL exterior noise level. Measures to achieve the required exterior noise level could include features such as sound walls, selective patio/balcony orientation, site configuration, and architectural fenestration to deflect sound. The proposed Project includes actions to use the Land Use Noise Compatibility Matrix to evaluate land use decisions and to require development projects to implement mitigation measures, where necessary, to reduce exterior and interior noise levels to meet standards. While it may be possible to satisfy the exterior noise standards for some projects, the transportation noise levels may still exceed the exterior 65 dBA CNEL standard for some projects. Therefore, the exterior on-site transportation noise impact is considered significant and unavoidable.

The interior noise levels of future developments must comply with the CBC interior noise level standards. The interior noise level is the difference between the predicted exterior noise level at the building facade and the noise reduction (NR) of the structure. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 25 dBA noise reduction with windows closed. However, sound leaks, cracks, and openings within the window assembly can greatly diminish its effectiveness in reducing noise. Several methods are used to improve interior noise reduction, including: (1) weather-stripped solid core exterior doors; (2) upgraded dual glazed windows; (3) mechanical ventilation/air conditioning; and (4) exterior wall/roof assembles free of cut outs or openings.

To provide the necessary interior noise level reduction, all future buildings developed with residential units would be required to provide a windows-closed condition and a means of mechanical ventilation (e.g., air conditioning) such that the residents of those buildings can achieve a 45 dBA CNEL environment. As previously discussed, the estimated traffic noise contours indicate some focus areas would experience exterior noise levels, which exceed 70 dBA CNEL at the building facade. With typical building construction and a windows-closed condition, a minimum 25 dBA CNEL reduction is achievable for residential dwelling units. However, the minimum 25 dBA CNEL with standard building construction may result in interior noise levels

greater than 45 dBA CNEL, which would be considered a significant impact. Therefore, MM NOI-2 requires that the Project Applicant/Developer of future residential and mixed-use projects submit an interior noise analysis, which demonstrates that the interior noise level meets 45 dBA CNEL, to the City prior to issuance of a building permit. With implementation of MM NOI-2, traffic noise impacts on future development would be less than significant.

Stationary Source Noise

The proposed residential land uses would be noise-sensitive receiving land uses and are not expected to include any specific type of stationary noise sources beyond the typical noise sources (e.g., heating, ventilating and air conditioning [HVAC] units) associated with existing residential land use in the City. Project-related stationary source (operational) noise could be generated by the operation of potential commercial/retail and office uses. Such noise sources could include HVAC units, loading dock activities, outdoor restaurant dining and music activities, and parking lot vehicle movements. It is noted that these potential noise sources are consistent with type of existing stationary noise sources observed in the City. The proposed Project includes actions to require mixed-use structures to minimize the transmission of noise generated by commercial uses affecting residential uses, minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/residences, landscaping activities, and special events. However, because the stationary source noise levels due to operation of future commercial/retail and office uses would vary depending on the tenant, the impacts due to operation of non-residential uses are considered potentially significant. Therefore, MM NOI-3 requires that the Applicant/Developer of future projects with non-residential uses that are near noise-sensitive land uses submit an acoustical report, which demonstrates that exterior noise levels at adjacent noise-sensitive land use property lines satisfy Section 19A.7(b), 19A.12, and 19.21(c) of the SPMC. The acoustical report shall provide specific site mitigation, if needed, to ensure that all exterior noise standards are implemented to the satisfaction of the City prior to issuance of a building permit. With implementation of MM NOI-3, on-site operational noise impacts from stationary sources would be less than significant.

To summarize the Project noise analysis:

- Project-generated traffic noise level increases at off-site sensitive receptors would be less than significant and no mitigation is required;
- Exterior transportation noise levels at proposed future development would be a significant and unavoidable impact even with implementation of MM NOI-1;
- Interior noise impacts at proposed future development would be less than significant with implementation of MM NOI-2; and
- Stationary source noise impacts would be less than significant with implementation of MM NOI-3.

Threshold 3.11b: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used and distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Construction activities that would have the potential to generate low levels of ground-borne vibration include mobile equipment activities and pile driving, among others.

Ground vibration levels associated with various types of construction equipment are summarized in Table 3.11-5, Vibration Source Levels for Construction Equipment, which is based on the reference vibration levels provided by the FTA.

TABLE 3.11-5
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Source: FTA 2007.	

Based on the reference vibration levels provided by the FTA, a large bulldozer represents the highest source of typical construction-related vibration with a reference velocity of 0.089 in/sec PPV at 25 feet. At distances ranging from 25 to 400 feet from the site of construction activity, typical construction (i.e., non-pile driving) vibration velocity levels are expected to range from less than 0.001 to 0.089 in/sec PPV.

Compared with the County of Los Angeles construction vibration standard of 0.01 in/sec RMS, the typical construction activities (i.e., non-pile-driving) associated with future development projects would exceed the vibration standard at receiver locations within 25 feet for jackhammers, 50 feet of loaded trucks, and 100 feet of large bulldozers, if used. Therefore, MM NOI-4 requires that the use of loaded trucks, large bulldozers, and jackhammers at construction sites nearby sensitive land uses (e.g., residential, school) shall be minimized to the maximum extent feasible unless the vibration levels are shown to be less than the County threshold of 0.01 in/sec RMS.

Similarly, pile driving vibration levels would exceed the County construction vibration standard of 0.01 in/sec RMS at receiver locations within 400 feet of the pile locations if impact pile drivers are used during Project construction. MM NOI-4 also requires pile driving activity within 400 feet of nearby sensitive land uses (e.g., residential, school) be minimized, or alternative methods be used, unless the vibration levels are shown to be less than the County threshold of 0.01 in/sec RMS.

MM NOI-4 prescribes various means to reduce both construction vibration levels and noise levels (discussed further below under Threshold 3.11d). Additionally, vibration levels exceeding standards have the potential to damage fragile historic structures. Therefore, MM NOI-5 requires a pre-construction assessment of possible structural damage for construction activity within 25 feet of a historic building, as identified on the City of South Pasadena Historic Resources Survey at that time. The construction vibration levels at the site of the closest sensitive receivers are unlikely to be sustained during the entire construction period but would occur only during the times that heavy construction equipment is operating adjacent to the construction site perimeter. Further, construction would be restricted to SPMC daytime construction hours, unless otherwise permitted by the City, thereby reducing potential vibration impacts during the sensitive nighttime hours. With implementation of MMs NOI-4 and NOI-5, the construction-related vibration impacts at nearby sensitive receiver locations would be reduced to a less than significant level impact during the worst-case construction activities at the site boundary.

Rail Line Operation

Based on the methodology provided by the FTA's General Vibration Assessment, Metro L Line rail activities are anticipated to generate vibration levels of up to 73 VdB at 50 feet from trains traveling at 50 mph. At the average speed of 35 mph, the reference vibration level is reduced by 3 VdB, and results in estimated vibration impacts of 70 VdB at 50 feet from the railroad tracks. It is important to note that this rail vibration assessment likely overstates the vibration levels at the future Project uses since the FTA Transit Noise and Vibration Impact Assessment states that "*although actual levels fluctuate widely, it is rare that ground-borne vibration will exceed the curves by more than one or two decibels unless there are extenuating circumstances, such as wheel or running-surface defects*".

However, some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro L Line railroad tracks and may experience vibration levels greater than 70 VdB, which can exceed the residential 72 VdB and non-residential 75 VdB criteria for frequent rail events. This would be considered a significant impact. Therefore, MM NOI-6 requires that the Applicant/Developer of future projects within 50 feet of the Gold Line submit a Vibration Study, which identifies all reasonable and feasible measures to avoid exceeding a 72 VdB residential and 75 VdB non-residential vibration level, to the City prior to issuance of a building permit. With implementation of MM NOI-6, operational vibration impacts would be less than significant.

It is noted that while future development could be exposed to vibration from off-site sources (i.e., train activity on the railroad tracks), the proposed land uses (i.e., residential and commercial/office) are not expected to include any specific type of operational vibration sources.

Threshold 3.11c: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

The nearest airport is the El Monte Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. There are no private airstrips in or near the City; thus, no noise from airstrips would occur. There would be no impact, and no mitigation is required.

3.11.6 CUMULATIVE IMPACTS

Future development in the City and the surrounding area would add new mobile and stationary noise sources, resulting in increased noise levels. The analysis of buildout of the proposed Project includes cumulative traffic volumes in the region by 2040. Thus, noise impacts associated with the Project account for cumulative noise impacts.

The Project-only traffic noise levels would not exceed a 3 dBA threshold and therefore would not be audible to human hearing. Therefore, the off-site traffic noise increase would be less than significant cumulative impact under the future (2040) with Project scenario, which accounts for regional traffic growth. However, the year 2040 traffic would be expected to result in on-site exterior noise levels that would exceed the standard of 65 dBA CNEL at future development in the focus areas. This would be a significant and unavoidable impact with implementation of MM NOI-1. This would also be considered a significant and unavoidable cumulative impact.

Interior noise levels at future development in the focus areas with traffic would be less than significant with implementation of MM NOI-2, and on-site operational noise impacts from stationary sources would be less than significant with implementation of MM NOI-3. Therefore, there would be less than significant cumulative impacts related to interior noise levels and operational noise from stationary sources.

Noise and vibration impacts related to the Metro L Line and construction activity would be limited geographically to the alignment of the L Line within the City of South Pasadena and individual construction sites, respectively. Therefore, these noise and vibration sources would not contribute to a cumulatively significant impact due to the effects of noise attenuation.

3.11.7 MITIGATION MEASURES

NOI-1 Prior to the issuance of a building permit for new residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the project will satisfy the 65 dBA CNEL exterior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.

NOI-2 Prior to the issuance of a building permit for new residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the interior noise levels in all habitable rooms will satisfy the California Building Code 45 dBA CNEL interior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.

NOI-3 Prior to the issuance of a building permit and/or certificate of occupancy for non-residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates:

- Exterior noise levels at adjacent property lines will satisfy the South Pasadena Municipal Code Section s19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. The site-specific acoustical report shall identify the necessary measures, if any, required to reduce exterior noise levels to below the South Pasadena Municipal Code Section 19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval.
- Acoustical isolation between units has been included in the project design for residential dwelling units situated above non-residential uses.

NOI-4 Prior to the issuance of a building permit for new development, the Project Applicant/ Developer shall submit a final acoustical report to the City of South Pasadena Community Development Department, or designee, that demonstrates:

- Exterior construction noise levels at the closest sensitive receiver locations will satisfy the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level standards and the County of Los Angeles 0.01 in/sec root-mean-square velocity (RMS) vibration standard. The site-specific report shall identify the necessary reduction measures, if any, required to reduce exterior noise and vibration levels to below FTA noise and County of Los Angeles vibration thresholds.
- Measures to reduce construction noise and vibration levels, such as but not limited to those provided below, shall be incorporated in the final acoustical report:
    - Install temporary construction noise barriers at the project site boundary that break the line of sight for occupied sensitive uses for the duration of construction activities. The noise control barrier(s) must provide a solid face from top to bottom and shall:
        - Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;
        - Be properly maintained with any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.
- Install sound dampening mats or blankets to the engine compartments of heavy mobile equipment (e.g., graders, dozers, heavy trucks). The dampening materials must be capable of a 5 dBA minimum noise reduction, must be installed prior to the use of heavy mobile construction equipment, and must remain installed for the duration of the equipment use.
- Construction activities requiring pile driving within 400 feet, large bulldozers within 100 feet, loaded trucks within 50 feet, or jackhammers within 25 feet of nearby sensitive land uses (e.g., residential, school) shall be minimized, or alternative equipment or methods shall be used, unless the vibration levels are shown to be less than the County of Los Angeles RMS threshold of 0.01 in/sec.

NOI-5 The Project Applicant/Developer of any site-specific development within 25 feet of an extremely fragile historic building, as defined by the South Pasadena Historic Resources Survey, shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and, prior to the issuance of a building permit, submit evidence to the City of South Pasadena Planning and Building Department, or designee, that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, ground borne vibration monitoring of nearby historic structures shall be required.

NOI-6 Prior to the issuance of a building permit for new development projects within 50 feet of the Metro L Line, the Project Applicant/Developer shall submit a final vibration study to the City of South Pasadena Planning and Building Department, or designee, which shall identify and require implementation of reasonable and feasible vibration reduction measures to avoid exceeding the 72 VdB residential and 75 VdB non-residential vibration level standards.

NOI-7 The Project Applicant/Developer for new development shall be responsible for ensuring that following requirements are implemented by the contractor throughout the construction period. Construction contractors shall be required to implement the following measures to reduce noise levels from construction activity:

- equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity;
- locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity; and
- limit haul truck deliveries to the same hours specified for construction equipment by Section 19A.13(a) of the South Pasadena Municipal Code. The contractor shall design delivery routes to minimize the exposure of sensitive land uses to delivery truck noise.

3.11.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction Noise Levels

Significant Unavoidable Impact with Mitigation

Construction and Operational Vibration Levels

Less Than Significant Impact with Mitigation

On-Site Stationary Source Noise

Less Than Significant Impact with Mitigation

Exterior Traffic Noise

Significant Unavoidable Impact with Mitigation

Interior Traffic and Stationary Source Noise

Less Than Significant Impact with Mitigation

Airport and Airstrip Noise

No Impact

Cumulative Impacts

Significant Unavoidable Impact with Mitigation

3.12 POPULATION AND HOUSING

3.12.1 METHODOLOGY

This section addresses the existing population, housing, and employment conditions in the City of South Pasadena (City) and analyzes anticipated changes to population, housing, and employment related to implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)ss. Existing and future population and housing characteristics are based on the California Department of Finance (DOF) estimates, U.S. census data, and growth projections from the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS; also referred to as Connect SoCal). Existing employment statistics were taken from the U.S. Department of Labor, Bureau of Labor Statistics (BLS), California Employment Development Department (EDD), and SCAG growth projections. The assessment of population, housing, and employment impacts assumes full buildout of the proposed General Plan and DTSP Update & 2021–2029 Housing Element.

3.12.2 EXISTING CONDITIONS

Population

Table 3.12-1, Historic Population Trends, 1990–2022, shows the population and percent change in the City and the County in 1990, 2000, and 2010, based on U.S. Census data, and for 2021 based on the most recent California DOF estimates. The City has experienced an approximately 6.9 percent increase in population between 1990 and 2022, compared to an approximately 11.3 percent increase in population in Los Angeles County as a whole. As shown below, the City has experienced minimal but steady population growth since 1990, with the greatest growth between 2000 and 2010 at approximately 0.55 percent annually. The City's trends do not always mimic the County's population trends.

TABLE 3.12-1
HISTORIC POPULATION TRENDS, 1990–2021

	South Pasadena		Los Angeles County	
Year	Population	Average Change Per Year [and Per Decade]	Population	Average Change Per Year [and Per Decade]
1990	23,936	—	8,863,052	—
2000	24,292	+0.15% [1.49%]	9,519,338	+0.69% [7.40%]
2010	25,619	+0.55% [5.46%]	9,818,605	+0.31% [3.14%]
2022	25,580	-0.01% [N/A]	9,861,224	+4.3% [N/A]
Sources: U.S. Census 1992, 2002, 2012; and DOF 2022				

Housing

Table 3.12-2, Historic Housing Trends, 1990–2022, shows the housing units (including vacant units) and percent change in the City and the County in 1990, 2000, and 2010, based on the decennial U.S. Census data, and for 2022 based on the DOF estimates. The City has experienced an approximately 4.1 percent increase in housing units between 1990 and 2022, compared to an approximately 15.0 percent increase in housing units in Los Angeles County as a whole. As shown

below, the City has experienced relatively minor housing growth since 1990, with a total of 437 net new units, with the greatest growth between 2000 and 2010 at approximately 0.25 percent annually. The City's trends often, but not always, mimic the County's housing trends.

TABLE 3.12-2
HISTORIC HOUSING TRENDS, 1990–2022

	South Pasadena		Los Angeles County	
Year	Housing Units	Average Change Per Year [and Per Decade]	Housing Units	Average Change Per Year [and Per Decade]
1990	10,719	—	3,163,310	—
2000	10,850	+0.12% [1.22%]	3,270,909	+0.34% [3.40%]
2010	11,118	+0.25% [2.47%]	3,445,076	+0.53% [5.32%]
2022	11,156	+0.03% [N/A]	3,635,915	+0.46% [N/A]
Sources: U.S. Census 1992, 2002, 2012; and DOF 2022.				

Employment

Table 3.12-3, Historic Employment Trends, 2000–2022, shows the number of jobs and percent change in the City and the County in 2000, 2010, and 2022 based on BLS and EDD data estimates. As shown below, the City has experienced modest employment growth since 2010, approximately 1.3 percent. There was a substantial reduction in jobs in the City between 2000 and 2010 of over 13 percent, reflecting the effects of the Great Recession. The relatively low increase in jobs between 2010 and 2022, represented by estimated employment in 2022, reflects the ongoing recovery from the Great Recession combined with the effects of the COVID-19 pandemic. What these perturbations show is the strong link between unanticipated–yet periodic–economic upheavals and associated employment levels. The City's trends generally mimic the County's employment trends.

TABLE 3.12-3
HISTORIC EMPLOYMENT TRENDS, 2000–2021

	South Pasadena		Los Angeles County	
Year	Jobs	Percent Change	Jobs	Percent Change
2000	14,857[a]	—	4,413,200[c]	—
2010	13,128[a]	-13.2%	4,318,700[c]	-2.2%
2022	13,700[b]	+4.4%	4,703,800[b]	+8.9%
Sources: [a] BLS 2018 [b] EDD 2022 [c] EDD 2021				

Growth Projections

Growth projections for the City of South Pasadena have been developed by SCAG as part of its regional planning efforts for the development of the 2020 RTP/SCS and the Regional Housing Needs Assessment (RHNA). The projections for the 2020–2045 RTP/SCS (SCAG 2021a) are presented in the *Demographics and Growth Forecast Technical Report* (SCAG 2021b). In this technical report, the jurisdiction-level forecast is provided for the years 2016 and 2045 only.

Therefore, Psomas submitted a public records request to SCAG for the forecast data by jurisdiction for more intervals between 2016 and 2045. The SCAG-provided forecast included the years 2016, 2020, 2040, 2035, and 2045, but not 2040; however, SCAG indicated the year 2040 projections could be calculated by using a linear interpolation between 2035 and 2045 data sets (Aguilar 2021).

According to SCAG, the City is projected to have a 2040 population of 27,004 persons, with 11,109 households, and an employment base of 11,984 persons. It is noted these projections are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. Specifically, it more closely matches the 2040 conditions with 589 dwelling units (DUs) and 430,000 sf of non-residential, which was envisioned prior to including the 2021–2029 Housing Element in this Environmental Assessment (EA). Table 3.12-4, SCAG Growth Projections for South Pasadena, summarizes SCAG's growth forecast for the City.

TABLE 3.12-4
SCAG GROWTH PROJECTIONS FOR SOUTH PASADENA

	South Pasadena			Los Angeles County		
	2016	**2020**	**2040**	**2016**	**2020**	**2040**
Population	25,992	26,088	27,100	10,110,339	10,407,326	11,423,962
Households	10,431	10,517	11,109	3,318,988	3,471,759	4,002,104
Employment	11,411	11,528	11,984	4,743,403	4,838,458	5,276,927
Source: SCAG 2020, Aguilar 2021.						

It is noted that the SCAG employment figure (11,528 jobs in 2020) is well below the EDD employment figure (13,700 jobs in 2022) (see Table 3.12-3 above). This EA utilizes the EDD 2022 estimate of employment as the more relevant figure for this issue (i.e., employment) for purposes of determining impacts, because it is derived from more frequently updated, real-time datasets.

Jobs – Housing Balance

SCAG states that "a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion). Alternatively, a jobs/housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply" (SCAG 2001). Jobs and housing are considered in balance when a subregion has enough employment opportunities for most people who live there and enough housing opportunities for most people who work there. SCAG uses the jobs/housing ratio to assess the relationship between housing and employment growth. An area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). The jobs/housing balance is one indicator of quality of life in a project area.

Jobs-rich areas in Southern California are located in the highly urbanized areas in the western portion of the region primarily in southern and western Los Angeles County, and in central and northern Orange County. Housing-rich areas are located in suburban communities located east of these employment centers, including San Bernardino and Riverside Counties and North Los Angeles County. Table 3.12-5, Los Angeles County and South Pasadena Jobs-Housing Ratios (2016–2040), identifies the projected jobs-housing ratio for both the County and the City between 2016 and 2040 based on SCAG data, for purposes of disclosure.

TABLE 3.12-5
COUNTY OF LOS ANGELES AND CITY OF SOUTH PASADENA
PROJECTED JOBS-HOUSING RATIOS (2016–2040)

	2016	2020	2040
South Pasadena			
Households (DUs)[a]	10,431	10,517	11,109
Housing Units	11,038	11,129	11,756
Employment[a]	11,411	11,528	11,984
Jobs/Housing Ratio	1.03	1.04	1.02
Los Angeles County			
Households (DUs)[a]	3,318,988	3,471,759	4,002,104
Housing Units	3,545,927	3,709,144	4,275,752
Employment[a]	4,246,600	4,662,500	5,225,800
Jobs/Housing Ratio	1.34	1.30	1.23

DUs: dwelling unit(s)

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena and 6.4 percent for Los Angeles County (DOF 2022).

Sources: SCAG 2020, Aguilar 2021.

As shown in Table 3.12-5, based on SCAG data, the City's jobs-housing ratio was 1.04 in 2020 with a slight decrease to 1.02 in 2040. The County is also projected to experience a declining jobs-housing ratio, though at approximately three times the rate of the City. A declining jobs-housing ratio results from households increasing relative to employment.

However, as discussed previously, SCAG's existing employment figures are well below jobs figures calculated by the EDD and do not accurately reflect the reality of employment provided in the City. Based on California EDD data, the estimated 2022 employment was reported as 13,700 jobs (EDD 2022). Based on an estimated 11,156 housing units in 2022 reported by DOF, the jobs-housing balance in the City of South Pasadena is, more accurately, approximately 1.23. The estimated jobs-housing ratio in the future with Project implementation is discussed in the impact analysis below.

3.12.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Uniform Relocation Assistance and Real Property Acquisition Act

The Uniform Relocation Assistance and Real Property Acquisition Act (42 *United States Code* Section 4601 et. seq.) was passed by Congress in 1970 and establishes standards for federally-funded programs and projects that require the acquisition of real property (real estate) for the displaced persons from their homes, businesses, or farms. It applies to projects using U.S. Department of Housing and Urban Development (HUD) funds and HUD programs only. It calls for (1) just compensation of any real property acquisition, including reimbursement for expenses resulting from the transfer of title (such as recording fees, prepaid real estate taxes, or other expenses); (2) relocation services to displaced residential tenants and owner occupants with adequate notice; (3) reimbursement for moving expenses and payments for the added cost of renting or purchasing comparable replacement housing; (4) relocation services for displaced

businesses, farms, and nonprofit organizations with adequate notice; and (5) reimbursement for moving and re-establishment expenses.

State

It is noted that the California legislature continues to consider, and is expected to pass, additional regulations that could affect housing requirements and/or development mandates. Pending legislation is not analyzed in this EA. The State regulations below are those already passed that are most relevant to the environmental analysis of the Project.

California Relocation Assistance Act

In 1970, the State adopted the California Relocation Assistance Act (*California Government Code* §7260 et seq.), which follows the federal Uniform Relocation Assistance and Real Property Acquisition Act. Like the federal program, this regulation does not apply to private projects; the State law applies for displacement due to a program or project undertaken by a public entity (Section 7260 of the Government Code). This State law requires public agencies to provide procedural protections and benefits when they displace businesses, homeowners, and tenants in the process of implementing public programs and projects. The act calls for fair, uniform, and equitable treatment of all affected persons through the provision of relocation benefits and assistance to minimize the hardship of displacement on the affected persons.

AB 1482

In 2019, Assembly Bill (AB) 1482 was signed into law by Governor Newson and caps rent increases statewide for the next 10 years. Specifically, effective on January 1, 2020, annual rent increases are limited to 5 percent plus any rise in the consumer price index, which cannot exceed 10 percent. AB 1482 does not apply to all residential dwellings, such as buildings constructed within the past 15 years. AB 1482 includes apartments and multi-family buildings containing two or more units but exempts single-family residences, owner-occupied duplexes, and condominiums except when owned by corporations or an LLC in which at least one member is a corporation. In addition to limiting rent increases, AB 1482 prevents evictions without just cause for tenants that have lived in the unit for at least one year. Just cause for eviction includes failure to pay rent, criminal activity, or breach of a material term of the lease. It also includes repossessing the property for the owner or owner's immediate family member to move in, demolish or substantially remodel the property, and withdraw the property from the rental market.

Land Use Planning Law

The requirements and authority for local municipalities (i.e., counties and cities) in California to prepare and administer general plans are contained in Sections 65300 et. seq. of the *California Government Code.* A general plan is a regulatory document established by a city or county to provide a guide for the future physical, economic, social, and environmental well-being of the city or county. It generally consists of goals, policies, actions and/or programs that would achieve the community's vision for its future. For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence. The City of South Pasadena does not have a sphere of influence; its jurisdictional boundaries align with the City limits.

The housing element is one of the State-mandated elements of a general plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the programs that are the

foundation of each municipalities housing strategy. However, unlike all other general plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). State law required City Council adoption of the 2021–2029 Housing Element Update by October 15, 2021, with a 120-day grace period (i.e., February 15, 2022) after which cities and counties face statutory penalties. Additionally, if a city cannot identify sufficient sites adequate to accommodate its RHNA allocation, the Housing Element must commit to rezone properties within three years to allow "by right" development of 20 percent below market rate projects. Assembly Bill (AB) 398 requires a locality that fails to adopt a housing element that Housing and Community Development (HCD) has found to be in substantial compliance with State law within 120 days of the statutory deadline to complete this required rezoning no later than one year from the deadline for adoption of the housing element – and prohibits the Housing Element from being found in substantial compliance until that rezoning is completed. Previously, an agency had three years to rezone. AB 215 requires local agencies to make draft revisions of the housing element available for public comment for 30 days. The agency (i.e., City of South Pasadena) must consider and incorporate public comments prior to submission to the HCD for review. Because of legal action against the City related to its Housing Element preparation, the City is the subject of a Court Order[1] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. This Court Order supersedes the time limits discussed above.

The requirements for preparation and implementation of specific plans are contained in Sections 65450–65457 of the *California Government Code.* Specific plans are a tool for the systematic implementation of a general plan and establish a link between implementing policies of the general plan and the individual development proposals in a defined area. The provisions of Section 65450 et. seq. of the *California Government Code* require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. In turn, all development, all public works projects, and zoning regulations must be consistent with the specific plan. The requirements for the adoption and administration of zoning laws, ordinances, and other regulations by counties and cities is contained in Sections 65800–65912 of the *California Government Code.*

Additionally, on September 30, 2008, Assembly Bill (AB) 1358, the California Complete Streets Act was signed into law and became effective on January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of a general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Assembly Bill 1233

Assembly Bill 1233, approved by the Governor in 2005, requires that housing elements analyze vacant sites, sites having potential for redevelopment, and the relationship of zoning, facilities, and services to these sites. AB 1233 requires that housing elements specify action programs that will be taken to make sites available during the 6th Cycle Housing Element planning period (2021-2029), as necessary to accommodate the RHNA units assigned to each municipality, plus any additional actions that are necessary to make sites available to accommodate any RHNA units that were assigned during the 5th Cycle Housing Element (2013–2021) that were not accommodated.

[1] *Settlement Agreement (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

If a jurisdiction fails to implement programs in its housing element to identify adequate sites or fails to adopt an adequate housing element, AB 1233 requires local governments to zone or rezone adequate sites by the first year of the new planning period. Specifically, AB 1233 applies to local governments that:

- Failed to adopt an updated Housing Element for the prior planning period;
- Adopted a Housing Element that California HCD found out of compliance due to failure to substantially comply with the adequate sites requirement;
- Failed to implement the adequate sites programs to make sites available within the planning period; or
- Failed to identify or make available adequate sites to accommodate a portion of the regional housing need.

The City of South Pasadena has reutilized rezoning and other strategies to identify adequate sites to meet the 6th Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5th Cycle Housing Element planning period (i.e., 63 DUs) were accommodated in the City's 2014–2021 Housing Element.

Senate Bill 375

Senate Bill (SB) 375, approved by the Governor in 2008, aligns land use and transportation planning to drive development towards transit-accessible places and reduce car dependency. SB 375 is the land use component of California's wider strategy to reduce GHG emissions, codified by the 2006 Global Warming Solutions Act (Assembly Bill [AB] 32).

SB 375 also requires that housing elements identify the existing and projected housing needs of all economic segments of the community. In certain cases, the State requires rezoning actions to be included within the housing elements to accommodate 100 percent of the need for very low and low-income households. If a jurisdiction does not fulfill the housing element action programs that are tied to affordability levels (prior to the June 30, 2020, deadline for the 5th Cycle production period), then penalties may be incurred in accordance with SB 375 and AB 1233 (discussed above).

Assembly Bill 1397

AB 1397 (2017) made several changes to housing element law by revising what could be included in a municipality's inventory of land suitable for residential development. AB 1397 changed the definition of land suitable for residential development to increase the number of multi-family sites. Identified sites must be "available" and "suitable" for residential development and have a "realistic and demonstrated potential" for redevelopment during the planning period. In addition, AB 1397 requires housing element inventory sites to be 0.5 acre to 10 acres, have sufficient infrastructure, or to be included in a program to provide such infrastructure, to support and be accessible for housing development. Further, the municipality must specify the realistic unit count for each site and whether it can accommodate housing at various income levels.

If a community does not have enough sites to accommodate its housing need, it must adopt a program to make adequate sites available, including a program for rezoning sites to provide lower-income housing. Pre-SB 375 housing law, cities asserted they were only required to identify actions that would be undertaken to make sites available to accommodate various housing needs-that they were not mandated to actually adopt the rezoning included in the Housing Element programs. However, SB 375 provides that communities preparing an eight-year housing element

must complete all required rezoning if the available housing sites inventory does not identify adequate sites to accommodate the RHNA allocation. The planned rezoning must include "minimum density and development standards" for all sites, and, for sites designated for very low and low-income housing, rezoning must provide for "by right" zoning at certain minimum densities, with no discretionary approvals allowed except design review and subdivision map approval. In these instances, CEQA review cannot be required unless a subdivision map is needed. Additionally, the programmed rezoning must be completed within certain time frames.

Housing Crisis Act of 2019 (SB 330) and Senate Bill 8

The California Housing Crisis Act (SB 330) was enacted by Governor Newson in 2019 to combat the State's growing housing crisis. This legislation's goal is to increase California's affordable housing stock by 3.5 million new units by 2025. To streamline residential development, a new preliminary development application process is required, which includes a staff-level review of basic information regarding a project such as:

- Site characteristics;
- The planned project;
- Certain environmental concerns;
- Facts related to any potential density bonus;
- Certain coastal zone-specific concerns;
- The number of units to be demolished; and
- The location of recorded public easements.

SB 330 further streamlines housing development by reducing the number of public meetings or hearings to five or less (e.g., workshops, design review board meetings, planning commission meetings, advisory committee meetings, and city council meetings). A shortened approval time of 90 days instead of 120 days from the time of certification for an EIR is also required to streamline the development approval process.

Local agencies are no longer able to remove or modify land use designations or allowances to inhibit the development of housing, unless the local agency replaces the lost housing potential; therefore, ensuring no net loss in housing availability. Further, local agencies will no longer be able to limit the annual number of housing-focused land use approvals, create caps on the amount of constructed housing units, or limit the population size of their city. Subjective design limitations on parcels where housing is an allowable use is also no longer permissible for projects that are subject to processing per SB 330 (any housing project).

SB 8 extends until 2034 the HCA provision that prohibits cities from conducting more than five hearings on an application as well as HCA provisions that provide vesting rights for housing projects that submit a qualifying "preliminary application." Applicants who submit qualifying preliminary applications for housing developments prior to January 1, 2030, can now invoke vesting rights until January 1, 2034. SB 8 extends until 2030 provisions that limit localities' authority to impose shifting requirements as part of application "completeness" review, as well as provisions that require localities to render any decision about whether a site is historic at the time the application for the housing development project is deemed complete. SB 8 also enacts a series of reforms intended to provide that HCA provisions apply to both discretionary and ministerial approvals as well as to the construction of a single dwelling unit and makes a series of revisions to the already complex replacement housing and relocation requirements.

Senate Bill 166

SB 166 (2017) requires a city or county to ensure that its housing element inventory can accommodate its share of the RHNA throughout the planning period. It prohibits a city or county from reducing, requiring, or permitting the reduction of the residential density to a lower residential density than what was utilized by the California Department of Housing and Community Development for certification of the housing element, unless the city or county makes written findings supported by substantial evidence that the reduction is consistent with the adopted general plan, including the housing element. In such cases, any remaining sites identified in the housing element must be adequate to accommodate the jurisdiction's share of the RHNA. A city or county may reduce the residential density for a parcel only if it identifies sufficient sites remaining within the housing element, as replacement sites, so that there is no net loss of residential unit capacity.

Assembly Bill 345

AB 345 further facilitates ADUs by removing the requirement for a local agency to first pass an ordinance allowing the conveyance of an ADU separately from a primary residence (which can be an extended process) before such conveyance occurs and permits an ADU to be sold or conveyed separately from the primary residence to a qualified buyer (low- and moderate-income individuals and families as defined in California Health and Safety Code Section 50093) and if certain conditions are met, including that the primary residence or ADU was built by a qualified nonprofit corporation and that the property is held pursuant to a recorded tenancy in common agreement.

Assembly Bill 491

AB 491 requires that, for any residential structure with five or more residential dwelling units that include both affordable housing units and market-rate housing units, the BMR units must provide the same access to common entrances, areas, and amenities as non-BMR units, and the building "shall not isolate the affordable housing units within that structure to a specific floor or an area on a specific floor."

Assembly Bill 787

AB 787 expands existing law that permits jurisdictions to claim credit for up to 25 percent of their RHNA from the conversion of existing housing units for very low- and low-income households by also permitting cities and counties to satisfy up to 25 percent of the local agency's moderate-income regional housing need through RHNA by permitting the conversion of units in an existing multifamily building to be restricted for moderate-income households. To qualify, the conversion 1) must occur beginning January 1, 2022; 2) may not be for a unit previously affordable to very low-, low-, or moderate-income households; 3) must be subject to a 55-year recorded agreement; and 4) have an initial post-conversion rent at least 10 percent less than the average monthly rent charged during the 12 months prior to conversion.

State Density Bonus Law and Related Legislation

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of AB 1763, projects qualifying for a density bonus were entitled to one - three "incentives" and "concessions" to help make the development of

affordable and senior housing more economically feasible, such as reduced setback, additional height, and/or minimum square footage requirements as requested by the developer. AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If the project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet.

The Density Bonus Law was further amended by SB 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. In connection with for-sale density bonus units that qualified a developer for an award of a density bonus under the Density Bonus Law, SB 728 requires that such unit be either 1) initially occupied by a person or family of the required income, offered at an affordable housing cost and subject to an equity sharing agreement, or 2) purchased by a qualified nonprofit housing organization receiving a property tax welfare exemption.

AB 571 prohibits agencies from imposing affordable housing impact fees, including inclusionary zoning fees and in lieu fees, on affordable units proposed as part of a Density Bous Law project.

The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of 8 to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

Covenants, Conditions, and Restrictions Legislation

AB 721 makes recorded covenants that limit residential development unenforceable against qualifying affordable housing developments. The law builds on existing law that allows parties to eliminate unenforceable racially restrictive covenants from recorded documents–but goes further by making any recorded covenants, conditions, and restrictions (CC&Rs) that restrict the number, size, or location of residences that may be built on a property, or that restrict the number of persons or families who may reside on a property, unenforceable against the owner of a 100 percent below market rate housing development that is affordable to lower-income households. There are exceptions for certain conservation easements and covenants required to comply with State or federal law.

AB 1584, a housing omnibus bill, establishes a restriction on contractual development controls that mirrors AB 721 by declaring unenforceable any CC&R contained within a deed, contract, security instrument, or other instrument that prohibits, effectively prohibits, or restricts the construction or use of an ADU on a lot zoned for single-family use.

Existing law notifies a buyer of real property that recorded covenants on the property may contain racially restrictive or other unenforceable discriminatory provisions and informs buyers of their right to file a Restrictive Covenant Modification (RCM) form. AB 1466 aims to hasten the removal of these covenants by requiring all county recorders throughout the State to establish a program to identify and redact unlawfully restrictive covenants and easing restrictions on the ability of other parties to seek to remove such covenants.

SB 9 provides for the ministerial approval of converting existing homes occupied by a homeowner into a duplex if certain eligibility restrictions are satisfied. It also allows a single-family home lot to be split into two lots, and a duplex to be built on each lot, provided that the initial home is occupied by an owner who attests that the owner will continue to live in a unit on the property as their primary residence for at least three years. The most notable exceptions to duplex and lot split by right approvals are 1) the property could not have been used as a rental for the past three years, 2) the property cannot already have an accessory dwelling unit or junior ADU, 3) the new lot may not be less than 40 percent of the property and must be at least 1,200 square feet, 4) modifications to the existing home may not require the demolition of more than 25 percent of an exterior wall, and 5) neither the new duplex nor the lot split with up to four new units (a duplex on each) may not result in a significant adverse impact to the physical environment.

Regional

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization (MPO) for six Southern California counties: Imperial, Orange, Riverside, San Bernardino, Ventura, and Los Angeles. Regional plans are prepared and adopted by SCAG, which is the Council of Governments for the County of Los Angeles. The federal government mandates that SCAG research and draw up plans for transportation, growth management, hazardous waste management, and air quality for its region. SCAG has developed several plans to achieve these regional objectives. The most applicable to the Project are the 2020–2045 RTP/SCS and RHNA.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill 375.

On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS (RTC/SCS; also referred to as Connect SoCal) and the addendum to the *Connect SoCal Program Environmental Impact Report*. The 2020–2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020).

Regional Housing Needs Allocation

Housing needs are determined by the California HCD, which allocates numerical housing targets to the MPOs, including SCAG, through the RHNA process. The RHNA identifies the existing and projected housing needs of each municipality (city and county) within the SCAG region. The 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. State requirements to boost housing production and provide more affordable housing units and justification for such new additions. Accordingly, the proposed Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation and Affirmatively Furthering Fair Housing (AFFH) concerns. It also introduces new policies and programs consistent with State law

based on a comprehensive and inclusive strategy to encourage housing production and retention to serve the entire community.

Based on the 6th Cycle RHNA, approved by HCD on March 22, 2021, the City's proposed 2021–2029 Housing Element has a need for 2,067 new units to be provided, distributed across the four income levels established by HCD, including the following:

- Very Low Income (757),
- Low Income (398),
- Moderate Income (334), and
- Above Moderate Income (578) (SCAG 2021).

The above-moderate income units are considered market rate, while units for the remaining income levels are considered below market rate at a range of affordability levels. The current RHNA allocation of 2,067 units is almost 33 times higher than the last cycle (63 units). Additionally, the California Department of HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. The surplus would be 708 DUs for a total of 2,775 DUs.

Cities and counties are not responsible for building the number of units specified in the RHNA, but rather are required to plan for them, by demonstrating the sufficiency of current land use and development standards and identifying specific housing element programs to provide capacity to accommodate the RHNA with implementation dates within three years. A municipality's housing element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA including rezoning if necessary. Penalties, including fines and loss of local discretion, can be levied against cities and counties that fail to implement the housing element programs that are included to reach the required housing production capacity. Per State requirements, the City's proposed Housing Element Update includes the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics;
- An analysis of the barriers to producing and preserving housing;
- A review of the City's progress in implementing current housing policies and programs;
- An identification of goals, policies and actions in addition to a full list of programs that will implement the vision of the Housing Element; and
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

City

Existing General Plan and Housing Element

The current *South Pasadena General Plan* (General Plan) was last updated and adopted by the City in 1998, with the 2013–2021 Housing Element last adopted in 2014 to address the City's future housing needs for the 2013–2021 planning period, in accordance with State laws (South Pasadena 1998, 2014). The currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);

- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing RHNA allocation and housing issues for the 2013–2021 period);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2-2, Existing Land Use Policy Map, presented in Section 2.0 of this EA, depicts the current land use plan for the City.

Existing Mission Street Specific Plan

The Mission Street Specific Plan (MSSP) was adopted in 1996 (South Pasadena 1996). Under State law (Section 65450 et. seq. of Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues. Exhibit 2-3, Mission Street Specific Plan Area, presented in Section 2.0, provides an illustration of the geographic area covered by the MSSP.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations equivalent to zoning code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area.

The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include the following:

- Provide a central parking facility to serve the Blue Line (now Gold Line) station;
- Establish a Business Improvement District (BID) to help financing parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area; and
- Increase the water pressure so that on-pumps are not required for second and third story uses (South Pasadena 1996).

Municipal Code

The Section 36.530.020 of the South Pasadena Municipal Code (SPMC) provides that where a residential structure is proposed at the time of construction as a condominium or other common interest development, and would involve conversion of an existing residential use, the Applicant must provide the City with a Relocation Assistance Program. This program must show how the Applicant will assist tenants displaced through the conversion in relocating to equivalent or better housing. Additionally, Section 36.530.020 of the SPMC requires the Applicant to give notice to all

existing or prospective tenants as set forth in the Subdivision Map Act (Map Act) (Sections 66410 through 66413.5 of the California Government Code). The City will not approve a project converting residential real property unless the findings, regarding notification, set forth in Section 66427.1 of the Map Act are first made (Section 36.530.020[B][6][b] of the SPMC).

3.12.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse population and housing impact if it would:

Threshold 3.12a: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); and/or

Threshold 3.12b: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.12.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the Housing Rights Center.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Goal 3.0 Provide opportunities to increase housing production

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4 Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5 Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB9 and SB10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Goal 4.0 Compliance with State Housing Laws

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Policy 5.1 Provide information on fair housing practices and resources on the City's website.

Policy 5.2 Coordinate with the Housing Rights Center to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the Housing Rights Center at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination.

Policy 5.5 In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6 Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

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

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

3.12.6 ENVIRONMENTAL IMPACTS

Threshold 3.12a: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Housing, Population, and Employment Growth

Future development under the proposed Project would increase housing, population, and employment in the City. As discussed in Section 2.4, buildout of a city under an adopted general plan is not tied to a specific timeline. However, for the purposes of this EA, development of the proposed Project is assumed to occur by the horizon year of 2040.

To encompass all possible future development capacity within the City, this EA addresses the buildout of up to an additional 2,775 DUs and 430,000 sf of commercial/office, which is estimated to generate up to an additional 6,882 residents[2] and 1,978 jobs[3] in the City through 2040 compared to existing conditions. The maximum of 6,882 residents equate with full occupancy of 2,775 units; however, the City had a vacancy rate of 5.5 percent in both 2017 and 2018, and the

[2] Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

[3] Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

County's vacancy rate was 6.3 percent in 2017 and 6.4 percent in 2018 (DOF 2021). A vacancy rate of 5.5 percent for the City and 6.4 for the County are applied in this analysis as they are the most recent prior to the COVID-19 pandemic.

Based on this vacancy rate, the maximum of 2,775 DUs in the proposed 2021–2029 Housing Element would result in a resident population increase of approximately 6,503persons occupying an estimated 2,622 DUs. Also, this approach conservatively estimates the total population increase even with a reasonable vacancy rate because some of the new dwelling units would replace dwelling units removed as part of a redevelopment project. Table 3.12-6, Comparison of Existing and Projected Conditions, provides context for the intensity of proposed growth in the City with buildout of the Project.

TABLE 3.12-6
COMPARISON OF EXISTING AND PROJECTED CONDITIONS

	Existing Conditions	Project Buildout (2040)	Growth	Difference
Households (DUs)	10,623[a]	13,245	2,622	+25.0%
Housing Units (DUs)	11,156[a]	13,931	2,775	+25.0%
Population (residents)	25,580[a]	32,083	6,503	+25.4%
Non-residential (sf)	1,256,000[b]	1,686,000	430,000	+34.2%
Employment (jobs)	13,700[c]	15,678	1,978	+14.4%

DUs: dwelling units; sf: square feet

Note: Population in this table based on 5.5 percent housing vacancy rate

Sources:
[a] DOF 2022
[b] HR&A 2017
[c] EDD 2022

As shown, the maximum 2,775 DUs would be expected to result in approximately 1,953 occupied DUs and would represent an approximate 25 percent increase–or about 1.25 percent per year–in the City's households. Assuming a 5.5 percent vacancy rate, this would result in a population of approximately 32,083 residents, which would represent an approximate 25.4 percent increase–or about 1.25 percent per year–in population. If all potential homes were occupied, the City would have a population of up to approximately 32,462 persons. However, no municipality experiences full occupancy of all housing units.

The maximum 430,000 sf of non-residential uses represent an approximate 34.2 percent increase–or about 1.7 percent per year–in the City's commercial and office space and would represent an approximate 14.4 percent increase–or about 0.7 percent per year–in the number of jobs within the City. The annual increase rates are based on 20 years and assume maximum buildout of all development capacity in the City by 2040.

Table 3.12-7, Comparison of SCAG Growth Projections and Project Buildout, provides a comparison of the 2040 SCAG growth projections and the General Plan Update buildout projections.

TABLE 3.12-7
COMPARISON OF SCAG PROJECTIONS AND PROJECT BUILDOUT

	Existing Conditions	Project Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	13,245 (2,622 DUs)[a]	11,109[c]	+2,136 DUs / +19.2%
Housing Units	11,156[a]	13,931 (2,775 DUs)	N/A	N/A
Population	25,580[a]	30,083 (6,503 persons)[a]	27,004[c]	+5,079 persons / +18.8%
Employment	13,700[b]	15,678 (1,978 jobs)	11,984[c]	+3,694 jobs / +30.8%
Jobs-Housing Ratio	1.23	1.13	1.01	N/A

DUs: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022a
[c] SCAG 2020, Aguilar 2021

As shown in Table 3.12-7, the number of households, residents, and jobs in the City at buildout of the Project would exceed SCAG's regional projections derived from the 2020–2045 RTP/SCS. The number of housing units is presented solely for purposes of calculating the jobs-housing ratio, discussed further below, because SCAG forecasts number of households only.

The household and population growth in the City would exceed the SCAG projections by 2,136 DUs (19.2 percent) and 5,079 persons (18.8 percent), respectively. As previously mentioned, SCAG's projections in the RTP/SCS are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. At that time, the City would have provided to SCAG demographic projections based on the proposed 589 DUs and 430,000 sf of non-residential formerly envisioned for the City. The 2020–2045 RHNA was approved by SCAG's Regional Council on September 3, 2020. While preparation of the 6th Cycle RHNA partially overlapped preparation of the RTP/SCS, the 6th Cycle RHNA preparation continued beyond its adoption and was approved by HCD almost seven months later on March 22, 2021. Therefore, the SCAG 2020–2045 RTP/SCS projections are internally inconsistent with the SCAG 6th Cycle RHNA.

SB 375 promotes consistency between RTP's and regional housing policy. It requires the RTP to plan for the RHNA, and the RHNA to be consistent with the RTP's projected development pattern. SB 375 also aligned the RHNA with the regional transportation planning process and created an eight-year planning period for cities within MPOs. Allocation of housing share to various cities and counties must be consistent with the SCS. Nonetheless, the necessity of the RHNA to meet the very considerable, recent changes in housing policy at the State level and other processes have resulted in this inconsistency. At the time of preparation of these SCAG documents, and this EA, the legislative and planning environment for providing housing and preferable land use patterns to meet GHG reduction and air quality goals is undergoing a marked transformation. The City is required to demonstrate it can accommodate the RHNA allocation. At the same time, accommodating this RHNA allocation results in a substantial unplanned population growth. Therefore, buildout of the Project would result in a significant and unavoidable impact related to population growth. There are no feasible mitigation measures to avoid or reduce this impact, because any such mitigation would reduce the potential housing stock to be constructed and

thereby place the City in violation of State law and susceptible to a variety of penalties, including monetary fines.

Regarding employment, as discussed previously, the SCAG projections of employment in the City are substantively underestimated (refer to Tables 3.12-6 and 3.12-7). Therefore, this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding. For comparison, the projected employment of 15,678 jobs represents an increase of 1,978 jobs (or about a 14.4 increase or 0.72 percent per year) from EDD's 2021 estimate of 13,700 jobs. The City's jobs-housing balance, a different metric for consideration of a City's employment, is presented below.

Jobs-Housing Balance

Jobs-housing balance defines an area where the number of housing units available for the employed population is equivalent to the number of jobs in an area. Alternatively, the provision of employment to fill the housing supply may also be considered jobs-housing balance. Assuming a reasonable match between the affordability of housing and the incomes of jobs in the local market, if the number and proximity of residences is proportionate to the number and proximity of jobs, the majority of employees would have the opportunity to work and reside in the same community. A well-balanced ratio of jobs and housing can contribute to reductions in the number of vehicle trips resulting from commuting due to employment opportunities in closer proximity to residential areas, although this may not occur. Such a reduction in vehicle trips would result in lower levels of air pollutant emissions (including lower GHG emissions) and less congestion on area roadways and intersections.

An area with a ratio between 1.0 and 1.29 is considered "balanced" (SCAG 2001). Table 3.12-7 also compares the City's existing (1.23) and buildout (1.13) jobs-housing balance. Therefore, the City would have slightly more balanced jobs-housing ratio with buildout of the Project. Although the SCAG employment projection cannot be feasibly compared to the anticipated 2040 conditions, consideration of jobs-housing balance indicates the increase in employment would not be considered a substantial inducement of growth, as the jobs-housing would be only slightly decreased (i.e., more housing-rich than the existing conditions). However, the proposed land use plan is consistent with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers such as the Mission L Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive. Consistency with SCAG policies is discussed further in Section 3.10, Land Use and Planning. There would be a less than significant impact related to employment growth, and no mitigation is required.

Improvements to roads and other infrastructure would be implemented either to alleviate existing capacity issues or in support of anticipated future growth. In conclusion, there would be a significant and unavoidable impact related to direct population growth, through provision of a land use plan that supports the 6th Cycle RHNA allocation; and less than significant impacts related to indirect population growth or direct employment growth, and no mitigation is required.

Threshold 3.12b: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As discussed above in Section 3.12.3, Relevant Programs and Regulations, the 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. Additionally, the California legislature has passed numerous housing-related bills in recent years.

The central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to the identified growth areas. Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the housing element update relies on includes inclusionary housing requirements that the City Council adopted in 2020; encouraging ADUs with simpler, objective requirements; and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units would follow the adoption of a revised General Plan Land Use Element together with the DTSP, an update and expansion of the 1996 Mission Street Specific Plan (MSSP).

The Project encourages most of the new housing to be in walkable mixed-use environments in the Downtown and along major transit corridors and arterial roadways but also accommodates increased housing opportunities within existing residential neighborhoods. In addition, the Project introduces an affordable housing overlay district to allow projects with affordable housing to be distributed across the City on appropriate sites. The Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation with the pattern of the existing land use plan outside of the focus areas.

Thus, most of the residential land uses in the City are expected to remain in place. New residential development on the limited number of vacant lots in the City would not involve any displacement of housing; however, transitions to higher densities within the focus areas or those lots outside the focus areas that have been determined a possibility for redevelopment and currently contain residential land uses could result in displacement. However, it is speculative at this time due to lack of sufficient information.

As discussed above, the 2021–2029 Housing Element has the need for 2,775 DUs across the four income levels defined by HCD. The new residential, and non-residential, uses are anticipated to occur primarily as infill redevelopment or development in the five focus areas; however, suitable sites for development or redevelopment of housing are identified outside of the focus areas. There are existing residential and mixed-use (i.e., retail ground floor with residential above) land uses within the focus areas. Therefore, there is a potential that existing residential uses would be removed to accommodate new development. The locations of future redevelopment projects, and, by extension, the precise number of existing housing units and people that may be displaced cannot be reasonably foreseen and would be speculative to define.

As noted above, Section 36.530.020 of the SPMC describes requirements for tenant notification, consistent with the Subdivision Map Act, and preparation of a Relocation Assistance Program by the Applicant for a development project involving conversion of residential use as a condominium or other common interest development. Where a development that would involve conversion of residential uses is due to a program or project undertaken by a public entity, the development process must be conducted in compliance with the California Relocation Assistance Act. This includes adequate notification of affected properties and provision of fair compensation and relocation assistance. This State law requires public agencies to provide procedural protections and benefits when they displace businesses, homeowners, and tenants in the process of implementing public programs and projects.

However, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the City. As such, there would be no impact under this threshold because there would be no indirect environmental impact from

construction of housing elsewhere. There would be no impacts related to displacement of housing or people that would necessitate construction of housing elsewhere, and no mitigation is required.

3.12.7 CUMULATIVE IMPACTS

The cumulative impacts related to demographic growth are analyzed within the County of Los Angeles, because County-wide demographic data are available from SCAG, DOF, and EDD. Also, because of the interconnectedness of cities and unincorporated areas in the Los Angeles metropolitan area, due to roadways, increasing transit, and other sociological factors, demographic growth in smaller sized cities like South Pasadena cannot be treated like an isolated phenomenon as it is part of the fabric of the region.

Increases in the population, housing, and employment base of the County are expected over time due to in-migration and birth. Future growth and development in the City of South Pasadena and in the County would lead to the development of new homes, the creation of new jobs, and the increase in the resident population of the City and the rest of the region. SCAG estimates there could be as many as 11,423,962 persons, 4,002,104 households (not housing units), and 5,276,927 jobs throughout the County by 2040 (Table 2-4; SCAG 2020; Aguilar 2021).

As discussed above, because of the inconsistency between SCAG's RTP/SCS and 6th Cycle RHNA, the increase in population and housing is considered a significant and unavoidable impact. This is more of a technicality due to timing and rapid changes in housing policy. However, a direct cumulative adverse impact would not be expected if there is housing that can adequately accommodate the population and there are goods and services available to meet residents' needs. The cumulative increase in population in the County would be accompanied by an increase in housing stock as projected by SCAG. This balance is partially driven by economic and other market forces out of the control of any single municipality. Whether this housing is adequate would depend on the rate of housing development and the success of housing programs in the various cities and communities in the region.

As discussed above, there would be a less than significant impact related to employment growth because the City would have a balanced jobs-housing ratio with buildout of the Project, and proposed land use plan is consistent with SCAG policies. As such, no significant adverse cumulative impacts related to employment growth would occur with the Project and future growth and development in the County.

Redevelopment projects that occur on developed or underutilized lots may involve some displacement of local housing stock or population in the San Gabriel Valley. However, the City's vacant housing stock and the County's vacant housing stock are expected to provide sufficient alternative accommodation for displaced households and residents, and significant displacement is not anticipated in the County. As such, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the City. No significant cumulative adverse impacts related to displacement would occur with the Project and future growth and development in the County, and no mitigation is required.

3.12.8 MITIGATION MEASURES

There would be less than significant impacts related to substantial growth and no impacts related to displacement of housing or people necessitating construction elsewhere, and no mitigation is required.

3.12.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and unavoidable related to population and housing growth.

Less than significant related to employment growth and related job-housing ratio, and no impact for displacements of housing or people that would necessitate construction of housing elsewhere.

3.12.10 REFERENCES

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3.13 PUBLIC SERVICES AND RECREATION

3.13.1 METHODOLOGY

This section discusses the existing public services in the City of South Pasadena and addresses potential impacts associated with the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project) to the following services:

- Fire protection and emergency medical services (South Pasadena Fire Department);
- Police protection services (South Pasadena Police Department);
- School services (South Pasadena Unified School District);
- Library services (South Pasadena Public Library); and
- Parks and recreation services (City of South Pasadena).

The public service providers were consulted for information regarding current services and to determine if the proposed Project would significantly impact the respective providers abilities to provide services such that new or physically altered facilities would be required, whose construction could result in an environmental impact. Other information presented in this section was derived from the City's website and the adopted General Plan.

3.13.2 EXISTING CONDITIONS

Fire Protection and Emergency Medical Services

Fire protection and emergency medical services in the City are provided by the South Pasadena Fire Department (SPFD). The SPFD is a full-service fire department that provides fire/rescue services, paramedics, safety education, inspections, plan reviews, and emergency management. The SPFD is also an all risk emergency services agency, as SPFD personnel are trained to handle responses such as structure, wildland and vehicle fires, hazardous materials releases, rescues and service calls, and provide advanced life support and medical transport. The SPFD includes the following divisions: Administrative Management, Operations (e.g., fire and emergency medical response), Fire Prevention Bureau (e.g., plan checks, public education, brush clearance program), and Emergency Management Program (e.g., disaster preparedness and response).

There is one fire station in the City, located at 817 Mound Avenue, that houses an engine company (Engine 81), a rescue ambulance, and a light and air unit. The SPFD currently has 21 sworn personnel as well as support personnel. The SPFD operates on a 48/96 schedule[1] with in-house daily staffing consisting of 7 personnel as follows: 1 Division Chief, 1 Captain, 2 Engineers, and 3 Firefighter/Paramedics. Battalion Chief coverage is provided by a contract agreement for management between the cities of South Pasadena and San Marino. In 2017 (the most recent data online) there were more than 2,300 responses by the SPFD. Of these, about 1,500 were for incidents within the City borders. The balance of the responses (about 800) were with adjoining agencies. Within the City, the most frequent dispatches are for minor falls and fire alarms.

[1] A 48/96 schedule uses 3 teams and 3 shifts to provide 24/7 coverage. It consists of a 6-day cycle where each team works 2 consecutive 24-hour shifts, followed by 4 consecutive days off duty.

A mutual aid agreement is an agreement in which participating agencies guarantee the provision of available resources to a requesting agency in the event of an emergency. An automatic aid agreement provides services without regard for service boundaries but based on earliest response. The SPFD has automatic aid agreements with the twelve other agencies[2] affiliated with the Verdugo Fire Communications Center (VFCC), all of whom operate under the Unified Response agreement. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary.

Police Protection Services

Police protection and law enforcement services in the City are provided by the South Pasadena Police Department (SPPD) from its station at 1422 Mission Street. The SPPD's mission statement is "…to provide our community with the safest possible environmental using interactive crime prevention methods, public education programs, and the equitable and professional application of the law". The SPPD includes the following divisions, Field Services and Support Services, each described below.

The Field Services Division provides the front line police services to the community and includes the following: Patrol Officers, Reserves, Traffic Unit, K9 Team, Bicycle Unit, Detective Bureau including Police Assistants, Records, Cadets, and Parking Enforcement, Foothill Air Support Program (FAST), Evidence/Property, Area C Mutual Aid, and Emergency Management. The SPPD has participated in the FAST for the past five years. FAST provides a regional law enforcement helicopter air support program to enhance public safety services in the San Gabriel Valley. FAST also assists with Homeland Security checks at major sporting events in the San Gabriel Valley. Currently, FAST is a partnership between the cities of Alhambra, Arcadia, Covina, Glendora, Monrovia, Pasadena, Pomona, San Marino, Sierra Madre, and South Pasadena. The Support Services Division including Crime Analysis, Crime Prevention, and a School Resource Officer; Office of Professional Standards; Communications; Emergency Operations; and Volunteers. The Support Services Division also oversees department purchases, vehicle and station maintenance, and budget and grant management.

As of 2021, the South Pasadena Police Department consists of 33 sworn officers, 16 non-sworn (i.e., civilian) full-time employees, 4 part-time non-sworn employees, and 2 volunteers; and the SPPD is also augmented with 4 Reserve Officers (SPPD 2022). The SPPD has divided the City into four sections designated as service areas 1 through 4; the dividing lines between the service areas are Meridian Avenue (north-south) and Monterey Road (east-west). In the case of an emergency call for service, officers can respond anywhere in the City, not just the assigned service area. In 2021, SPPD received 54,312 calls for service, including 27,339 calls for dispatched service and 5,909 emergency (i.e., 911) calls. Table 3.13-1, South Pasadena Part One Crime Statistics – Years 2020 and 2021, summarizes the calls for service for Part One Crimes. As shown, Part One Crimes decreased by 20.2 percent from 2020 to 2021 (SPPD 2022).

[2] The VFCC currently includes the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and the Bob Hope Airport Fire Department.

TABLE 3.13-1
SOUTH PASADENA PART ONE CRIME STATISTICS – YEARS 2020 AND 2021

Crime	2020	2021
Homicide	1	0
Rape	4	2
Robbery	17	10
Assault	66	63
Burglary (Residential)	44	42
Burglary (Commercial)	65	43
Larceny-Theft	429	349
Auto Theft	92	65
Arson	4	2
Total	**722**	**576**
Source: SPPD 2022.		

School Services

The South Pasadena Unified School District (SPUSD) provides educational services to the City, through three elementary schools, one middle school, and one high school. The SPUSD schools and their enrollment for the 2021–2022 school year are summarized in Table 3.13-2, SPUSD Schools and Enrollment for 2021-2022 School Year.

TABLE 3.13-2
SPUSD SCHOOLS AND ENROLLMENT FOR 2021-2022 SCHOOL YEAR

School Name	Address	Enrollment (2020–21)
SPUSD High School (Grades 9–12)		
South Pasadena High School	1401 Fremont Avenue	1,450 students
SPUSD Middle School (Grades 6–8)		
South Pasadena Middle School	1500 Fair Oaks Avenue	1,146 students
SPUSD Elementary Schools (Grades K–5)		
Arroyo Vista Elementary School	335 El Centro Street	683 students
Marengo Elementary School	1400 Marengo Avenue	761 students
Monterey Hills Elementary	1624 Via Del Rey	584 students
Total		**4,649 students**
Source: CDE 2022.		

Library Services

The South Pasadena Public Library (SPPL), located at 1100 Oxley Street, provides library services to the City and is a community resource for literacy, lifelong learning, recreation, and professional development. The SPPL was founded in 1895, with the first dedicated library built in 1907 on the southeast corner of Diamond Avenue and El Centro Street with funding from the Carnegie Corporation. In 1917 the building was significantly expanded, and in 1930 portions of the original building were moved to the current location in the center of Library Park. In 1982, the library underwent a major renovation that included all new construction for reading rooms,

children's room, staff areas, conference rooms, and stacks. A portion of the original historic structure was retained as a 3,000-square-foot community room that hosts library and City events and is available to the community as a rental space. The 24,500-square-foot facility offers free high-speed Wi-Fi, Internet connected computers, a conference room, dedicated space for teens and children, and seating for more than 130 people. In the 2020-2021 fiscal year, library collections included 114,300 physical items in print and audiovisual formats, 35,144 e-books and e-audiobooks, 27,403 downloadable video materials, and a wide variety of online resources (e.g., homework help language learning, tools for researchers and job seekers). In 2019, prior to the pandemic, more than 23,000 people attended library programs, including concerts, author talks, storytimes, hands-on crafting activities, book discussions, summer reading program performances and workshops, and other community-focused programs. Except for ongoing operational changes due to the COVID-19 pandemic, the SPPL is open 7 days a week for a total of 57 hours per week, or more than 2,679 public service hours in Fiscal Year 2018–2019. There were 3,270 new library cards issued, more than 260,000 visits, 11,000 reference interactions, approximately 323,000 items checked out, and over 22,000 internet computer sessions (CSL 2019, 2022).

Parks and Recreation Services

City Recreational Facilities

The City of South Pasadena has approximately 118.34 acres of parkland, recreation facilities, and open space areas. The City currently provides approximately 4.6 acres of parkland per 1,000 residents. Table 3.13-3, South Pasadena Parks and Recreational Facilities, summarizes the recreation amenities within the City.

TABLE 3.13-3
SOUTH PASADENA PARKS AND RECREATIONAL FACILITIES

Name/Location	Size (acres)	Facilities
Neighborhood Public Parks and Other Facilities		
Arroyo Seco Park 613 Stoney Drive	73.9	Lighted athletic fields, playground equipment, picnic area, golf course/driving range/miniature golf, racquet center, San Pascual Stables, skate park, batting cages, Arroyo Woodland and Wildlife Park
Garfield Park 1750 Mission Street	7.0	Playground equipment, 2 tennis courts (lighted), picnic areas, walking path, open lawn, fire ring, Youth House, Healing Garden
Eddie Park 2017 Edgewood Drive	1.5	Open lawn, playground equipment/swings, historic Eddie House, group barbecue area
Library Park 1102 Oxley Street	2.0	Benches, open lawn, walkways surrounding library building
Orange Grove Park 815 Mission Street	2.5	Softball and soccer fields (lighted), 2 tennis courts (lighted), recreation room, and daycare
Legion Park	2.0	Memorial garden War Memorial building with multi-purpose room for up to 200 people
South Paws-adena Dog Park 650 Stoney Avenue	0.75	Opened in November 2016; off-leash dog park, with separate small and special needs dog, and large dog areas
Arroyo Seco-South Pasadena Woodland and Wildlife Park 100 Pasadena Avenue	3.0	Trails and seating areas among native California flora and fauna
Total Acres	**92.7**	
Source: South Pasadena 1998		

There are gazebos and/or fields available for reservation by the public at Garfield Park, Orange Grove Park, Arroyo Park, and Eddie Park. There are indoor facilities available for reservation by the public at the War Memorial Building, South Pasadena Senior Center, Eddie Park House, Orange Grove Mid-Level Meeting Room, and Garfield Park Youth House. Garfield Park is also the first zero-emission American Green Zone Alliance Green Zone municipal park in the United States.

Park development, renovation, and maintenance, as well as leisure classes and recreational programs are provided by the South Pasadena Community Services Department. The Community Services Department also oversees the City-leased and -managed properties, including the Arroyo Seco Golf Course, Arroyo Seco Racquet Club, San Pasqual Stables, All-Star Baseball School Batting Cages, and South Pasadena Historical Museum; manages the South Pasadena Senior Center and related services, including Dial-A-Ride; and provides a variety of youth services and events, including after-school programs and middle school summer camp (South Pasadena Community Services Department 2022).

Regional Recreational Facilities

The Angeles National Forest is located at the San Gabriel Mountains approximately five miles north of the City. This National Forest has a natural environment, offering scenic views, with developed campgrounds, picnic areas, and opportunities for swimming, fishing, and skiing. Walking and hiking trails wind throughout the forest for use by hikers, equestrians, mountain bikers, and off-highway vehicle enthusiasts.

There are a variety of recreation opportunities within the Arroyo Seco where it extends several miles northward from the City of South Pasadena. The Lower Arroyo Seco is the area south of the Colorado Street Bridge; the Central Arroyo Seco is the area between the bridge and Devil's Gate Dam; and the Upper Arroyo, or Hahamongna Watershed Park, is a large park that extends from the dam into the Angeles National Forest. The Lower Arroyo Seco includes features such as a casting pond, archery range, bird sanctuary, memorial grove, and the historic La Casita del Arroyo; the Central Arroyo Seco includes features such as the 3.3-mile paved recreation loop around the Rose Bowl, Rose Bowl Stadium, Rose Bowl Aquatic Center, Kidspace Children's Museum, Brookside Park, and Brookside Golf Course; and the Hahamongna Watershed Park includes features such as Oak Grove multipurpose field, Flint Wash Bridge, Oak Grove Disc Golf Course, spreading basins and Devil's Gate Dam (a County of Los Angeles Department of Public Works facility). There are hiking, biking, and/or equestrian trails throughout the Arroyo Seco, including trails that connect the City of South Pasadena north to the Hahamongna Watershed Park (Pasadena 2010).

The Ernest E. Debs Regional Park, located at 4235 Monterey Road in the Montecito Heights neighborhood of central-northeast Los Angeles less than one mile from South Pasadena at the nearest point, is a large open space nature reserve and park operated and maintained by the City of Los Angeles Department of Recreation and Parks (Los Angeles 2018).

Griffith Park, also operated by the City of Los Angeles, is located at 2800 East Observatory Road approximately 5.5 miles west-northwest of South Pasadena. Griffith Park is one of the largest municipal park in North America and is the largest historic landmark in the City of Los Angeles, now covering 4,511 acres. In addition to providing over 70 miles of hiking and equestrian trails, Griffith Park houses the Griffith Observatory, Autry Museum of the American West, Greek Theatre, Los Angeles Zoo, Travel Town Transportation Museum, Los Angeles Live Steamers Railroad Museum, Shane's Inspiration universally-accessible playground, a ranger station, two

180 hole golf courses, three tennis complexes, and “The Plunge” swimming pool (Los Angeles 2016).

There are other public recreation spaces of various sizes and amenities within approximately 10 miles of the City, maintained by the County or other city municipalities. The above-described facilities are the largest and/or nearest major regional facilities that City of South Pasadena residents can access with ease.

3.13.3 RELEVANT PROGRAMS AND REGULATIONS

State

California Fire Plan

In a collaborative effort between the State Board of Forestry and the California Department of Forestry and Fire Protection (CDF), the *2018 Strategic Fire Plan for California* (Fire Plan) was prepared to address the protection of lives and property from California wildfires while recognizing that wildfires are a natural phenomenon and can have beneficial effects, particularly on ecosystem health. The Fire Plan is a comprehensive update to the 2010 Strategic Fire Plan for *California*. The overarching vision of the Fire Plan is to have “A vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships”. This vision is supported by eight goals and related objectives, and the application of adaptive management as a fundamental strategy of Fire Plan implementation to provide flexibility and allow for changing internal and external conditions (CAL FIRE 2018).

California Disaster and Civil Defense Master Mutual Aid Agreement

The California Disaster and Civil Defense Master Mutual Aid Agreement is an agreement between the State of California, its various departments and agencies, and the various political subdivisions, municipal corporations, and other public agencies of the State of California. The agreement allows for the use of all the resources and facilities of the participating agencies in preventing and combating the effect of disasters, such as flood, fire, earthquake, pestilence, war, sabotage, and riot. It commits the participating agencies to voluntarily aid and assist each other in the event of a disaster, through the interchange of services and facilities, including fire, police, medical and health, communication, and transportation services and facilities, as necessary to provide rescue, relief, evacuation, rehabilitation, and reconstruction.

Assembly Bill 2926

The State has traditionally been responsible for funding local public schools. To assist in providing facilities to serve students generated by new development projects, the State passed Assembly Bill (AB) 2926 in 1986. This bill allows school districts to collect impact fees from developers of new residential and commercial/industrial building space to fund school construction and reconstruction. AB 2926 also established maximum fees (adjusted for inflation) which can be collected under this and any other school fee authorization.

Senate Bill 50

Senate Bill (SB) 50 (or “Leroy Greene School Facilities Act”) and Proposition 1A (both of which passed in 1998) provide a comprehensive school facility financing and reform program by, among

other methods, authorizing both a $9.2 billion school facilities bond issue and school construction cost containment provisions. Specifically, the bond funds are to provide for new construction and for reconstruction/modernization needs. The provisions of SB 50 (1) prohibit local agencies from denying either legislative or adjudicative land use approvals on the basis that school facilities are inadequate and (2) reinstate the school facility fee cap for legislative actions (e.g., general plan amendments, specific plan adoption, zoning plan amendments). According to Section 65996 of the *California Government Code*, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation".

SB 50 establishes three levels of developer fees that may be imposed upon new development by a school district's governing board. Beginning in 2000, the maximum allowable amount of Level 1 developer fees is adjusted every two years based on the change in the statewide cost index for class B construction per Section 65995(b)(3) of the Government Code (OPSC 2023). These fee levels depend upon certain conditions within a district. For year 2022, these three levels currently include the following:

Level 1: Level 1 fees are the base statutory fees. Level 1 fees are $4.79 per square foot (sf) for new residential development and $0.78 per sf of chargeable, covered, and enclosed floor space for new commercial/industrial development. These amounts represent the maximum that can currently be legally imposed upon new development projects by a school district unless the district qualifies for a higher level of funding. Payment of this fee is deemed to constitute full, complete, and adequate mitigation of a project's impacts on school facilities (OPSC 2023).

Level 2: Level 2 fees allow a school district to impose developer fees above the statutory levels up to 50 percent of school construction costs under designated circumstances. The State provides grant amounts for new school construction if funds are available.

Level 3: Level 3 fees apply if the State runs out of bond funds, allowing a school district to impose 100 percent of the cost of the school facility or mitigation on the developer minus any local dedicated school monies. However, Senate Bill 1016 (Chapter 38, Statutes of 2012) suspended the ability of school districts to levy Level III fees.

To accommodate students from new development projects, school districts may alternatively finance new schools through special school construction funding resolutions and/or agreements between developers, the affected school districts and, occasionally, other local governmental agencies. These special resolutions and agreements often allow school districts to realize school mitigation funds in excess of the developer fees allowed under SB 50. As discussed further below, SPUSD adopted Level 1 Developer Fees that were effective December 12, 2022.

Quimby Act

California allows a City or County to pass an ordinance that requires, as a condition of approval of a subdivision, either the dedication of land, the payment of a fee in lieu of dedication, or a combination of both for park or recreational purposes (*California Government Code,* Section 66477). This legislation, commonly called the "Quimby Act," establishes a standard of 3 acres of parkland per 1,000 residents for new subdivision development unless the municipality has already established a higher rate. This is the case with the City of South Pasadena, which has set a standard of 4 acres per 1,000 population.

In February 2008, the City established a Park Impact Fee of $5.89 per sf with an exemption for the first 250 square feet for renovations/remodels. In June 2016, the City Council increased the fee to $7.65 per sf of new or remodeled residential, with fees for senior housing projects at $2.95 per sf, and exemptions for the first 250 sf of the project that increases the habitable living space. These capital fees remain in place as of the City's Master Fee Schedule effective July 1, 2022 (South Pasadena 2022).

Assembly Bill 602

AB 602 imposes additional standards and procedures for agencies adopting impact fees. It requires agencies to identify an existing level of services for public facilities and information supporting the agency's actions in increasing fees and requires agencies to impose fees on a housing development proportionately to the square footage of the development or make findings for a different methodology. Agencies must adopt studies at a public hearing with at least 30 days' notice, notify any member of the public who requests notice of an impact fee nexus study, and consider any evidence submitted by any member of the public that the agency's determinations or findings are insufficient. Large jurisdictions are required to adopt a capital improvement plan as part of the nexus study. Agencies must update nexus fee studies at least every eight years from the period beginning on January 1, 2022. Agencies must also post the current impact fee schedule and update at least twice a year. Finally, the law directs the California Department of Housing and Community Development (HCD) to create an impact fee nexus study template. The modification or establishment of development impact fees in the City, that would apply to new development or redevelopment pursuant to the Project, would be developed in compliance with AB 602.

City

Municipal Code

Chapter 16A, Growth Requirement Capital Fee

Pursuant to Chapter 16A of the South Pasadena Municipal Code (SPMC), the City assesses a growth requirement capital fee (capital fee) upon new residential and commercial development within City boundaries to support the associated need for additional public facilities and services. The fees collected from residential development are used for all capital improvements, which include government, police, and fire facilities; essential infrastructure and related facilities; and cultural and recreational facilities. Residential developments also pay a park facilities impact fee in addition to the capital fee, which contributes to the City's funding for park facilities. The capital fees collected from commercial and industrial development are only used for capital improvements but not park facilities.

The capital fee is based on a formula designed to ensure that individual developers pay their fair share for public facilities needed to serve the city's growing population. The rates upon which the fees are based shall be adjusted as of July 1st of each year to reflect changes in building costs as determined by the Construction Cost Index for Los Angeles. The public improvements are identified by category in the city's capital improvement program, which is updated annually. Effective July 1, 2022, the capital fees are $1.64 per sf for residential and $1.07 per sf for commercial (South Pasadena 2022).

South Pasadena Unified School District and SB 50

Per SB 50, SPUSD requires developers to pay fees for new residential, commercial, and industrial development; residential construction which increases assessable space by greater than 500 sf; and location, installation, or occupancy of manufactured and mobile homes. The current fees, which went into effect on December 12, 2022, are as follows: No fee for Additions to Existing Residences under 500 sf; $4.79 per sf for Additions to Existing Residences over 500 sf or New Residential; and $0.78 per sf for Commercial/Industrial (SPUSD 2023).

3.13.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse public services impact if it would:

Threshold 3.13a: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection.

b) Police protection.

c) Schools.

d) Parks.

e) Other public facilities.

Threshold 3.13b: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or

Threshold 3.13c: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.13.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to public services and recreation.

3.13.6 ENVIRONMENTAL IMPACTS

Threshold 3.13a: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

b) Police protection?

c) Schools?

e) Other public facilities?

Fire Protection and Emergency Medical Services

Future development pursuant to the Project would increase the number of residents, employees, businesses, and structures in the City, including patrons and visitors, thereby increasing the demand for fire protection services. This development is anticipated to create the typical range of fire service calls that other similar uses existing in the City generate. Assuming buildout of the Project, the City is anticipated to increase by up to 2,775 dwelling units (DUs) and 430,000 sf of retail/office land uses, which would generate an estimated 6,882 residents and 1,978 jobs. It is noted the proposed increase in non-residential uses is focused on office and retail development, and no industrial/manufacturing land uses that would more likely handle hazardous materials and/or have increased fire risk are envisioned. The SPFD has indicated the existing facilities and staffing could support the buildout of land uses, and associated increase in resident and daytime population, under the proposed Project.

Individual development projects would be reviewed by the SPFD as part of the City's project review process and would be required to comply with all fire code standards in effect at the time the building permit is issued, pursuant to Section 14.4 et. seq. of the SPMC, which includes requirements for building construction, fire flows and pressures, hydrant placement, and other requirements that would reduce the creation of fire hazards and facilitate emergency response. Additionally, the area located south of Monterey Road and west of Meridian Avenue is defined as a "High risk fire area" pursuant to Section 14.1 of the SPMC. In addition to City fire code standards, development of any parcels in this area would be required to have Class A roof assemblies, which are effective against severe fire test exposures.

The SPFD has determined the construction of new or expanded facilities would not be required to serve the projected growth in the City; therefore, there would be no physical impacts associated with the construction of new facilities as a result of the General Plan Update. Additionally, future funding for maintenance of SPFD resources and services (i.e., fire inspectors or fire companies) would be provided through the City's capital fee program collected on new development (Chapter 16A of the SPMC) as well as through the collection of taxes from existing taxes. If it is determined at a later date that additional fire protection facilities are required, such a development would be subject to project-specific environmental review pursuant to the California Environmental Quality Act (CEQA). Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this Environmental Assessment (EA), and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation.

Therefore, with implementation of the Projectwould result in less than significant impacts to fire protection services and no mitigation is required.

Police Protection Services

Future development pursuant to the Project would increase the number of residents, employees, businesses, and structures in the City, including patrons and visitors, thereby increasing the demand for police protection services. Increase in vehicle trips on City roadways could also increase the potential for traffic accidents and violations. These factors would lead to increases in the demand for police protection and law enforcement services from the SPPD.

The SPPD has indicated that while the existing facilities could support the buildout of land uses under the Project, it is recommended that two additional sworn police officers are added to the existing staff. This increase in staff would also entail an additional administrative cost to support the increase in calls for service, public requests, special events, community activities, and ancillary support. The small increase in sworn and non-sworn support staff to provide police protection services to future land uses and populations is solely a cost-based issue. The funding for new officer positions and resources needed to maintain acceptable Citywide police protection service levels comes from the growth requirement capital fee assessed on all new residential and commercial development (Chapter 16A of the SPMC) and the City's General Fund. Property taxes and other fees assessed on property owners within the City contribute to the General Fund revenues.

However, the SPPD has determined that construction of new or expanded facilities is not required to support implementation of the General Plan and DTSP Update& 2021–2019 Housing Element. If it is determined at a later date that additional police protection facilities are required, they would be subject to project-specific environmental review pursuant to CEQA. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the proposed Projectwould result in less than significant impacts to police protection services, and no mitigation is required.

School Services

Future development pursuant to the Project would increase the number of homes in the City through 2040, thereby increasing the demand for school services. For purposes of this analysis, all student generation in the City is assumed to be served by the SPUSD.

Long term enrollment projections are predicated primarily on birth rates, property and rental values, family migration patterns and unknown changes in the California Education Code by the Governor and State Legislature. Therefore, current facilities for elementary, middle, and high school students may need to be expanded. Specifically, the SPUSD envisions the need for expansion of permanent (non-modular) facilities on existing campuses and/or reopening the Oneonta School, located at 1955 Fremont Avenue, as an SPUSD elementary school and/or reconfiguring the grade level composition at its elementary and middle schools. The Oneonta School property is owned by the SPUSD, and the facility is leased by the Institute for the Redesign of Learning Almansor Academy, a special education non-public day school. The latter option would require extensive remodeling and modernization to accommodate the planned use.

When and if it is determined that expanded and/or renovated school facilities are required, they would be subject to project-specific environmental review pursuant to CEQA and would also be required to comply with State standards for school siting. This would include consideration of any indirect effects to the Almansor Academy and its relocation. However, at this time, there is not enough data to determine the precise scenario for expanding permanent elementary school services that would ultimately be determined preferable by the SPUSD. As such, the environmental effects of such expansion are not reasonably captured in this EA. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

As allowed under the SB 50, school districts serving the City can assess school impact fees based on the floor area of new dwelling units and non-residential developments. These fees are used to fund school services and facilities needed to provide the necessary school services. Future development would need to pay school impact fees prior to issuance of building permits. These fees are subject to changes on an annual basis, as deemed appropriate by the SPUSD, and will be determined at the time individual projects are processed/reviewed. As noted above, SPUSD's current fees are as follows: $4.79 per sf for Residential and $0.78 per sf for Commercial (SPUSD 2023). As part of this fee program, information on individual development projects would have to be submitted to the school districts that would serve each development to determine applicable school impact fees and to allow the school districts to analyze potential demand for school services and the facility needs of the development. In addition to SB 50 fees, State and local bond measures have been passed, and may be passed in the future, to fund additional school facilities.

As provided under *California Education Code* Section 17620 and *California Government Code* Section 65970, the payment of statutory school fees is presumed to fully mitigate a project's impacts on schools. *California Government Code* Section 65995(h) states that payment of fees is "full and complete mitigation of the impacts". The *California Education Code* and *California Government Code* do not require the dedication of land or payment of fees in excess of statutorily established school fees. Thus, impacts on school services from future residential development would be less than significant with payment of required SB 50 fees, and no mitigation is required.

Library Services

For purposes of this EA, other public services refer to library services.

Future development pursuant to the Project would increase the number of residents in the City, thereby increasing the demand for library services. The American Library Association and the Public Library Association do not publish service ratio standards for public libraries since needs vary across diverse communities; however, there are a variety of professional resources available (e.g., The National Institute of Building Sciences[3]) that provide a standard framework for calculating public library facility and equipment needs based on population. These guidelines address collection space, user seating space, staff workspace, meeting space, and special use space.

Based on current cardholder data, the SPPL assumes that approximately 55 percent of future residents would carry and use a library card, or approximately 17,854 total residents (55 percent of the projected 2040 population of 32,462). SPPL residents make up 53 percent of the total number of active cardholders. While the popularity of the library's e-books and e-audiobooks that are available remotely continues to increase, lending of physical materials remains robust and the demand for in-person services at the library is undiminished. The SPPL states that the library is the most visited public building in the City, and it is expected that the demand for in-library services, including computers, Wi-Fi, space to work and study, librarian assistance, and programs and special events, would increase as the population increases. The existing library facility and equipment is not always adequate to meet current demand.

The SPPL was last expanded and renovated in 1982 and as early as 2020 the Library Board of Trustees recognized that the library needed to be upgraded and expanded to meet the community's needs for a 21st century library. The City and the SPPL have considered expanding library services into the existing Senior Center if and when a new Community Center is

[3] https://www.wbdg.org/building-types/libraries/public-library

constructed. However, a new Community Center remains in the planning stages, and the location and timing of this facility is unknown.

The SPPL would continue to evaluate library space with regard to adequacy of levels of service as the City grows in the future. The City's growth requirement capital fee assessed on all new residential and commercial development (Chapter 16A of the SPMC) is intended in part to support library services. When and if it is determined that additional library facilities are required, they would be subject to project-specific environmental review. Like the discussion of schools above, a likely path to provide expanded library services has already been identified and would also involve reuse of an existing space; however, at this time, there is not enough data to determine the precise scenario for expanding library services that would ultimately be implemented by the City. As such, the environmental effects of such expansion are not reasonably captured in this EA and would be analyzed as a separate project in the future, if implemented. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the proposed Projectwould result in less than significant impacts to library services, and no mitigation is required.

Threshold 3.13a: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

d) Parks?

Future development pursuant to the Project would increase the number of residents in the City, thereby increasing the demand for recreational services. Non-residential development is not likely to create a direct demand for parks and recreational facilities. As discussed above, the City has approximately 118 acres of parks, equating to approximately 4.6 acres of parkland per 1,000 residents. The City's parks standard of 5 acres of parkland per 1,000 residents is slightly higher than the State standard at 4 acres of parkland per 1,000 residents.

To meet this standard for the existing population (25,580 persons), an estimated 9.5 acres of additional, or 128 acres total, of parks, recreation facilities, and open space areas would be needed. To meet this standard for future growth, the estimated 6,882 residents generated with buildout of the Project (assuming no residential vacancies) would require approximately 34.4 acres of parks and other recreation facilities. When considering both existing and future growth, an estimated 44.0 acres of additional, or approximately 162 acres total, of parks and other recreation acres would be needed.

In Spring 2017, the City has acquired the deeds to two parcels previously owned by Caltrans, located at 2006 Berkshire Avenue and 1107 Grevelia Street, for the development of pocket parks. The City Council has approved the hiring of a landscape architecture firm to compile the results of the ongoing public outreach effort and complete a conceptual design for each park, for use in seeking grant funding for the construction of each site. On May 10, 2021, the City reinitiated this effort with a community meeting. On June 14, 2021, the Parks and Recreation Commission provided a recommendation to City Council to move forward with the concept designs and

construction documents for the two pocket parks. In August 2021, City Council approved the concept designs and associated budgets for construction of the pocket parks.

The City would strive to meet and maintain acceptable parkland standards. The City recognizes that providing adequate, or abundant, parks and other open spaces has substantial benefits both to its residents and to the environment. Site-specific improvement plans would be evaluated at the time the development is proposed. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the Project would result in less than significant impacts to parks services, and no mitigation is required.

Threshold 3.13b: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The additional residents in the City pursuant to the Project would be likely to use both existing and future parks and recreational facilities in the City, as well as facilities in the surrounding area. These include City parks, County parks and recreational facilities, private recreational facilities, and recreational areas at the Angeles National Forest.

As discussed above, to meet the proposed standard of 5 acres of parks per 1,000 residents for future growth, the estimated 6,882 residents generated with buildout of the Project would require approximately 44.0 acres of parks and other recreation facilities. The City currently provides approximately 4.6 acres of parks per 1,000 residents, which exceeds the State/Quimby Act standard of 3 acres per 1,000 residents. Under this standard, the City's approximately 118 acres of parks and recreation facilities would meet the State standard even when considering the projected growth under the Project, which would equate to approximately 97 acres. Therefore, the need to add parkland to meet the City's standard is solely a function of the high standard for recreation being sought. However, when considering that the State standard would be met (for what is considered adequate parkland in combination with the likely expansion of parks in the City, the addition of an estimated 6,882 residents (assuming no residential vacancies) would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Therefore, the Project would result in less than significant impacts to park conditions, and no mitigation is required.

Threshold 3.13c: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

There are no individual parks or recreational facilities that would be constructed through adoption of the Project. New parks or park expansions that would be constructed by the City or are part of individual development projects are expected to occur within the developed areas of the City, including infill vacant lots. As discussed above, many of the methods that may be used to create additional parkland involve the strategic and creative use of existing lands in the City, such as the Southern California Edison easement and vacant lots, as the City is largely built out. The development of new parks and recreational facilities would be a beneficial impact in the City by meeting existing and future demands. New parks and recreational facilities would result in

environmental impacts as discussed under the various sections of this EA, including but not limited to short-term construction-related impacts (e.g., air quality, noise, and water quality) as well as long-term operational impacts (e.g., light/glare, noise, traffic). There are several policies and actions pertaining to recreation facilities that focus on the sustainable long-term operation and maintenance of these facilities, both environmentally and financially. Individual park projects would be subject to separate environmental review once specific development plans are identified.

Therefore, the proposed Project would result in less than significant impacts to park construction, and no mitigation is required.

3.13.7 CUMULATIVE IMPACTS

Future growth and development within the San Gabriel Valley would generate increased demand for public services from various service agencies. While increases in demand would occur on other public service agencies that do not serve the City, future development pursuant to the Project would not add to the service demands on those agencies that do not serve the City. Thus, the cumulative analysis for public services considers the service area of the respective providers and adjacent service agencies, as they may be affected by services provided in the City. As identified in this section, the proposed Project would not result in cumulatively considerable impacts related to public services, and no mitigation is required.

Fire Protection and Emergency Medical Services

For fire protection services, the SPFD provides automatic aid to the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, and Sierra Madre and the Bob Hope Airport Fire Department as part of the VFCC. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary. Thus, future development in the City of South Pasadena and the VFCC participating agencies would increase the population and introduce structures that would create a demand for fire protection and emergency services. This cumulative demand for fire protection services would require additional personnel and resources at individual agencies to provide the same level of service and maintain existing response times. Conversely, the purpose of the VFCC is to provide a localized dispatch center with a borderless system among the participating agencies whereby the nearest available responder to the event, regardless of jurisdictional boundary, would provide the needed fire or emergency services. Essentially, each participating agency has the resources of all other participating agencies available for emergency response.

Individual developments are required to comply with pertinent provisions of the California Fire Code to prevent the creation of fire hazards, to promote fire safety, and to facilitate emergency response. The individual fire agencies, including the SPFD, also regularly review their services and the needed increases in staffing, fire stations, and equipment, as necessary, to keep response times acceptable and to adequately serve their service areas. Plan reviews of proposed development projects by the individual fire departments would accomplish the following: (1) prevent the creation of fire safety hazards by development; (2) require fire prevention measures to be incorporated into individual projects; and (3) facilitate fire emergency response by providing adequate access and fire alarm systems. Compliance with these existing regulations by the participating VFCC agencies would avoid potential significant cumulative impacts on fire protection service levels, and no mitigation is required.

Police Protection Services

For police protection services, the geographic area for consideration of cumulative impacts is the City, as this is the SPPD service area. As discussed, the SPPD participates in FAST Program, which provides a regional law enforcement helicopter air support program. The SPPD also participates in a mutual aid program similar to the fire department. As determined in the analysis above, implementation of the Project would result in less than significant impact related to police protection services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

School Services

For school services, the geographic area for consideration of cumulative impacts is the City, as this is the SPUSD service area. As determined in the analysis above, implementation of the Project would result in less than significant impact related to school services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

Library Services

For library services, the geographic area for consideration of cumulative impacts is the City, as this is the SPPL service area. As determined in the analysis above, implementation of the Project would result in less than significant impact related to library services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

Parks and Recreation Services

Future residential development pursuant to the proposed Project and development projects in areas surrounding the City would contribute to the cumulative need for more parks and recreation within the City. The analysis of cumulative impacts to parks and recreation considers buildout of the City and growth and development in the San Gabriel Valley through year 2040.

Typically, parkland requirements are a function of expected demand and are related to the number of residential dwelling units created by projects. Pursuant to Section 66477 of the *California Government Code* (or Quimby Act), many nearby cities (e.g., Arcadia, Pasadena, Sierra Madre, Temple City, and El Monte and the County of Los Angeles) have adopted Quimby Act ordinances that require the payment of fees or the dedication of parkland to meet the demand for parks and recreational facilities generated by each residential development. Consistent with these regulations, developers of individual projects would pay park fees, dedicate open space lands for park and recreation development, and/or provide on-site recreational facilities to meet the demand for parks and recreational facilities generated by each development. Thus, residential developments in and around the City of South Pasadena would provide parks and recreational facilities to meet their demands. Based on the small increment of park demand (approximately seven acres) required for the Project and the adoption of Quimby Act requirements by several surrounding cities and the County, no significant cumulative impacts would result related to park demand from regional population growth.

The development of new parks and recreational facilities to meet the demand of future growth and development in the San Gabriel Valley would result in cumulative environmental impacts. Since the Valley is largely built out, these projects are not expected to represent a significant amount of new development and construction in the Valley. These projects would be subject to separate environmental review once specific development plans are identified. Since new parks

developed under the Project would have less than significant impacts, the Project's cumulative contribution to impacts related to parks and recreation is also considered less than significant.

The increase in San Gabriel Valley population through 2040 would result in the increased use of existing neighborhood and regional parks or other recreational facilities. However, the surrounding cities, County of Los Angeles, and National Forest Service have policies and programs to maintain and/or develop recreation facilities to meet increased demand. It is not expected that there would be regional growth, without some parallel growth of recreation facilities, such that the existing facilities would experience substantial physical deterioration. There would be no significant cumulative impacts related to deterioration of existing facilities from regional population growth, and no mitigation is required.

3.13.8 MITIGATION MEASURES

No significant adverse impacts related to public services and recreation have been identified with implementation of relevant policies and actions . Therefore, no mitigation is required.

3.13.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.13.10 REFERENCES

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3.14 TRANSPORTATION

3.14.1 METHODOLOGY

This section evaluates the potential for implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)s to result in transportation and traffic impacts in the City of South Pasadena (City). This section describes the existing transportation conditions in the City, including the roadway network, bicycle and pedestrian network, transit network, and current intersection and roadway segment operations.

On May 20, 2020, the City adopted California Environmental Quality Act (CEQA) transportation analysis thresholds (Resolution No. 7656) pursuant to Senate Bill (SB) 743. SB 743 was passed in September 2013 and incorporated into updated State CEQA Guidelines adopted by the Natural Resources Agency in December 2018. The updates included changes to the CEQA Environmental Checklist presented in Appendix G of the State CEQA Guidelines, including a finding that auto delay and roadway volume to capacity measures are no longer applicable metrics to evaluate transportation impacts under CEQA. For the purposes of a CEQA-compliant transportation analysis, the City utilizes measures of vehicle miles traveled (VMT) per capita, per employee, and per service population (i.e., residents plus employees). However, the City will continue to maintain the use of local traffic operations analysis (i.e., Level of Service [LOS] analysis) outside of the CEQA process to ensure adequacy of public roadway facilities.

3.14.2 EXISTING CONDITIONS

South Pasadena's transportation system includes roadways, public transportation, and bicycle and pedestrian infrastructure.

Existing Roadway Network

The City classifies its streets into three major categories based on the functional classification system and includes arterials, collectors, and local residential streets.

Arterial streets are generally the commercial arteries. They carry most of the traffic within the City. A major arterial would contain either four or six lanes of through traffic, plus left-turn lanes at key intersections. Minor arterials serve the same function as major arterials but have four lanes of through traffic and may or may not have separate left-turn lanes. Recommended design volumes on arterials are generally greater than 25,000 vehicles per day for major arterials and between 4,000 and 30,000 vehicles per day for minor arterials, depending on number of lanes and left-turn movements. Arterials serve two primary functions: (1) to move vehicles within the City and (2) to serve adjacent commercial land uses. Driveways and other curb cuts along arterials are generally limited to minimizing disruption to traffic flow. Major arterials in the City include Huntington Drive and Fair Oaks Avenue. Minor arterials in the City include Freemont Avenue, Garfield Avenue, Grevilia Street, Monterey Road, Orange Grove Avenue, Mission Street, and Pasadena Avenue.

Collector streets are intended to carry traffic between residential neighborhoods and the arterial street network. They are generally two and four-lane roadways that have a mixture of residential and commercial land uses along them. Traffic volumes on collector streets are generally between 7,000 and 20,000 vehicles per day. Higher density residential land uses, or side yards of single-family homes may be located adjacent to collector streets. Higher traffic volumes may be acceptable on certain collector streets such as those fronting commercial uses.

Local residential streets are designed to serve adjacent residential land uses only. They allow access to residential driveways and often provide parking for the neighborhood. They are not intended to serve through traffic. Traffic volumes on a residential street can carry up to 6,000 vehicles per day. The maximum residential traffic volume that is acceptable to persons living along a street may vary from one street to another, depending upon roadway width, type of dwelling units (i.e., high density apartments versus single-family homes), presence of schools, and other factors.

Truck Routes

Streets declared by the City as truck routes are for the movement of commercial vehicles exceeding a maximum gross weight of 6,000 pounds, laden or unladen, include the following:

- Fair Oaks Avenue between Huntington Drive and the northerly City limits;
- Huntington Drive between the westerly City limits and the easterly City limits;
- Pasadena Avenue between Mission Street and the westerly City limits;
- Mission Street between Pasadena Avenue and Fair Oaks Avenue; and
- Fremont Avenue between Alhambra Drive and the south drive of Huntington Drive.

Baseline Traffic Conditions

The VMT analysis was prepared in conformance with the City of South Pasadena's transportation analysis guidelines. VMT is defined as the total miles traveled by vehicles (within a transportation network). Daily VMT values for the City were generated using the Southern California Association of Governments' (SCAG's) regional travel demand model. SCAG's regional model analyzes modes of travel—local and express bus transit, urban rail, commuter rail, toll roads, carpools, and truck traffic—as well as non-motorized trips based on changes in land use types, household characteristics, transportation infrastructure, and travel costs such as transit fares, parking costs, tolls, and auto operating costs.

The baseline VMT was developed through utilizing the SCAG regional travel demand model's most recent existing conditions socioeconomic data and transportation network at the time of preparation of the transportation analysis (designated as Year 2018 in the SCAG regional travel demand model). Table 3.14-1 presents the City's VMT baseline scenario. Two metrics for VMT are shown: (1) home-based VMT per population (VMT per Capita) and (2) total VMT per service population (VMT per Service Population), which is population plus employment. As shown in Table 3.14-1, under baseline conditions the City's VMT per Capita is 14.5 miles per day and the VMT per Service Population is 24.4 miles per day.

TABLE 3.14-1
CITY OF SOUTH PASADENA BASELINE DAILY VMT

Scenario	Home-Based VMT	Population	VMT/ Capita	Total VMT	Service Population	VMT/Service Population
Baseline	375,456	25,932	**14.5**	869,167	35,646	**24.4**

Public Transportation System

The Los Angeles County Metropolitan Transportation Authority (Metro) provides transit services in the City of South Pasadena and is the leading transit provider in the County of Los Angeles (County), offering a wide range of rail and fixed-route bus service. The Metro L Line Station near the intersection of Mission Street and Meridian Avenue provides light rail service between East Los Angeles and the City of Azusa via downtown Los Angeles.

Metro also provides transit services through its Access service for people who have a disability. Access service will pick up and drop off disabled riders within ¾-mile or less from Metro routes. Access services are consistent with all federal Title V requirements. The City is located in the Eastern Access Service Region.

The City also provides Dial-A-Ride services for City residents who are over 55 years of age, and/or residents with disability. Registration is required and all rides are by appointment only. Transportation is provided to and from any location within the City limits. Services is also provided to some surrounding medical offices in the cities of Pasadena, San Marino, Arcadia, and Alhambra.

Bikeway Network

Bicycling is encouraged throughout the City of South Pasadena, and the City continues to make fiscal commitments to substantively expand the existing network of bikeways in the community. The existing bicycle facilities serving the community include the following:

Bicycle Path

- The Arroyo Seco Bike Path from Arroyo Seco Park to the Montecito Recreation Center in the City of Los Angeles.

Class II Bicycle Lanes

- Marengo Avenue from Alhambra Road to Mission Street;
- Mission Street from Brent Avenue to east of Garfield Avenue;
- Raymondale Drive from State Street to Amberwood Drive;
- El Centro Street from Orange Grove Park to Pasadena Avenue;
- Pasadena Avenue from Mission Street to Hawthorne Street;
- Pasadena Avenue from Arroyo Drive to Arroyo Verde Drive; and
- Marmion Way from east of Arroyo Verde Road to west of Arroyo Verde Street.

Class III Bicycle Routes

- Oxley Street from Fremont Avenue to Fair Oaks Avenue.
- El Centro Street from Meridian Avenue to Orange Grove Park.

Pedestrian Network

Metro L Line station access is a major focus of the Project. Several streets lead to the station from the north, south, east, and west (i.e., Meridian Street, Mission Avenue, El Centro Street, and Glendon Way). These have been identified as path arterials. There are also several streets that connect to and extend for a considerable distance from these streets and provide important connections. These include, but are not limited to, Grand Avenue, Orange Grove Avenue, Prospect Avenue, Fremont Avenue, Grevelia Street, and Monterey Road. Some of these streets are existing or planned bicycle routes providing important connections beyond the half-mile radius to the larger bikeshed. For example, Mission Street and El Centro Street connect to the Pasadena Avenue bike lanes at their western ends.

The walkshed around the L Line station is a well-connected network of streets with relatively small blocks, enabling direct pedestrian and bicycle paths. However, a few obstacles are noted. These include physical barriers—State Route (SR) 110, the rail line itself, the four lanes on Mission Street, lack of traffic calming on Fremont Avenue, and high-speed intersection turns at El Centro Street and Orange Grove Avenue—as well as widely spaced or missing crosswalks, substandard or missing sidewalks on El Centro Street, Monterey Road, and Mission Street, and gaps between bike lanes on Mission Street.

3.14.3 RELEVANT PROGRAMS AND REGULATIONS

State

California Transportation Commission

The California Transportation Commission (CTC) administers the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. The CTC's programming includes the State Transportation Improvement Program, a multi-year capital improvement program of transportation projects on and off the State highway system, funded with revenues from the State Highway Account and other funding sources. The California Department of Transportation (Caltrans) manages the operation of State highways.

California Department of Transportation

Caltrans is the primary State agency responsible for transportation issues. One of its duties is the construction and maintenance of the State highway system. Caltrans approves the planning, design, and construction of improvements for all State-controlled facilities, including the Arroyo Seco Parkway (SR 110) and the associated interchanges. Caltrans has standards for roadway traffic flow and has developed procedures to determine if State-controlled facilities require improvements.

For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. Caltrans also prepares comprehensive planning documents, including corridor system management plans and transportation concept reports, which are long-range planning documents that establish a planning concept for State facilities.

California Manual of Uniform Traffic Control Devices

The California Manual on Uniform Traffic Control Devices (California MUTCD) is published by the State and is issued to adopt uniform standards and specifications for all official traffic control devices in California, in accordance with Section 21400 of the California Vehicle Code. Effective March 10, 2023, Caltrans has made edits, referred to as Revision 7, to the 2014 California MUTCD.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law. A key element of this law is the elimination of or deemphasizing auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant environmental impacts in many parts of the State. According to the legislative intent of SB 743, these changes to current practice were necessary to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.

The California Legislature found that with adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), discussed further below, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006, Assembly Bill (AB) 32. Additionally, AB 1358, described further below, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay and similar measures of vehicular capacity or traffic congestion (commonly referred to as LOS analysis) as the basis for determining significant transportation impacts. As part of the updated State CEQA Guidelines, the new criteria were designed to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. The Office of Planning and Research (OPR) developed alternative metrics and thresholds based on VMT. The updated State CEQA Guidelines reflecting SB 743 were certified by the Secretary of the Natural Resources Agency in December 2018. These updates require that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. Individual agencies (cities and counties) had until July 1, 2020, to adopt new VMT-based criteria.

The City developed and adopted new CEQA transportation impact analysis methodology consistent with SB 743 on May 20, 2020 (Resolution No. 7656), to evaluate the transportation impacts of projects in the City's jurisdiction.

SB 375: Sustainable Communities and Climate Protection Act

On December 11, 2008, the California Air Resources Board (CARB) adopted its proposed Scoping Plan for AB 32, the Global Warming Act. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG emissions targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the State comply with AB 32. There are five major components to SB 375.

First, SB 375 addresses regional GHG emissions targets. CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each metropolitan planning organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional GHG emissions targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land because of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments also qualify if they: (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within one-half mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Fifth, and finally, MPOs must use transportation and air emission modeling techniques consistent with guidelines prepared by the CTC. Regional transportation planning agencies, cities, and counties are encouraged but not required to use travel demand models consistent with the CTC guidelines.

AB 1358: California Complete Streets Act of 2008

The California Complete Streets Act of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 required circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must "meet the needs of all users…in a manner suitable to the rural, suburban, or urban context of the general plan." Essentially, this bill requires a circulation element to plan for all modes of transportation where appropriate—including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled. For further clarity, AB 1358 tasked OPR to release guidelines for compliance, which were released in December 2010.

California Fire Code

The 2019 California Fire Code sets requirements pertaining to fire safety and life safety, including for building materials and methods, fire protection systems in buildings, emergency access to buildings, and handling and storage of hazardous materials (Title 24 Part 9 of the California Code of Regulations).

Regional

Regional Transportation Plan/Sustainable Communities Strategies

SCAG is the MPO for six counties: San Bernardino, Orange, Riverside, Los Angeles, Ventura, and Imperial, which encompasses an area of more than 38,000 square miles with a population exceeding 19 million persons. As the designated MPO, the federal government mandates that SCAG research and prepare plans for transportation, growth management, hazardous waste management, and air quality. SCAG has developed several plans to achieve these regional objectives, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS).

The RTP/SCS is a long-range plan that provides a vision for transportation investments throughout the southern California region. The RTP/SCS integrates land use and transportation strategies that will achieve CARB emissions reduction targets. The RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and utilize resources more efficiently. SCAG utilizes a regional travel demand model to analyze the air quality and transportation impacts of the RTP/SCS transportation and land use strategies. The SCAG travel demand model was used to inform the transportation impact analysis for the Project.

High-Quality Transit Areas

With adoption of the former 2012 RTP/SCS, the areas formerly known as 2% Strategy Opportunity Areas were replaced with what are now referred to as High-Quality Transit Areas (HQTAs). HQTAs are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours (SCAG 2020). The one-half mile radius around Metro's L Line Station at the Mission Street and Meridian Avenue intersection and along much of Fair Oaks Avenue are identified as HQTAs.

Federal Transportation Improvement Program (SCAG Region)

The Federal Transportation Improvement Program (FTIP) is the implementation tool for the RTP/SCS and includes a listing of highway improvements, transit, rail and bus facilities, high occupancy vehicle lanes, signal synchronization, intersection improvements, freeway ramps, and other transportation projects that have been proposed by cities and local agencies in the SCAG region. The 2023 FTIP lists federally funded projects and regionally significant projects developed in compliance with State and federal requirements. The 2023 FTIP has been reviewed and adopted by SCAG. It has also been given an air quality conformity determination by the Federal Highway Administration (FHWA)/Federal Transit Administration (FTA).

South Coast Air Quality Management District, Air Quality Management Plan

The South Coast Air Quality Management District (SCAQMD) is the federally mandated agency that is assigned the responsibility for promulgating and enforcing regulations to achieve compliance with national and State air quality standards. SCAQMD's central mandate is reflected in its 2022 Air Quality Management Plan (AQMP), which is the region's blueprint for achieving air quality standards in the South Coast Air Basin, which includes the City. Because of the importance of motor vehicles—the primary source of air pollution—substantial emphasis is placed on reducing motor vehicle travel and increasing transit ridership. The 2022 AQMP relies on

regulatory and incentive-based approaches to reducing pollution while eliminating reliance on future uncertain technologies.

County

Metro Long Range Transportation Plan

The Metro 2020 Long Range Transportation Plan (LRTP) is Metro's roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP guides funding plans and policies needed to move Los Angeles County forward for a more mobile, resilient, accessible, and sustainable future. The vision of this program is to enhance the public transit program by investing in bus system while expanding the rail system. The plan is also delivering highway improvements such as new carpool lanes and projects that are easing freeway bottlenecks for both auto and truck traffic. Additionally, the LRTP invests in many other programs, including transit operations, highway maintenance, local street improvements, bicycle and pedestrian connections, and transit services for the disabled. The LRTP was adopted by the Metro Board of Directors on September 24, 2020.

Los Angeles County Measures R and M

Measure R is a half-cent sales tax for the County to finance new transportation projects and programs and accelerate those already in the pipeline. This measure took effect in July 2009. The Measure R Expenditure Plan devotes its funds to seven transportation categories as follows: 35 percent to new rail and bus rapid transit projects; 3 percent to Metrolink projects; 2 percent to Metro Rail system improvement projects; 20 percent to carpool lanes, highways and other highway-related improvements; 5 percent to rail operations; 20 percent to bus operations; and 15 percent for local city sponsored improvements. All Measure R funds will be spent in accordance with the plan approved by voters. There will be an annual independent audit and report to taxpayers and ongoing monitoring and review of spending by an independent taxpayer oversight committee.

Measure M, a half-cent sales tax ballot measure, was approved in 2016. Measure M was developed to address new transit and highway projects, enhanced bus and rail operations, and several other transportation improvements in the County. Metro's Program Management Plan serves as a strategic framework for Measure M Capital Project. The Program Management Plan summarizes program scope, schedule, and budget; provides organizational information for control systems, processes, responsibilities, and authority; describes agency policies, procedures, and interrelationships; establishes mechanisms for managing technical and financial risks; and demonstrates stakeholder accountability and transparency. Measure M is expected to fund 40 major highway and transit projects in the first 40 years. The goals of Measure M include easing traffic congestion; improving freeway traffic flow; expanding rail and rapid transit systems and improving system connectivity; repaving local streets, repairing potholes, and synchronizing signals; making public transportation more accessible, convenient and affordable for seniors, students, and the disabled; earthquake retrofitting bridges and keeping the transit and highway system safe and in good working condition; embracing technology and innovation; creating jobs, reducing pollution and generating local economic benefits; and providing accountability and transparency by protecting and monitoring the public's investment.

City

South Pasadena Climate Action Plan

The City of South Pasadena adopted the City's first Climate Action Plan (CAP) on December 16, 2020, a strategy for reducing its GHG emissions in accordance with Statewide targets. The CAP set a baseline for past and current GHG emissions. The CAP also intends to facilitate the reduction of GHG emissions throughout the City through the implementation of SCAG's 2016–2040 RTP/SCS, the current RTP/SCS at the time of CAP adoption, in a way that is practical, efficient, and beneficial to the community and enhances the City's desirable characteristics and qualities.

The foundation for developing GHG emissions reduction and climate adaptation measures is based on the City's existing work as detailed in the extensive plans and programs comprising the City's sustainability goals and vulnerability analysis. In the long term, the CAP will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life.

SB 743 Transportation Impact Analysis Guidelines

The City adopted CEQA transportation analysis guidelines on May 20, 2020 (Resolution No. 7656), pursuant to SB 743, discussed above. The guidelines outline screening criteria and significance thresholds for land use plans, land development projects, and transportation projects.

For land use plans that would change population and/or employment, the SCAG model will be used to forecast the change in VMT. The model parameters will be determined by the City's Director of Public Works prior to each analysis.

The total VMT of the land use plan area will be divided by population (per capita) and service population (population plus employees). The comparison will use the same model year for both scenarios (i.e., a land use plan with a buildout of 2040 would be compared to a baseline year 2040 no project scenario). The baseline model scenario VMT per population and service population will also be reported in the analysis but will not be used to determine potential significant environmental impacts. A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per population or service population of the baseline. A cumulative significant impact would be the same as the project-level impact since the analysis includes all regional land use and transportation cumulative conditions.

South Pasadena Bicycle Master Plan Update

On August 17, 2011, the City Council approved an update to the City's Bicycle Master Plan. Utilizing the existing bicycle plan, the updated plan recommends programs and infrastructure improvements that upon implementation will lead to the development of a safe, inviting, and viable mobility choice for bicycle riders of all levels while reinforcing the small-town atmosphere commonly associated with the City.

South Pasadena Complete Streets Policy

On January 18, 2017, the City Council approved the City's Complete Streets Policy (Resolution No. 7497) to consider the needs of all users when evaluating available treatments for a project and can lead to the development of superior project designs that facilitate a multi-modal network for walking, biking, and driving.

Public Works Department

The City has historically focused on stopping the northern extension of the SR-710. The City's Public Works Department also works on regional and local policy issues related to improving mobility choices while reinforcing a small-town quality of life in South Pasadena that is connected to the larger Los Angeles region. This department also prepares local policy and planning documents. On a regional level, staff participates in the development of regional transportation plans such as Metro's LRTP and SCAG's RTP/SCS. Staff also represents the City at various stakeholder groups such as regional boards, working groups, technical advisory groups, and councils of governments.

In addition, the Public Works Department oversee transportation issues not related to policy, such as street paving, stop lights, signs, and traffic-calming. Other departments also oversee transportation issues not related to policy, such as the Dial-A-Ride program (Community Services Department); and parking (Police Department). Metro oversees all issues related to mass transit; the City is served by both the Metro L Line and Metro Bus systems.

It is noted that the Public Works Department has proposed several transportation improvement concepts to be included in, and thereby receive funding for, Metro's SR-710 Early Action Projects. This is happening concurrent with the General Plan and DTSP Update process, and in coordination with the adjacent municipalities (e.g., Alhambra, Pasadena). It is not known if funding will be received for some or all of the proposed concepts, and as such implementation of these concepts is not considered reasonably foreseeable for purposes of CEQA.

3.14.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse transportation/traffic impact if it would:

Threshold 3.14a: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

Threshold 3.14b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);

Threshold 3.14c: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or

Threshold 3.14d: Result in inadequate emergency access.

3.14.5 PROPOSED HOUSING PLAN GOALS AND POLICIES

There are no Housing Element goals or policies related to transportation.

3.14.6 ENVIRONMENTAL IMPACTS

Threshold 3.14a: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project is consistent with the planning goals of the 2020–2045 RTP/SCS and Metro's LRTP. Additionally, under the Complete Streets Act, general plans are required to include planning for complete streets—that is, streets that meet the needs of all users of the roadway, including pedestrians, bicyclists, users of public transit, motorists, children, the elderly, and the disabled. The Project is consistent with the Complete Streets Act by supporting the City's Complete Streets Policy. The City considers roadways, complete streets, transit, and bicyclist and pedestrian travel as key components of the overall land use plan and planning program for the City into the future.

Transit

Policies and actions related to supporting transit facilities in the City include prioritizing multimodal systems, supporting first/last mile connectivity to transit, implementing additional complete streets improvements when it fits the context of the community, and supporting the improvement of transit opportunity corridors.

Bicyclist Travel

Future bicycle facilities are a mixture of bicycle routes, bicycle lanes, and bicycle paths. Bicycle travel in the City is supported by prioritizing multimodal systems, maintaining a network of complete streets to provide mobility opportunities for all users, implementing additional complete streets improvements when it fits the context of the community, developing and maintaining local and regional bicycle networks, and promoting bicycle safety when infrastructure improvements are made. Pedestrian Travel

The Project promotes the development of mixed-use, pedestrian-friendly areas clustered around activity centers; encourages community interaction through the development and enhancement of plazas, open space, public places, and pedestrian connections with the public realm; and enhances streets to facilitate safe walking through community participatory design.

Conclusion

In summary, implementation of the Project would support improved public transit, bicycle, and pedestrian facilities as well as roadway circulation. There are no potential inconsistencies or conflicts with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or the performance or safety of those facilities. There would be no impact, and no mitigation is required.

Threshold 3.14b: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per capita or service population of the baseline. A cumulative significant impact would be the same as the Project-level impact since the analysis includes all regional land use and transportation cumulative conditions. Whereas the Project would result in additional employment and population growth, it does not identify the precise locations of the growth. The City provided locations for office and retail, and employment-generating development would be

focused primarily within the Ostrich Farm District and as part of infill development in Downtown and along other arterial roadways. The Ostrich Farm District is already home to creative offices and is therefore a natural area for expansion. New infill office development on Mission Street, Fair Oaks Avenue, and Huntington Drive can leverage the City's transit connectivity and provide a daytime shopping population to support surrounding retail businesses and restaurants. Detailed housing distribution is based on the availability of sites for housing in the City's 2021–2029 Housing Element to meet the requirements of the RHNA and HCD.

Also, accessory dwelling units (ADUs) are allowed in all City zones that allow for single-family and multifamily residential units.

The real-life distribution of land uses that would generate VMT will vary. Individual projects would be built incrementally over time and, where necessary, circulation improvements would be implemented by Public Works.

The Project promotes a land use pattern with increasing density, a mix of housing types and land uses and places the highest density proximate to local and regional multi-modal transportation systems. This would reduce the VMT per capita and VMT per service population compared to the existing condition. Therefore, the Project would not conflict or be inconsistent with Section 15064.3(b) of the State CEQA Guidelines. There would be less than significant transportation impact, and, and no mitigation is required.

Threshold 3.14c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project supports circulation network improvements that would be subject to review and future consideration by the City's Public Works engineering staff. Transportation improvements to the existing roadway network would be implemented with the goal of safer and more efficient traffic movement, for all modes of travel. An evaluation of the roadway alignments, intersection geometrics, and traffic control features would be needed. Roadway improvements would be made in accordance with the City's design standards and meet design guidelines of the California MUTCD.

Roadway and other transportation improvements that may be implemented in the future would involve only existing streets, ramps, driveways, and sidewalks. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure. No new major streets or other substantial alterations to the existing roadway network could be accommodated as the City is essentially built out. The proposed growth that could be implemented under the Project involves the same land uses already developed within the City, and as part of the City's transportation pattern. Therefore, these land uses would not be considered incompatible. The Project would result in no impacts related to substantially increasing a hazard due to a design feature or incompatible uses, and no mitigation is required.

Threshold 3.14d: Would the Project result in inadequate emergency access?

Evacuation routes include major roadways in the City, with SR-110 and Interstate 210 freeways serving as primary regional exit routes. No major change to the existing roadway system serving the City is proposed. Any transportation improvements contemplated by the City would be implemented with the goal of safer and more efficient traffic movement. This would include traffic

during an emergency or evacuation. There would be no impact related to operation of future transportation improvements, and no mitigation is required.

Access to individual development sites would be made available through existing or planned on-site roadways/driveways, as required under Section 36.310.090 “Driveways and Site Access” of the South Pasadena Municipal Code (SPMC). Section 36.310.090 of the SPMC defines requirements for all access from public streets to private properties that ensure adequate and safe access by vehicular and other traffic. The plan check and building permit process by the South Pasadena Fire Department includes review of access for emergency vehicles in accordance with the *California Fire Code*, as adopted by reference by the City (Chapter 14 of the SPMC). Compliance with the requirements for emergency lane width, vertical clearance, and distance would provide adequate emergency access to all development implemented pursuant to the Projects. There would be no impact related to operation of future land uses, and no mitigation is required.

Construction activities on public rights-of-way may temporarily block traffic and access near the construction zones. As discussed above, compliance with Section 36.310.090 of the SPMC in the design and construction of future projects would always maintain emergency access to individual parcels. Impacts on traffic flows for emergency response or evacuation would be less than significant during construction activities, and no mitigation is required.

3.14.7 CUMULATIVE IMPACTS

Future development pursuant to the Project, and future growth and development throughout the San Gabriel Valley, and in the rest of the region would increase the number of vehicle trips to, from, and through the City. Traffic congestion is expected to increase on freeways and major roadways if no changes to the existing transportation network are made. Some vehicle trips would be confined to the City (short trips), while other trips would travel outside the City to surrounding cities and urban centers and would affect the regional transportation system. Based on regional traffic forecasts, SCAG has identified regional transportation improvements to meet the transportation and circulation needs of the region in its RTP/SCS and FTIP. Additional freeway travel lanes, expanded transit services, rapid bus transit expansion, high-speed rail service, dedicated truck lanes, and other projects are planned and accounted for in the travel forecasts.

As discussed above, the Project would be consistent with regional plans and policies for the circulation system, reflecting all modes of travel. Therefore, there would be a less than significant cumulative impact related to conflict with circulation system plans, ordinances, or policies.

Traffic issues are generally regional in nature, with drivers and travelers commuting throughout the Southern California region to places of employment and residence. Based on the analysis presented above, there would be less than significant cumulative impacts related to transportation consistent with the methodology presented in Section 15064.3(b) of the State CEQA Guidelines.

As discussed above, the Project would result in no impacts related to traffic hazards, incompatible uses, or emergency access. Therefore, the Project would not contribute to cumulatively considerable impact related to these issues. As discussed, the Project would result in less than significant impacts related to emergency access during construction activities associated with future projects; this impact would be temporary and intermittent. This would not be considered a cumulatively considerable impact to emergency access.

3.14.8 MITIGATION MEASURES

No significant adverse impacts related to transportation have been identified with implementation of the Project. Therefore, no mitigation is required.

3.14.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.15 UTILITIES AND SERVICE SYSTEMS

3.15.1 METHODOLOGY

This section addresses utilities and service systems that would be used with implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)and analyzes potential impacts on the availability and capacity of the local providers for the following utilities and service systems (the service provider is noted parenthetically):

- Water supply and distribution (City of South Pasadena);
- Wastewater facilities (City of South Pasadena [sewage conveyance] and County Sanitation Districts of Los Angeles County [sewage treatment]);
- Solid waste disposal (Athens Services [waste collection] and County Sanitation Districts of Los Angeles County [landfill disposal]); and
- Dry utilities (Southern California Edison and Clean Power Alliance [electric], Southern California Gas Company [natural gas], and various telecommunications companies).

Storm drainage facilities are addressed in Section 3.8, Hydrology and Water Quality. Information presented in this section was derived from the City's and the respective utilities' websites, the existing General Plan, interim drafts of the 2020 Urban Water Management Plan (UWMP) and Integrated Water and Wastewater Resources Management Plan (IWWRMP) being prepared by the City, information from the City Public Works Department staff, and the Recirculated Notice of Preparation comment letter from the County Sanitation Districts of Los Angeles County regarding wastewater.

3.15.2 EXISTING CONDITIONS

Water

Water Supply Sources

The City of South Pasadena supplies water to approximately 24,650 residents[1] through approximately 6,200 active connections. The City's water supply sources include groundwater from the Main San Gabriel Groundwater Basin (Basin), treated imported water from the Metropolitan Water District (MWD) Upper San Gabriel Area 2 (USG-2), and purchased water from the City of Pasadena (South Pasadena 2021). Each of these water sources is discussed further below.

Main San Gabriel Basin

The total fresh water storage capacity of the Basin is estimated to be approximately 8.7 million acre feet (af). Of that storage, about one million af is historically considered to have been actively managed for local public water supply. The Court adjudication of the Basin in 1973 provided for groundwater management that allows operation of basin storage to meet water demands and provide a mechanism to fund the purchase and replenishment of untreated imported water to supplement recharge of local water. The management of Basin storage and the use of

[1] Estimated number of current residents receiving potable water from the City is different from the estimated 2021 City population used throughout the rest of this EA because they are derived using different methodologies and used for different purposes.

supplemental imported water for recharge expand and increase the reliability of the available Basin groundwater supply (South Pasadena 2021).

Although there is no limit on the quantity of groundwater that may be extracted by Parties to the Basin adjudication, including the City, groundwater production in addition to a pumper's proportional share of the Operating Safe Yield, requires the pumper to bear the cost of imported Replacement Water to recharge the Basin. The City's share is currently 1.80520 percent of the Operating Safe Yield. Untreated imported water for replacement/recharge purposes is purchased from one of three municipal water districts overlying or partially overlying the Basin that provide imported water for groundwater replacement/recharge or for direct use. The three municipal water districts are Upper District, San Gabriel Valley Municipal Water District (SGVMWD) and TVMWD. The City is located within Upper District's service area. The management of the Basin and the large volume of groundwater in storage allow groundwater producers, including the City, to produce groundwater even when replacement water is not available. Any requirement to purchase untreated imported water for replacement/recharge purposes can be met when such water is available in the future. Also, there is the cyclic storage provision allowing producers, like the City, to store supplemental water within the Main San Gabriel Basin for the purpose of supplying a future replacement water requirement. For example, the City and other producers have added/deducted from cyclic storage accounts and as a result, have a total balance of approximately 60,044 af in cyclic storage accounts as of April 2021 illustrating the effectiveness of this water resource program in meeting the replacement water requirements of water producers.

The Operating Safe Yield in the Basin has averaged about 150,000 acre-feet per year (afy) over the past five years (fiscal years 2015-2016 through 2019-2020) plus the surface water rights are fixed at about 10,500 af for a total of about 160,500 af of water rights. Over the past five years, the average water production from the Main San Gabriel Groundwater Basin has been approximately 194,462 afy, and the average replacement water requirements and cyclic storage deductions (total Basin over production) has been approximately 33,512 afy. These, however, are averages. As noted above, producers in the Basin currently have a positive balance in cyclic storage accounts.

The City has four wells located within the Main Basin: Graves Well No. 2, Wilson Well No. 2, Wilson Well No. 3 and Wilson Well No. 4 with approximate pumping capacities of 705 gallons per minute (gpm), 750 gpm, 1,960 gpm and 1,100 gpm, respectively. The City installed a volatile organic compound (VOC) treatment system (Granular Activated Carbon and Ion Exchange) at Graves Well No. 2 in 2020. Wilson Well No. 2 is inactive as of June 2018, but City staff indicated there are plans to rehabilitate its Wilson Well No. 2 by 2025. The City installed a VOC treatment system (Granular Activated Carbon treatment) at Wilson Wells No. 3 and No. 4 in December 2018. The current collective well capacity from Graves Well No. 2, Wilson Wells No. 3 and No. 4 is about 4,960 gpm or about 7.1 million gallons per day (mgd). By 2045, the collective capacity from Graves Well No. 2, Wilson Wells No. 2, No. 3 and No. 4 is anticipated to be about 4,500 gpm or about 6.5 mgd. Assuming the City wells were limited to 75 percent of capacity during calendar years 2020 through 2045, the available pumping capacity would be about 5.3 mgd (about 5,900 af) in 2021 and about 4.9 mgd (5,500 af) in 2045. Over the past 20 years, the City's groundwater production has ranged from approximately 1,950 afy to approximately 5,264 afy, with an average production of approximately 4,026 afy (Watermaster 2020).

Imported Water

The City can receive direct deliveries of treated imported water through its MWD connection through Upper District (USG-2), which has a capacity of 4,500 gpm or 6.5 mgd. Historically, treated import water accounted for less than five percent of the City's total water demands. In addition, the City purchases water from the City of Pasadena through any of three interconnections to serve a small portion of the City's service area. The three interconnections have a total capacity of approximately 2,000 gpm. The City regularly uses one of the three interconnections located at the northeasterly corner of the City's distribution system and receives an average of 17 afy from the City of Pasadena as a source of the City's supply, which is less than one percent of the City's total water demands (South Pasadena 2021).

Water Storage and Distribution

The groundwater well sites identified have associated booster stations and storage reservoirs to provide contact time for disinfection. These include the Wilson Reservoir, with a capacity of 1.3 MG, and the Graves Reservoir, with a storage capacity of 1.0 MG. The City has four different pressure zones: Pasadena, Raymond, Bilicke, and Central. The City has the following additional storage reservoirs: Garfield Reservoir (6.5 MG), Grand Reservoir (2.4 MG), and Westside Reservoir (2.0 MG) located in the Central zone; and Bilicke (0.15 MG) and Raymond (0.15 MG) elevated tanks located in the Bilicke and Raymond zones, respectively. The City of Pasadena connection that supplies water to the Pasadena zone on a continuous basis. There are four distribution booster stations located within City limits that provide water to the different pressure zones. Therefore, the total water storage capacity of the City is 13.5 MG. The City distributes potable water via 6,200 water meters that are connected by 67.7 miles of water pipes located throughout the City (South Pasadena 2017a).

Wastewater

Wastewater Conveyance

The City operates and maintains a sanitary sewer collection system, which consists of approximately 53 miles of gravity sewer lines which ultimately flow into larger trunk lines owned and operated by the County Sanitation Districts of Los Angeles County (LACSD). This 24-inch diameter trunk sewer line has a peak capacity of 8.4 million gallons per day (mgd) and conveyed a peak flow of 3.2 mgd (37 percent of capacity) when last measured in 1993.

The City's sewer system operates under Los Angeles Regional Water Quality Control Board (LARWQCB) Permit Number 4SS010436 and the City is responsible to ensure compliance with Order 2006-003-DWQ. This LARWQCB order requires the City to take a proactive approach to ensure a Citywide operation, maintenance, and management plan is in place to reduce the number and frequency of Sanitary Sewer Overflows (SSO) within the City. In January 2012, the City entered into a consent judgment with the State Regional Water Quality Control Board (SWQCB) as a result of a number of SSO experienced in the City's sanitary sewer system. The consent judgment requires the City to repair certain deficiencies identified through the City's sewer video inspection program within a specified period of time. Phase 1 of the sewer repairs started in 2014 and was completed in year 2015. Phase 1 addressed 233 pipe segments totaling approximately 64,000 lineal feet of sewer lines. In March 2017, the City Council awarded a construction for Phase 2 of the sewer repair project. The project consisted of a comprehensive multi-year capital improvement sewer program to satisfy the terms of the consent judgment on a

broader scale. The project addressed all of the remaining deficiencies of the consent judgment and consisted of approximately 107,100 linear feet of sewer mains and modification of 143 existing flush tanks. This project was completed in December 2017, improving approximately 60 percent of the City's sanitary sewer lines through sewer lining or full pipe replacement.

Wastewater Treatment

Wastewater from the City is treated at either the LACSD's Whittier Narrows Water Reclamation Plant (WRP) located near the City of El Monte or at the Los Coyotes WRP located in the City of Cerritos depending on LACSD's operations and/or diversion settings. The Whittier Narrows WRP, located near the City of El Monte, has a design capacity of 15 million gallons per day (mgd) and currently processes an average flow of 9.9 mgd (approximately 66 percent of capacity). The Los Coyotes WRP, located in the City of Cerritos, has a design capacity of 37.5 mgd and currently processes an average flow of 21.3 mgd (approximately 57 percent of capacity)(South Pasadena 2017a, LACSD 2021).

Solid Waste

The City of South Pasadena contracts with Athens Services (Athens) as its residential and commercial solid waste and recycling hauler. Athens has two large volume transfer/processing facilities–also called materials recycling facilities (MRF)–one in City of Industry with a permitted throughput of 5,000 tons per day (tpd) and one in the community of Sun Valley with a permitted throughput of 1,500 tpd (CalRecycle 2021a, 2021b).

According to CalRecycle records for 2021 (the most recent year data is available), the City of South Pasadena has a per resident disposal rate target of 4.4 pounds per day (PPD) and the per employee disposal rate target of 15.8 PPD. The City achieved disposal rates of 3.6 PPD per capita and 14.2 PPD per employee (CalRecycle 2023a). Regarding waste disposal, in 2019 (the most recent year data is available) the City of South Pasadena disposed of approximately 21,482 tons of waste, which included 99 tons transformed to energy and 3,263 tons used as alternative daily cover (CalRecycle 2023c).

3.15.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Clean Water Act

The Clean Water Act is discussed in Section 4.8, Hydrology and Water Quality, of this EIR.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), *Health and Safety Code,* Sections 116350–116405) was passed in 1974 and is intended to protect public health by regulating the nation's public drinking water supply. The Federal SDWA authorizes the U.S. Environmental Protection Agency (USEPA) to set national standards for drinking water to protect against contaminants. Amendments in 1996 expanded the focus of the SDWA from primarily water treatment to enhanced source water protection, operator training, funding for water system improvements, and public information as important components of protecting drinking water supplies. The SWDA applies to every public water system in the United States and sets the enforceable maximum contaminant levels (MCLs) for drinking water supplies.

State

Safe Drinking Water Act

California enacted its own Safe Drinking Water Act, with the California Department of Health Services (DHS) granted primary enforcement responsibility. Title 22 of the *California Code of Regulations* (CCR) (Division 4, Chapter 15, "Domestic Water Quality and Monitoring Regulations") established DHS authority and provides drinking water quality and monitoring requirements, which are equal to or more stringent than federal standards.

Senate Bill 610 and Senate Bill 221

Senate Bill (SB) 610 amended State law[2] to improve the link between information on water supply availability and certain land use decisions made by cities and counties. Specifically, it requires land use planning entities (in this case, the City of South Pasadena), when evaluating certain large development projects, to request a water supply availability assessment from the water supply entity that would provide water to the project. A water supply assessment (WSA) must be prepared in conjunction with the land use approval process associated with a project, and it must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project in question) over a 20-year horizon that includes normal, single-dry, and multiple dry-years. An SB 610 WSA is required for any "project" that is subject to CEQA and that proposes, among other things, residential development of more than 500 dwelling units.

In addition, SB 221 requires land use planning agencies, such as the City, to include (as a condition in any tentative map that includes a subdivision involving more than 500 dwelling units) a requirement to obtain written verification that sufficient water supplies are available for the subdivision from the applicable public water system, or, where there is no existing water supplier, from a consultant directed by the City. SB 221 also addresses the issue of land use and water supply, but at a different point in the planning process than does SB 610. SB 221 requires a city or county to deny approval of a tentative or parcel map if the city or county finds that the project does not have a sufficient, reliable water supply as defined in the bill.

A General Plan Update is not subject to either SB 610 or SB 221 because a General Plan, in itself, does not grant entitlements. However, these requirements may be applicable to future projects in the City.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (*California Water Code*, Division 6, Part 2.6, Section 10610 et seq.) was enacted in 1983. The UWMP Act applies to municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 afy of water. The UWMP Act requires these suppliers to update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

[2] SB 610 amended section 21151.9 of the *California Public Resources Code*, and amended sections 10631, 10656, 10910, 10911, 10912, and 10915 of, repealed section 10913 of, and added and amended section 10657 of, the *California Water Code*.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (Assembly Bill 1881) requires cities and counties, including charter cities and charter counties, to adopt landscape water conservation ordinances by January 1, 2010. The Department of Water Resources (DWR) prepared an updated Model Water Efficient Landscape Ordinance (MWELO), as contained in *California Code of Regulations* Title 23, Division 2, Chapter 2.7. Cities and counties have the option to adopt DWR's ordinance or to develop their own. DWR's ordinance identifies the landscape documentation that needs to be submitted to the local agency, including a completed Water Efficient Landscape Worksheet that estimates total water use and compares it to the Maximum Applied Water Allowance (MAWA) based on the annual reference evapotranspiration value for the project area. The MAWA is considered the water budget and should not be exceeded by the estimated water use. Standards for soil management, landscape design, irrigation design and efficiency, grading design, irrigation scheduling, maintenance, audit and survey of water use, recycled water, storm water management, public education, and wastewater prevention are provided to reduce irrigation water demand.

Senate Bill 7

Senate Bill 7 (SBX7_7) was approved in November 2009 and requires urban water retail suppliers in California, which includes the City of South Pasadena, to reduce per capita water use by at least 10 percent on or before December 31, 2015 and achieve a 20 percent reduction by December 31, 2020. An urban retail water supplier must have included in its urban water management plan for the 2010 update, the baseline daily per capita water use, urban water use target, interim urban water use target, and compliance daily per capita water use, along with the bases for determining those estimates, including references to supporting data. Urban wholesale water suppliers shall include an assessment of their present and proposed future measures, programs, and policies to help achieve the water use reductions required by this bill.

Urban retail water suppliers and agricultural water suppliers would not be eligible for State water grants or loans for surface water or groundwater storage, recycling, desalination, water conservation, water supply reliability, and water supply augmentation unless they comply with the water conservation requirements established by this bill.

Title 24 Green Building Standards

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in greenhouse gas (GHG) emissions from buildings; (2) promote environmentally responsible, cost effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

AB 939 and California Solid Waste Reuse and Recycling Access Act of 1991

In 1989, the California legislature passed a bill (Assembly Bill [AB] 939), which requires jurisdictions to reduce the amount of solid waste disposed of in landfills by 50 percent by the year 2000 and thereafter. The purpose of AB 939 is to "reduce, recycle, and reuse solid wastes generated in the State to the maximum extent feasible" (State of California 2013).

Subsequent to AB 939, additional legislation was passed to assist local jurisdictions in accomplishing the required waste reduction goals. The California Solid Waste Reuse and Recycling Access Act of 1991 directs CalRecycle to draft a "model ordinance" relating to adequate areas for collecting and loading recyclable materials in development projects.

Solid Waste Disposal Measurement Act of 2008 (Senate Bill 1016)

The purpose of the Solid Waste Disposal Measurement Act of 2008 (Senate Bill [SB] 1016) is to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal as reported by disposal facilities.

Each year CalRecycle will calculate each jurisdiction's per capita (per resident or per employee) disposal rates; the per capita disposal rate will be used for most jurisdictions. Each year's disposal rate will be compared that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress, or other changes, over time.

75 Percent Initiative

In 2011, Governor Brown signed AB 341, which sets a goal of 75 percent recycling, composting, or source reduction of solid wastes by 2020. It also mandates commercial recycling by 2012. The 75 percent goal will shift the focus from local diversion to a Statewide approach that would decrease reliance on landfills. CalRecycle has been holding workshops with stakeholders since May 2012 to identify existing programs and new ways to reduce the waste streams. A number of programs will be implemented under this initiative, including continued local jurisdiction diversion; commercial recycling; mattress recovery; greenhouse gas reduction grant and loan program; commercial organics recycling; potential packaging reduction activities; and other new programs that are under development.

Mandatory Commercial Organics Recycling Bill (AB 1826)

In 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the State to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper

waste that is mixed in with food waste. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

California Plumbing Code

Part 5 of the California Building Code (Title 24 of the Code of Regulations) is the California Plumbing Code, which provides standards for the design and construction of water and sewer systems, storm drains, and recycled water systems in buildings. It prohibits connection to a septic tank in areas served by a public sewer system and requires the proper abandonment of septic tanks, cesspools, and seepage pits.

Assembly Bill 602

AB 602 imposes additional standards and procedures for agencies adopting impact fees. It requires agencies to identify an existing level of services for public facilities and information supporting the agency's actions in increasing fees and requires agencies to impose fees on a housing development proportionately to the square footage of the development or make findings for a different methodology. Agencies must adopt studies at a public hearing with at least 30 days' notice, notify any member of the public who requests notice of an impact fee nexus study, and consider any evidence submitted by any member of the public that the agency's determinations or findings are insufficient. Large jurisdictions are required to adopt a capital improvement plan as part of the nexus study. Agencies must update nexus fee studies at least every eight years from the period beginning on January 1, 2022. Agencies must also post the current impact fee schedule and update at least twice a year. Finally, the law directs the California Department of Housing and Community Development (HCD) to create an impact fee nexus study template. The modification or establishment of development impact fees in the City, that would apply to new development or redevelopment pursuant to the Project, would be developed in compliance with AB 602.

Regional

Sanitation Districts of Los Angeles County Wastewater Ordinance

In 1972, the Sanitation Districts of Los Angeles County (LACSD) adopted a Wastewater Ordinance, which was most recently amended in 1998, for the operation and financing of the LACSD's wastewater conveyance, treatment, and disposal facilities. The Wastewater Ordinance applies to all direct and indirect discharges of wastewater to any part of the sewerage system and regulates industrial wastewater discharges to protect the public sewerage system. The LACSD also charges Connection Fees and Surcharges. The Surcharge program requires all industrial companies discharging to the LACSD's sewerage system to pay their fair share of the wastewater treatment and disposal costs. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments.

City

Urban Water Management Plan

The 2020 Urban Water Management Plan (UWMP) for the City of South Pasadena was prepared to meet the mandates of the California Urban Water Management Planning Act (South Pasadena 2021). The UWMP identifies historic and projected water supplies available to the City of South Pasadena; existing and projected water demand; available water rights; and programs to meet demand during an average year, single-dry year, and a five consecutive year drought. The UWMP is the foundational document for compliance with both the *California Water Code* and SB 610 and SB 221 documentation for applicable development projects in the City.

Municipal Code

Water Efficient Landscape

Sections 35.50 through 35.76 of the South Pasadena Municipal Code (SPMC) describes the City's landscape water conservation ordinance consistent with the requirements of DWR's Water Conservation in Landscaping Act of 2006, discussed above. The City's ordinance pertains to the planning, designing, installing, maintaining, and managing water efficient landscapes in new construction and rehabilitated projects. These requirements apply to new construction projects with an aggregate landscape area equal to or greater than 500 square feet requiring a building or landscape permit, plan check or design review; rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit, plan check, or design review; existing landscapes limited to those defined in Section 35.70 through 35.72 of the SPMC; and cemeteries (Section 35.51[a][4] of the SPMC).

Water and Sewer Impact Fee

Section 16B et. seq. of the SPMC defines water and sewer impact fees. The purpose of this impact fee is to mitigate unfavorable impacts on the City's water and sanitary sewer systems attributed to new development. This fee is to be applied toward the costs of new or expanded public water and sewer facilities. It is based on a formula designed to ensure that individual developers pay their fair share for public facilities needed to serve the increased population which results from new development. All new development is required to pay this fee except for the following development: alterations that do not increase floor area; single-family residential additions that do not add habitable space; single-family residential units that are upsizing their meter, but not changing their use; and development exempt due to applicable State or federal laws. Water and sewer impact fees collected are directed into the Water and Sewer Impact Fee Fund; these funds are used only for water and sewer facilities improvements.

3.15.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse utilities and service systems impact if it would:

Threshold 3.15a: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

Threshold 3.15b: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;

Threshold 3.15c: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

Threshold 3.15d: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or

Threshold 3.15e: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

3.15.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to utilities and service systems.

3.15.6 ENVIRONMENTAL IMPACTS

Threshold 3.15a: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Threshold 3.15c: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Water Treatment Facilities

A comprehensive analysis of the overall system previously conducted identified a series of system-wide modifications required to improve the operation of the distribution system. As discussed above, in recent years the City has invested heavily in and embarked on an aggressive capital improvement and aging infrastructure replacement program. Improvements include the Grand, Wilson, and Garfield reservoirs reconstructions, water line replacements, and creation of a hydraulic modeling system of the entire water system to identify and address deficiencies on an ongoing basis. Replacement of the Graves Reservoir and pump station improvements has been completed, and replacement of the Westside Reservoir and pump station improvements is an upcoming capital improvement project.

However, even with the modifications implemented to date, water pressure within the downtown area averages about 45 pounds per square inch (psi) during peak use hours, with lower pressures occurring in the eastern portion. Water pressure of 50 to 70 psi is desirable. These pressures are low but unavoidable given the current water distribution system equipment and configuration. The City anticipates that future development may encounter problems associated with low water pressures that can only be remedied on a system-wide basis. Some of the possible pressure and flow rate remedies identified include modifications to the lines entering and leaving the Grand and Garfield reservoirs; enlarging, replacing, or adding water lines, adding pumping stations, and

increase usage of MWD water. Also, after implementation of some of the recommended system-wide improvements, all new development may require on-site pumps for two- or three-story buildings. The City's IWWRMP, which is under development, will identify other water distribution system issues including low pressure areas and provide recommendations for resolution.

Water infrastructure improvements would be directly related to the pace of development. Also, consistent with Section 16B of the SPMC, this chapter includes an action to require Applicants/Developers of future development projects to pay fair share Water and Sewer Impact Fees for improvements to the water distribution and sanitary sewer systems. The purpose of this fee is to mitigate unfavorable impacts on the City's water and sewer systems attributed to new development, and the fees collected are applied toward the costs of new or expanded public water and sewer facilities.

As part of the City's plan review process, the Public Works Department conducts a review of wet utility (i.e., water and wastewater) infrastructure needs. The South Pasadena Fire Department also reviews development plans to determine fire safety requirements are met, including provision of fire flows and pressures. The Applicant/Developer of future development projects would be responsible for installing all new or replacement water-related infrastructure on the property and within the proposed structure(s) deemed required by the City and remitting the water impact fee calculated by the City for that project. The City would be responsible for continuing to manage the Water and Sewer Impact Fee Fund and implement the necessary improvements to the water distribution system.

In summary, new or expanded water infrastructure may be necessary to serve future development projects. The need for, and environmental impacts of, additional water distribution infrastructure would be addressed in the required project-level California Environmental Quality Act (CEQA) review. If significant impacts associated with installation of the necessary infrastructure are identified, mitigation measures would be required. Through compliance with the City's plan review processes; application of the Water and Sewer Impact Fee (Section 16B of the SPMC); implementation of applicable General Plan Update policies and actions; and identification of and, if necessary, mitigation for, environmental impacts associated with new or expanded water distribution infrastructure, there would be a less than significant impact and no mitigation is required.

Wastewater Treatment Facilities

All sewage treatment/wastewater reclamation plants are subject to the water quality discharge requirements of the applicable National Pollution Discharge Elimination System (NPDES) permit. The City is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) and is subject to the waste discharge requirements of the Los Angeles County MS4 Permit (Order No. R4-2012-0175). Future development pursuant to the General Plan Update would increase wastewater flows on City sewer lines, on LACSD trunk sewer lines, and at the WRPs. Any sewer discharges that would cause a receiving WRP to exceed applicable NPDES requirements for discharges into MS4 facilities would result in a potentially significant impact.

Residential wastewater does not require levels of treatment that would exceed LARWQCB NPDES treatment requirements; however, some industrial, manufacturing, and/or commercial uses may generate wastewater requiring additional treatment. In compliance with the LACSD's Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharges standards set forth to protect the public sewerage system. The LACSD Surcharge program requires all industrial companies discharging to the LACSD sewerage system to pay their fair share of the wastewater treatment and disposal costs, and the Connection

Fee program requires all new users of the LACSD sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. Therefore, compliance with LACSD's Wastewater Ordinance by all Applicants/Developments of future development projects would ensure potential impacts related to wastewater treatment requirements would be less than significant.

Based on the wastewater loadings published by the LACSD and provided with their RNOP comment letter, it can conservatively be estimated that buildout of the Project could generate approximately 662,329 gpd, or 0.66 mgd. This volume of additional wastewater generation could be fully accommodated by either the Whittier Narrows or Los Coyotes WRPs. Specifically, this wastewater generation would represent approximately 13.0 percent of the Whittier Narrows WRP's remaining capacity of 5.1 mgd, and approximately .14 percent of the Los Coyotes WRP's remaining capacity of 16.2 mgd (based on LACSD's RNOP comment letter). Therefore, implementation of the proposed Project would not result in the need for new or expanded wastewater treatment facilities or a determination by the LACSD that there would be inadequate capacity in addition to existing commitments. Also, consistent with the Connection Fee program of LACSD's Wastewater Ordinance, all new users of the LACSD sewerage system must pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.

Regarding the City's sewer system, similar to the analysis of the water distribution system above, the City has recently completed a large sewer system improvement program. Any additional improvements to the sewer system would be directly related to the pace of development.

The Our Planned Community chapter requires the City to create a long-term plan to update infrastructure to not only accommodate growing population/businesses, but also the effects of climate change. This General Plan Update chapter also requires the City to adopt zero net water building codes, which would also reduce wastewater generation. Finally, consistent with Section 16B of the SPMC, this chapter includes an action to require Applicants/Developers of future development projects to pay fair share Water and Sewer Impact Fees for improvements to the water distribution and sanitary sewer systems. The purpose of this fee is to mitigate unfavorable impacts on the City's water and sewer systems attributed to new development, and the fees collected are applied toward the costs of new or expanded public water and sewer facilities.

As part of the City's plan review process, the Public Works Department conducts a review of wet utility (i.e., water and wastewater) infrastructure needs. The Applicant/Developer of future development projects would be responsible for installing all new or replacement sewer-related infrastructure on the property and within the proposed structure(s) deemed required by the City and remitting the sewer impact fee calculated by the City for that project. The City would be responsible for continuing to manage the Water and Sewer Impact Fee Fund and implement the necessary improvements to the sanitary sewer system.

In summary, new or expanded wastewater infrastructure may be necessary to serve future development projects. The need for, and environmental impacts of, additional wastewater infrastructure would be addressed in the required project-level CEQA review. If significant impacts associated with installation of the necessary infrastructure are identified, mitigation measures would be required. Through compliance with the City's plan review processes; application of the Water and Sewer Impact Fee (Section 16B of the SPMC); implementation of applicable General Plan Update policies and actions; and identification of and, if necessary, mitigation for, environmental impacts associated with new or expanded wastewater infrastructure, there would be a less than significant impact and no mitigation is required.

Stormwater Drainage Facilities

Changes in drainage patterns would be confined to individual development sites and would not affect major underground storm drain lines and concrete-lined drainages in the City. Most development sites pursuant to the proposed Project would be redevelopment of existing, fully developed sites, the change in drainage patterns on these sites would be nominal. All development must be conducted in compliance with applicable State and local regulations, which prevent substantial alteration of site drainage patterns by controlling the volume and direction of runoff. Since drainages in the City are concrete-lined, no alteration in the alignment of these channels would occur from future development. Impacts would be less than significant, and no mitigation is required.

Dry Utilities (Electrical, Natural Gas, and Telecommunications)

Southern California Edison (SCE) provides electrical services and Southern California Gas (The Gas Company) provides natural gas services in the City. South Pasadena uses the Clean Power Alliance (CPA) for electricity generation at the 100 percent renewable level, wherein the City purchases electricity from the CPA but uses the physical plant and billing processes of SCE. Telecommunications (i.e., telephone, television, and/or internet) services are provided by several companies, including, but not limited to, Spectrum, AT&T, and EarthLink. There is a backbone of dry utility infrastructure throughout the City. Electric and natural gas services are regulated by the California Public Utilities Commission (CPUC), which requires that these utilities provide services as required by the public. Telecommunications services are provided on demand in a free market system. The need for new, expanded, and/or relocation dry utilities would be determined as part of future individual projects and dependent on the conditions at each project site. The environmental impacts (e.g., air quality and noise) of constructing these facilities is within the range of assumptions applied to the analysis in this Environmental Assessment (EA).

Threshold 3.15b: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Future development pursuant to the Project would generate a demand for water that will require increased pumping of groundwater resources and imported water use. The following water supply analysis is based on the City's 2020 UWMP and input from the City Public Works Department staff.

Based on the 2020 water demand factor of 124 gallons per capita per day (gpcd) from the City's 2020 UWMP, the total estimated water demand for the additional population (assuming no residential vacancies) is calculated to be 2.62 af (0.85 mgd). The actual water demand in fiscal year 2019-2020 was 3,546 af; therefore, the additional population of the Project would result in a total average day water demand of about 3,549 af. It is anticipated the City will be able to meet its average day demand in 2045 with its total water supply of 4,163 af (South Pasadena 2021). While the Project would accommodate non-residential growth and additional landscaping, residential growth would be the source of most additional water demand and therefore is used for analysis purposes only to determine whether projected growth could reasonably be expected to have adequate water supplies. Water supply sufficiency would be assessed on a project-by-project basis based on State and other regulations in place at that time and the City's current UWMP. The City has historically met all its water demands with groundwater production, treated imported water from MWD, and purchased water from the City of Pasadena. Even with the City's historically reliable water supply, the City included a Water Conservation and Supply Shortage Plans and Enforcement (Ordinance No. 2268) in its 2020 UWMP identifying actions to be taken

to respond to a severe or extended water shortage. If water supplies are temporarily insufficient to meet customer demand, the City may implement its Water Conservation and Supply Shortage Plans and Enforcement (Ordinance No. 2268) (South Pasadena 2021).

It is noted the City can increase production from the Basin in accordance with the Main San Gabriel Basin Judgment, even during periods of drought to meet its demands. Groundwater pumping limitations have never been applied to groundwater producers with rights in the Main San Gabriel Basin. This is because in addition to the City's groundwater extraction from the Main San Gabriel Basin, the City has the ability to obtain supplemental water supplies from its Main San Gabriel Basin cyclic storage account. Under the Main San Gabriel Basin, cyclic storage provisions allow producers, including the City, to store supplemental water within the Main San Gabriel Basin for the purpose of supplying replacement water. As discussed previously, the City and other producers have a total balance of approximately 60,044 af in cyclic storage accounts as of April 2021.

Active and effective groundwater management enables water producers in the Basin to historically meet water demands, including during single and multiple dry years. Based on the demonstrated reliability of water resources available to the City, including the City's access to the Basin water supplies, including imported replacement water and the City's access to treated imported water from MWD and purchased water from the City of Pasadena, the City has sufficient and reliable water supplies to meet its future demands from 2020 to 2045, including during single and five consecutive year droughts (South Pasadena 2021). There would be adequate water supplies to support buildout of the Project from existing entitlements and resources. There would be a less than significant impact, and no mitigation is required.

Threshold 3.15d: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Threshold 3.15e: Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

As the City is served by a private waste hauler, the City's waste can be disposed, after sorting and recycling at one of Athens MRFs, at any landfill with capacity that can accept the municipal waste. Review of CalRecycle documents show that in 2019 (the most recent data available) City-generated municipal waste of approximately 21,482 tons was disposed at landfills, transformation facilities, and used for alternative daily cover (CalRecycle 2023c).

Based on the 2021 reporting year disposal rate targets (4.4 PPD per capita and 15.8 PPD per employee)(CalRecycle 2023a), at buildout of the Project the estimated 6,882 residents would generate approximately 30,281 PPD of solid waste, or approximately 5,526 tons per year[3]. The estimated 1,978 employees would generate approximately 31,252 PPD of solid waste, or approximately 5,704 tons per year[4]. This equates to approximately 11,230 tons per year (approximately 30.8 tons per day) of additional solid waste requiring disposal in 2040, assuming full buildout of the Project. Compared to the 2019 solid waste disposal after application of source reduction and recycling efforts, this would represent an approximate 52 percent increase municipal solid waste generation requiring disposal. It is noted that these figures are for analysis purposes only, as they assume no additional source reduction programs would be enacted by the City or that additional sorting and/or transformation technologies would not be developed to

3 (30,281 PPD * 365 days)/2,000 pounds per ton = 5,526 tons per year
4 (31,252 PPD * 365 days)/2,000 pounds per ton = 5,704 tons per year

further reduce the waste stream, which is unlikely. It is also noted that these figures assume population growth with no residential vacancies, which is unlikely.

As of December 2020, (the most data available), the County's 10 municipal landfills have a permitted daily capacity of 27,765 tons and an estimated remaining permitted capacity of 142.67 million tons, with remaining life estimates of between 9 and 35 years (LACPW 2021). The City's estimated daily solid waste increase requiring disposal (approximately 30.8 tons) represents approximately 0.11 percent of the County landfill's daily capacity and the annual solid waste increase (approximately 11,230 tons) approximately 0.01 percent of the remaining permitted capacity. As such, it is not anticipated that the City's additional waste stream would exceed the capacity of these landfills. Also, in addition to in-County landfills, Athens can dispose of any available landfill at the time of disposal, including those out-of-County.

The City is currently exceeding its CalRecycle-defined per capita and per employee disposal rates. The City will continue to implement a variety of solid waste reduction, recycling, and re-use measures to continue to meet its obligation under AB 939, and to meet upcoming obligations under AB 341 and AB 1826. Therefore, there would be less than significant impacts related to landfill capacity and solid waste regulations, and no mitigation is required.

3.15.7 CUMULATIVE IMPACTS

Growth and development within the San Gabriel Valley would generate increased demand for utility services from various service agencies. While increases in utility demands would occur on agencies that do not serve the City, future development pursuant to the proposed Project would not add to the service demands of these outside agencies. At the same time, cumulative impacts on regional utility providers would account for growth and development within the larger region, rather than just the San Gabriel Valley. Thus, the cumulative analysis for impacts on utility services considers the service area of the respective providers and adjacent service agencies, as they may be affected by services to be provided within the City.

Water Supply

As discussed above, water services in the City are provided by the City. The primary water supply source now and through 2045 is the Main San Gabriel Groundwater Basin. The City's 2020 UWMP considered the reliability of the Basin and imported water supplies, based on anticipated growth in entitlements and/or demands on these resources, during average, single dry, and five consecutive year droughts. The 2020 UWMP concluded the Basin and other water sources would reliably provide water demand under all conditions with Project build-out.

Water and Wastewater Infrastructure

The cumulative service area for both water distribution and wastewater conveyance infrastructure is the City of South Pasadena. As such, the analysis presented above is also the cumulative impact analysis. As discussed, future development projects would be required to evaluate the effects on the City's infrastructure system, as well as identify environmental impacts of and mitigation measures for installation of any necessary infrastructure. As discussed above, through compliance with the City's plan review processes, application of the Water and Sewer Impact Fee (Section 16B of the SPMC), and project-level CEQA analyses, there would be a less than significant impacts related to the need for new or expanded water distribution and wastewater conveyance infrastructure, and no mitigation is required. Accordingly, there would not be a cumulative impact related to water and wastewater infrastructure.

Wastewater Treatment

Cumulative impacts on trunk sewer lines and wastewater treatment would occur within the service area of the LACSD. Future growth and development in the region would generate additional wastewater that would require conveyance and treatment at the WRPs of the LACSD, including the Whittier Narrows and Los Coyotes WRPs. Based on information provided by LACSD, these two WRPs have a combined remaining capacity of 21.3 mgd. Of this, the conservative, hypothetical wastewater generation estimated for the City's buildout represents approximately 13.0 percent of the Whittier Narrows WRP's remaining capacity and approximately .14 percent of the Los Coyotes WRP's remaining capacity, as discussed previously. Also, all future development projects in the LACSD's service area would be subject to the LACSD's Wastewater Ordinance, which includes the Connection Fee program. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments. Based on continued implementation of the LACSD Wastewater Ordinance and the nominal contribution of additional wastewater flows to the LACSD system, the proposed Project would not contribute to a cumulatively considerable impact to LACSD facilities.

Solid Waste

Solid waste collection services are provided on demand by private haulers, and cumulative impacts on their services from future development pursuant to the General Plan and DTSP Update, public and infrastructure projects in the City, and growth and development within the San Gabriel Valley are not expected to result in adverse impacts on solid waste collection services. Available landfill capacity is expected to decrease over time with future growth and development in the San Gabriel Valley. Waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. Also, CalRecycle is responsible for administering and monitoring State solid waste reduction initiatives, and individual jurisdiction's ability to meet these requirements. It is assumed that CalRecycle's role would continue in the future. Based on the available capacity of landfills in the region and the nominal contribution of additional solid waste requiring disposal, approximately 0.11 percent of the County landfill's remaining daily permitted capacity, the proposed Project would not contribute to a cumulatively considerable impact to landfill capacity or solid waste regulations.

Dry Utilities

Natural gas is provided on demand from CPUC-regulated utilities (i.e., The Gas Company) and from free-market providers (e.g., AT&T and Spectrum). The CPA, discussed further above, is a community choice aggregate utility is also not regulated by the CPUC. The respective service areas for these utility providers are large and all cover at least substantial portions of California. Because these utilities are provided on demand, including CPUC-regulated and community choice aggregate utilities, the expansion of services based on regional growth is part of each providers business strategy. Therefore, growth and development within the San Gabriel Valley are not expected to result in adverse impacts on dry utilities. The proposed Project would not contribute to a cumulatively considerable impact related to the need for new or expanded dry utilities.

3.15.8 MITIGATION MEASURES

No significant impacts related to utilities and service systems have been identified with implementation of the Project. Therefore, no mitigation is required.

3.15.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.15.10 REFERENCES

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3.16 WILDFIRE

3.16.1 METHODOLOGY

This section describes the existing wildfire hazards in the City of South Pasadena (City) and the potential to exacerbate wildfire risks with future development projects under the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

3.16.2 EXISTING CONDITIONS

Wildfire Hazards in the City of South Pasadena

Wildfires can potentially occur where developments are adjacent to open space or proximate to wildland fuels such as grass, leaf litter, trees, or shrubs that can ignite when exposed to a natural occurrence (i.e., lightning) or by an unplanned, unauthorized, and/or accidental human-caused activity. Wildfires may originate in undeveloped areas and spread to developed or urban areas where landscape and structures are not designed and maintained to be fire-resistant.

High Risk Areas (South Pasadena Municipal Code)

Section 14.1 et. seq. of the City of South Pasadena Municipal Code (SPMC) designates as a 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." The requirements for construction in this area are described below in Section 3.16.3, Relevant Programs and Regulations.

Fire Hazard Severity Zones (California Department of Forestry and Fire Protection)

The California Department of Forestry and Fire Protection (CAL FIRE) is mandated by Section 4201-4204 of the Public Resources Code and Section 51175-51189 of the Government Code to identify Fire Hazard Severity Zones in the State. These are areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors where the State has financial responsibility for wildland fire protection. These areas are also known as State Responsibility Areas (SRAs). Areas where local fire protection agencies are responsible for wildfire protection are classified as Local Responsibility Areas (LRAs). These classifications influence where development occurs and how a city will respond to future wildfire emergencies.

CAL FIRE has not designated any lands within the City of South Pasadena as High Fire Hazard Severity Zones. However, lands abutting the western and southwestern boundaries of the City are identified as within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2023). Most of these lands are in the City of Los Angeles, and a small portion is in the City of Pasadena (see Exhibit 3.16-1). Those VHFHSZs are in LRA; thus, the cities of Los Angeles and Pasadena are responsible for the costs of wildfire suppression in those areas.

Historic Wildfires in the City

Based on the most recent data, CAL FIRE reports one historic wildfire is mapped as within the City, a 1974 fire in the Monterey Hills area that burned 4.4 acres. Additionally, the edge of a 1957 wildfire that burned 170 acres in the City of Los Angeles immediately to the west-southwest, slightly encroached on the City's lands near what is now Oak Hill Place (CAL FIRE 2021). The City has experienced small brush fires that are managed by local agencies as well, but these are not tracked as wildfires by CAL FIRE.

Firefighting Resources

As discussed further in Section 3.13, Public Services and Recreation, the South Pasadena Fire Department (SPFD) provides fire protection and emergency medical services in the City. The SPFD is a full-service fire department that provides fire/rescue services, paramedics, safety education, inspections, plan reviews, and emergency management. The SPFD is also an all risk emergency services agency, as SPFD personnel are trained to handle responses such as structure, wildland and vehicle fires, hazardous materials releases, rescues and service calls, and provide advanced life support and medical transport. There is one fire station in the City, located at 817 Mound Avenue, that houses an engine company (Engine 81), a rescue ambulance, and a light and air unit.

A mutual aid agreement is an agreement in which participating agencies guarantee the provision of available resources to a requesting agency in the event of an emergency. An automatic aid agreement provides services without regard for service boundaries but based on earliest response. The SPFD has automatic aid agreements with the twelve other agencies[1] affiliated with the Verdugo Fire Communications Center (VFCC), all of whom operate under the Unified Response agreement. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary.

3.16.3 RELEVANT PROGRAMS AND REGULATIONS

State

CAL FIRE

CAL FIRE's Fire Prevention Program consists of various activities including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. Common projects include fire break construction and other fire fuel reduction activities that lessen the risk of wildfire to communities. These activities include brush clearance around communities, along roadways and evacuation routes. Other important activities include defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping (discussed above), preparation and implementation of the State's fire plan, fire-related law enforcement activities such as investigations to determine fire cause and origin as well as arson cases, and support for local government fire safe planning in the SRA.

California Fire Plan

In a collaborative effort between the State Board of Forestry and the California Department of Forestry and Fire Protection, the *2018 Strategic Fire Plan for California* (Fire Plan) was prepared to address the protection of lives and property from California wildfires while recognizing that wildfires are a natural phenomenon and can have beneficial effects, particularly on ecosystem health. The Fire Plan is a comprehensive update to the 2010 Strategic Fire Plan for *California*. The overarching vision of the Fire Plan is to have "A vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships". This vision is supported by eight goals and related

[1] The VFCC currently includes the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and the Bob Hope Airport Fire Department.

objectives, and the application of adaptive management as a fundamental strategy of Fire Plan implementation to provide flexibility and allow for changing internal and external conditions (CAL FIRE 2018).

Fire Hazard Severity Zone Mapping

CAL FIRE prepares Fire Hazard Severity Zone maps for SRA and LRA considering many factors such as fire history, existing and potential fuel (natural vegetation), flame length, blowing embers, terrain, and typical weather for the area. The CAL FIRE Director evaluates fire hazard severity in LRA and makes a recommendation to the local jurisdiction where VHFHSZs exist. The Government Code then provides direction for the local jurisdiction to take appropriate action.

Section 4291 of the Public Resources Code

In January 2005, a new State law became effective that extended the defensible space clearance around homes and structures from 30 feet to 100 feet. Proper clearance to 100 feet dramatically increases the chance of a house surviving a wildfire. This defensible space also provides for firefighter safety when protecting homes during a wildland fire. This State law is promulgated in Section 4291 et. seq. of the Public Resources Code, which CAL FIRE is responsible for enforcing.

Section 4291(a)(1) of the Public Resources Code states that "A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

> (A) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line, except as provided in subparagraph (B). The amount of fuel modification necessary shall consider the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This subparagraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, with more intense fuel reductions being utilized between 5 and 30 feet around the structure, and an ember-resistant zone being required within 5 feet of the structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. The promulgation of these regulations by the board is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this subparagraph, "fuel" means any combustible material, including petroleum-based products and wildland fuels."
>
> (B) A greater distance than that required under subparagraph (A) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other

feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(C) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under subparagraph (A) if a fire expert, designated by the director, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

California Disaster and Civil Defense Master Mutual Aid Agreement

The California Disaster and Civil Defense Master Mutual Aid Agreement is an agreement between the State of California, its various departments and agencies, and the various political subdivisions, municipal corporations, and other public agencies of the State of California. The agreement allows for the use of all the resources and facilities of the participating agencies in preventing and combating the effect of disasters, such as flood, fire, earthquake, pestilence, war, sabotage, and riot. It commits the participating agencies to voluntarily aid and assist each other in the event of a disaster, through the interchange of services and facilities, including fire, police, medical and health, communication, and transportation services and facilities, as necessary, to provide rescue, relief, evacuation, rehabilitation, and reconstruction.

California Fire Code

The 2022 California Fire Code (Title 24, Part 9 of the California Code of Regulations), effective January 1, 2023, is based on the 2021 International Fire Code. Typical fire safety requirements of the California Fire Code include requirements for the installation of fire sprinkler; building materials and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. In addition, the California Fire Code addresses fire flow requirements, fire hydrant spacing, and access road specifications. Specific California Fire Code fire safety regulations have been incorporated by reference in both the County of Los Angeles Code and the SPMC with local amendments.

Chapter 7A of the California Building Code (CBC) focuses primarily on preventing ember penetration into homes, a leading cause of structure loss from wildfires. These codes have been developed through decades of fire structure “save” and “loss” evaluations to determine what causes buildings to ignite or how to avoid ignition during wildfires. The resulting fire codes now focus on mitigating former structural vulnerabilities through construction techniques and materials so that the buildings are resistant to ignitions from direct flames, heat, and embers.

Senate Bill 969

Senate Bill 969, signed into law in 2018, applies to all new garage doors and garage door opener installations. The law states that when a new garage door is installed or when an existing garage door opener is replaced, the homeowner must install a battery backup garage door opener. Widespread power outages are often associated with wildfires. Without electricity, homeowners/occupants are unable to open their garage doors using the garage door opener. While garage doors do have an emergency cord, which disconnects the garage door from the

garage door opener, some people have difficulty engaging the emergency release and/or manually opening the garage door.

City

Municipal Code

As stated above, the City has a self-defined High Risk Fire Area pursuant to Section 14.1 et. seq. of the SPMC. The location of this area and the requirements for construction in this area related to fire prevention and protection are as follows:

> 14.1 High risk fire area and special provisions related to roof types.
>
> 1. High Risk Fire Area. “High risk fire area” is defined as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border.
> 2. Special Provisions Related to Roof Types. Except as permitted below, roof covering assemblies shall be Class A.
>
> The following exceptions shall only apply to structures not located within the high risk fire area as defined in subsection (1) of this section:
>
> Exceptions:
>
> a. Replacements within any 12-month period of time that are not more than 25 percent of the total roof area of any individual structure shall be not less than Class C;
> b. Replacements within any 12-month period of time that are not more than 50 percent of the total roof area of any individual structure shall be not less than Class B;
> c. Entirely noncombustible roof assemblies of masonry or concrete construction;
> d. Clay or concrete roof tile installed on an entirely noncombustible substructure;
> e. Roof assemblies of ferrous or copper shingles or sheets installed on an entirely noncombustible substructure;
> f. Where the fire chief makes a written finding that a less fire resistive roof covering is permissible based on existing conditions.
>
> In no case shall any roof covering be less fire resistive than required by Chapter 15 of the current South Pasadena building code or Chapter 9 of the current South Pasadena residential code.

It is noted that the requirement for Class A roof assemblies, and the exceptions cited above, are consistent with Section R902.1, Roof Covering Materials, of the California Residential Code (Title 24, Part 2.5 of the California Code of Regulations).

Emergency Operations Plan

The *City of South Pasadena and the South Pasadena Unified School District Joint Emergency Operations Plan* (EOP) address the City's planned response to emergency/disaster situations associated with natural disasters, human-made emergencies, and national security emergencies. The EOP does not address day-to-day emergencies or the well-established and routine procedures used in coping with such emergencies. Instead, the operational concepts reflected in the EOP focus on large-scale events and was developed with a multi-hazard perspective to make it applicable to the emergency operations for the widest range of emergencies and disasters, both natural and human caused, of the City and the South Pasadena Unified School District. This plan was a preparedness document—designed to be read, understood, and exercised prior to an emergency/disaster. The EOP was prepared in compliance with California Standardized Emergency Management System and National Incident Management System, and also incorporates the concepts and principles of the and the Incident Command System (South Pasadena 2012).

Draft Local Hazard Mitigation Plan

The *Draft Local Hazard Mitigation Plan* (HMP) assists the City in reducing vulnerability to disasters by identifying critical facilities, resources, information, and strategies for risk reduction, while helping to guide and coordinate mitigation actions. The HMP provides a set of strategies intended to do the following: reduce risk from natural hazards through education and outreach programs, foster the development of partnerships, and implement risk reduction activities. Hazard mitigation ensures that post-disaster repairs and reconstruction result in a true reduction in future hazard vulnerability (South Pasadena 2018).

Additionally, the federal Disaster Mitigation Act of 2000 requires that local governments, as a condition of receiving federal disaster mitigation funds, have a mitigation plan that describes the process for identifying hazards, risks and vulnerabilities, identifies and prioritizes mitigation actions, encourages the development of local mitigation, and provides technical support for those efforts. The City's HMP serves to meet these requirements and therefore enables the receipt of federal disaster funds, when applicable.

3.16.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. If located in or near State responsibility areas or lands classified as VHFHSZ, a project would result in a significant adverse wildfire impact if it would:

Threshold 3.16a: Substantially impair an adopted emergency response plan or emergency evacuation plan;

Threshold 3.16b: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

Threshold 3.16c: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or

Threshold 3.16d: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

3.16.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to wildfire.

3.16.6 ENVIRONMENTAL IMPACTS

Threshold 3.16a: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

As noted above, while no part of the City of South Pasadena is classified as a VHFHSZ, there are lands immediately to the west and southwest that are identified by CAL FIRE as VHFHSZ. Additionally, the City has defined the southwest corner of South Pasadena as a High Risk Fire Area. For purposes of this analysis, the City-defined High Risk Fire Area is treated the same as a VHFHSZ.

Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. As discussed above, compliance with Section 36.310.090 of the SPMC in the design and construction of future projects would always maintain emergency access to individual parcels. Impacts on traffic flows for emergency response or evacuation would be less than significant during construction activities, and no mitigation is required.

The City has a developed roadway network that provides emergency access and evacuation routes to existing development. Evacuation routes include major roadways in the City, with the State Route 110 and Interstate 210 freeways serving as primary regional exit routes. These freeways provide area-wide evacuation routes, with major north-south and east-west roadways in the City connecting to the freeways and adjacent cities. No major change to the existing roadway system serving the City is proposed. Access to individual development sites would be available through existing or planned on-site roadways/driveways, as required under Section 36.310.090 “Driveways and Site Access” of the SPMC. Section 36.310.090 of the SPMC defines requirements for all access from public streets to private property to ensure adequate and safe access by vehicular and other traffic. The plan check and building permit process by the SPFD includes review of access for emergency vehicles in accordance with the *California Fire Code*, as adopted by reference by the City (Chapter 14 of the SPMC). Compliance with the requirements for emergency lane width, vertical clearance, and distance would provide adequate emergency access to all new development pursuant to the Project. Continued implementation of State and City emergency access requirements would provide future development with adequate access for emergency response or evacuation.

The proposed General Plan Update includes actions to update the City’s Hazard Mitigation Plan to address disaster recovery in the business community, explore the development of a Business Disaster Assistance Center, develop a rapid response team to support safe evacuation in the hillside areas, and periodically review and update the City’s post-disaster recovery plan. Also, the City has an Emergency Management Program, which includes all elements necessary to respond quickly and effectively to major emergencies. These elements include the following: Emergency Operations Plan, Emergency Operations Center, Emergency Response Program, and Public Education Program.

With implementation of the policies and actions identified above and continued implementation of the City's emergency response programs, impacts related to emergency response and evacuation would be less than significant, and no mitigation is required.

Threshold 3.16b: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

There are parcels identified for potential housing in the Suitable Sites Inventory, which is a required part of housing element preparation, within the City's designated High Risk Fire Area covering properties south of Monterey Road and west of Meridian Drive. Some of these parcels are situated on or near existing slopes. However, individual development projects would be reviewed by the SPFD as part of the City's project review process and would be required to comply with all State CBC and City fire code standards in effect at the time the building permit is issued, pursuant to Chapter 14, Fire Prevention, of the SPMC. Section 14.4 of the SPMC includes requirements for building construction, fire flows and pressures, hydrant placement, and other requirements that would reduce the creation of fire hazards and facilitate emergency response. In addition to City-wide fire code standards, Section 14.1 of the SPMC requires that development of any parcels in the High Risk Fire Area would be required to have Class A roof assemblies, which are effective against severe fire test exposures, with exceptions including, but not limited to, installation of an entirely non-combustible roof assembly, clay or concrete tile or ferrous or copper shingles or sheets on an entirely non-combustible substructure, and timing and amount of roof replacements. Therefore, new development pursuant to the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose residents or other persons to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. There would be less than significant impacts, and no mitigation is required.

Threshold 3.16c: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Since the City of South Pasadena is largely built out, the roadway and utility infrastructure systems are in place. Improvements to roads and other infrastructure may be implemented either to alleviate existing issues or in support of anticipated future growth. The need for and installation of new infrastructure would be determined during the City's discretionary review process for new development and redevelopment. Extension of utilities or roadway improvements would serve only the existing and proposed uses and would most likely be installed in existing public rights-of-way and/or private property (e.g., water and sewer laterals, gas line connections). Also, new or replacement infrastructure would not extend into wildlands or otherwise substantively beyond the existing urban land uses. As such, while implementation of the Project may result in the installation and maintenance of infrastructure, the locations of this infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. There would be a less than significant impact, and no mitigation is required.

Threshold 3.16d: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The designated High Risk Fire Area is located in the hilly portion of the City. Accordingly, any development or redevelopment in this area would be subject to Section 36.340 et. seq. of the SPMC. This section defines additional requirements, beyond the City Building Code, for development on sites with an average slope of 20 percent or greater, except parcels within the Altos de Monterey (AM) overlay zone situated along Via Del Rey and adjoining streets in the south-central portion of the City. These sites are instead subject to the AM Overlay District (Section 36.250.030 of the SPMC). Procedures for Hillside Development Permits are established in Section 36.410.065 of the City Municipal Code.

Future development or redevelopment within the areas subject to a Hillside Development Permit, largely in the southwest portion of the City, would also be required to prepare site-specific geotechnical investigations that include analysis of slope stability and erosion as it pertains to the site's unique topography and provide appropriate construction recommendations, as necessary. The General Plan Update includes policies and actions related to development in the City and in the hillside areas to ensure that regulations related to grading are adopted and maintained, and that development in areas subject to the hillside ordinance are fully investigated. As such, while implementation of the Project may result in development or redevelopment in hillside areas, through compliance with State and City requirements structures would not be exposed to significant downslope or downstream risks as a result of runoff, post-fire slope instability, or drainage changes. There would be a less than significant impact, and no mitigation is required.

3.16.7 CUMULATIVE IMPACTS

The geographic context for cumulative wildfire impacts is generally the City of South Pasadena and those areas within the cities of Los Angeles and Pasadena that are within VHFHSZs abutting the City of South Pasadena (refer to Exhibit 3.16-1). Compliance with State and local regulations pertaining to development in VHFHSZs and/or on hillsides in the cities of Los Angeles and Pasadena would be required of all development in the cumulative area for wildfires. Individual projects would be designed and built in accordance with applicable standards in the CBC and the city's respective municipal codes as well as all requirements pertaining to emergency access and evacuation. Site-specific geotechnical hazards related to slope and/or landslide risk would be addressed by the geotechnical investigations required by individual cities and the County for each development proposal. Compliance with applicable State and local regulations would prevent significant adverse impacts associated with wildfire hazards, and impacts associated with the Project would not be cumulatively considerable, and no mitigation is required.

3.16.8 MITIGATION MEASURES

No significant adverse impacts related to wildfire have been identified with implementation of the Project. Therefore, no mitigation is required.

3.16.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.16.10 REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE). 2023a. (April 25, access date) FHSZ Viewer. Sacramento, CA: CAL FIRE. FHSZ Viewer (ca.gov).

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South Pasadena, City of. 2018 (July). *Draft Local Hazard Mitigation Plan*. South Pasadena, CA: the City. Draft (V1) (southpasadenaca.gov).

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SECTION 4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines addresses the discussion of alternatives in an Environmental Impact Report (EIR). Key provisions of the State CEQA Guidelines are identified throughout this section to explain the basis for the alternatives evaluation in this Environmental Assessment (EA). Section 15126.6(a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

4.1.1 PROJECT SUMMARY

Pursuant to State law, the City of South Pasadena (City) has an approved General Plan. The *South Pasadena General Plan* was last updated and adopted by the City in 1998. Similarly, the City has an approved Specific Plan for a portion of the downtown area. The Mission Street Specific Plan (MSSP; now expanded to include a segment of Fair Oaks Avenue and referred to as the Downtown Specific Plan [DTSP]) was adopted in 1996. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element, which must be updated every five to eight years. However, a general plan needs to be updated if it is to reflect community values and priorities as they change over time. The City's current General Plan, including the Housing Element, does not align with the City's vision for its future nor with the need to provide housing in compliance with State law.

Accordingly, the comprehensive General Plan and Downtown Specific Plan (DTSP) Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community 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 and DTSP Update serve as long-term (through 2040) policy guides for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City.

The housing element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities and establishes the goals, policies, and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City of South Pasadena. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021 and has

allocated 2,067 dwelling units (DUs) to the City of South Pasadena. Additionally, HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. The Court Order[1] requires that the City bring its Housing Element into compliance with State Planning Law. The changes in the draft 2021–2029 Housing Element is reflected in both the General Plan and DTSP Update, being prepared contemporaneously. This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). The central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to five focus areas including the Downtown area (i.e., DTSP), Ostrich Farm District, and three Neighborhood Centers on Huntington Drive while providing an enhanced variety of housing opportunities.

The Project would accommodate a total of 2,775 residential DUs and 430,000 square feet (sf) of non-residential uses, comprised of retail and office development, in addition to both the existing land uses (see Table 2-4 in Section 2.0 of this EA). The full buildout of the Project, for purposes of this EA, would generate up to an additional 6,882 residents (assuming no residential vacancies) and 1,978 jobs in the City through 2040 compared to existing conditions.

It is important to note that the Project would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. New development would continue to be subject to the City's development review process. The General Plan and DTSP Update serve as a long-term policy guide for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The proposed 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 (i.e., SCAG) requirements.

4.1.2 PROJECT OBJECTIVES

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of the proposed project's objectives. The proposed Project seeks to achieve the following key 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. 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.
4. Develop clear and precise standards that offer predictable outcomes and processes.
5. 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.

[1] *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

6. 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.

4.1.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the project objectives listed above, while reducing or eliminating one or more of the significant and unavoidable impacts of the proposed Project, which include:

- Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation, and Cumulative Air Quality Impacts);
- Greenhouse Gas Emissions (GHG Emissions, Plan Consistency);
- Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and
- Population and Housing (Population Growth).

4.1.4 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with the Section 15126.6(a) of the State CEQA Guidelines, this section summarizes the range of alternatives considered in the EA.

The following alternative has been considered and eliminated from detailed consideration for the reasons identified in Section 4.2, below:

- Alternative Site, and
- No Project/No Development.

Alternatives that are considered in detail in this EA include:

- Alternative 1: No Project/Existing General Plan; and
- Alternative 2: Reduced Development Capacity.

4.2 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

4.2.1 ALTERNATIVE SITE

Section 15126.6(f)(2)(A) of the State CEQA Guidelines indicates that, in determining the consideration of an alternative location, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the

significant effects of the project need be considered for inclusion in the EIR". Section 15126.6(f)(3) of the State CEQA Guidelines further states "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative". Because the Project encompasses the entirety of the City of South Pasadena, an alternative site where the City has no jurisdiction is not feasible. Therefore, further analysis of an alternative site in this EA is not required.

4.2.2 NO PROJECT/NO DEVELOPMENT

Section 15126.6(e) of the State CEQA Guidelines requires than an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). In addition, Section 15126.6(e)(2) of the State CEQA Guidelines specifies that the "No Project analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services"..

No project option 1 above is analyzed below as the No Project/Existing General Plan Alternative. No project option 2, No Project/No Development Alternative, has been eliminated from detailed consideration because assuming no development would occur in the City of South Pasadena in the future is neither reasonable nor feasible. Therefore, further analysis of the No Project/No Development Alternative in this EA is not required.

4.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED CONSIDERATION

The analysis of each of the project alternatives identified below includes the following:

- A description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the proposed project. Pursuant to the State CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- An assessment of the alternative's ability to meet the project objectives (previously identified in Section 4.1.2).

The comparison of impacts between each alternative and the proposed Project assumes that the general nature and types of (1) existing regulations; (2) proposed General Plan Update goals, policies, and actions; and (3) the Mitigation Measures (MMs) identified in Section 3.0, Environmental Analysis, of this EA would also be applicable to each of the alternatives, where appropriate.

4.3.1 ALTERNATIVE 1: NO PROJECT/EXISTING GENERAL PLAN

Description of the Alternative

The proposed Project is the revision of an existing land use plan, accordingly, pursuant to Section 15126.6(e)(3)(A) and the State CEQA Guidelines, this No Project/Existing General Plan Alternative considers the comparative environmental impacts of the continued implementation of the existing General Plan, based on the existing conditions in and around January 2018 through the planning horizon of the Project (2040).

This alternative assumes the 1998 General Plan and 2014–2021 Housing Element would remain as the adopted long-range planning policy document for the City of South Pasadena, with future development occurring pursuant to the City's current General Plan goals and policies and Land Use Map. The current Land Use Map is provided in Exhibit 2 in Section 2.0, Environmental Setting and Project Description, of this EA. It is noted that retention of the 2014–2021 Housing Element would violate State law as well as the Court Order; however, continuation of the existing (1998) General Plan is allowable. Further, as discussed above, the State CEQA Guidelines require a "no project" alternative be addressed. Therefore, this Alternative 1 has been given detailed consideration solely for purposes of comparing and contrasting the environmental impacts of the Project, as proposed, with the reduced development scale of Alternative 1. However, this is a purely hypothetical exercise and cannot be an actionable alternative.

Buildout under this alternative is estimated at 265 DUs in the City over the next approximately 20 years (through 2040), or approximately 13 percent of the Project's residential units. This estimate is derived from the assumption that the average of 13.25 DUs permitted per year, over the past 8 years, would continue over the next 20 years. Buildout under this alternative also estimates approximately 66,124 sf of non-residential (commercial/office) development, or approximately 15 percent of the Project's non-residential space. This estimate assumes that the floor area ratio (FAR) of 0.30 in the existing (1998) General Plan is applied to a total of 5.09 acres from select sites with development potential across a total of 12 parcels.

This development would generate approximately 657 residents[2] (assuming no residential vacancy) and 304 jobs[3]. Compared to the proposed Project, this development capacity would result in 2,510 fewer DUs, 63,876 less sf of commercial/office, 6,225 fewer residents, and 1,674 fewer jobs. While this Alternative does not reflect the five focus areas of the Project, based on current and recent land use patterns, this Alternative assumes that the most of this development would occur along Fair Oaks Avenue, Mission Street, within the Ostrich Farm, and more sparsely along other major arterials. Because this alternative assumes continuation of the existing General Plan, including 2014-2021 Housing Element, and MSSP, the policies and actions of the Project documents and the DTSP's form-based code are assumed not to be implemented under Alternative 1.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 1 would result in a reduced level of visual change compared to the proposed Project, commensurate with the reduced geographic scope (i.e., extent of ground disturbance) and amount (i.e., number of DUs and total sf of non-residential) of potential development and

2 Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

3 Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

redevelopment. Future development under this Alternative would result in similar types and proportions of land uses as currently exist; the same City height limits; and be subject to the same design standards and processes as the Project, with the exception of the form-based code in the DTSP Update. Any new light sources installed under Alternative 1 would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting. Accordingly, a lighting plan would be submitted to the City and requiring that lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Like the Project, Alternative 1 would not adversely affect a scenic vista, substantially degrade scenic resources within a scenic highway, substantially degrade the City's visual quality and character, or result in a substantial increase in light and glare. Because Alternative 1 assumes only 265 DUs, the number of developments including structures exceeding the City's 45-foot building height limit due to application of certain parts of the State Density Bonus Law would be lower than the Project. However, the City must adopt a 2021–2029 Housing Element or be in violation of State law as well as implement requirements of the Court Order, including is to seeking, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre).

Air Quality

Alternative 1 would generate reduced criteria pollutant emissions from construction and operation commensurate with the reduced amount of potential development compared to the Project. As discussed in Section 3.2, Air Quality, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Similarly, consistent with SCAQMD guidance, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. Even with incorporation of MM AQ-1 requiring a project-level air quality analysis for future development projects, construction of development projects would have the potential to result in significant and unavoidable impacts with respect to construction activity. Although construction-related emissions would be reduced, for the same reasons as the proposed Project, Alternative 1 would result in significant and unavoidable direct and cumulative impacts during construction activity with implementation of MM AQ-1.

The Project would exceed the SCAQMD threshold for regional volatile organic compounds (VOC) emissions by over 60 percent. VOCs are an ozone (O_3) precursor. The primary source of VOC emissions would be consumer products. MM AQ-1 requires that future projects would provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. While air quality emissions do not increase or decrease in a strictly linear fashion with increases or decreases in development capacity, based on the development capacity of Alternative 1 being, on average, about 14 percent of the Project (i.e., 13 percent of housing units and 15 percent on non-residential) it is possible Alternative 1 would not result in significant operational emissions of VOC. As discussed for the Project, because the effects of MM AQ-1 cannot be quantified at this time, operational emissions would be considered directly and cumulatively significant and unavoidable for Alternative 1.

Regarding 2022 Air Quality Management Plan (AQMP) consistency, buildout of Alternative 1 would be below the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population forecast for 2040 by 767 persons and would exceed the employment forecast by 2,020 jobs. As discussed further in Section 3.12, Population and Housing, projections of employment in the City are substantively underestimated by SCAG in the 2020–2045 RTP/SCS and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding related to demographic growth. However, the AQMP requires the comparison to the correlating RTP/SCS. Therefore, based on

the SCAQMD criteria, this alternative would result in significant and unavoidable direct and cumulative impacts related to inconsistency with the 2022 AQMP, same as the Project.

Although overall emissions would be reduced under this alternative, the focus of growth would remain the focus areas, in particular the DTSP and Ostrich Farm areas. As such, because the northernmost segment of the DTSP area is within 500 feet of SR-110, this area presents a risk of exposure to diesel particulate matter (DPM, a toxic air contaminant [TAC]). Like the proposed Project, Alternative 1 would result in a less than significant impacts related to exposure to TACs with MM AQ-2, which requires preparation of a Health Risk Assessment (HRA) for development projects that would include sensitive land uses within the area proximate to SR-110.

Biological Resources

Alternative 1 would result in reduced impacts to biological resources compared to the proposed Project, commensurate with the reduced geographic scope of potential development and redevelopment. Like the proposed Project, Alternative 1's potential impacts to biological resources would be reduced to a less than significant level with implementation of MMs BIO-1 through BIO-5.

Cultural and Tribal Cultural Resources

Alternative 1 is anticipated to result in reduced impacts to cultural and tribal cultural resources compared to the proposed Project, commensurate with the reduced geographic scope of potential development and redevelopment. As such, Alternative 1 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Similarly, Alternative 1 would also involve less disturbance of ground on undeveloped land and less ground disturbance on developed land to greater depth or extent than past ground disturbance that could contain unknown buried historical or archaeological resources or human remains. However, development under this Alternative would be subject to the same policies and procedures related to historic preservation in the City and regulatory requirements related to encounter of remains. Like the proposed Project, Alternative 1's potential impacts to cultural and tribal cultural resources would be reduced to a less than significant level with implementation of MM CUL-1.

Energy

Alternative 1 would result in less construction-related energy use and long-term stationary (i.e., not transportation/mobile) energy demand than the proposed Project, commensurate with the reduced geographic scope and amount of potential development and redevelopment. However, when taking into consideration that Alternative 1 would result in a less dense and less mixed land use pattern than the proposed Project, both fuel efficiency and total VMT (i.e., energy demand from operation) would be higher under this alternative. On balance, it is anticipated that Alternative 1 would result is less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy, or conflicts with plans for renewable energy or energy efficiency, like the Project.

Geology and Soils

Geologic and soils conditions, particularly seismic shaking and secondary seismic risks are essentially the same throughout most of the City. The hilly areas in the northeast and southwest may experience additional or slightly different conditions related to slope and/or underlying geologic units. Like the proposed Project, the design and construction of structures for human

occupancy under Alternative 1 would require preparation of a geotechnical report and be subject to the same State, County, and City codes and requirements.

Alternative 1 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. However, all construction projects under Alternative 1 would be subject to the same State or City stormwater quality requirements as the proposed Project.

Alternative 1 would involve less ground disturbance that could impact unknown paleontological resources than the proposed Project. Like the proposed Project, impacts to paleontological resources would be less than significant after implementation of MM CUL-1.

Greenhouse Gas Emissions

Alternative 1 would generate reduced total greenhouse gas (GHG) emissions from construction and operation of the reduced development capacity compared to the Project. However, as discussed below for Land Use and Planning, this alternative would result in higher vehicle miles traveled (VMT) for the City as a whole compared to the proposed Project. A higher VMT reflects greater relative contribution of the City per capita and per service population to GHG emissions. Therefore, while this Alternative would reduce development capacity to an average of 14 percent of the Project, at the program level, GHG emissions would potentially result in a significant impact on the environment. MM GHG-1 requires project-level GHG analysis and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impacts would remain significant and unavoidable under Alternative 1, same as the Project.

As discussed further in Section 3.7, Greenhouse Gas Emissions, the City adopted its first CAP on December 16, 2020. The proposed Project was demonstrated to be consistent with the City's CAP, and the CAP is, in turn, consistent with State plans, policies, and regulations, AB 32, the AB 32 scoping plan and updates, EO B-30-15, SB32, and EO B-55-18, and there would be a less than significant impact. The actions in the CAP would apply City-wide regardless of the amount of development. Therefore, Alternative 1 would also be consistent with the CAP and there would be a less than significant impact, same as the proposed Project.

Hazards and Hazardous Materials

Alternative 1 would result in reduced impacts related to hazards and hazardous materials as the proposed Project, because it involves less disturbance of soil that could be contaminated; and would involve less construction effort and thus less use of hazardous materials by construction projects. While the proposed Project would permit development of more residential units than Alternative 1 would, operation of residences generally involves use of only small amounts of hazardous materials for cleaning and maintenance purposes, and operational hazardous materials impacts would be generally similar for Alternative 1 compared to the proposed Project. Hazardous materials would be used in accordance with existing regulations. Fewer residents and construction workers would be potentially exposed to hazardous materials under Alternative 1 than under the proposed Project. Like the proposed Project, potential impacts related to hazards and hazardous materials would be less than significant with implementation of MMs HAZ-1 and HAZ-2.

Hydrology and Water Quality

Alternative 1 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. Construction projects in each scenario would comply with

State or City stormwater quality requirements, as applicable. Operational impacts to operational water quality standards and waste discharge requirements would be reduced, due to lower development intensity, compared to the proposed Project. However, like the proposed Project, there would be less than significant impacts related to hydrology and water quality, including drainage patterns, through compliance with State and local regulations.

Developable vacant land in the City comprises less than one percent of the City's land area; thus, Alternative 1 and the proposed Project would each cause only minor increases in impermeable surfaces in the City. Alternative 1 would generate a lower increase in water demands compared to the proposed Project, commensurate with the reduced amount of potential development and redevelopment. The Main San Gabriel Groundwater Basin (basin), from which the City provides most of its water supply, is controlled by the Main San Gabriel Basin Watermaster. Regardless of the amount of potable water demand by the City, the Watermaster is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Therefore, impacts on groundwater recharge and supply from Alternative 1 would be similar to those of the proposed Project.

Land Use and Planning

Alternative 1 would result in a new significant and unavoidable impact related to land use and planning because this alternative would not demonstrate to the State that the City can meet its mandated RHNA allocation. As such, this alternative would conflict with State planning law.

Alternative 1 would be less consistent with SCAG's 2020-2045 RTP/SCS, as the reduced amount of development and redevelopment would reflect a land use pattern that contribute less towards the GHG emissions reduction targets compared to the proposed Project. This alternative would provide less residential, commercial/office, and mixed-use development near transit and other existing infrastructure (e.g., roads, utilities, services) and generally build at a lower density in selected portions of the City. Therefore, Alternative 1 would result in a higher VMT per capita and per service population for the City as a whole compared to the proposed Project. A higher VMT reflects greater relative contribution of the City to GHG emissions. Like the proposed Project, Alternative 1 would conserve established residential neighborhoods, would not substantially change the development pattern of the City, and would not divide established communities.

Noise

Alternative 1 would result in reduced noise impacts from construction and operation of the reduced development capacity compared to the Project. Buildout under Alternative 1 would result in reduced vehicle trips. Alternative 1 would involve an 90 percent reduction in residential development and an 85 percent reduction in non-residential development. However, as shown in Table 3.11-9 in Section 3.11, Noise, of this EA, the contribution of the proposed Project's traffic noise would be less than three dBA, which is considered barely perceptible to human hearing. Therefore, the future exterior noise levels at residential uses after implementation of MM NOI-1 may remain above 65 dBA CNEL at some locations because this is a result of existing conditions and not buildout of the Project. Therefore, this impact would be reduced but remain significant and unavoidable. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant with implementation of MMs NOI-2 and NOI-3, respectively.

With reduced development capacity, there would likely be reduced construction activity over the planning horizon. As such, the significant and unavoidable construction noise impact at receiver locations within 200 feet, after implementation of MMs NOI-4 through NOI-7, would affect fewer

existing receptors. Like the proposed Project, vibration generated during construction would be less than significant with implementation of MMs NOI-4 and NOI-5; and within 50 feet of the Metro L Rail Line with implementation of MM NOI-6.

Alternative 1 would not subject people in South Pasadena to excessive airport-related noise; the nearest airport to the City is the San Gabriel Valley Airport approximately six miles away.

Population and Housing

As discussed above, Alternative 1 assumes development of up to 265 DUs and 66,124 sf of non-residential (commercial/office) development in the City over the next 20 years (through 2040). Table 4-1, Comparison of SCAG Projections and Alternative 1 Buildout, provides a comparison of the 2040 SCAG growth projections and the Alternative 1 buildout projections.

TABLE 4-1
COMPARISON OF SCAG PROJECTIONS AND ALTERNATIVE 1 BUILDOUT

	Existing Conditions	Alternative 1 Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	10,873 (250 DUs)[a]	11,109[c]	-236 DUs / -2.1%
Housing Units	11,156[a]	11,421 (265 DUs)	11,822[a]	N/A
Population	25,580[a]	26,200 (620 persons)[a]	27,004[c]	-804 persons / -3.0%
Employment	13,700[b]	14,004 (304 jobs)	11,984[c]	+2020 jobs / 16.9%
Jobs-Housing Ratio	1.23	1.23	1.01	N/A

DU: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022
[c] SCAG 2020, Aguilar 2021

As shown in Table 4-1, buildout of Alternative 1 would result in approximately 236 fewer households (2.1 percent) and 804 fewer residents (3.0 percent) (assuming a 5.5 percent vacancy rate) than SCAG's 2040 projections. This would not represent substantial unplanned population growth. Regarding employment, Alternative 1 would result in approximately 2,020 more employees than the SCAG's projections. As discussed for the Project, projections of employment in the City are substantively underestimated by SCAG and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding. For comparison, Alternative 1's projected employment of 14,004 represents an increase of about 2.2 percent or 0.1 percent per year from EDD's 2022 estimate of 13,700 jobs in the City.

As shown, Alternative 1 would result in the same jobs-housing ratio as the existing conditions in the City and would be more jobs-rich than projected by SCAG. Again, this is due to the disparity between SCAG's and EDD's data. Regardless, an area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001).

Therefore, Alternative 1 would avoid the significant and unavoidable impact related to demographic growth resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation. However,

the Alternative 1 land use plan is less consistent than the Project with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers and arterial roadways such as the Mission L Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive.

Like the proposed Project, Alternative 1 could cause some displacement of existing residential units and residents. Projects displacing residents would be mandated to comply with City requirements for tenant notification and relocation assistance programs. Conversion of residences due to projects undertaken by a public entity would be required to comply with the California Relocation Assistance Act. Any residential displacement under Alternative 1 would not require construction of replacement housing, as Alternative 1 would permit construction of up to 265 residential units. Like the Project, there would be no impacts related to displacement of housing or people that necessitates construction of housing elsewhere.

Public Services and Recreation

Alternative 1 would result in reduced demand for fire protection, police protection, school services, library services, and recreation facilities than the proposed Project, commensurate with the reduced amount of potential development and redevelopment. Therefore, like the proposed Project, Alternative 1's potential impacts to public services would be less than significant level.

Transportation

Alternative 1 would result in reduced total VMT compared to the proposed Project, commensurate with the reduced amount of development or redevelopment and resultant density. However, this alternative would result in relatively higher VMT per capita and VMT per service population compared to the Project, which is the metric used to determine the significance of transportation impacts. Increasing density of land uses, especially when near transit and/or mixed with employment and services, reduces VMT. The proposed Project's land use plan provides a mix and density of land uses that contributes to reducing vehicle trips through improved alternative transportation options and proximity of housing to employment and services than in the existing condition. Also, unlike the Project, this alternative would not include the extensive transportation-related policies and actions that support reducing VMT, separate from the land use plan. However, without extensive modeling, it is unknown the actual VMT per capita or VMT service population that would result. Like the proposed Project, Alternative 1 would not cause substantial hazards due to a geometric design feature or incompatible roadway uses, and future projects developed under Alternative 1 must comply with City requirements to ensure adequate emergency access.

Utilities and Service Systems

Alternative 1 would generate reduced demands for utilities and service services, including water supply, water and wastewater infrastructure, wastewater treatment, dry utilities (i.e., electricity, natural gas, telecommunications), and solid waste generation, commensurate with the reduced amount of development or redevelopment. However, through compliance with applicable regulations and proposed policies and actions, the Project would result in less than significant impacts related to these utilities and service systems. Therefore, with reduced demands, Alternative 1 would also result in less than significant impacts to water supply, water and wastewater infrastructure, wastewater treatment, solid waste, and dry utilities.

Wildfire

Like the proposed Project, it is possible that parcels in the City's High Risk Fire Area could be developed or redeveloped under Alternative 1, although the likelihood and extent of this activity would be lower. Also like the proposed Project, implementation of development under Alternative 1 would be required to comply with State and local codes and other regulations related to emergency access and building in wildfire hazard areas and on hillsides. Accordingly, Alternative 1 would not substantially impact emergency response or evaluation, exacerbate wildfire risks, including due to installation or maintenance of infrastructure, and expose persons to pollutant concentrations from wildfire; or expose people or structures to significant risks subsequent to wildfire such as flooding or landslides. Wildfire impacts of Alternative 1 would be less than significant.

Ability to Meet Project Objectives

Alternative 1 would not meet objective 1 to provide sufficient and inclusive housing capacity to meet State mandates. This alternative would be in violation of State law and would open the City to penalties.

Alternative 1 would meet five of the six Project objectives, as the objectives are more closely aligned with providing a high-quality environment rather than a certain amount of development. Specifically, objectives 2, 4, 5, and 6 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 3 would be met because Alternative 1 would still direct growth primarily towards the downtown and Ostrich Farm areas, which is also a policy decision.

Conclusion

Alternative 1 would avoid the significant and unavoidable impact related to visual character. However, the City must adopt a 2021–2029 Housing Element or be in violation of State law as well as implement requirements of the Court Order, including placement of a ballot measure proposing the repeal of the City's 45-foot height limit for sites that meet specific characteristics.

Alternative 1 would reduce criteria pollutant emissions and GHG emissions; however, the reduction would not eliminate the significant and unavoidable impacts associated with AQMP consistency, VOC emissions, GHG emissions, or GHG plan inconsistency because the effects of MMs AQ-1 and GHG-1, requiring project-level analysis and mitigation measures, cannot be quantified at this time. Exterior traffic noise levels would be reduced but a significant and unavoidable impact would remain, because this is a result of existing conditions and not buildout of the Project. This Alternative would expose fewer receptors to construction noise that may exceed the standard, but the potential impact on exposed receptors would remain significant and unavoidable. Alternative 1 would result in a new significant and unavoidable impact related to land use and planning as the number of dwelling units would be far below the 6th Cycle RHNA allocation for the City, which would violate State law, opening the City to penalties; and the Court Order to which the City is now subject, opening the City to Court-ordered sanctions.

For all other topics, impacts would be similar or reduced compared to the proposed Project. Although a lower level of development capacity may be preferable to some, this increment of reduction would not alleviate the total significant and unavoidable impacts of the Project, by eliminating one impact (population and housing) and adding one (land use and planning). From an environmental standpoint, perhaps most importantly, this alternative would not be as

consistent with regional (SCAG) planning programs and policies related to reducing GHG emissions consistent with SB 375.

4.3.2 ALTERNATIVE 2: REDUCED DEVELOPMENT CAPACITY

Description of the Alternative

During preparation of the EA for the General Plan and DTSP Update, the City chose to combine the proposed housing element update into the proposed Project. The proposed 2021–2029 Housing Element Update incorporates the 6th Cycle RHNA issued by the SCAG, which requires the City to provide 2,067 DUs plus the HCD-required surplus of 708 DUs between 2021 and 2029. The City chose to retain the environmental analysis in the Administrative Draft EA that has already been prepared for the former project without the Housing Element in condensed form as an alternative to the Project.

Therefore, Alternative 2 assumes a net increase in development capacity of 589 DUs (or approximately 28 percent of the Project's residential units) and 430,000 sf of non-residential (commercial/office) building area, same as the Project. As shown below in Table 4-2, Alternative 2 Development Capacity (2040), the total 500 DUs previously proposed and all of the net increase of 430,000 sf of non-residential uses would be permitted in the five focus areas, and 89 DUs in lots outside the focus areas, through the Project horizon year of 2040. Additionally, Alternative 2 assumes that proposed policies and goals and the DTSP's form-based code would be implemented.

TABLE 4-2
ALTERNATIVE 2 DEVELOPMENT CAPACITY (2040)

Proposed Development Capacity	Size (acres)	Residential (DUs)	Non-Residential (sf)		Population
			Commercial	Office	
Corridors[a]					
Downtown Specific Plan Area	80.0	300	100,000	125,000	738
Districts[a]					
Ostrich Farm	13.4	75	5,000	100,000	185
Neighborhood Centers[a]					
Huntington Drive & Garfield Avenue	4.5	75	10,000	50,000	185
Huntington Drive & Fletcher Avenue	1.6	0	5,000	0	0
Huntington Drive & Fremont Avenue	7.4	50	10,000	25,000	123
Remainder of City[b]					
Vacant Lots Outside Focus Areas	N/A	89	0	0	219
Totals	–	**589**	**130,000**	**300,000**	**1,449**

du: dwelling units; sf: square feet; N/A: not available

Sources:
[a] South Pasadena 2017a
[b] Inloes 2018
[c] HR&A 2017

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 2 would result in a reduced level of visual change compared to the proposed Project, commensurate with the reduced geographic scope (i.e., extent of ground disturbance) and amount of potential development and redevelopment. Future development under this Alternative would result in similar types and proportions of land uses as currently exist; the same height limits (including possible increased heights via the State Density Bonus Law and Court Order to which the City is now subject); and be subject to the same design standards and processes as the Project, including the form-based code in the DTSP Update. Any new light sources installed under Alternative 2 would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting. Accordingly, a lighting plan would be submitted to the City requiring lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Like the Project, Alternative 2 would not adversely affect a scenic vista, substantially degrade scenic resources within a scenic highway, substantially degrade the City's visual quality and character, or result in a substantial increase in light and glare.

Air Quality

Criteria pollutant emissions were quantified for the development of 589 DUs and 430,000 sf of non-residential growth as part of EA preparation prior to the inclusion of the 2021–2029 Housing Element. However, in June 2021, the latest version of the California Emissions Estimator Model™ (CalEEMod), which is used to model air quality and GHG emissions, was released. This EA uses the current CalEEMod version for analysis of the proposed Project. While modeling results are generally similar between versions, they do not represent an apples-to-applies comparison.

For purposes of comparison, the air quality modeling for the growth under Alternative 2 concluded there would be a significant and unavoidable impact related to operational nitrous oxides (NOx), whose primary source is combustion engines. Emissions of VOCs were below the SCAQMD significance threshold. Like the proposed Project, mitigation was required to perform a project-specific analysis. Similar to the Project, it was concluded that because the effects of MM AQ-1 cannot be quantified at this time, operational emissions would be considered directly and cumulatively significant and unavoidable for Alternative 2.

All other aspects of the air quality analysis performed for the growth under Alternative 2 were the same as the Project. Alternative 2 would generate reduced criteria pollutant emissions from construction. As discussed in Section 3.2, Air Quality, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Similarly, consistent with SCAQMD guidance, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. Even with incorporation of MM AQ-1 requiring a project-level air quality analysis for future development projects, construction of development projects would have the potential to result in significant and unavoidable impacts with respect to construction activity. Although construction-related emissions would be reduced, Alternative 2 would result in significant and unavoidable direct and cumulative impacts during construction activity with implementation of MM AQ-1.

Regarding 2022 AQMP consistency, buildout of Alternative 2 would exceed the 2020–2045 RTP/SCS population forecast for 2040 by 25 persons and would exceed the employment forecast by 3,394 jobs. As discussed further in Section 3.12, Population and Housing, projections of employment in the City are substantively underestimated by SCAG and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future

employment to reach a significance finding related to demographic growth. However, the AQMP requires the comparison to the correlating RTP/SCS. Therefore, based on the SCAQMD criteria, this alternative would result in significant and unavoidable direct and cumulative impacts related to inconsistency with the 2022 AQMP, same as the Project.

Although overall emissions would be reduced under this alternative, because there are properties within 500 feet of SR-110 that may be developed/redeveloped, this area presents a risk of exposure to diesel particulate matter (DPM, a toxic air contaminant [TAC]). Like the proposed Project, Alternative 2 would result in a less than significant impacts related to exposure to TACs with MM AQ-2, which requires preparation of a Health Risk Assessment (HRA) for development projects that would include sensitive land uses within the area proximate to SR-110.

Biological Resources

Alternative 2 would result in reduced impacts to biological resources compared to the proposed Project, commensurate with the reduced geographic scope of potential residential development and redevelopment. Like the proposed Project, Alternative 2's potential impacts to biological resources would be reduced to a less than significant level with implementation of MMs BIO-1 through BIO-5.

Cultural and Tribal Cultural Resources

Alternative 2 is anticipated to result in reduced impacts to cultural and tribal cultural resources compared to the proposed Project, commensurate with the reduced geographic scope of potential residential development and redevelopment. As such, Alternative 2 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Similarly, Alternative 2 would also involve less disturbance of ground on undeveloped land and less ground disturbance on developed land to greater depth or extent than past ground disturbance that could contain unknown buried historical or archaeological resources or human remains. However, development under this Alternative would be subject to the same policies and procedures related to historic preservation in the City and regulatory requirements related to encounter of remains. Like the proposed Project, Alternative 2's potential impacts to cultural and tribal cultural resources would be reduced to a less than significant level with implementation of MM CUL-1.

Energy

Alternative 2 would result in less construction-related energy use and long-term stationary (i.e., not transportation/mobile) energy demand than the proposed Project, commensurate with the reduced geographic scope and amount of potential development and redevelopment. However, when taking into consideration that Alternative would result in a slightly less dense and less mixed land use pattern than the proposed Project, both fuel efficiency and total VMT (i.e., energy demand from operation) would be higher under this Alternative. On balance, it is anticipated that Alternative 2 would result is less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy, or conflicts with plans for renewable energy or energy efficiency, like the Project.

Geology and Soils

Geologic and soils conditions, particularly seismic shaking and secondary seismic risks are essentially the same throughout most of the City. The hilly areas in the northeast and southwest may experience additional or slightly different conditions related to slope and/or underlying

geologic units. Like the proposed Project, the design and construction of structures for human occupancy under Alternative 2 would require preparation of a geotechnical report and be subject to the same State, County, and City codes and requirements.

Alternative 2 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. However, all construction projects in Alternative 2 would be subject to the same State or City stormwater quality requirements as the proposed Project.

Alternative 2 would involve less ground disturbance that could impact unknown paleontological resources than the proposed Project. Like the proposed Project, impacts to paleontological resources would be less than significant after implementation of MM CUL-1.

Greenhouse Gas Emissions

As discussed for the air quality analysis of Alternative 2 above, GHG emissions were quantified for the development of 589 DUs and 430,000 sf of non-residential growth as part of EA preparation prior to the inclusion of the 2021–2029 Housing Element. However, in June 2021, the latest version of CalEEMod was released. This EA uses the current CalEEMod version for analysis of the proposed Project. While modeling results are generally similar between versions, they do not represent an apples-to-apples comparison.

For purposes of comparison, the GHG emission modeling for the growth under Alternative 2 concluded there would be an exceedance of the SCAQMD threshold of annual GHG emissions per service population. MM GHG-1 developed of part of the Administrative Draft for the formerly defined project required adoption of a Climate Action Plan (CAP) within 24 months of the General Plan and DTSP Update's adoption. The required CAP would have ensured that GHG emissions from buildout of the proposed Project were minimized. However, it was also concluded that the CAP may not feasibly obtain the AB 32 targets and that additional Statewide measures would be necessary to reduce GHG emissions to meet legislative goals. Because additional Statewide measures were not currently available, some of which would involve unforeseen advances in technology, GHG impacts were considered significant and unavoidable for development of 589 DUs and 430,000 sf of growth through 2040.

Alternative 2 would generate reduced greenhouse gas (GHG) emissions from construction and operation of the reduced development capacity compared to the Project. However, as discussed below for Land Use and Planning, this alternative would result in higher vehicle miles traveled (VMT) for the City as a whole compared to the proposed Project. A higher VMT reflects greater relative contribution of the City per capita and per service population to GHG emissions. Like the proposed Project, MM GHG-1 in this Draft EA requires project-level GHG analysis, and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impacts would remain significant and unavoidable under Alternative 2, same as the Project.

As discussed further in Section 3.7, Greenhouse Gas Emissions, the City adopted its first CAP on December 16, 2020. The proposed Project was demonstrated to be consistent with the City's CAP, and the CAP is, in turn, consistent with State plans, policies, and regulations, AB 32, the AB 32 scoping plan and updates, EO B-30-15, SB32, and EO B-55-18, and there would be a less than significant impact. The actions in the CAP would apply City-wide regardless of the amount of development. Therefore, Alternative 2 would also be consistent with the CAP and there would be a less than significant impact, same as the proposed Project.

Hazards and Hazardous Materials

Alternative 2 would result in reduced impacts related to hazards and hazardous materials as the proposed Project, because it involves less disturbance of soil that could be contaminated; and would involve less construction effort and thus less use of hazardous materials by construction projects. While the proposed Project would permit development of more residential units than Alternative 2 would, operation of residences generally involves use of only small amounts of hazardous materials for cleaning and maintenance purposes, and operational hazardous materials impacts would be generally similar for Alternative 2 compared to the proposed Project. Hazardous materials would be used in accordance with existing regulations. Fewer residents and construction workers would be potentially exposed to hazardous materials under Alternative 2 than under the proposed Project. Like the proposed Project, potential impacts related to hazards and hazardous materials would be less than significant with implementation of MMs HAZ-1 and HAZ-2.

Hydrology and Water Quality

Alternative 2 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. Construction projects in each scenario would comply with State or City stormwater quality requirements, as applicable. Operational impacts to operational water quality standards and waste discharge requirements would be reduced, due to lower development intensity, compared to the proposed Project. However, like the proposed Project, there would be less than significant impacts related to hydrology and water quality, including drainage patterns, through compliance with State and local regulations.

Developable vacant land in the City comprises less than one percent of the City's land area; thus, Alternative 2 and the proposed Project would each cause only minor increases in impermeable surfaces in the City. Alternative 2 would generate a lower increase in water demands compared to the proposed Project, commensurate with the reduced amount of potential residential development and redevelopment. The Main San Gabriel Groundwater Basin (basin), from which the City provides most of its water supply, is controlled by the Main San Gabriel Basin Watermaster. Regardless of the amount of potable water demand by the City, the Watermaster is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Therefore, impacts on groundwater recharge and supply from Alternative 2 would be similar to those of the proposed Project.

Land Use and Planning

Alternative 2 would result in a new significant and unavoidable impact related to land use and planning because this alternative would not demonstrate to the State that the City can meet its mandated RHNA allocation. As such, this alternative would conflict with State planning law.

Alternative 2 would be less consistent with SCAG's 2020-2045 RTP/SCS, as the reduced amount of residential development and redevelopment would reflect a land use pattern that contributes less towards the GHG emissions reduction targets compared to the proposed Project. This alternative would provide less residential and mixed-use development near transit and other existing infrastructure (e.g., roads, utilities, services) and generally build at a lower density in selected portions of the City. Therefore, Alternative 2 would result in a higher VMT per capita and VMT per service population for the City as a whole compared to the proposed Project. A higher VMT reflects greater relative contribution of the City to GHG emissions. Like the proposed Project, Alternative 2 would conserve established residential neighborhoods, would not substantially change the development pattern of the City, and would not divide established communities.

Noise

Alternative 2 would result in reduced noise impacts from construction and operation of the reduced development capacity compared to the Project. Buildout under Alternative 2 would result in reduced vehicle trips. Alternative 1 would involve a 72 percent reduction in residential development and no reduction in non-residential development. However, as shown in Table 3.11-9 in Section 3.11, Noise, of this EA, the contribution of the proposed Project's traffic noise would less than three dBA, which is considered barely perceptible to human hearing. Therefore, the future exterior noise levels at residential uses after implementation of MM NOI-1 may remain above 65 dBA CNEL at some locations because this is a result of existing conditions. Therefore, this impact would be reduced but remain significant and unavoidable. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant with implementation of MMs NOI-2 and NOI-3, respectively.

With reduced development capacity, there would likely be reduced construction activity over the planning horizon. As such, the significant and unavoidable construction noise impact at receiver locations within 200 feet, after implementation of MMs NOI-4 through NOI-7, would affect fewer existing receptors. Like the proposed Project, vibration generated during construction would be less than significant with implementation of MMs NOI-4 and NOI-5; and within 50 feet of the Metro L Rail Line with implementation of MM NOI-6. Alternative 2 would not subject people in South Pasadena to excessive airport-related noise; the nearest airport to the City is the San Gabriel Valley Airport approximately six miles away.

Population and Housing

As discussed above, Alternative 2 assumes development of up to 589 DUs and 430,000 sf of non-residential development and in the City through 2040. Table 4-3, Comparison of SCAG Projections and Alternative 2 Buildout, provides a comparison of the 2040 SCAG growth projections and the Alternative 2 buildout projections.

TABLE 4-3
COMPARISON OF SCAG PROJECTIONS AND ALTERNATIVE 1 BUILDOUT

	Existing Conditions	Alternative 2 Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	11,180 (557 DUs)[a]	11,109[c]	-71 DUs / -0.6%
Housing Units	11,156[a]	11,745 (589 DUs)	11,822[a]	N/A
Population	25,580[a]	26,961 (1,381 persons)[a]	27,004[c]	-43 persons / -0.1%
Employment	13,700[b]	15,678 (1,978 jobs)	11,984[c]	+ 3,694 jobs / +30.8%
Jobs-Housing Ratio	1.23	1.33	1.01	N/A

DU: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022
[c] SCAG 2020, Aguilar 2021

As shown in Table 4-3, buildout of Alternative 2 would result in essentially the same number of households and population growth as the SCAG projections. This would not represent substantial unplanned population growth. This is because, as discussed in Section 3.12, Population and Housing, of this EA, SCAG's projections in the RTP/SCS are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. At that time, the City would have provided to SCAG demographic projections based on the proposed 589 DUs and 430,000 sf of non-residential formerly envisioned for the City.

Regarding employment, Alternative 2 would result in the same number of jobs as the Project. As discussed in Section 3.12, the projected employment of 15,678 jobs represents an increase of 1,978 jobs (or about a 14.4 percent increase or 0.72 percent per year) from EDD's 2022 estimate of 13,700 jobs. As shown, however, Alternative 2 would result in a higher jobs-housing ratio than both the existing conditions in the City (based on EDD data) and would be more jobs-rich than projected by SCAG. Again, this is due to the disparity between SCAG's and EDD's data. An area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). As such, development of Alternative 2 would lead to a potential jobs-housing ratio that is unbalanced through provision of relatively more employment than housing.

Therefore, Alternative 2 would avoid the significant and unavoidable impact related to demographic growth resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation. However, the Alternative 2 land use plan is less consistent than the Project with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers such as the Mission L Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive.

Like the proposed Project, Alternative 2 could cause some displacement of existing residential units and residents. Projects displacing residents would be mandated to comply with City requirements for tenant notification and relocation assistance programs. Conversion of residences due to projects undertaken by a public entity would be required to comply with the California Relocation Assistance Act. Any residential displacement under Alternative 2 would not require construction of replacement housing, as Alternative 2 would permit construction of up to 589 residential units. Like the Project, there would be no impacts related to displacement of housing or people that necessitates construction of housing elsewhere.

Public Services and Recreation

Alternative 2 would result in reduced demand for fire protection, police protection, school services, library services, and recreation facilities than the proposed Project, commensurate with the reduced amount of potential residential development and redevelopment. Therefore, like the proposed Project, Alternative 2's potential impacts to public services would be less than significant level.

Transportation and Traffic

Alternative 2 would result in reduced total VMT compared to the proposed Project, commensurate with the reduced amount of residential development or redevelopment and resultant density. However, this alternative would result in relatively higher VMT per capita and VMT per service population compared to the Project, which is the metric used to determine the significance of transportation impacts. It is noted that, compared to Alternative 1, Alternative 2 would result in relatively higher total VMT but improved VMT per capita and VMT per service population. Increasing density of land uses, especially when near transit and/or mixed with employment and

services, reduces VMT. The proposed Project's land use plan provides a mix and density of land uses that contributes to reducing vehicle trips through improved alternative transportation options and proximity of housing to employment and services than in the existing condition. Like the Project, this alternative would include the extensive transportation-related policies and actions that support reducing VMT. However, without extensive modeling, it is unknown the actual VMT per capita or service population that would result. Like the proposed Project, Alternative 2 would not cause substantial hazards due to a geometric design feature or incompatible roadway uses, and future projects developed under Alternative 2 must comply with City requirements to ensure adequate emergency access.

Utilities and Service Systems

Alternative 2 would generate reduced demands for utilities and service services, including water supply, water and wastewater infrastructure, wastewater treatment, dry utilities (i.e., electricity, natural gas, telecommunications), and solid waste generation, commensurate with the reduced amount of residential development or redevelopment. However, through compliance with applicable regulations and proposed policies and actions, the Project would result in less than significant impacts related to these utilities and service systems. Therefore, with reduced demands, Alternative 2 would also result in less than significant impacts to water supply, water and wastewater infrastructure, wastewater treatment, solid waste, and dry utilities.

Wildfire

Approximately the southwest quadrant of the City is designated a High Risk Fire Area by the City of South Pasadena Municipal Code (SPMC). No fire hazard severity zones are designated by the California Department of Forestry and Fire Protection (CAL FIRE) within the City. Like the proposed Project, it is possible that parcels in the High Risk Fire Area could be developed or redeveloped under Alternative 2, although the likelihood and extent of this activity would be lower. Also like the proposed Project, implementation of development under Alternative 2 would be required to comply with State and local codes and other regulations related to emergency access and building in wildfire hazard areas and on hillsides. Accordingly, Alternative 2 would not substantially impact emergency response or evaluation, exacerbate wildfire risks, including due to installation or maintenance of infrastructure, and expose persons to pollutant concentrations from wildfire; or expose people or structures to significant risks subsequent to wildfire such as flooding or landslides. Wildfire impacts of Alternative 2 would be less than significant.

Ability to Meet Project Objectives

Alternative 2 would not meet objective 1 to provide sufficient and inclusive housing capacity to meet State mandates. This alternative would be in violation of State law, opening the City to penalties, and the Court Order to which the City is now subject, opening the City to Court-ordered sanctions.

Alternative 2 would meet five of the six Project objectives, as the objectives are more closely aligned with providing a high-quality environment rather than a certain amount of development. Specifically, objectives 2, 4, 5, and 6 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 3 would be met because Alternative 2 would still direct growth primarily towards the downtown and Ostrich Farm areas, which is also a policy decision.

Conclusion

Alternative 2 would reduce criteria pollutant emissions and GHG emissions; however, the reduction would not eliminate the significant and unavoidable impacts associated with AQMP consistency, VOC emissions, GHG emissions, or GHG plan inconsistency because the effects of MMs AQ-1 and GHG-1, requiring project-level analysis and mitigation measures, cannot be quantified at this time. Exterior traffic noise levels would be reduced but a significant and unavoidable impact would remain, because this is a result of existing conditions and not buildout of the Project. This Alternative would expose fewer receptors to construction noise that may exceed the standard, but the potential impact on exposed receptors would remain significant and unavoidable. However, Alternative 2 would result in a new significant and unavoidable impact related to land use and planning as the number of dwelling units would be far below the 6th Cycle RHNA allocation for the City, which would violate State law and the Court Order to which the City is now subject.

For all other topics, impacts would be similar or reduced compared to the proposed Project. Although a lower level of development capacity may be preferable to some, this increment of reduction would not alleviate the total significant and unavoidable impacts of the Project, by eliminating one impact (population and housing) and adding one (land use and planning). From an environmental standpoint, perhaps most importantly, this alternative would not be as consistent with regional (SCAG) planning programs and policies related to reducing GHG emissions consistent with SB 375.

4.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Table 4-4, Comparison of Impacts for Project Alternatives, on the following page, provides a summary comparison of impacts resulting from both alternatives to the Project.

As shown in Table 4-4, both alternatives would eliminate the significant and unavoidable impact related to population resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation, because of the reduced residential development proposed in Alternatives 1 and 2. However, because of the reduced residential development, both Alternatives 1 and 2 would result in a new significant and unavoidable impact related to land use and planning. Specifically, these alternatives would not accommodate the City's RHNA allocation and therefore would be in violation of State law as well as the Court Order to which the City is now subject.

For all other topics, the Alternatives' final impact finding is the same although the degree of impact varies compared to the Project. For instance, both alternatives would have a reduced impacts to public services as there would be less additional land use development; however, under Alternative 1 this comparative reduction would be greater than under Alternative 2 as it proposes the least amount of both residential and non-residential development. From an environmental standpoint, perhaps most importantly, Alternative 2 would not be as consistent with regional (SCAG) planning programs and policies related to reducing GHG emissions pursuant to SB 375 and other State legislation.

Alternatives 1 and 2 would have the same consistency with most Project objectives.

Therefore, Alternative 2 is concluded to be the environmentally superior alternative because of its greater amount of development capacity compared to Alternative 1, which results in greater consistency with both the 6th Cycle RHNA allocation, Court Order, and regional plans to reduce GHG emissions.

TABLE 4-4
COMPARISON OF IMPACTS FOR PROJECT ALTERNATIVES

Environmental Issue and EA Section	Alternative 1 (No Project/ Existing General Plan) Comparison to the Project	Alternative 2 (Reduced Development Capacity) Comparison to the Project
3.1 Aesthetics	Similar Impacts	Similar Impacts
3.2 Air Quality	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.3 Biological Resources	Reduced Impacts	Reduced Impacts
3.4 Cultural and Tribal Cultural Resources	Reduced Impacts	Reduced Impacts
3.5 Energy	Similar Impacts	Similar Impacts
3.6 Geology and Soils	Similar Impacts (Geology); Reduced Impacts (Paleontology)	Similar Impacts (Geology); Reduced Impacts (Paleontology)
3.7 Greenhouse Gas Emissions	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.8 Hazards and Hazardous Materials	Reduced Impacts	Reduced Impacts
3.9 Hydrology and Water Quality	Reduced Impacts	Reduced Impacts
3.10 Land Use and Planning	New Significant and Unavoidable Impact	New Significant and Unavoidable Impact
3.11 Noise	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.12 Population and Housing	Elimination of Significant and Unavoidable Impact	Elimination of Significant and Unavoidable Impact
3.13 Public Services and Recreation	Reduced Impacts	Reduced Impacts
3.14 Transportation	Unknown	Unknown
3.15 Utilities and Service Systems	Reduced Impacts	Reduced Impacts
3.15 Wildfire	Similar Impacts	Similar Impacts

4.5 REFERENCES

Aguilar, M. 2021 (June 10). Personal Communication. *E-mail correspondence between M. Aguilar (Clerk of the Board, Southern California Association of Governments) and J. Neary (Project Manager, Psomas) regarding 2040 demographic projections pursuant to the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*.

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California Employment Development Department, Labor Market Information Division (EDD). 2022 (July). *Unemployment Rates and Labor Force: Cities and Census Designated Places by Individual County: Los Angeles*. Sacramento, CA: EDD. https://www.labormarketinfo.edd.ca.gov/file/lfmonth/lasub.xls.

Southern California Association of Governments (SCAG). 2020 (September 3). *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*. Los Angeles, CA: SCAG. Read the Plan Adopted Final Plan - Southern California Association of Governments.

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SECTION 5.0 OTHER CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIRED CONSIDERATIONS

Section 15126 of the State California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The following must be identified for the project being analyzed; the location of the required information in this Environmental Assessment (EA) is presented in parentheses:

a) Significant environmental effects of the proposed Project (see Table ES-1 and Sections 3.1 through 3.16);

b) Significant environmental effects which cannot be avoided if the proposed Project is implemented (see Table ES-1, Sections 3.1 through 3.16, and Section 4.0);

c) Significant irreversible environmental changes which would be involved in the proposed Project should it be implemented (see Section 5.1);

d) Growth-inducing impacts of the proposed Project (see Section 5.2);

e) The mitigation measures proposed to minimize significant effects (see Table ES-1 and Sections 3.1 through 3.16); and

f) Alternatives to the proposed Project (see Section 4.0).

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the Project. Section 15126.2(c) states:

> "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impact and, particularly, secondary impacts (e.g., highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current compensation is justified."

As such, a project would generally result in significant irreversible environmental changes if:

- The proposed consumption of resources is not justified (e.g., the project involved the wasteful or inefficient use of energy) (refer to Section 3.5, Energy);
- The project would involve a large commitment of nonrenewable resources; or
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Potential future development associated with implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project) would consume limited, slowly renewable, and non-renewable resources. Over the long term, new development would require the commitment and reduction of nonrenewable and slowly renewable resources, including petroleum

fuels and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, roadways, and infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by long-term implementation of the Project (e.g., air quality through the combustion of fossil fuels and production of greenhouse gases, and water supply through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs).

Future construction activities related to implementation of the Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment. However, the Project would not be creating a need for jobs or housing. The proposed growth would fulfill an existing and anticipated future need that is based on estimates of local and regional population growth. Therefore, the non-renewable resources used in construction of future development projects pursuant to the Project would be expected to be consumed by housing and employment-generating land uses that are anticipated, and are unfulfilled, in the San Gabriel Valley and the wider region. Additionally, the land uses proposed are not unusually wasteful or excessive in terms of construction materials and fossil fuel use.

Implementation of the Project would result in the continuation of long-term resource commitments to potential future development. The resources that would be committed during development would be similar to those currently consumed within the City. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle trips, and water. Fossil fuels would represent the primary energy source associated with potential future development within the City, and the existing, finite supplies of these natural resources would be incrementally reduced. Any future development would occur in accordance with Title 24, Part 6 of the California Building Code in effect at that time, which sets forth conservation practices that would limit the amount of energy consumed by future development.

The majority of future growth under the Project would consist of infill development and redevelopment, and much of this would be located in proximity to transit (light rail or bus) and/or walking distance to retail and services. The location and type of future growth in the focus areas is intended to reduce vehicle miles traveled (VMT) compared to land uses not located near transit and/or not near a mix of uses and services. Because the future growth in the City would be on or near sites of existing development and would provide a portion of the needed housing stock in the region, the Project would not be considered wasteful or inefficient in its use of fossil fuels, including energy resources.

Similarly, most of the future land uses would not include lawns or other large-scale landscaped areas, and landscaped areas proposed would be required to meet the requirements of Article III, Water Efficient Landscape, of the South Pasadena Municipal Code. As such, the Project would not be considered wasteful or inefficient in its use of water. Although minimal compared to the existing energy use of the City, because of the relatively small increment of growth and types and land uses, the fossil fuel and water requirements associated with implementation of the Project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The State CEQA Guidelines also require a discussion of the potential for irreversible damage caused by environmental accidents associated with a project. While implementation of the Project would result in the use, transport, storage, and disposal of hazardous materials and/or wastes typical of urban areas, such as associated with dry cleaners, restaurant and office cleaning/maintenance, and landscape maintenance, as described in Section 3.8, Hazards and Hazardous Materials, all activities would comply with applicable State and federal laws related to

hazardous materials transport, use, and storage, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage, and such an accident causing irreversible damage is not considered reasonably foreseeable.

In summary, potential future development associated with the Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses through the year 2040. However, the use of such resources is anticipated and accounted for in the State, regional, and local regulations, which generally prohibit wasteful practices and require environmentally conservative actions, as summarized in the "Relevant Programs and Regulations" discussion within Sections 3.1 through 3.16 of this EA. Similarly, as discussed in Section 3.9, Land Use and Planning, the proposed Project is entirely consistent with the goals adopted in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, which is intended to reduce VMT, contribute to improved air quality, and greenhouse gas emissions, among other objectives. Therefore, although irreversible changes would result from implementation of the Project, such changes would not be considered significant, and no mitigation is required.

5.2 GROWTH-INDUCING IMPACTS

Pursuant to Section 15126.2(d) of the State CEQA Guidelines, this analysis examines ways in which the Project could foster economic or population growth or the construction of additional development, either directly or indirectly, in the surrounding environment.

Also, this section discusses whether the Project could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in several ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, and/or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental impact, it could potentially lead to environmental effects.

Accordingly, a project may foster spatial, economic, or population growth in a geographic area if it meets one or more of the following criteria:

1. Removal of an obstacle to growth (e.g., construction or extension of major infrastructure, providing new access to an area);
2. Foster population growth (e.g., construction of additional housing), either directly or indirectly;
3. Foster economic effects that could result in other activities that could significantly affect the environment (e.g., changes in revenue base, employment expansion);
4. Establish a precedent-setting action that could result in other activities that could significantly affect the environment (e.g., an innovation, a change in zoning, general plan amendment); and/or
5. Development of or encroachment on an isolated or adjacent area of open space (being distinct from an in-fill project).

The potential growth-inducing impacts associated with the Project are evaluated below against these criteria. It should be noted that growth-inducing effects are not necessarily beneficial,

detrimental, or of little significance to the environment (Section 15126.2[d] of the State CEQA Guidelines).

The impacts associated with the future development of vacant lots and the redevelopment/infill of existing properties to higher intensity or different land uses is analyzed in Sections 3.1 through 3.16 of this EA. As summarized in the Executive Summary of this EA, significant adverse impacts would be avoided or reduced to less than significant levels through compliance with the policies and actions in the proposed Project; compliance with existing regulations; and required mitigation measures (MMs). Significant unavoidable adverse impacts would remain related to Air Quality (Section 3.2), Greenhouse Gas Emissions (Section 3.7), Noise (Section 3.11), and Population and Housing (Section 3.12).

As described in Section 2.0, Environmental Setting and Project Description, a general plan guides the development of a city or county and consists of policies actions and/or programs that would achieve the community's vision for its future. Accordingly, the Project is premised on a certain amount of growth taking place. As discussed in Section 2.0, the proposed Project presents an opportunity to re-evaluate the City's values; address broader issues; and respond to changing economic, environmental, legal, social, and regulatory settings. City of South Pasadena decision makers will use the Project to provide direction when making land use and public service decisions.

Since the City of South Pasadena is largely built out, the roadway and utility infrastructure systems are in place. Improvements to roads and other infrastructure would be implemented either to alleviate existing issues or in support of anticipated future growth. Extension of water and sewer lines (i.e., laterals), if needed, would be part of individual future projects and provide services to those developments. However, extensions or replacements of wet utilities (water and sewer infrastructure), dry utilities (i.e., electric, natural gas, telecommunications), or roadway improvements that would serve only the existing and proposed uses and would not serve other nearby areas may be an inducement to further (i.e., unplanned) development either within or near the City. It is also noted that because the City is almost entirely built out and the existing open space areas are not proposed for development, implementation of the Project would not result in development of or encroachment on an isolated or adjacent area of open space.

Implementation of the Project would induce population growth within the City by facilitating directed growth. This analysis assumes the buildout of up to 2,775 additional dwelling units and 430,000 square feet of non-residential uses, comprised of retail and office development. This is estimated to generate up to an additional 6,882 residents and 1,978 jobs. Potential growth inducement impacts of adoption and implementation of the Project are addressed in Section 3.12, Population and Housing, of this EA. Implementation of the Project, which is by definition growth-inducing regardless of the significance finding for the Project in Section 3.12, would result in significant environmental impacts after mitigation, as presented in Sections 3.1 through 3.16 of this EA. This is considered a significant and unavoidable growth-inducing impact.

If the Project is adopted, the City will subsequently need to review and update, as needed, its Zoning Code to make sure it is consistent with policies in other planning documents. The environmental impacts of the update to the Zoning Code consistent with State law (Section 65860 of the Government Code). Similar to the discussion of growth inducement above, adoption of a General Plan, Specific Plan, and/or Housing Element and an update to the Zoning Code are, by definition, precedent setting actions, as these documents/codes set the path for future development in the City and would result in significant environmental impacts after mitigation, as presented in Sections 3.1 through 3.16 of this EA. This is considered a significant and unavoidable growth-inducing impact.

APPENDIX A-1

CULTURAL RESOURCES RECORD SEARCH

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-00112		1974	D'Altroy, Terence N.	Impact on Archaeological Resources of Proposed Upgrading Ramps on the Pasadena Freeway	University of California, Los Angeles Archaeological Survey	
LA-00115		1974	Clewlow, William C. Jr.	Evaluation of the Archaeological Resources and Potential Impact of Proposed Extension of the Long Beach Freeway (rt. 7) North From Valley Blvd. to Rt. 210 (colorado Freeway)	University of California, Los Angeles Archaeological Survey	
LA-01319		1983	Romani, John F.	Archaeological Survey Report for Two Proposed Disposal Sites 07-la 7 Routes 10 to 210 07-204-020090	Caltrans	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-03440		1994	Kane, Diane	Third Supplemental Historic Architectural Survey Report 710 Freeway Gap Closure Report (07-la 710, 26.5/r32.7 Ea 07-020090) Volume Ii: Pasadena Avenue District Re-evaluation	Caltrans District 7: Environmental Planning Branch	19-150039, 19-150040, 19-150041, 19-150042, 19-150043, 19-150044, 19-150045, 19-150046, 19-150047, 19-150048, 19-150049, 19-150050, 19-150051, 19-150052, 19-150053, 19-150054, 19-150055, 19-150056, 19-150057, 19-150058, 19-150059, 19-150060, 19-150061, 19-150062, 19-150063, 19-150064, 19-150065, 19-150066, 19-150067, 19-150068, 19-150069, 19-150070, 19-150071, 19-150072, 19-150073, 19-150074, 19-150075, 19-150076, 19-150077, 19-150078, 19-150079, 19-150080, 19-150081, 19-150082, 19-150083, 19-150084, 19-150085, 19-150086, 19-150087, 19-150088, 19-150089, 19-150090, 19-150091, 19-150092, 19-150093, 19-150094, 19-150095, 19-150096, 19-150097, 19-150098, 19-150099, 19-150100, 19-150101, 19-150102, 19-150103, 19-150104, 19-150105, 19-150106, 19-150107, 19-150108, 19-150109, 19-150110, 19-150111, 19-150112, 19-150113, 19-150114, 19-150115, 19-150116, 19-150117, 19-150118, 19-150119, 19-150120, 19-150121, 19-150122, 19-150123, 19-150124, 19-150125, 19-150126, 19-150127, 19-150128, 19-150129, 19-150130, 19-150131, 19-150132, 19-150133, 19-150134, 19-150135, 19-150136, 19-150137, 19-150138, 19-150139, 19-150140, 19-150141, 19-150142, 19-150143, 19-150368, 19-150370, 19-150371, 19-150372, 19-150373, 19-150374, 19-150375, 19-150376, 19-150377, 19-150378, 19-150379, 19-150380, 19-150381, 19-155886, 19-155887, 19-155888, 19-155889, 19-155891, 19-155892, 19-155894, 19-155897, 19-155898, 19-155900, 19-155901, 19-155902, 19-155903, 19-155904, 19-155905, 19-155906, 19-155908, 19-155909, 19-155910, 19-155913,

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
						19-155914, 19-155915, 19-155917, 19-155918, 19-155919, 19-155920, 19-155921, 19-155922, 19-155923, 19-155924, 19-155925, 19-155928, 19-155929, 19-155930, 19-155931, 19-155932, 19-155933, 19-155935, 19-155936, 19-155937, 19-155938, 19-155939, 19-155940, 19-155942, 19-155943, 19-155944, 19-155945, 19-155946, 19-155947, 19-155948, 19-155949, 19-155950, 19-155951, 19-156643, 19-175665, 19-175669, 19-175673, 19-175674, 19-175682, 19-175687, 19-175690, 19-175696, 19-175700, 19-175701, 19-175731, 19-175734, 19-175736, 19-184979
LA-03497		1994	Anonymous	Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498		1994	Anonymous	Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498A			Saurenman, Hugh	Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System	Harris Miller Miller & Hanson Inc	
LA-04216		1900	Holmes, William Henry	Report of the US National Museum Under the Direction of the Smithsonian Institute for the Year Ending June 30, 1900	The Smithsonian Institute	
LA-04386		1993	Anonymous	Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project	Caltrans	
LA-04451		1983	Anonymous	Route 7 Environmental Impact Statement Supplement	Caltrans	19-179484, 19-179518, 19-179524, 19-179529, 19-179530, 19-179531, 19-179561, 19-179610, 19-179614, 19-179618
LA-04638		1999	Duke, Curt	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 948-01, in the County of Los Angeles, California	LSA Associates, Inc.	
LA-04890		2000	Storey, Noelle	Negative Archaeological Survey Report, Highway Project Description	Caltrans District 7	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-04909		2000	Atchley, Sara M.	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California	Jones & Stokes	
LA-05132		1999	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 1319 and 1921 Fremont Avenue, South Pasadena, Los Angeles County, California	McKenna et al.	
LA-05421		2000	Sylvia, Barbara	Negative Archaeological Survey Report: 07-la-110-07-174-965120	Caltrans District 7	
LA-05434		2001	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 809 and 813 Meridian Avenue, South Pasadena, Los Angeles County, California	Mc Kenna et al.	
LA-06334		2002	Kinkella, Andrew	Below the Basketball Court: Burial Recovery at Arroyo Seco Park	Greenwood and Associates	
LA-06362		1994	Borg, Roger	Finding of Effect on Historic Properties Arroyo Seco Parkway and Four Level Interchange	Caltrans District 7	
LA-06385		2001	McAvoy, Christy J.	Section 106 Review for 5568 Via Marison Avenue Arroyo Seco Park Historic District Los Angeles, Ca	Historic Resources Group	19-189325, 19-189326
LA-06835		2003	Harper, Caprice D.	Cultural Resource Assessment Cingular Wreless Facility No. Vy311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.	
LA-06839		2003	Hale, Alice E.	Burial Data Summary Arroyo Seco/san Pascual Park Los Angeles, California	Greenwood and Associates	19-003057
LA-07426		2004	McMorris, Christopher	Caltrans Historic Bridges Inventory Update: Concrete Arch Bridges	JRP Historical Consulting	19-150195, 19-192481, 19-192482, 19-192483, 19-192484, 19-192485, 19-192486
LA-07553		2004	Fulton, Terri	Cultural Resource Assessment Cingular Wireless Facility No. Vy 311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.	
LA-08526		2004	Unknown	Historic Resources Report, 258-266 Monterey Road, South Pasadena, California	San Buenaventura Research Associates	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-08542		2004	Bonner, Wayne H.	Cultural Resource Records Search Results and Site Visit for Cingular Wireless Facility Candidate Sb-390-01 (bilicke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	Michael Brandman Associates	
LA-08634		2007	Anonymous	Cultural Resources Study of the Arroyo Seco Park Project, Royal Street Communications Site No. La0108b, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-003057
LA-08928		2007	McKenna, Jeanette A.	A Phase I (ceqa) and Class Iii (nepa) Cultural Resources Investigation for the Lower Arroyo Seco Trail and Trailhead Improvements Project Area in the City of Pasadena, Los Angeles County, California	McKenna et al.	19-003057, 19-180037
LA-08948		2007	Lajoie, Glenn and Starla Hack	Public Review Draft Environmental Impact Report, Downtown Revitalization Project, Sch No. 2007031024	RBF Consulting	
LA-09098		2006	Bonner, Wayne H.	Extended Phase I Testing for Cingular Wireless Facility Candidate 950-014-198e/lsanca0336 (arroyo Park) Arroyo Seco Park, South Pasadena, Los Angeles County, California	Michael Brandman Associates	19-003057
LA-09099		2005	Bonner, Wayne H.	Cultural Resources Records Search Results and Site Visit for Cingular Wireless Site 950-014-198e (city Park) Arroyo Park, Near Intersection of Comet Street and Pasqual Avenue, South Pasadena, Los Angeles County, California	Michael Brandman Associates	19-003057
LA-09489		2003	Lee, Portia	Arroyo Seco Parkway Historic District	California Archives	19-179645
LA-09601		2008	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for AT&T Candidate SV0061-01 (OG Park), 820 El Centro Street, South Pasadena, Los Angeles County, California.	Michael Brandman Associates	19-003057
LA-10209		2004	English, John	Finding of Effect Report for the Raymond Ave. To SR110 Connector Project, Los Angeles County, CA	Myra L. Frank & Associates, Inc	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-10388		2009	Bonner, Wayne H. and Kathleen A. Crawford	Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS0099A/LA03XC129A (S. Pasadena Water Tank), 700 S. La Portada, South Pasadena, Los Angeles County, California	MBA	19-188513
LA-10541	OHP PRN - FHWA040514A	2005	Dolan, Christy and Monica Strauss	Finding of Effect for the Proposed Arroyo Seco Bike Path, Los Angeles County, California	EDAW, Inc.	19-003100, 19-003101, 19-003102, 19-186110, 19-186721, 19-186858, 19-186859
LA-10541A		2003	Monica Strauss and Christy Dolan	Historic Property Survey Report Proposed Arroyo Seco Bike Path County Of Los Angeles, California	EDAW	
LA-10541B		2003	Monica Strauss and Christy Dolan	Arroyo Seco Bike Path Historic Resources Evaluation Report HRER - Appendix 1	EDAW	
LA-10541C		2004	OHP - Steve Mikesell acting SHPO	HPSR / Determinations of Eligibility for Arroyo Seco Bike Path Project	Caltrans	
LA-10576		2004	Greenwood, David	Historic Property Suvey Report for the Raymond Avenue to SR 110 Connector project for the Raymond Avenue to SR 110 Connector Project	Myra L. Frank & Associates, Inc.	19-179645, 19-184719, 19-184723, 19-188719, 19-188766, 19-188767
LA-10866		2007	Supernowicz, Dana	Cultural Resources Study of the Arroyo Seco Park Project Royal Street Communications Site No. LA0108B, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-003057, 19-179332, 19-179484, 19-179645, 19-186859
LA-11231		2009	Meiser, M.K.	Historic American Engineering Record Arroyo Seco Flood Control Channel, Los Angeles County, California	EDAW, Inc.	19-186859
LA-11529		2008	Castanon, David	Arroyo Seco Channel Project in the cities of Los Angeles and Pasadena, Los Angeles County, California	Department of the Army	19-186859
LA-11554		2000	Lee, Portia	Historic Resources Evaluation Report and Finding of No Adverse Effect for Oaklawn Bridge =, City of South Pasadena Seismic Retrofit and Historic Restoration Project	California Archives	19-179486
LA-11650		2011	Bonner,Wayne	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidiate IE24844-G (Stein Rooftop), 1959 Huntington Drive, Alhambra, Los Angeles County, California	Michael Brandman Associates	19-189957

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-12060		2012	Supernowicz, Dana	Cultural Resources Study of the South Pasadena Water Tank Project, MetroPCS California, LLC Site No. MLAX04166, 700 La Portdada Street, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-150041, 19-150042, 19-179475, 19-179524, 19-179525, 19-179530, 19-179610, 19-179614, 19-179617, 19-179649, 19-179650, 19-188513
LA-12221		2012	Bonner, Wayne, Williams, Sarah, and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04862A (SB390 Billcke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	mBA	19-150041, 19-150042, 19-179475, 19-179523, 19-179525, 19-179530, 19-179617, 19-179649
LA-12422		2013	Tibbit, Casey and Goodwin, Riordan	Cultural Resources Assessment Arroyo Seco Pedestrian and Bicycle Path Project Cities of South Pasadena and Los Angeles Los Angeles County, California	Lsa	19-190613
LA-12423		2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04948A (LA948 Sinclair) 1499 Huntington Drive, South Pasadena, Los Angeles County, California	MBA	19-190632
LA-13148		2013	Comeau, Brad	Initial Study/Mitigated Negative Declaration Sewer Rehabilitation and Replacement Project	DUDEK	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-003057	CA-LAN-003057	Resource Name - Arroyo Seco / San Pascual Site	Site	Prehistoric	AP02; AP09	2002 (John M. Foster, Greenwood & Associates)	LA-06839, LA-08634, LA-08928, LA-09098, LA-09099, LA-09601, LA-10866
P-19-150039		OHP Property Number - 116020; Resource Name - Whitney & Virginia Smith House	Building	Historic	HP02	1993 (Anne Schield, Caltrans)	LA-03440
P-19-150040		OHP Property Number - 102633; Resource Name - Warren D House	Building	Historic	HP02	1994 (D. Kane, Caltrans)	LA-03440
P-19-150041		OHP Property Number - 116021; Resource Name - East Wynyate	Building	Historic	HP02	1993 (Anne Schield, Cal Trans)	LA-03440, LA-12060, LA-12221
P-19-150042		OHP Property Number - 116022; Resource Name - Otake/Nambu House	Building	Historic	HP02	1994 (Anne Schield, Caltrans)	LA-03440, LA-12060, LA-12221
P-19-150075		OHP Property Number - 116029; Resource Name - Stimson Historic District; Voided - 19-185128	District	Historic	HP02; HP39	1994 (D. Kane, Caktrans)	LA-03440
P-19-150078		OHP Property Number - 030300; Resource Name - Stone/Brooks House; Voided - 19-179611	Building, Element of district	Historic	HP02	1993 (A. Scheid, Caltrans)	LA-03440
P-19-150079		OHP Property Number - 030301; Resource Name - Henry Stephen Boice House; Voided - 19-179612	Building, Element of district	Historic	HP02	1993 (A. Scheid, Caltrans)	LA-03440
P-19-150080		OHP Property Number - 030302; Resource Name - Frank P O'Connor House; Voided - 19-179613	Building, Element of district	Historic	HP02	1994 (A. Scheid, Caltrans)	LA-03440
P-19-179471		OHP Property Number - 030160; Resource Name - Leo Longley House	Building	Historic	HP02	1977 (Tom Sitton, Natural History Museum)	
P-19-179472		OHP Property Number - 030161; Resource Name - William Cooper House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179473		OHP Property Number - 030162; Resource Name - Anna B McKay House; Other - Marins S Daniels House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179474		OHP Property Number - 030163; Resource Name - Porter House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179475		OHP Property Number - 030164; Resource Name - South Pasadena School	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	LA-12060, LA-12221
P-19-179476		OHP Property Number - 030165; Resource Name - Raymopnd Hill Waiting Station; Other - SW Fair Oaks Ave & Raymond Hill Rd	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179477		OHP Property Number - 030166; Resource Name - Kate Plumb House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179478		OHP Property Number - 030167; Resource Name - Kate A White House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179479		OHP Property Number - 030168; Resource Name - A S Hoyt House	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179481		OHP Property Number - 030170; Resource Name - Williams-Perrin House; Other - Charles P Williams House	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179482		OHP Property Number - 030171; Resource Name - Garfield House; Other - Mrs Lucretia R Garfield House; Other - Mrs James A Garfield House	Building, Element of district	Historic	HP02	1973 (M L Fey, South Pasadena Cultural Heritage Commission)	
P-19-179483		OHP Property Number - 030172; Resource Name - Howard Longley House	Building, Element of district	Historic	HP02	1973 (M L Fey, South Pasadena Cultural Heritage Commission)	
P-19-179484		OHP Property Number - 030173; Resource Name - Buean Vista District	District	Historic	HP02	1976 (Lois M. Webb, Cal Trans)	LA-04451, LA-10866

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179486		OHP Property Number - 030175; Resource Name - Oaklawn Bridge & Waiting Station	Building, Structure, Element of district	Historic	HP04; HP19	1972 (M L Fey, South Pasadena Cultural Heritage Commission); 2000 (Daniel Abeyta, OHP); 2001 (Dan Peterson, Avila Tom Architects); 2001 (Glen Duncan, S. Pasadena Cultural Heritage Commission)	LA-11554
P-19-179499		OHP Property Number - 030188; Resource Name - Oaklawn District; Other - Oak Lawn Place	District	Historic	HP02	1976 (L Webb, CA Department of Transportation); 2008 (Robert J. Magiligan)	
P-19-179500		OHP Property Number - 030189; Resource Name - Seymour House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179501		OHP Property Number - 030190; Resource Name - J R Riggins House, Gertmenian House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum); 1985 (John W. Snyder, Caltrans)	
P-19-179502		OHP Property Number - 030191; Resource Name - Alexander Block	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179503		OHP Property Number - 030192; Resource Name - Graham Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179505		OHP Property Number - 030194; Resource Name - Shapiro Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179506		OHP Property Number - 030195; Resource Name - Edwards & Faw Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179509		OHP Property Number - 030198; Resource Name - Herlihy Block; Other - South Pasadena Review Bldg	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179510		OHP Property Number - 030199; Resource Name - Taylor Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179516		OHP Property Number - 030205; Resource Name - Mission Hotel	Building, Element of district	Historic	HP05	1977 (T Sitton, Natural History Museum)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179518		OHP Property Number - 030207; Resource Name - South Pasadena Historic District; Resource Name - Mission West District	District	Historic	HP06; HP15	1976 (L Webb, CA Department of Transportation); 1977 (T Sitton, Natural History Museum)	LA-04451
P-19-179519		OHP Property Number - 030208; Resource Name - Jacobs Block	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179520		OHP Property Number - 030209; Resource Name - Fremont Ave Brethren Church	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179521		OHP Property Number - 030210; Resource Name - Rialto Theater	Building, Element of district	Historic	HP10	1977 (R Hatheway, Natural History Museum); 1977 (R Shryock)	
P-19-179522		OHP Property Number - 030211; Resource Name - War Memorial Bldg	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179523		OHP Property Number - 030212; Resource Name - South Pasadena High School Administration Bldg; Other - South Pasadena School District Office	Building	Historic	HP15	1977 (T Sitton, Natural History Museum)	LA-12221
P-19-179524		OHP Property Number - 030213; Resource Name - A A Mitchell House, Dieterle House, Wilson House; Other - Albert A Mitchell House; Other - Wililam Dieterle House; Other - Wilson House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum); 1982 (John Snyder, Caltrans)	LA-04451, LA-12060
P-19-179525		OHP Property Number - 030214; Resource Name - A C Bilicke House; Other - South Pasadena Methodist Church	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	LA-12060, LA-12221
P-19-179526		OHP Property Number - 030215; Resource Name - St James Episcopal	Building	Historic	HP16	1977 (T Sitton, Natural History Museum)	
P-19-179527		OHP Property Number - 030216; Resource Name - Tanner House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179528		OHP Property Number - 030217; Resource Name - Grokowsky House	Building	Historic	HP02	1976 (L M Webb & A Cole, CA Department of Transportation)	
P-19-179529		OHP Property Number - 030218; Resource Name - Sherry House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179530		OHP Property Number - 030219; Resource Name - Kenneth W Joy House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060, LA-12221
P-19-179531		OHP Property Number - 030220; Resource Name - The Captain's House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179561		OHP Property Number - 030250; Resource Name - North of Mission District; Voided - 19-179647	District	Historic	HP02	1982 (J Snyder, DOTP Clatrans)	LA-04451
P-19-179610		OHP Property Number - 030299; Resource Name - South of Mission District; Voided - 19-179648	District	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060
P-19-179614		OHP Property Number - 030303; Resource Name - J G Pierce House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060
P-19-179615		OHP Property Number - 030304; Resource Name - Miltimore House	Building	Historic	HP02	1970 (E McCoy, UCSB/UCLA)	
P-19-179616		OHP Property Number - 030305; Resource Name - Adobe Flores; Other - La Casa de Jose Perez	Building	Historic	HP44	1972 (M Fay, South Pasadena Cultural Heritage Commission)	
P-19-179617		OHP Property Number - 030306; Resource Name - Wynyate; Other - Welsh for Vineyard	Building	Historic	HP02	1973 (Margaret Leslie Fay, S. Pasadena Cultural Heritage Commission)	LA-12060, LA-12221
P-19-179618		OHP Property Number - 030307; Resource Name - Tanner House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179645		OHP Property Number - 030334; Resource Name - Arroyo Seco Parkway Historic District; Other - SR-110 Pasadena Freeway, Arroyo Seco Freeway; OHP Property Number - 177126; National Register - NPS-10001198-9999	Structure, District	Historic	HP37	1982 (Snyder, John W., Cal Trans); 2003 (David Greenwood, Myra L. Frank & Assoc.); 2008 (Janice Calpo, Cal Trans)	LA-09489, LA-10576, LA-10866, LA-11404, LA-12526, VN-03153

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179649		OHP Property Number - 030339; Resource Name - 1100 Loma Vista Ct; OHP Property Number - 064983	Building	Historic	HP02	1986 (J. Triem, McClelland Engineers)	LA-12060, LA-12221
P-19-179650		OHP Property Number - 030340; Resource Name - Swimming Pool Bldg; Other - Plunge	Building	Historic	HP09	1986 (J Snyder, Caltrans)	LA-12060
P-19-179651		OHP Property Number - 030342; Resource Name - Edward Hall House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179652		OHP Property Number - 030343; Resource Name - E C Emmons House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179653		OHP Property Number - 030344; Resource Name - 1002 Highland St	Building	Historic	HP02	1985 (J. Snyder, Caltrans)	
P-19-179654		OHP Property Number - 030345; Resource Name - 1004 Highland St	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179655		OHP Property Number - 030346; Resource Name - Anna S Breed House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179656		OHP Property Number - 030347; Resource Name - Drachmann House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179657		OHP Property Number - 030348; Resource Name - Groetzinger House; Other - Ruddock House	Building	Historic	HP02	1986 (J Snyder, Caltrans)	
P-19-179658		OHP Property Number - 030349; Resource Name - 629 Grand Ave	Building	Historic	HP02	1985 (J snyder, Caltrans)	
P-19-179659		OHP Property Number - 030350; Resource Name - Thomson House; Other - Garrison House; OHP Property Number - 064905	Building	Historic	HP02	1986 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179660		OHP Property Number - 030351; Resource Name - 400 Prospect Circle; OHP Property Number - 149742	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179661		OHP Property Number - 030352; Resource Name - Mrs E E Ambrose House; OHP Property Number - 149744	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179662		OHP Property Number - 030353; Resource Name - 420 Prospect Circle; OHP Property Number - 149747	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179663		OHP Property Number - 030354; Resource Name - R L Gabriel House; Other - Percy & Emogene Griffin House; OHP Property Number - 149749	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179664		OHP Property Number - 030355; Resource Name - 902 Buena Vista	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179665		OHP Property Number - 030356; Resource Name - R L Spayde House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179666		OHP Property Number - 030357; Resource Name - Jessie Waterman House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179667		OHP Property Number - 030358; Resource Name - P A Reid House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179668		OHP Property Number - 030359; Resource Name - Donald E Marquis House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179669		OHP Property Number - 030360; Resource Name - Kenneth A Gabriel House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179670		OHP Property Number - 030361; Resource Name - P Tully House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179671		OHP Property Number - 030362; Resource Name - Stillman B Jameson House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179672		OHP Property Number - 030363; Resource Name - 310 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179673		OHP Property Number - 030364; Resource Name - D C Smith House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179674		OHP Property Number - 030365; Resource Name - 330 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179675		OHP Property Number - 030366; Resource Name - 340 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179676		OHP Property Number - 030367; Resource Name - 441 Prospect Circle; OHP Property Number - 149751	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179677		OHP Property Number - 030368; Resource Name - Lucian M Williams House; OHP Property Number - 149750	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179678		OHP Property Number - 030369; Resource Name - Percy & Emogene Griffin House; OHP Property Number - 149749	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179679		OHP Property Number - 030370; Resource Name - A C Buttalph Jr House; OHP Property Number - 149748	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179680		OHP Property Number - 030371; Resource Name - Edward Byrne House; OHP Property Number - 149743	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179681		OHP Property Number - 030372; Resource Name - Marie Emry House; OHP Property Number - 149755	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179682		OHP Property Number - 030373; Resource Name - H A Wilcox House; OHP Property Number - 149754	Building	Historic	HP02	1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179683		OHP Property Number - 030374; Resource Name - 461 Prospect Circle; OHP Property Number - 149753	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179684		OHP Property Number - 030375; Resource Name - 451 Prospect Circle; OHP Property Number - 149752	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179685		OHP Property Number - 030376; Resource Name - T L Stearns House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179686		OHP Property Number - 030378; Resource Name - M Brokaw House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179687		OHP Property Number - 030378; Resource Name - C E Tracy House; OHP Property Number - 149737	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179688		OHP Property Number - 030379; Resource Name - 430 S Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179689		OHP Property Number - 030380; Resource Name - R L Langer House; OHP Property Number - 149738	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179690		OHP Property Number - 030381; Resource Name - I F Gordon House; OHP Property Number - 149739	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179691		OHP Property Number - 030382; Resource Name - J F Gordon House; OHP Property Number - 149740	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179692		OHP Property Number - 030383; Resource Name - Prospect Circle District; OHP Property Number - 149735	District	Historic		1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-186859		Resource Name - Arroyo Seco Flood Control Channel; OHP Property Number - 147051 status code (2S2); OHP Property Number - 173825 status code (6X); National Register - NPS-08000579-0027	Structure, Element of district	Historic	HP11; HP20	2003 (M. Strauss, EDAW)	LA-08736, LA-09105, LA-09351, LA-09561, LA-10270, LA-10541, LA-10638, LA-10713, LA-10834, LA-10866, LA-10938, LA-11231, LA-11336, LA-11387, LA-11529, LA-11625, LA-11802, LA-11953, LA-12427, LA-12428, LA-12526, LA-12714, VN-03153
P-19-187627		OHP Property Number - 126436; Resource Name - El Centro Market	Building	Historic	HP06	2000 (G. Duncan, South Pasadena Cultural Heritage Commission)	LA-10185
P-19-188513		OHP Property Number - 147063; Resource Name - S Pasadena Water Tower; Other - Sprint CA-LOS0099A; Other - Bilicke Water Tank	Structure	Historic	HP11	2009 (K.A. Crawford, Michael Brandman Associates)	LA-10388, LA-12060
P-19-189325		OHP Property Number - 177126; Resource Name - Arroyo Seco Park; Other - Art in the Park	District	Historic	HP35	2000 (Christy Johnson, Historic Resources Group)	LA-06385, LA-12059, LA-12714
P-19-190613		Resource Name - Arroyo Seco Golf Course	Building	Historic	HP39	2013 (Casey Tibbet, LSA Associates, Inc)	LA-12422, LA-12714
P-19-190632		Resource Name - Medical Offices; Other - T-Mobile West LLC IE04948A/LA948 Sinclair	Building	Historic	HP07	2013 (K.A. Crawford, Michael Brandman Associates)	LA-12423
P-19-190788		Resource Name - 1000 Block Fair Oaks District; OHP Property Number - 150988	District	Historic	HP03; HP06; HP10	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)	
P-19-190789		Resource Name - 1100 Block Fair Oaks District	District	Historic	HP06	2002 (Jan Ostashay, Peter Moruzzi, PCR Services)	
P-19-191944		Resource Name - Garfield Substation Property	District	Historic	HP09	2015 (Wendy L. Tinsley Becker, Urbana Preservation & Planning)	

APPENDIX A-2

NATIVE AMERICAN CONSULTATION RECORDS

CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Andrew Salas, Chairperson
Gabrieleno Band of Mission Indians, Kizh Nation
P.O. BOX 393
Covina, CA 91723

Dear Mr. Salas,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

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Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources in and around the City and wish to consult with the City of South Pasadena regarding these resources, please direct your email to mlin@southpasadenaca.gov or any correspondence on this matter to:

Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

The City of South Pasadena would welcome a response at your earliest possible convenience, but no later than 30 days after receiving this letter. Should we not receive a response within 30 days, we will presume that you've declined consultation under AB 52; however, under SB 18 you have 90 days to respond. Please do not hesitate to let me know if you have any questions or would like to discuss this Project. I can be reached by email at the address above or by phone at (626) 403 -7221.

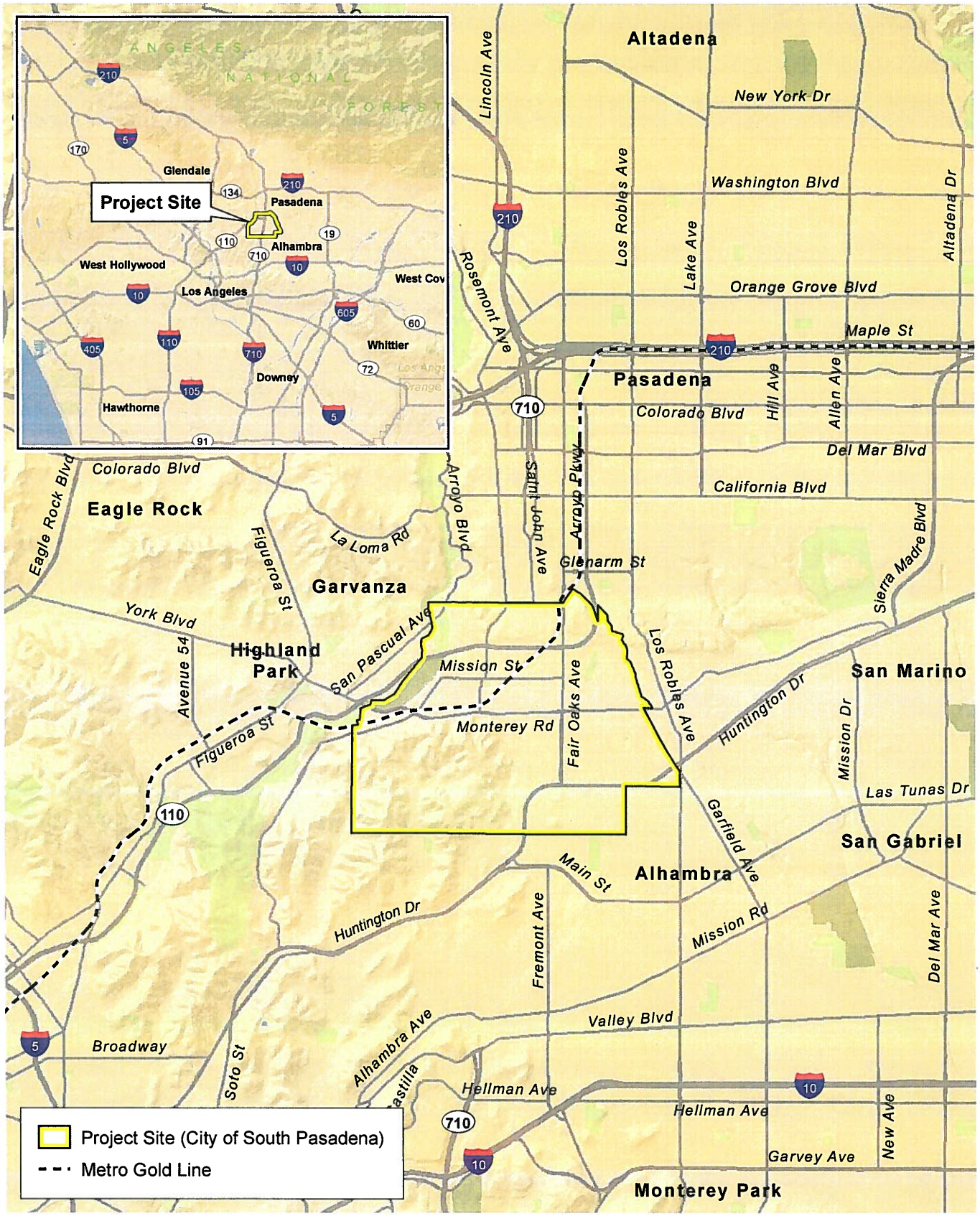
Thank you very much for your assistance.

Sincerely,

Margaret Lin

Margaret Lin
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

N W E S

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PSOMAS

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PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Anthony Morales, Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. BOX 693
Covina, CA 91778

Dear Mr. Morales,

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Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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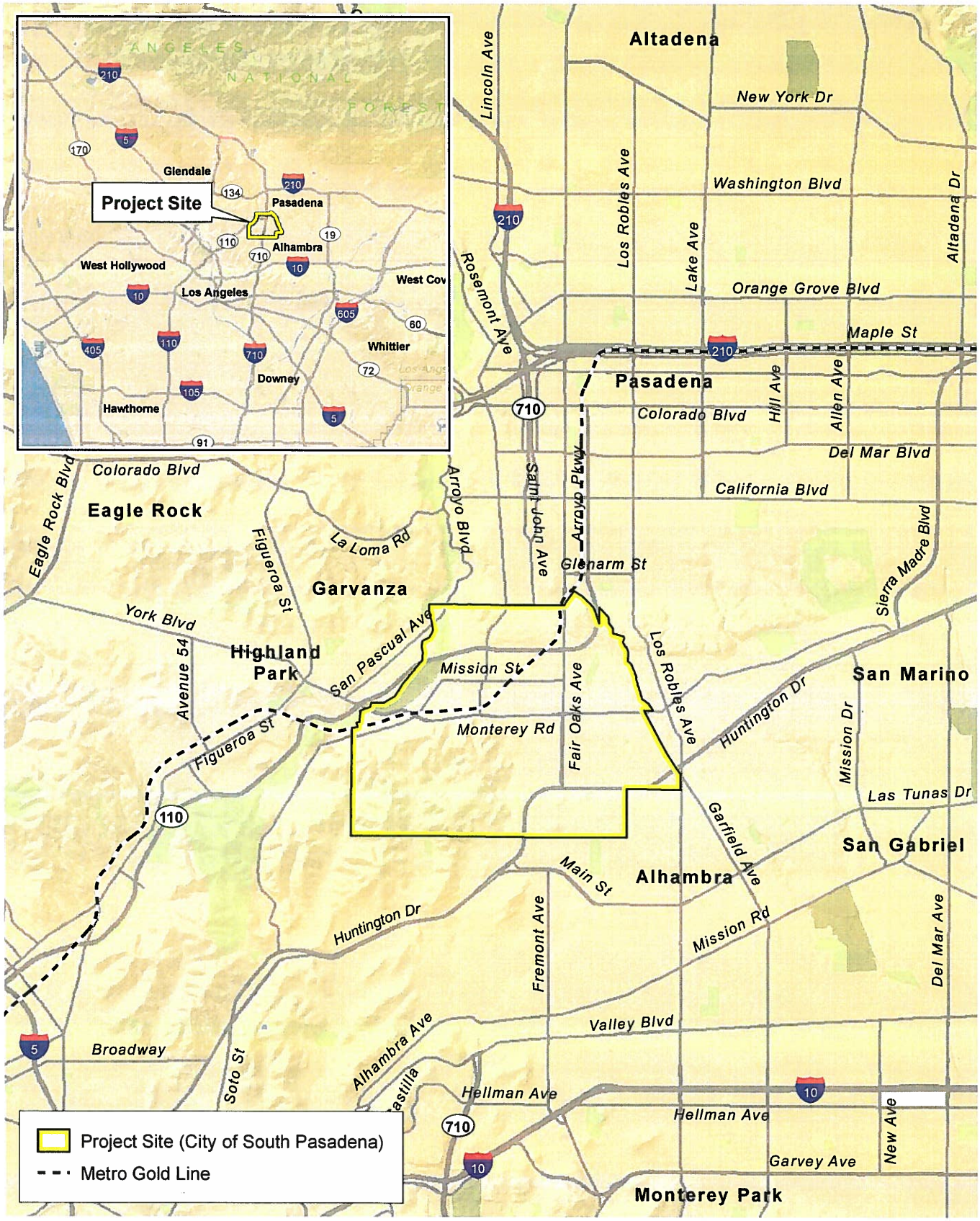

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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WWW.SOUTHPASADENACA.GOV

04/21/21

Sandonne Goad, Chairperson
Gabrieleno/Tongva
106 ½ Judge John Aiso Street, #231
Los Angeles, CA 90012

Dear Mr. Goad,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

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1414 Mission Street
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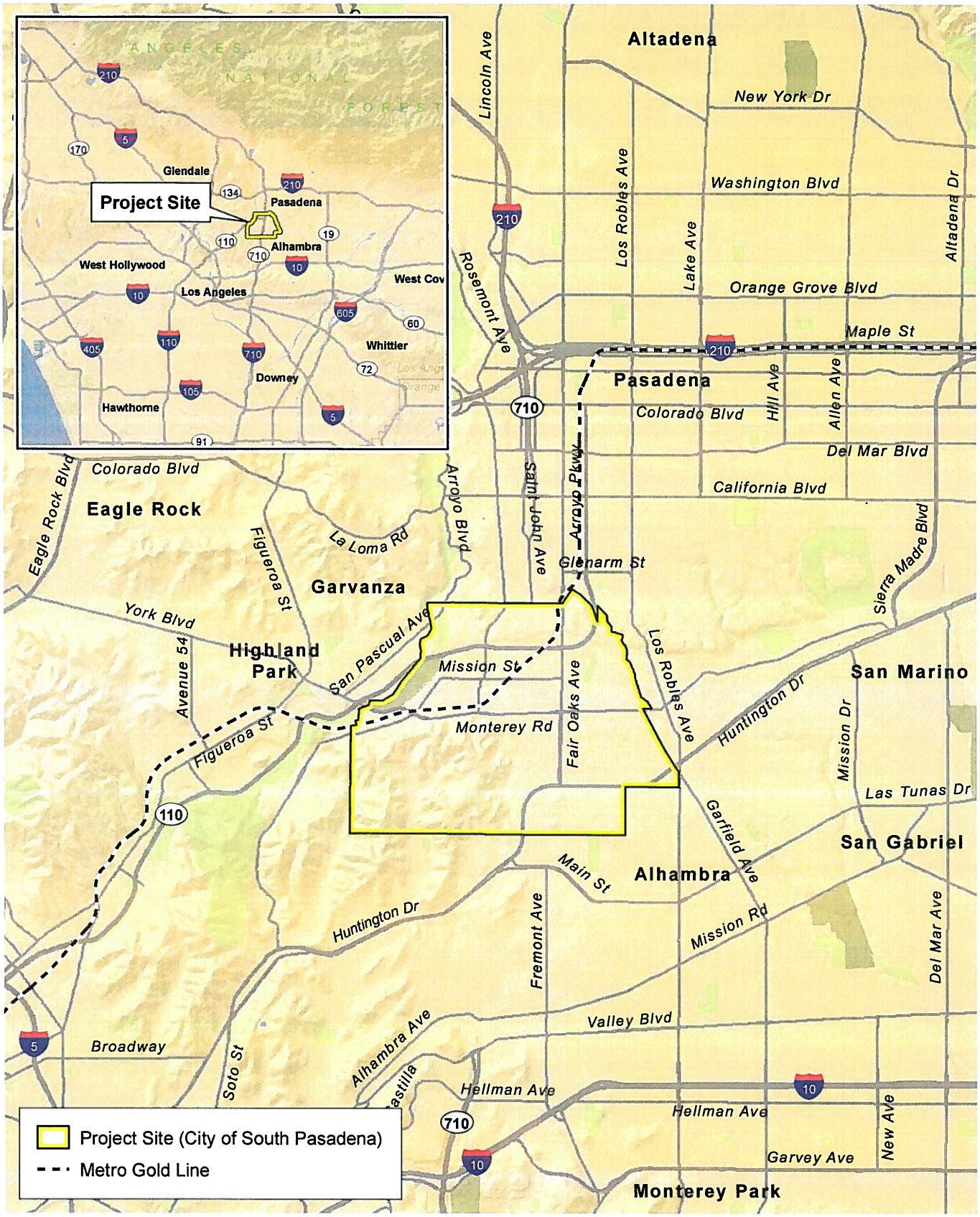

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Robert Dorame, Chairperson
Gabrieleno Tongva Indians of California Tribal Council
P.O. BOX 490
Bellflower, CA 90707

Dear Mr. Dorame,

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Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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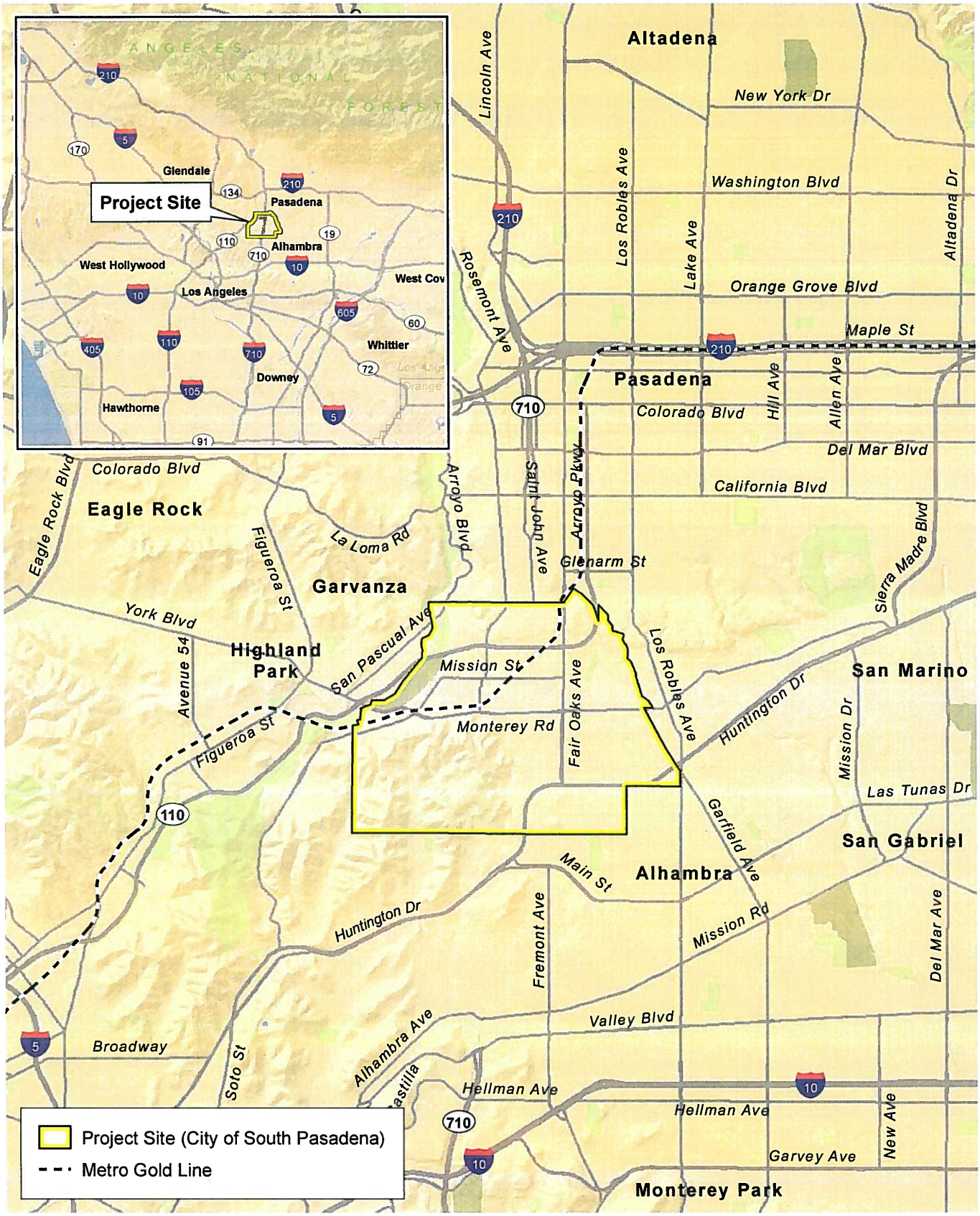

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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WWW.SOUTHPASADENACA.GOV

04/21/21

Charles Alvarez
Gabrieleno-Tongva Tribe
23454 Vanowen Street
West Hills, CA 91307

Dear Mr. Alvarez,

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Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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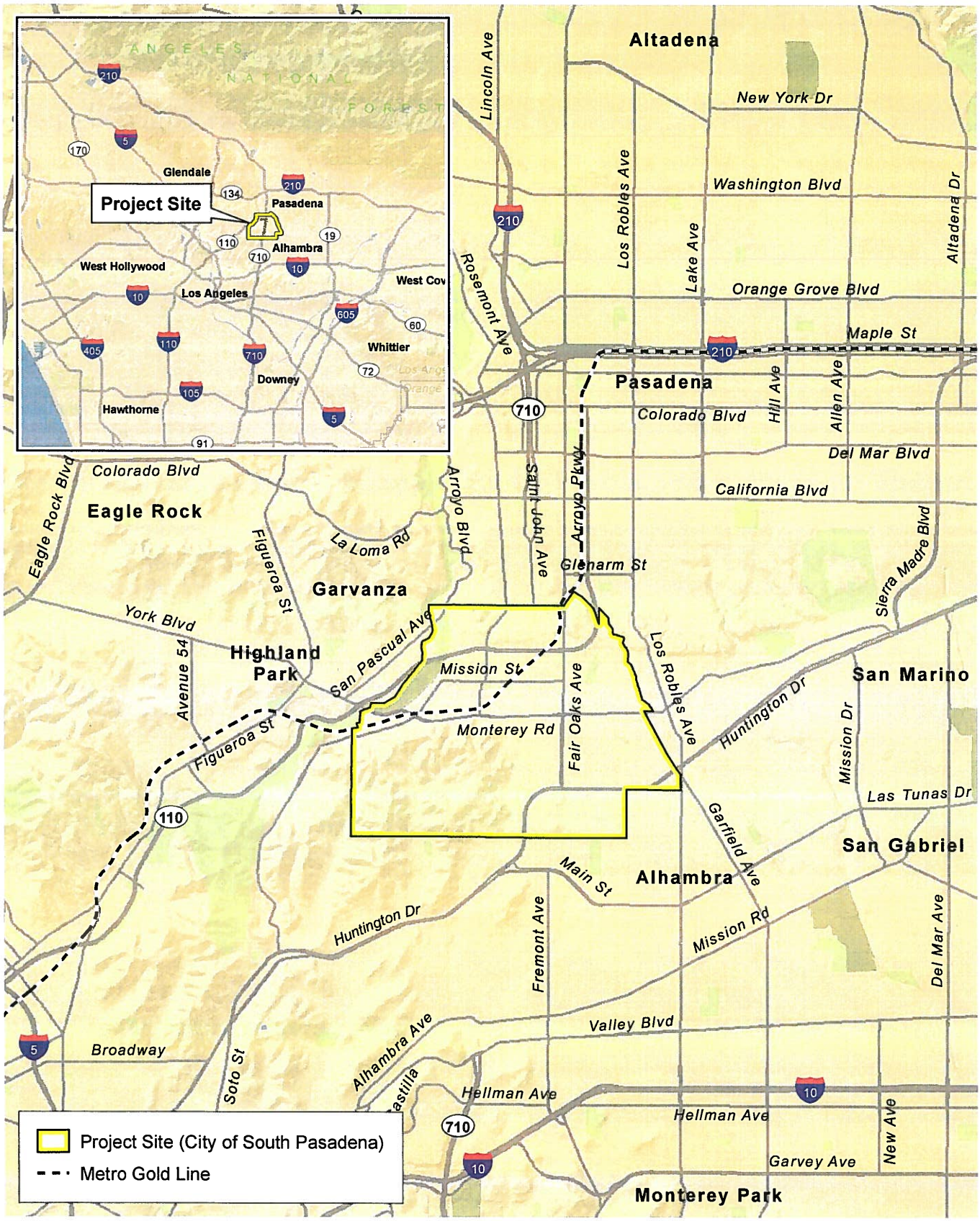

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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PSOMAS

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WWW.SOUTHPASADENACA.GOV

04/21/21

Scott Cozart, Chairperson
Soboba Band of Luiseno Indians
P.O. BOX 487
San Jacinto, CA 92583

Dear Mr. Cozart,

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As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of South Pasadena.

AB 52 requires lead agencies to consult with California Native American tribes that request such consultation in writing prior to the agency's release of a Notice of Preparation (NOP) of an Environmental Impact Report (EIR), or notice of a Mitigated Negative Declaration (MND), or Negative Declaration (ND). To that end, the City of South Pasadena is notifying you of this Project. AB 52 allows tribes 30 days after receiving notification to request consultation.

Because this Project is a General Plan Update, it is subject to the statutory requirements of Senate Bill 18 Tribal Consultation Guidelines (Section 65352.3 of the *Government Code*). Under the law, tribes identified by the Native American Heritage Commission (NAHC) are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of South Pasadena, pursuant to SB 18.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources in and around the City and wish to consult with the City of South Pasadena regarding these resources, please direct your email to mlin@southpasadenaca.gov or any correspondence on this matter to:

Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

The City of South Pasadena would welcome a response at your earliest possible convenience, but no later than 30 days after receiving this letter. Should we not receive a response within 30 days, we will presume that you've declined consultation under AB 52; however, under SB 18 you have 90 days to respond. Please do not hesitate to let me know if you have any questions or would like to discuss this Project. I can be reached by email at the address above or by phone at (626) 403 -7221.

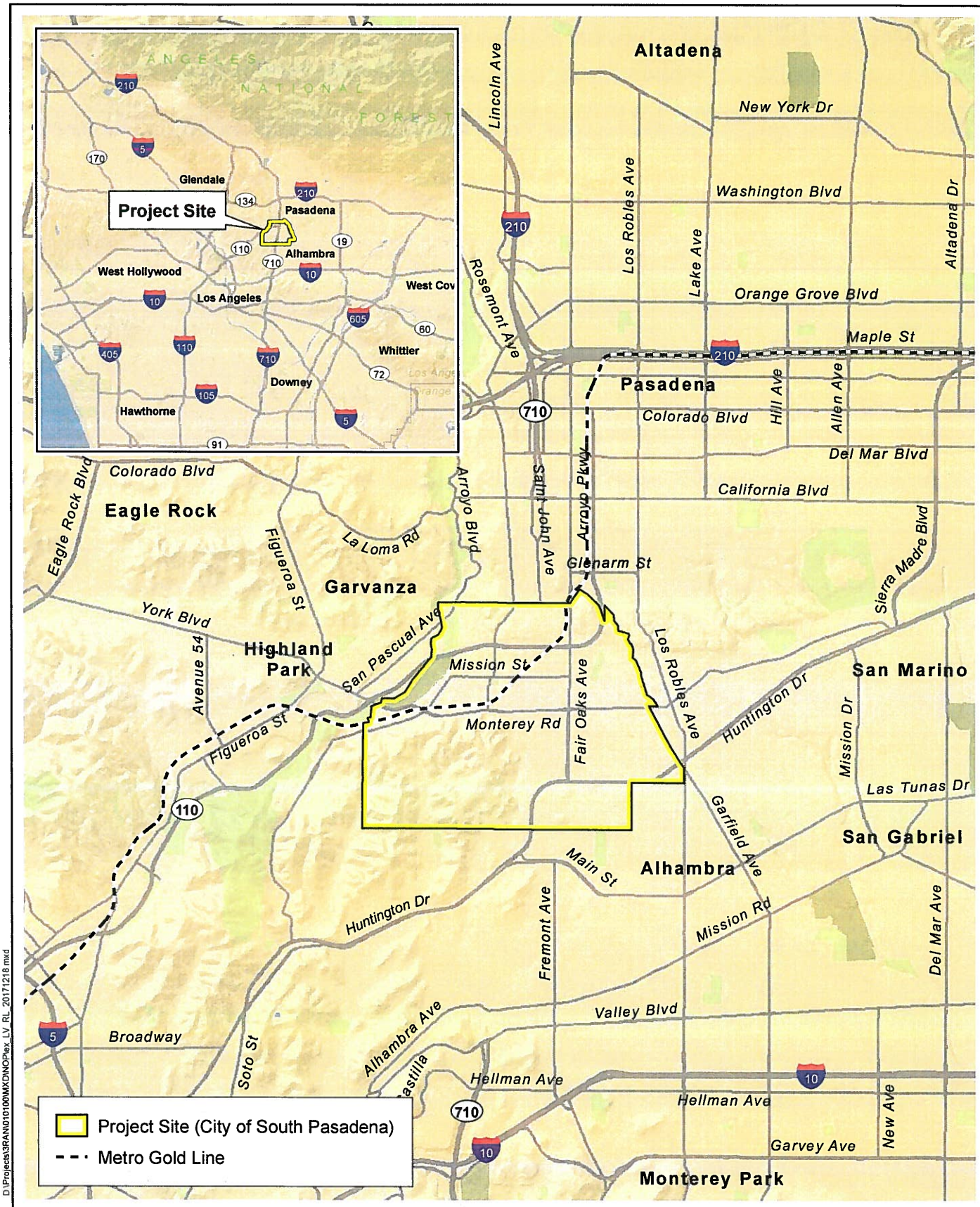
Thank you very much for your assistance.

Sincerely,

Margaret Lin

Margaret Lin
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

PSOMAS

(Rev 12-18-2017 MMD) R:\Projects\RAN\3RAN010100\Graphics\NOP\ex_LV_RL.pdf

May 29, 2021

Attention: Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030
mlin@southpasadenaca.gov

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Tribe

Subject: Assembly Bill 52 Tribal Consultation and SB 18– South Pasadena General Plan and Downtown Specific Plan Update and 2021-2029 Housing Element

Dear Miss Lin,

The Gabrielino Tongva Tribe requests formal consultation pursuant to SB 18 and AB 52 on the proposed project. Our tribe's concerns will focus on any potential impact on our tribal's cultural resources. during consultation, we will request direct involvement in formulating adequate mitigation measures that will protect the cultural resources of our tribe. I ask that you please contact me directly at tongvatcr@gmail.com.

Sincerely,

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Tribe
tongvatcr@gmail.com
(909) 262-9351

APPENDIX B

PALEONTOLOGICAL RECORDS SEARCH

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

May 3, 2021

PSOMAS

Attn: Charles Cisneros

re: Paleontological resources for the Project 3SPA010100

Dear Charles:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the 3SPA010100 project area as outlined on the portion of the Los Angeles USGS topographic quadrangle map that you sent to me via e-mail on April 29, 2021. We have three fossil localities from within the project area:

Locality Number	Location	Formation	Taxa	Depth
LACM IP 2542	838 Lyndon Street; South Pasadena	Topanga Formation	Mantis shrimp (Squillidae)	Surface
LACM IP 23222	on Fair Oaks Ave; north of the intersection of Fair Oaks and the Arroyo Seco Freeway	Unknown formation (Pliocene)	Invertebrates (unspecified)	Surface, along bluff next to sidewalk
LACM IP 24385	South Pasadena; on east side of Fair Oaks Ave just north of intersection of Pasadena Freeway and Fair Oaks Ave	Unknown formation (Pliocene)	Invertebrates (unspecified)	Unknown

The following table shows additional known localities in the collection of the Natural History Museum of Los Angeles County that are near the project area:

Locality Number	Location	Formation	Taxa	Depth
LACM VP CIT424	Near intersection of Burleigh Rd and Avenue 64	Topanga Formation	Herring (*Ganolytes*), perch-like fish (*Thyrsocles*), ray-finned fish (*Etringus*), and other unspecified	Unknown

			fish	
LACM VP CIT342	Sparkletts property near 45th & Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth (*Mammuthus*), Bison (*Bison*)	14 ft bgs
LACM VP 6934	Along the slope between Quail Drive & Pheasant Drive; E of Mt Washington Elementary School	Monterey Formation (yellowish tan siltstone)	Baleen whale *(Mysticeti*)	found in hillslope rubble
LACM VP 7507	Near intersection of San Fernando Rd. & Humbolt St.	Monterey Formation	Perch-like fish (*Thyrsocles kriegeri*)	31-32 m bgs (collected during excavations of the Humboldt Street Sewer Shaft)
LACM VP 1023	Workman & Alhambra Sts	Unknown Formation (Pleistocene)	Sabertooth cat (*Smilodon*), horse (*Equus*), deer (*Odocoileus*), Turkey (*Meleagris*)	Unknown (excavations for storn drains)
LACM VP 2032	Los Angeles Brickyard Mission Rd. & Daly St.	Unknown Formation (Pleistocene, silt & clay)	Mastodon (*Mammut*)	20-35 ft bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the Natural History Museum of Los Angeles County ("NHMLA"). It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice

ATTACHMENT 2

PC Resolution

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RESOLUTION NO. 23-04

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SOUTH PASADENA, CALIFORNIA RECOMMENDING TO THE CITY COUNCIL 1) APPROVAL OF THE ENVIRONMENTAL ASSESSMENT; AND 2) ADOPTION OF THE 2021-2029 GENERAL PLAN HOUSING ELEMENT (SIXTH CYCLE, FIFTH DRAFT) UPDATE OF THE SOUTH PASADENA GENERAL PLAN, CONSISTENT WITH THE STATUTORY REQUIREMENT OF CALIFORNIA HOUSING ELEMENT LAW.

WHEREAS, Government Code § 65580, et seq., requires the City of South Pasadena to periodically prepare and update its Housing Element in its General Plan. A city's housing element establishes goals, policies, and programs to accommodate the maintenance and expansion of the city's housing supply; and

WHEREAS, the 2021-2029 General Plan Housing Element Update ("the 2021-2029 Housing Element") has been prepared for the City of South Pasadena based on input from the City Council, Planning Commission, the California Department of Housing and Community Development (HCD), and public comments, and is incorporated herein by reference as Exhibit A; and

WHEREAS, the City of South Pasadena's 2021-2029 Housing Element includes updated data in compliance with state housing laws and a variety of programs and strategies to address citywide housing needs and priorities; and

WHEREAS, a draft 2021-2029 Housing Element was released for 60-day public review on October 12, 2021, and was submitted to HCD on October 22, 2021. A response letter was received from HCD on December 21, 2021; and

WHEREAS, on April 12, 2022, the City of South Pasadena was sued by Californians for Homeownership for non-compliance with State Housing Law for failing to have adopted a compliant Housing Element by October 15, 2021 (*Californians For Homeownership v. City of South Pasadena*, LASC Case Nos. 22STCP01388 & 22STCP01161); and

WHEREAS, on May 11, 2022, the City submitted a Second Draft 2021-2029 Housing Element to HCD for review; and

WHEREAS, on July 8, 2022, HCD provided a response letter on Second Draft 2021-2029 Housing Element; and

WHEREAS, on August 15, 2022, the City entered into a Settlement Agreement with Californians for Homeownership to resolve the lawsuit that committed the City to a number of actions, including: removal of certain parcels as identified housing sites; addition of a program to issue a request for proposal for city-owned housing sites no later than January 1, 2028; provide specific information for sites identified to meet the

City's housing needs; and addition of a program to seek, through voter approval, the removal of the City's existing 45-foot height limit for at least any parcel identified in the Housing Element for which the base density is anticipated to exceed 50 dwelling units per acre; and

WHEREAS, on August 19, 2022, the Settlement Agreement was adopted as the Court's Order and committed the City to adopting a housing element certified by or eligible for certification by HCD no later than May 31, 2023; and

WHEREAS, on September 15, 2022, the City submitted a Third Draft 2021-2029 Housing Element to HCD for review. On October 28, 2022, the City received a response letter on the Third Draft 2021-2029 Housing Element from HCD. On December 12, 2022, the City submitted a Fourth Draft 2021-2029 Housing Element to HCD for review. On January 27, 2023, the City received a response letter on Fourth Draft 2021-2029 Housing Element from HCD. On March 24, 2023, the City submitted a Fifth Draft 2021-2029 Housing Element to HCD for review. On April 28, 2023, based on recommendations in a status conference with HCD reviewers, the City made minor text edits and a program revision and rereleased the Fifth Draft 2021-2029 Housing Element for a seven-day comment period through May 5, 2023; and

WHEREAS, the Planning Commission has reviewed the Fifth Draft 2021-2029 Housing Element for consistency with the City's General Plan and Municipal Code, and programs have been identified to address any required changes to the General Plan and Municipal Code to ensure consistency, as necessary; and

WHEREAS, pursuant to Government Code Section 65759(a), the California Environmental Quality Act (CEQA) commencing with Public Resources Code section 21000 does not apply to any action necessary to bring a general plan or relevant mandatory element of the plan into compliance with any court order; and

WHEREAS, pursuant to Government Code section 65759, agencies subject to a court order to bring their general plan or relevant mandatory elements into compliance are required to prepare an Initial Study Initial Study in conformity with 14 CCR 15080(c) to determine the environmental effects of the proposed action necessary to comply with the court order, and, if warranted due based on such Initial Study, prepare an Environmental Assessment in conformity with 14 CCR 15140, et seq., within the timelines under the court order; and

WHEREAS, an Initial Study in conformity with 14 CCR 15080(c) and an Environmental Assessment in conformity with 14 CCR 15140, et seq., were prepared for this project. The Initial Study and Environmental Assessment are incorporated by reference as Exhibit B; and

WHEREAS, the Environmental Assessment was presented for evaluation by the Planning Commission, identifying seven significant and unavoidable impacts, as well as thirteen impacts that can be mitigated to less than significant; and

WHEREAS, based on the analysis presented in the Environmental Assessment, and as more thoroughly described therein, implementation of the proposed Project would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures: Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation; Cumulative Air Quality Impacts); Greenhouse Gas Emissions (GHG Emissions); Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and, Population and Housing (Population Growth). Table ES-1 therein presents a summary of significant environmental impacts identified in Sections 3.1 through 3.16 of the Environmental Assessment; Mitigation Measures (MMs) that reduce any significant impacts; and the level of significance of each impact after mitigation. Significant irreversible environmental changes and growth-inducing impacts are addressed in Section 5.0, Other CEQA Considerations of the Environmental Assessment; and

WHEREAS, pursuant to Government Code Section 65759(a), no further action is required regarding such findings; and

WHEREAS, the adoption of the Fifth Draft 2021-2029 Housing Element would supersede and replace the existing 2013-2021 Housing Element of the General Plan; and

WHEREAS, on May 17, 2023, the Planning Commission held a duly noticed public hearing, at which time it considered all material and evidence, whether written or oral; and

WHEREAS, all legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, THE PLANNING COMMSSION OF THE CITY OF SOUTH PASADENA, CALIFORNIA, DOES RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. The above recitals are hereby declared to be true and correct and are incorporated herein as findings of the South Pasadena Planning Commission.

SECTION 2. Based upon substantial evidence presented to this Commission during the public hearing, including public testimony and written and oral staff reports, and the environmental documentation, the Planning Commission finds:

A. All necessary public hearings and opportunities for public testimony and comment have been conducted in compliance with applicable law;

B. That the Fifth Draft 2021-2029 Housing Element addresses all of the requirements as set forth in Government Code §§ 65302 and 65580, et seq.; and

C. That the Fifth Draft 2021-2029 Housing Element is compatible with,

consistent with and integrated with all other elements of the City's General Plan.

SECTION 3. Based upon the foregoing, the Planning Commission recommends:

A. That the City Council approve the Initial Study and Environmental Assessment for the Fifth Draft 2021-2029 Housing Element as an adequate description of the impacts of the Project in conformity with 14 CCR 15080(c) and 14 CCR 15140, et seq., and the environmental review for future projects will occur on a project by project basis.

B. That the City Council adopt the Fifth Draft 2021-2029 Housing Element, with any revisions necessary to obtain certification from HCD, as the 2021-2029 Housing Element Update to the General Plan; and

C. That the 2013-2021 Housing Element be repealed by the City Council.

SECTION 4. This Resolution shall take effect immediately upon its adoption.

PASSED, APPROVED AND ADOPTED on this 17th day of May, 2023.

Laura Dahl, Planning Commission Chair

ATTEST:

Mark Perez, Deputy City Clerk

APPROVED AS TO FORM:

Andrew L. Jared, City Attorney

I HEREBY CERTIFY the foregoing Resolution No. 23-04 was duly adopted by the Planning Commission of the City of South Pasadena, California, at a special meeting held on the 17th day of May, 2023, by the following vote:

AYES: Dahl, Padilla, Lesak

NOES:

ABSENT: Barthakur, Swanborn

ABSTAINED:

Mark Perez, Deputy City Clerk

309120.v1

ATTACHMENT 3

2021-2029 Housing Element Redlined

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City of SOUTH PASADENA

CITY OF SOUTH PASADENA

2021-2029 GENERAL PLAN HOUSING ELEMENT

Revised FIFTH Draft
May 2023

Acknowledgements

CITY COUNCIL

Jon Primuth, Mayor (District 3)
Evelyn G. Zneimer, Mayor Pro Tem (District 1)
Jack Donovan, Councilmember (District 2)
Michael Cacciotti, Councilmember (District 4)
Janet Braun, Councilmember (District 5)

PLANNING COMMISSION

John Lesak, Commission Chair
Laura Dahl, Commission Vice-Chair
Amitabh Barthakur, Commission Secretary
Lisa Padilla, Commissioner
Arnold Swanborn, Commissioner

CITY STAFF

Arminé Chaparyan, City Manager
Domenica Megerdichian, Deputy City Manager
Tamara Binns, Assistant to the City Manager

Community Development Department

Angelica Frausto-Lupo, Director
Alison Becker, AICP, Deputy Director – Community Development
Matt Chang, Planning Manager
Christopher Mandala, Community Improvement Coordinator
Leah Demarest, Senior Management Analyst - Housing Programs

Interdepartmental Support

Public Works Department: Ted Gerber, Director; Anteneh Tesfaye, Deputy Director;
Arpy Kasparian, Environmental Sustainability Manager
South Pasadena Public Library: Olivia Radbill, Local History Librarian

City Attorney

Andrew L. Jared, Colantuono, Highsmith & Whatley, PC
Teresa Highsmith, Colantuono, Highsmith & Whatley, PC

Project Consultants

Fourth & Fifth Drafts (November 2022 - Present)
Grant Henninger, Mobius Planning, Housing Element Project Lead

First through Third Drafts (March 2020 - November 2022)
Amy Sinsheimer, AICP, PlaceWorks, Housing Element Project Lead
Jennifer Gastelum, AICP, PlaceWorks, Principal Planner

Jillian K. Neary, Psomas, Environmental Review Project Manager

TABLE OF CONTENTS

6.1 EXECUTIVE SUMMARY 1

6.2 INTRODUCTION 38

6.2.1 OVERVIEW 38
6.2.2 PURPOSE AND AUTHORITY OF THE HOUSING ELEMENT 38
6.2.3 AUTHORITY AND SCOPE OF THE HOUSING ELEMENT 40
6.2.4 PUBLIC PARTICIPATION 41
6.2.5 CALIFORNIA ENVIRONMENTAL QUALITY ACT 43
6.2.6 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS 43

6.3 HOUSING NEEDS ASSESSMENT 44

6.3.1 COMMUNITY PROFILE 44
6.3.2 EMPLOYMENT TRENDS 47
6.3.3 HOUSEHOLD CHARACTERISTICS 49
6.3.4 REGIONAL HOUSING NEEDS ASSESSMENT 54
6.3.5 EXTREMELY LOW-INCOME HOUSEHOLDS 55
6.3.6 SPECIAL-NEEDS GROUPS 57
6.3.7 HOUSING PROFILE 68
6.3.8 SUMMARY OF HOUSING NEEDS 76

6.4 FAIR HOUSING ASSESSMENT 78

6.4.1 OUTREACH 78
6.4.2 ASSESSMENT OF FAIR HOUSING ISSUES (AFFIRMATIVELY FURTHERING FAIR HOUSING) 83
6.4.3 PATTERNS OF INTEGRATION AND SEGREGATION 85
6.4.4 ACCESS TO OPPORTUNITY 94
6.4.5 DISPROPORTIONATE HOUSING NEED AND DISPLACEMENT RISK 99
6.4.6 SOUTH PASADENA HISTORY 105
6.4.7 ENFORCEMENT OF FAIR HOUSING AND OUTREACH CAPACITY 111
6.4.8 ANALYSIS OF SITES INVENTORY FOR FAIR HOUSING 114
6.4.9 CONTRIBUTING FACTORS TO FAIR HOUSING ISSUES 130

6.5 HOUSING CONSTRAINTS 133

6.5.1 MARKET CONSTRAINTS 133
6.5.2 GOVERNMENTAL CONSTRAINTS 135
6.5.3 ENVIRONMENTAL CONSTRAINTS 156

6.6 HOUSING DEVELOPMENT RESOURCES 159

6.6.1 ZONING CODE RESOURCES 159
6.6.2 LAND RESOURCES 173
6.6.3 FINANCIAL RESOURCES 248
6.6.4 OPPORTUNITIES FOR ENERGY CONSERVATION 250

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE 252
6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES 266
6.8.1 GOALS, POLICIES, AND PROGRAMS 266
6.8.2 SUMMARY OF QUANTIFIED OBJECTIVES 302

APPENDICES

Appendix A – Sites Exhibits
Appendix B – Public Participation Summary
Appendix C – Letter to Property Owners
Appendix D – Qualified Entries
Appendix E – Accessory Dwelling Unit Projection Methodology
Appendix F – Realistic Capacity Analysis

TABLES

Table VI-1 QUANTIFIED HOUSING IMPLEMENTATION SUMMARY 4
Table VI-2 SUMMARY OF HOUSING PROGRAMS FOR THE 2021-2029 HOUSING ELEMENT 5
Table VI-3 HISTORIC POPULATION ESTIMATES AND FUTURE PROJECTION 1970 – 2045 45
Table VI-4 POPULATION CHARACTERISTICS 46
Table VI-5 RACE AND ETHNICITY CHARACTERISTICS 47
Table VI-6 2019 OCCUPATIONS EMPLOYED PERSONS 16 YEARS OF AGE AND OVER 48
Table VI-7 2045 EMPLOYMENT PROJECTIONS SOUTH PASADENA AND LOS ANGELES COUNTY 48
Table VI-8 PERSONS PER HOUSEHOLD – 2019 49
Table VI-9 AVERAGE HOUSEHOLD SIZE 50
Table VI-10 TENURE BY HOUSEHOLD SIZE 50
Table VI-11 PERSONS PER ROOM 51
Table VI-12 2018 HOUSEHOLD INCOME BY TENURE 52
Table VI-13 HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER 53
Table VI-14 2020 INCOME LIMITS, LOS ANGELES COUNTY (4-PERSON HOUSEHOLD) 54
Table VI-15 SOUTH PASADENA REGIONAL HOUSING NEEDS ASSESSMENT 2021-2029 55
Table VI-16 HOUSEHOLDS WITH SPECIAL HOUSING NEEDS 57
Table VI-17 DISABILITIES BY TYPE AND AGE OF RESIDENT 58
Table VI-18 EMPLOYMENT AMONG POPULATION WITH DISABILITY 59
Table VI-19 PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE 60
Table VI-20 HOUSING UNIT TENURE BY AGE OF HEAD HOUSEHOLDER 61
Table VI-21 FAMILY HOUSEHOLD COMPOSITION 64
Table VI-22 HOUSING UNITS BY OCCUPANCY STATUS 69

Table VI-23 HISTORIC HOUSING TRENDS: 1980-2019 69
Table VI-24 HOUSING UNITS BY TYPE AND OCCUPANCY STATUS 70
Table VI-25 OCCUPIED HOUSING UNITS BY AGE OF HOUSING STOCK – AS OF 2018 71
Table VI-26 HOUSING CONDITION SURVEY SUMMARY 2022 72
Table VI-27 RESIDENTIAL RENTAL PRICES 73
Table VI-28 HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018 OWNER-OCCUPIED HOUSING UNITS 74
Table VI-29 HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2016 RENTER-OCCUPIED HOUSING UNITS 75
Table VI-30 AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS 75
Table VI-31 SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS 76
Table VI-32A HRC DISCRIMINATION INQUIRIES AND CASES 113
Table VI-32B DISTRIBUTION OF RHNA CAPACITY BY CENSUS TRACT 119
Table VI-33 FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES 131
Table VI-34 GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES 136
Table VI-35 RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT 137
Table VI-36 MULTI-FAMILY COMMON OPEN SPACE 140
Table VI-37 RESIDENTIAL PARKING REQUIREMENTS 142
Table VI-38 2022 PLANNING FEE AND IMPACT FEE SCHEDULE 144
Table VI-39 ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING* 146
Table VI-40 ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS 151
Table VI-41 TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES 155
Table VI-42 COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040) 166
Table VI-43 INCLUSIONARY HOUSING REQUIREMENT OPTIONS 171
Table VI-44 VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE 177
Table VI-45 REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA 180
Table VI-46 ACCESSORY DWELLING UNIT PROJECTION 181
Table VI-47 POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION 183
Table VI-48 REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA 186
Table VI-49 REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION 188
Table VI-50 SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA [1] 192
Table VI-51 DOWNTOWN SPECIFIC PLAN REZONING CAPACITY ANALYSIS[1] 194
Table VI-52 COMPARISON OF SITE CAPACITY AND RHNA 247
Table VI-53 FINANCIAL HOUSING RESOURCES 248
Table VI-54 COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED 252
Table VI-55 2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE 255
Table VI-56 QUANTIFIED HOUSING IMPLEMENTATION SUMMARY 303

FIGURES

Figure VI-1 POPULATION GROWTH TRENDS: SOUTH PASADENA AND SCAG* REGION 45
Figure VI-2 2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA 65
Figure VI-2 (continued) 2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA 66
Figure VI-3 MEDIAN HOME SALES PRICE FOR EXISTING HOMES 73
Figure VI-4 TCAC/HCD OPPORTUNITY AREAS 86
88
Figure VI-6 LOCAL POVERTY RATES 2015–2019 88
Figure VI-5 LOCAL POVERTY RATES 2010–2014 88
Figure VI-7 REGIONAL POVERTY RATES 2015–2019 88
Figure VI-8 REGIONAL MEDIAN INCOME 2015–2019 89
Figure VI-9 LOCAL MEDIAN INCOME 2015–2019 90
91
Figure VI-11 REGIONAL ETHNIC PREDOMINANCE 91
Figure VI-10 REGIONAL DIVERSITY INDEX 2018 91
Figure VI-12 REGIONAL CHANGE IN DIVERSITY INDEX 2010-2018 91
Figure VI-13 PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING ALONE 92
Figure VI-14 REGIONAL PERCENT OF POPULATION LIVING WITH A DISABILITY 93
Figure VI-15 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA ELEMENTARY SCHOOLS 94
Figure VI-16 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA MIDDLE SCHOOL 95
Figure VI-17 APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA HIGH SCHOOL 95
Figure VI-18 REGIONAL JOBS PROXIMITY INDEX 97
Figure VI-19 LOCAL HOUSING OVERCROWDING 100
Figure VI-21 CHANGE IN RENTER OVERPAYMENT OVER A FIVE-YEAR PERIOD 101
Figure VI-20 LOCAL OVERPAYMENT BY RENTERS 101
Figure VI-22 LOCAL OVERPAYMENT BY OWNERS 101
Figure VI-23 CHANGE IN OWNER OVERPAYMENT OVER A FIVE-YEAR PERIOD 101
Figure VI-24 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY POVERTY RATES 122
Figure VI-25 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RACIAL IDENTIFICATION 123
Figure VI-26 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY DISABILITY RATE 124
Figure VI-27 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH JOB PROXIMITY INDEX SCORE 125
Figure VI-28 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CALENVIROSCREEN PERCENTILE 126
Figure VI-29 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF HOMEOWNER OVERPAYMENT 127
Figure VI-30 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF RENTER OVERPAYMENT 128

Figure VI-31 SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY RATE OF OVERCROWDING.....129
Figure VI-32 HIGHER DENSITY PRECENT PROJECTS WITHIN 45 FOOT-BUILDINGS 149

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City of South Pasadena
2021-2029 HOUSING ELEMENT

6.1 EXECUTIVE SUMMARY

A New Approach to Increased and Inclusive Housing Production

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

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

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

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

New State Housing Legislation

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

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

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

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

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

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

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

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

The Public Outreach Process

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

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

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

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

Quantified Objectives

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

Table VI-1
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

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

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

Summary of the Housing Plan

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.				
Program 1.a - Energy Efficiency The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.	Ensure consistency with State green building standards triennially when the California Building Code is adopted.	General Fund; grants	Community Development Department, Public Works Department	Every three years; next building code adoption expected in 2023.
Program 1.b - Convert Caltrans Homes to Affordable Housing The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB381 that respond to the cost constraints of particular properties.	Acquire and c~~C~~onvert ~~20~~ unoccupied, Caltrans-owned properties, that are not sold at fair market value ~~containing 22 housing units,~~ to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas. Maximixe the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.	General Fund; HRE; public (federal, state, regional) grants, loans and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)	Caltrans; Community Development Department/City Manager's Office	Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State; target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
SB 381 allows the City to sell identified historic homes at fair market value, but requires that the City use the proceeds from the sale to provide three affordablue units for each home sold at fair market value. Additionally, if the City purchases non-historic surplus properties from Caltrans, SB 381 provides the City the option to sell the properties to moderate or lower income households, or rent the properties to lower income households. Additionally, the City may consider the construction of additional units, either as ADUs or Missing Middle housing, on certain parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.~~The California Department of Transportation (Caltrans) is obligated by State law to offer unoccupied Caltrans-owned surplus residential properties located in South Pasadena for sale to the City. The City has expressed interest to Caltrans in purchasing these twenty (20) unoccupied surplus properties through this State program, which contain twenty-two (22) housing units. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on these surplus properties ensuring that they are made available to moderate or lower income households. Through this Program, if economically feasible, the City will preserve and rehabilitate these properties as affordable housing, and make them available to moderate and lower income households.~~				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 1.c - Housing Rehabilitation and Code Enforcement The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions in the Southwest Monterey Hills neighborhood and other neighborhoods with the oldest housing stock identified in the 2022 survey (Table VI-26), or as subsequently identified, to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds annually, as available, through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. ~~The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy, that will~~To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge. ~~The City will post availability of this funding program on city's website by January 2023, with annual updates; and will develop a marketing strategy plan by July 2023 to educate homeowners and property owners of the availability of these funds for rehabilitation, which may include posts in local newspapers, on City social media, and in newsletters annually; sending mailers at least every other year to areas with older housing stock; annual inserts in electric and gas bills, and distribution of flyers at neighborhood street fairs, farmer's markets and similar community social events.~~	Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.	HOME, SB 2 PHLA, program fees collected by covered rental property owners, others	Community Development Department/ City Manager's Office	Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. ~~Develop~~ Propose Rental Housing ~~Occupancy~~ Inspection Program to City Council by October 2024~~and Policy in fiscal year 2022/2023~~.
Program 1.d – Assisted Housing Unit Preservation The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that the City has not been tracking any affordable housing units with deed-	Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.	General Fund	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
restrictions and/or subsidized funding. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions: ▪ Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability. ▪ If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources. Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives. If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing. When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.				
Program 1.e – Environmental Health Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually, or by request, with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino to bring the CalEnviroScreen percentile score below the 70th percentile impaired drinking water. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel particulate matter exposure which is concentrated in the northern portion of South Pasadena north of Mission Street, and groundwater contamination which is isolated in the southeastern portion of the City south of Mission Street and east of Meridian Avenue to reduce the impact of these in areas with the highest scores to below the CalEnviroScreen 50th percentile.	Determine whether there are existing sources of water contamination and mitigate as appropriate in identified areas to bring the CalEnviroScreen percentile impaired drinking water score below the 70th percentile; and groundwater and diesel particulate matter scores in identified areas below the 50th percentile.	General Fund	~~Community Development Department,~~ Public Works	Meet with water providers by June 2023 to develop strategies and review siting and mitigation requirements by December 2024.
Goal 2.0 Encourage and Assist in the Provision of Affordable Housing Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.				
Program 2.a – Provide Technical Assistance for Projects with Affordable Housing The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable	Expand housing mobility opportunities by encouraging construction of ~~1,000~~ affordable units ~~(lower-income RHNA allocation is 1,155), with at least 300 of these~~ in higher-income residential areas ~~with lower proportions of overpayment~~, as well as on sites with developer interest including higher density residential, mixed-use sites within the Downtown ~~-~~Specific Plan	General Fund	Community Development Department	Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency. The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.	and other mixed-use areas, and non-residential sites with redevelopment potential on underutilized commercial properties. Accomplish this by facilitating ~~timely~~ expedited review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.			
Program 2.b - Affordable Housing Production The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.	Fund and build 400 affordable units, at least 200 on sites with the highest access to resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and 200 affordable units on residentially zoned sites in higher-income neighborhoods to facilitate housing mobility in mixed-income neighborhoods,	Inclusionary in-lieu fees; General Fund; grant funding	City Manager's Office; Community Development Department	Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	and limit potential for concentrating affordable housing in areas identified with higher rates of renter households and incidence of poverty.			
Program 2.c - CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the City's contracted housing rights and tenant protection agency.	Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households in the areas with higher rates of homeowner overpayment and poverty and neighborhoods with a high proportion of renter households to facilitate housing mobility for a minimum of 50 low-income and 50 very low-income households to receive assistance during the 2021-2029 planning period. The status of availability of funding will be posted on the City's website and updated as funding becomes available.	CalHome	State of California/City Manager's Office; City's contracted housing rights and tenant protection agency	Ongoing as NOFAs are released for CalHome; City's contracted housing rights and tenant protection agency will conduct outreach at least once a year.
Program 2.d **- Section 8 Housing Choice Voucher Program for Rental Assistance** The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.	Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract with a housing rights and tenant protection agency to provide a biannual educational workshop, beginning in 2023, for rental property landlords, property managers, and other rental housing providers on the benefits of making their units available to HCV holders.	HUD	Los Angeles County Development Authority, Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	Prioritize outreach efforts to property owners and landlords with multifamily and single family rental units in higher-income residential neighborhoods to reduce existing concentrations of HCV renter households in the Fremont Avenue/Huntington Avenue/Meridian Avenue and Mission Street neighborhoods and maximize housing mobility opportunities in higher income neighborhoods, with the objective of at least 40 housing providers committing to pricing one or more of their units to be eligible to accept HCV holders			
Program 2.e - Facilitate Density Bonus for Projects with On-site Affordable Housing The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.	Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.	General Fund	Community Development Department	Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance (Program 2.m): Ongoing
Program 2.f - Offer Services to People without Housing The City will continue its participation in the regional mobile outreach program administered by San Gabriel Valley Council of Governments (SGVCOG). As part of this program, an outreach team spends three hours per week in South Pasadena to provide referrals and support to unhoused individuals. In addition, the South Pasadena Police Department will continue to perform its own outreach to unhoused individuals in South Pasadena, referring them to 211 for resources and services and providing its remaining emergency motel vouchers that were purchased with the City's formerly allocated Measure H funds. ~~emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received~~	Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.	General Fund and grants	Police Department, Community Development Department	Coordinate a meeting with neighboring jurisdictions by ~~February~~ December 2023 to identify strategies and translate materials on homeless services to Spanish by ~~May 2023~~March 2024. ~~The~~ SGV CARE pilot program was launched in

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
~~from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.~~ ~~Mobile Crisis Program~~ ~~The City of South Pasadena is participating in a Mobile Crisis Response Program along with the cities of San Marino and Arcadia to provide alternative mobile crisis teams to respond to non-violent service calls, including persons experiencing homelessness and those experiencing a mental health crisis. This approach alleviates the burden on law enforcement to respond to these types of calls, and provides social service and mental health professionals to more appropriately respond to these calls for service. One of the critical issues identified through regional coordination and collaboration was the need for an alternative crisis response option and immediate resource response for people experiencing mental health, substance abuse, and homelessness.~~ ~~The pilot program was launched in July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Two critical components of the pilot program launch are data collection and service connection. In coordination with the SGVCOG and the participating cities, the program will establish key program metrics and will ensure that data is being collected and shared to evaluate these program metrics. In addition, while the mobile crisis teams will be focused on responding to emergencies, another critical component is connecting these clients to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. LACADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it will be well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances.~~ ~~-~~SGV CARE				July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Permanent SGV CARE program to begin June 2023.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
The City of South Pasadena is participating in San Gabriel Valley Crisis Assistance Response and Engagement Program (SGV CARE) with Arcadia and San Marino. Launched in August 2022 by the SGVCOG and Los Angeles Centers for Alcohol and Drug Abuse (L.A. CADA), SGV CARE is the first multi-city regional effort to provide alternative mobile responses to 9-1-1 calls for people experiencing mental or behavioral health emergencies, including those who are unhoused. The SGV CARE response team is composed of a Licensed Clinical Social Worker, an Emergency Medical Technician, and a Substance Use Disorder Counselor, and it commits to a 30-minute maximum response time to non-violent, non-medical emergency service calls with a focus on serving a variety of needs related to mental and behavioral health and/or homelessness. The pilot phase of this program, also known as the Homeless, Mental Health and Crisis Response Pilot Program, entails a co-response with law enforcement and expires May 31, 2023. SGV CARE's approach alleviates the burden on law enforcement, while ensuring that communities members experiencing a mental or behavioral health crisis and/or homelessness receive safe and effective crisis intervention and de-escalation services; emotional support and counseling; mental health assessments; safety planning with referrals to local resources; and, if needed, transportation to a treatment facility or service provider. In SGV CARE's first quarter of operation, the average response was 10 minutes, and 64% of those served were unhoused individuals. Recognizing that crises do not end after a response call, a critical component of SGV CARE is following up with each client and connecting them to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. L.A. CADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it is well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances.				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
With the technical assistance of the Harvard Kennedy School Government Performance Lab, staff from SGV CARE cohort cities, SGVCOG, and L.A. CADA have been collecting and evaluating data and participating in regular implementation meetings to develop key performance metrics and improve the continued operation of SGV CARE beyond May 2023. The pilot program is fully funded by the Los Angeles County Board of Supervisors' Measure H funds, and the permanent SGV CARE program has thus far secured $850,000 in funding from State Senator Portatino's office and $1.5 million in federal funding. ~~The Mobile Crisis Pilot Program~~SGV CARE is an integral part of the City's adopted 2021-2026 Strategic Plan and commitment to affordable housing and helping persons of all income levels with housing options. The 2021-2026 Strategic Plan approved by Council on May 18, 2022 includes six key goals, including Goal 5: Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs. Additionally, item 5e, Homeless Initiatives, identifies several tasks including the City to continue working with the SGVCOG on region-wide solutions; participate in mental health/crisis intervention program (mobile crisis response program); and expand working relationships with community partners such as Union Station Homeless Services to help the unhoused. ~~The Mobile Crisis Program, which will run from July 2022 to May 2023, is fully funded by the Los Angeles County Board of Supervisors (BOS) Measure H Funding~~.				
Program 2.g – Expand Senior Housing Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.	Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.	General Fund, ~~and~~ grants, developer public funding sources	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 2.h - Incentivize Special-Needs Housing City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.	Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties..	Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, State No Place Like Home Funds (administered by LACDA), and other State and federal programs designated specifically for special-needs groups	Community Development Department, City Council	Prepare reasonable accommodation procedure handout and application form and post on website by December ~~2022~~2023; Train staff to process reasonable accommodations by December ~~2022~~2023; Seek funding opportunities beginning in ~~2022~~ 2023 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act wthin 120 days after the adoption of the Housing Element.
Program 2.i - Inclusionary Housing Regulations – Monitor for Effectiveness To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. Due to economic conditions, the Council has directed an amendment to revise the requirement (See Program 2m). The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. The City will encourage projects that meet this threshold to locate within higher-income neighborhoods and neighborhoods with lower proportions of rental households to facilitate income integration and housing mobility opportunities for lower-income and renter households, and reduce	Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.	General Fund (Code development); developer obligation (implementation)	Community Development Department	No later than June 30, 2025, review effectiveness of the Inclusionary Housing ordinance at producing affordable housing units and its impact on the viability of housing production. Make adjustments as necessary to the Inclusionary Housing ordinance based on the review findings no later than December 31, 2025.

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives, as applicable. The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are listed below in addition to the sites discussed in the next paragraph: ▪ Site ~~9~~8: Public works yard site ▪ Site ~~14~~13: City-Owned Parking Lot site (City owns three of the four parcels) There are no existing uses on these sites that impede additional development and there are no known conditions that preclude development in the planning period. The City is already coordinating with the owner of the other parcel on Site ~~14~~13. Site ~~9~~ 8 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site ~~13~~ 12 in Table VI-50 and will coordinate with the owner of the other parcel on Site ~~13~~ 12 to encourage development of housing on that sites. Additionally, the City will commit to monitoring the continued progress of developing the city-owned sites every other year and will identify alternative sites within 6 months if necessary if sites will not be developed during the planning period.				
Program 2.m – Update Inclusionary Housing Regulations. In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20% of base units to 15% of base units. Additionally, an exemption to the Ordinance will be added for projects with less than 10 units. Other provisions of the ordinance will also be reviewed, in consultation with the local development community, in the revision process inlcuding but not limited to ~~the 10-unit threshold,~~ in-lieu fees, cost of a comparable unit and how the inclusionary regulations relate to state density bonus law and other City development standards. As part of ~~(See also~~ Program 2.i., the effectiveness of the Inclusionary Housing Ordinance will be reviewed in 2025 and additional changes will be made to the Ordinance if it is deteremined that it is an impediment to housing development.~~)~~	Approve 137 inclusionary units during the planning period (15% inclusionary requirement on the moderate- and above moderate RHNA allocation of 912 units).	General Fund	Community Development Department and City Council	Adopt updates to the Inclusionary Housing Ordinance within 120 days of Housing Element adoption
Program 2.n – Citywide Height Limit Ballot Initiative ~~The~~ Consistent with requirements under state law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45	Facilitate proposed densities ~~above 50 dwelling units/acre~~ on residential sites in the Housing Element where the height limit	General Fund	Community Development Department and City Council	Place measure on ballot by December 31, 2024. Within 120 days after the enactment of a ballot

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
feet as to at least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit localized in the areas of increased density to stated density goals.. ~~, and if~~ If the height limit is replaced~~replaced by a new height limit~~, the new limit will be no less than ~~60~~ 84 feet ~~to achieve the densities identified in the DTSP. .and/or six stories (whichever is greater~~. ~~The City will analyze which areas of the city should be included in the proposed ballot measure.~~ In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; the City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.	may be an impediment to development.			measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code. If the ballot measure is not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre
Goal 3.0 Provide opportunities to increase housing production Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.				
Program 3.a - Rezone and Redesignate Sites to Meet RHNA Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Densit~~nti~~y Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. ~~The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac.~~ Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least ~~20~~15-percent lower-income units in compliance with the inclusionary	Rezone sufficient sites to ~~address 954 of lower-income units, 768 of moderate-income units and 1,365 of above moderate-income units.~~ accomodate the City's RNHA targets.	General Fund	Community Development Department	General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
housing ordinance without discretionary review or "by right." ~~Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the~~Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the increase in permitted density along the City's arterial corridors either through inclusing within the DTSP or through a zoning overlay district. Allowabl~~l~~be densities within these areas will be 70 du/ac, except for the Fair Oaks zone within the DTSP, which will be 110 du/ac. ~~currently undergoing public review prior to adoption hearings~~. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review.~~the adopted policies~~ ~~The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022.~~ Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.				
Program 3.b - Mixed-Use Developments and Adaptive Re-Use As part of the rezoning and adoption of the DTSP through Program 3.a, the City will create development standards that encourage the development of high density residential uses. It is anticipated that the base density of the DTSP zones will be either 70 or 110 du/ac, depending on the zone. Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards: • Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building. • Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone.~~up to 2.5 to 1~~ • Minimum unit size: 450 square feet.	Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive	General Fund	Community Development Department	Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website ~~by June 2023~~ to include revised process for streamlined processing of planned development permits for mixed-use and

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
• Required parking: o No required parking for parcels within ½ mile of a high quality transit stop; o One space per studio or one-bedroom unit; o 1.5 spaces per two-bedroom or larger unit; o Development incentive of 0.5 spaces for deed restricted affordable housing units. • Private open space: 50 square feet minimum for Liner and Flex Building typologies. These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include: • Reduced private open space requirements; • Reduced public open space requirements; • Reduced parking requirements; • Expedited processing. The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate. ~~The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan within 120 days of adoption of this Housing Element. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be~~	provisions of the Zoning Code to maximize the potential for a project to include affordable housing.			Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by ~~June~~ November 2023. Update handout materials by ~~June~~ November 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually (see Program 2.a.) Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code accordingly. Fee study if needed by December 2025.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
~~updated on the same timeframe to allow more mixed-use districts that allow high-density housing. Specific actions proposed to facilitate mixed use development in the draft Downtown Specific Plan include the items listed below. The strategy or incentive number in the proposed plan is shown in parentheses.~~ ~~Engage the development community and property owners to promote the redevelopment of single-use and single-story retail centers on Fair Oaks Avenue into mixed-use projects with shared parking. (A2.6a)~~ ~~Engage the development community and property owners to promote infill development on underutilized sites. Vacant and small underutilized sites contribute little to the City's tax base and diminish the character and feel of the City. These are prime opportunities for redevelopment and new growth that conforms to the City's urban design standards and context, and bolsters the City's tax base. The City can encourage development on these sites by engaging with property owners and developers to facilitate transactions and development activity. Such actions can include:~~ • ~~It is critical to engage with private owners of larger opportunity sites, particularly those who have expressed an interest in redevelopment. Such sites offer an excellent opportunity to begin transforming Fair Oaks Avenue into a veritable mixed-use corridor. Early "proof of concept" projects will demonstrate feasibility, and will likely convince others to follow suit.~~ • ~~Work with the South Pasadena Unified School District (SPUSD) to create refined development standards for the School District site on Mission Street that are aligned with both community desires noted in the General Plan and Downtown Specific Plan, School District needs, as well as market opportunities. (A2.6c)~~ • ~~Remove on site parking requirements near transit in accordance with State law to leverage transit access and to incentivize mixed-use development. (A2.7e)~~ • ~~Locate residential and employment growth in mixed-use buildings. (A2.8b)~~ • ~~Adopt flexible regulations that can respond to market changes in emerging industries and attract contextual development. (A3.6a)~~ • ~~Leverage the Metro L Line Station for walkable mixed-use development opportunities on nearby catalytic sites to provide variety of affordable housing types, local employment,~~				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
~~community benefits, and application of extensive Transportation Demand Management (TDM) measures. (A3.6b)~~ ▪ ~~Provide a mix of land uses within new infill projects. (A5.1a)~~ ▪ ~~In addition, the City is currently preparing objective development and design standards to streamline review of residential projects throughout the city, including in the Mixed Use areas and the DTSP.~~				
Program 3.c – Replacement of Lost Units from Residential Demolitions In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. Currently, existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. This requirement applies to: ▪ Non-vacant sites ▪ Vacant sites with previous residential uses that have been vacated or demolished.	Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.	General Fund	Community Development Department	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Program 3.d – Enable Parcel Assemblage To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.	Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.	General Fund (legislative efforts); Grant funding (implementation)	City Manager's Office; Community Development Department	Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and review annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
				legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Program 3.e – Develop an Electronic Permitting System Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.	All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.	General Fund and grants	Community Development Department	Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.
Program 3.f – Allow and Facilitate ADUs The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring ~~their~~ its ADU ordinance into compliance with State law. ~~The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties.~~ The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time. As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners:	Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 420 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).	General Fund; SCAG grant	Community Development Department	Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and and update ADU Amnesty information and incentives based on any state law changes. Review the effectiveness of the ADU regulations every two years starting in DecemberJune 2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
• Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets; • ~~have~~ Make brochures available at community center and libraries, and at "ADU Community Open House";~~.~~ • Create short promotional videos or flyers and brochures (digital and print) by January ~~2023~~2024;~~.~~ • Distribute at least annually though social media promotions, direct mailings to property owners, with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k). This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include: ▪ Online application process with staff intake for quality control ▪ Maintain and amend materials for better applicant guidance, as needed ▪ Provide consistent staff training and support ▪ Look for all opportunities to provide certainty earlier in the process ▪ Reduce the number of steps and shorten timeframes, and Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.				

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

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

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 3.1 – Increase and Maintain Planning and Housing Staff Resources The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.	Augment and support staff resources to expedite housing projects and implement housing programs.	General Fund	Community Development Department, City Council	~~City has already advertised new Planning positions and aims to be fully-staffed by June 2022. Include the housing division in the~~The Housing Division was included in the 2022-2023 budget and ~~add~~ new staff ~~by December 2022~~was hired by November 2022. Planning unit is operating with 5 FTE and recruiting for one additional person.
Program 3.m – Implement SB 9 and SB 10 The City intends to promote the housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resources. This will include the development of streamlined processes for SB9 and an SB10 implementation program with pre-approved building typologies. Specifically, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts. The baseline density for this program will be 15 du/acre in the RE and RS zones. Staff shall present a specific proposal to the City Council for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. The missing middle housing program proposal will include: o Zoning Code Text Amendment to establish a Missing Middle housing program. o Appropriate development standards to facilitate program density including but not limited to: identifying lot size requirements, reducing setbacks, increasing FAR and evaluating minimum unit size requirements.	Facilitate the development of at least 50 units with the SB10 Missing Middle housing program over the reporting period.~~Administration of SB 9 ordinance is ongoing; specific administrative process and guidelines for SB 9 to be developed; implement Missing Middle housing types – including duplexes, triplexes, four-plexes, and cottage courts – along high quality transit corridors and/or transit stops, expect for in high fire hazard areas~~explore potential ~~zoning code amendments pursuant to SB 10 and adopt feasible amendments~~.	General Fund; SCAG REAP 2.0 Grant	Community Development Department	The City will work with a technical consultant to develop objective design standards or building typologies related to this program and prepare and present the necessary implementation policy and zoning amendments to effectuate the program within 24 months of the adoption of the Housing Element. By December 2027, analyze Missing Middle housing program and make modifications as necessary. ~~SB 9 implementation began in December 2021, and a revised permanent ordinance and materials will be prepared within 120 days after the adoption of this Housing Element; SB 10 analysis~~

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
o A simple waiver system to ensure development standards do not preclude the density of 15 du/acre. o An exhibit or definition to clearly demarcate the area that is subject to the ordinance. By December 2027, the City will analyze whether it is on track to meet the eight-year objective for the Missing Middle housing program. If, at that point, the City is not on track to meet the eight-year objective, it will increase the allowable maximum density for this program. ~~These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption to expedite housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resource opportunities.~~ ~~The City took action by urgency ordinance to establish objective standards in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022~~fall~~.~~ ~~The City will also adopt a user-friendly and objective administrative process in compliance with SB 9 within the context of other City development requirements. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual progress report to HCD.~~ ~~The City commits to implementing the provisions of SB 10 that may be applied in order to address segregated living patterns and create balanced living patterns that affirmatively further fair housing.~~ ~~create a leprogram. This program will establish objective design standards for certain housing types low-density along high-quality transit corridors and/or transit stopscontemplated for this program mayAt the time of program development and Ordinance adoption, the community, Planning Commission and City Council will determine the scope of the program. Eligible property owners within these designated areas will be able to opt into this program.~~				~~and implementation by December 2024~~"Missing Middle" housing will be prepared within 120 days after the adoption of this Housing Element.
Program 3.n – Zoning Changes This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP). In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the	Update zoning to facilitate the needed housing units.	General Fund	Community Development Department	General Plan amendments and rezoning will occur within 120 days after adoption of a compliant Housing Element.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.				
Program 3.o – No Net Loss The City will evaluate the sites inventory identifying the zoning, size, and number of vacant and underutilized parcels suitable for residential development for each income category. If the sites inventory indicates a shortage of available sites to accommodate the remaining RHNA for an income category, the City shall rezone sufficient sites with appropriate densities to accommodate its remaining RHNA for each income category.	n/a	General Fund	Community Development Department	No later than December 31, 2024 and December 31, 2026, the City shall evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites.
Goal 4.0 Compliance with State Housing Laws Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.				
Program 4.a – Land Use Controls – Emergency Shelters In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))	The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law in regard to parking and distance between shelters and to establish a higher, economically feasible maximum number of beds permitted in any one emergency shelter and accommodate the increased homeless population documented in the 2022 Point in Time count.	General Fund	Community Development Department	Adopt zoning amendments within one year of Housing Element adoption.
Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either	The City will adopt an amendment to the Zoning Code for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.	General Fund	Community Development Department	Complete amendments to Zoning Code within 120 days after adoption of the Housing Element.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing. Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.				
Program 4.c – Land Use Controls – Flexible Zoning Regulations The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.	The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.	General Fund	Community Development Department	Ongoing as applications are received.
Program 4.d – ADA Accessibility Standards Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.	Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals for a minimum of 207 accessible units over the 2021 – 2029 planning period.	General Fund	Community Development Department	Amend zoning by 2024.
Program 4.e –Universal Design Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and	Maximize, to the extent feasible, the number of new or rehabilitated homes that	General fund, grants	Community Development Department	Three years for development of zoning standards and incentives

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member in areas with access to transit, commercial services, and amenities to improve mobility opportunities.	incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 15 percent of new homes incorporating universal design. Within the Downtown Specific Plan and mixed-use zones, target development of 300 new homes incorporating universal design.			with completion by July 2025; ongoing application and enforcement of accessibility requirements; ongoing education efforts and information added to ADA requirements on City website.
Program 4.f – Senate Bill 35 Procedure or Policy Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.	Streamline housing projects as required by SB 35.	General Fund	Community Development Department	Complete ~~in 2022~~ by June 2024.
Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.				
Program 5.a – Fair Housing Education, Outreach, and Services Provide ~~Fair~~ fair ~~Housing~~ housing education, outreach, mediation, and referral services through the ~~City Manager's office~~Housing Division and a contracted fair housing and landlord-tenant legal organization ~~housing rights and tenant protection agency~~ and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. Distribute informational materials to community organizations and neighborhood gathering spots in areas with higher rates of protected groups, particularly in the South Pasadena Southwest neighborhoods with higher rates of disabled persons; the South Pasadena North/Garfield Park areas with a higher proportion of seniors with disabilities and renter populations; and the South Pasadena Southeast neighborhoods with higher rates of poverty, renter households and lower incomes. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.	Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022 by providing assistance or referrals to 40 residents, or as needed; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with the City's contracted housing rights and tenant protection agency staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages	General fund, State, and federal funds	~~City Manager's Office;~~ Community Development Department, federal and State agencies	Ongoing; Meet annually with the City's contracted fair housing and landlord-tenant legal organization~~housing rights and tenant protection agency~~, beginning in 2023, to assess patterns of fair housing issues, and plan and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	by June 2023, updating annually or as needed.			
Program 5.b – Encourage a Variety of Housing Types Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements, when a state license is a requirement for the residential care facility.	Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.	General fund, State, and federal funds	Community Development Department	First zoning text amendment within 120 days after adoption of a compliant housing element. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.
Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide In the 1940's, covenants that restricted the sale of property to ~~Whites or Caucasians~~white people only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions	Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.	General Fund; grants if offered through a State or County program	Community Development Department; Los Angeles County Recorder	Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December ~~2022~~2023; encouragement of removal from private properties: ongoing.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.				
Goal 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.				
Program 6.a – Rent Registry Staff will research, develop, and propose to City Council a local rent registry program. The program would require owners of certain rental property types (those with a minimum number of units, for instance) to register their units and pay a per-unit registration fee on an annual basis. Staff envision the rent registry serving initially as a database that the City would use to collect and track rental data on units, including affordable units, and to disseminate information to property owners about tenant protections. However, the utility of the rent registry could be expanded over time to incorporate additional monitoring, compliance, and enforcement activities as new programs are established and linked to it. Staff will draw from thorough analysis to develop the details of the program, which will be subject to the approval of City Council.	City will have a comprehensive online database of all affordable and market-rate rental housing units in South Pasadena subject to the registration requirement with a user interface and fee payment system for rental property owners. The registry will be updated annually and serve as a streamlined platform for Community Development staff to track the City's rental housing inventory and provide information to rental housing property owners. City will decide whether to link this registry to the administration of other activities and programs.	General fund (staff time for development and administration); registration fees from property owners	Community Development Department (Housing Division)	Propose policy to City Council by February 2024
Program 6.b – Right to Return Policy Staff will research, develop, and propose to City Council a policy that establishes a tenant's legal right to return to a property after eviction and/or relocation due to substantial remodel or other other just cause reasons. This program, along with Programs 6.c and 6.c, if approved, could be included in a single Tenant Protections Ordinance.	In qualifying circumstances, all tenants who are temporarily displaced from their units due to construction work and wish to return upon completion will be able to do so under the law. Thus, this policy will stem permanent the permanent displacement of renters from South Pasadena due to just cause no-fault evictions and/or relocation for certain reasons.	General fund (staff time to develop the program)	Community Development Department (Housing Division)	Propose policy to City Council by December 2023
Program 6.c – Relocation Assistance	South Pasadena renters will have local tenant protections that reduce the financial burden	General fund (staff time to develop the	Community Development Department	Propose policy to City Council by December 2023

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
In 2019 and 2021, in response to the COVID-19 pandemic, City Council passed two urgency just cause ordinances that require the landlord to pay relocation assistance to the tenant when evicting the tenant for a just cause no-fault reason. Staff will review these urgency ordinances and draft and propose to City Council a new permanent ordinance with permanent and/or temporary relocation assistance requirements.	placed on tenants when they are (temporarily or permanently) displaced from their homes for legally permitted reason and instead place financial obligations onto the property owners.	program); property owners	(Housing Division)	
Program 6.d – Rent Stabilization Staff will research, develop, and propose to City Council a local rent stabilization program that would establish a low cap on rent increases that that set by the Tenant Protection Act or AB 1482.	Reduce high rent burdens and forced moves amoung South Pasadena's tenants due to excess rent increases and, in turn, increase their financial security and housing stability.	General fund (staff time to develop the program)	Community Development Department (Housing Division)	Propose policy to City Council by December 2023

6.2 INTRODUCTION

6.2.1 Overview

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

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

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

6.2.2 Purpose and Authority of the Housing Element

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

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

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

Housing Needs Assessment (Section 6.3)

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

Fair Housing Assessment (6.4)

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

Analysis of Constraints on Housing (6.5)

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

Site Inventory and Analysis (Section 6.6)

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

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

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

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

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

Housing Programs (Housing Plan) (Section 6.8)

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

Quantified Objectives

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

6.2.3 Authority and Scope of the Housing Element

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

6.2.4 Public Participation

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

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

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

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

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

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

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

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

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

Developer Forum, August 15, 2022 (Workshop 6)

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

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

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

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

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

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

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

6.2.5 California Environmental Quality Act

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

6.2.6 Relationship to Other General Plan Elements

The City of South Pasadena General Plan consists of seven elements: (1) Land Use & Community Design; (2) Circulation & Accessibility; (3) Economic Development & Revitalization Element; (4) Historic Preservation; (5) Open Space & Resource Conservation; (6) Housing; and (7) Safety & Noise. The Housing Element builds upon the other General Plan elements and is consistent with the policies and goals set forth by the entire General Plan. The City is currently partway through a comprehensive update to its General Plan. All of the other elements of the General Plan are currently being updated for consistency with recent updates to state law, including those related to environmental justice, a new General Plan requirement since the City last conducted a comprehensive General Plan Update. South Pasadena does not need to conduct an analysis in response to Senate Bill (SB) 244 because the City's sphere of influence is coterminous with the City limit, so no residential communities exist within the sphere of influence. In addition, the City will review for and confirm internal consistency as part of its annual general plan implementation report required under Government Code section 65400.

6.3 HOUSING NEEDS ASSESSMENT

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

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

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

6.3.1 Community Profile

The characteristics of a city's population are important factors affecting the housing market in the community. Issues such as population growth, age, race, ethnicity, and employment all help determine the city's housing needs. Table VI-3 compares the population estimates of the City of South Pasadena and Los Angeles County from 1970 to 2019 and shows the projected increase in population growth by 2045. The 1970, 1980, 1990, 2000, and 2010 figures are provided by the U.S. Census and the 2019 figures are an estimate provided by the California DOF. The 2045 figure comes from SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City's population increased between 1970 and 2019 by 14.2 percent with an average annual growth of 0.2 percent. In 2019, the City's population was 26,245. The City's population has represented a small percentage of the County's population at an average of 3 percent since 1970. Since 2010, however, the City's share of the County's population has substantially decreased, indicating that South Pasadena has grown at a slower rate than many other jurisdictions in the County. From the high-level regional perspective provided by SCAG in its local housing data profile for South Pasadena, the city experienced continuous population growth through from 2000 to 2015, increasing by an average of 2.3 percent every five years across this 15-year period, until the population declined slightly by approximately 2.2 percent from 2015 to 2020. The six-county jurisdictional area of SCAG

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

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

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

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

YEAR	CITY OF SOUTH PASADENA			LOS ANGELES COUNTY	
	POPULATION	PERCENTAGE OF COUNTY	AVERAGE ANNUAL GROWTH	POPULATION	AVERAGE ANNUAL GROWTH
1970	22,979	3%		7,041,980	
1980	22,681	3%	-0.1%	7,477,421	0.6%
1990	23,936	3%	.06%	8,832,500	1.8%
2000	24,292	3%	0.2%	9,519,338	0.8%
2010	25,619	3%	0.5%	9,818,605	0.3%
2019	26,245	0.3%	0.3%	10,253,716	0.5%
Average	--	3%	0.2%	--	0.8%
2045	27,200	0.2%	--	11,673,600	--

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

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

Table VI-4
POPULATION CHARACTERISTICS

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

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

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

Table VI-5
RACE AND ETHNICITY CHARACTERISTICS

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

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

6.3.2 Employment Trends

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

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

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

Source: 2015-2019 ACS DP03: Selected Economic Characteristics

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

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

Source: 2020 SCAG RTP/SCS

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

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

6.3.3 Household Characteristics

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

Household Composition and Size

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

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

Table VI-8
PERSONS PER HOUSEHOLD – 2019

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

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

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

Table VI-9
AVERAGE HOUSEHOLD SIZE

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

Source: California DOF (2007, 2012, 2019)

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

Overcrowding

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

Table VI-10
TENURE BY HOUSEHOLD SIZE

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

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

Table VI-11 identifies the number of persons per room by owner and rental units. Approximately 97 percent of all occupied units had one or less than one person per room in 2018. As a whole, South Pasadena had a relatively low rate of overcrowding in 2018 with approximately 2 percent of all households considered overcrowded, and only 1 percent considered severely overcrowded. Of the renter-occupied units, 213 units (about 4 percent) were overcrowded,~~,~~ and 66 (about 1 percent) were severely overcrowded. Of the owner-occupied units, 42 units (less than 1 percent) were overcrowded,

and 18 units were severely overcrowded. Given such low percentages, it is evident that overcrowding is not a significant housing problem in South Pasadena.

Table VI-11
PERSONS PER ROOM

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

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

Household Income and Income Distribution

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

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

Table VI-12
2018 HOUSEHOLD INCOME BY TENURE

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

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

Table VI-13
HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER

INCOME	AGE OF HOUSEHOLDER									
	BELOW 25 YEARS		25 TO 44 YEARS		45 TO 64 YEARS		65 YEARS AND ABOVE		TOTAL	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Less than $10,000	15	15%	173	5%	109	3%	141	7%	438	4%
$10,000 to $19,999	4	4%	90	3%	131	3%	217	10%	442	5%
$20,000 to $24,999	-	0%	33	1%	66	2%	28	1%	127	1%
$25,000 to $34,999	-	0%	128	4%	105	3%	232	11%	465	5%
$35,000 to $44,999	-	0%	98	3%	139	3%	173	8%	410	4%
$45,000 to $59,999	32	33%	221	6%	232	6%	134	6%	619	6%
$60,000 to $74,999	-	0%	353	10%	256	6%	185	9%	794	8%
$75,000 to $99,999	-	0%	489	14%	682	17%	211	10%	1,382	14%
$100,000 to $124,999	-	0%	361	10%	342	8%	229	11%	932	9%
$125,000 to $149,999	45	46%	344	10%	338	8%	114	5%	841	9%
$150,000 to $199,999	1	1%	359	10%	482	12%	194	9%	1,036	11%
$200,000 or more	-	0%	817	24%	1,209	30%	309	14%	2,335	24%
Total Households*	97	100%	3,466	100%	4,091	100%	2,167	100%	9,821	100%

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

Support for Lower Income Households

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

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

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

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

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

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

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

6.3.4 Regional Housing Needs Assessment

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

SCAG's RHNA development process extended over more than a year and a half, beginning with hearings on proposed methodology in Summer 2019. The proposed methodology was discussed in an extensive public review process before receiving approval from HCD and adoption by the SCAG Regional Council on March 4, 2020. SCAG issued the draft RHNA allocation on September 3, 2020, with South Pasadena receiving 2,062 units (in addition to the existing 10,678 housing units in the city). The City of South Pasadena filed an appeal based on strong evidence that the number was not realistic given certain characteristics of the local geography and development patterns. However, the appeal was rejected, along with the vast majority of appeals filed by other cities in the SCAG region. A few other appeals were approved, resulting in a reallocation of units to other jurisdictions within the region. Through that process, five additional units were reallocated to South Pasadena, with a final allocation of 2,067 units (see Table VI-15 below) in the Final RHNA that SCAG adopted on March 3, 2021.

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

Over the eight-year period of this housing element, these goals, policies, and programs are designed to allow the market to provide units in all income categories, to meet the RHNA as a minimum goal. Based on the SCAG 2021-2029 RHNA, South Pasadena needs 2,067 new units, distributed across the four income levels established by HCD.

Table VI-15 identifies South Pasadena's housing need by income group.

Table VI-15
SOUTH PASADENA REGIONAL HOUSING NEEDS ASSESSMENT 2021-2029

INCOME GROUP	NUMBER OF NEW UNITS	PERCENTAGE
Very Low Income	757	37%
Low Income	398	19%
Moderate Income	334	16%
Above-Moderate Income	578	28%
Total	**2,067**	**100%**

Source: SCAG RHNA, Adopted March 3, 2021

To clarify the requirements of state law concerning the RHNA allocation and the housing element, no city is not obligated to *construct* any of the units, but rather cities are required to establish goals, plans and programs that realistically encourage the private sector to develop the RHNA allocation.

6.3.5 Extremely Low-Income Households

Extremely low income households are defined as those with incomes less than 30 percent of the area median income, or AMI (Table VI-14, above). Extremely low-income households generally tend to experience housing insecurity and need assistance to obtain affordable housing. For example, most families and individuals whose sole source of income is from public assistance, such as social security insurance (SSI) or disability insurance live on extremely low-incomes. Households supported by a California minimum wage worker, even full-time, may fall into the extremely low-income category. According to Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data provided by HUD, approximately 77 percent of extremely low-income renter households in South Pasadena paid more than 30 percent of their income for housing and approximately 85 percent of extremely low-income homeowner households paid more than 30 percent of their income for housing (Table VI-15).

For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of 757 very low-income units (378 units) represents the additional housing needed to be provided for extremely low-income households. Some extremely low-income households could include household members with mental, physical or developmental disabilities, and special needs. A single senior citizen on a limited amount of fixed income, such as SSI, could also be considered extremely low income. As detailed earlier in this chapter, a greater percentage of extremely low-income households in the city are renter households. Extremely low income households are second only to very low income households in terms of paying more than 30 percent of monthly income towards housing. To address the needs of extremely low-income households with mental, physical, or developmental disabilities, the Housing Element includes a program for providing for housing types for this special-needs group

(see Program 2.h) in addition to other programs that would also address extremely low-income households (Programs 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance, Program 2.f - Offer Services to People without Housing, Program 2.g – Expand Senior Housing, Program 2.j – General Plan Affordable Housing Overlay, Program 2.k – Affordable Housing Overlay Zone, Program 3.f – Allow and Facilitate ADUs and the other ADU-related programs, Program 4.a – Land Use Controls – Emergency Shelters, Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers, Program 4.d – ADA Accessibility Standards, Program 4.e – Universal Design, and Program 5.a - Fair Housing Education, Outreach, and Services)

In recent years, the City undertook the following actions to support extremely low-income households, including those experiencing homelessness and the lowest-income households in the City:

- The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to add clarifying language to the definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This will be amended to continue to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.
- Housing Choice Vouchers: Information about Section 8 vouchers, accessible through Los Angeles County, is available on the City's website with this link to County website: https://www.southpasadenaca.gov/residents/housing/.
- The "Housing" webpage was relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program.

- HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. According to LACDA, there are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.
- Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.

6.3.6 Special-Needs Groups

Households with special housing needs as defined under state housing element law include disabled persons (including those with developmental disabilities), seniors, large households, farmworkers, single-parent households, and the homeless. Table VI-16 summarizes the numbers of households or persons in each of these special-needs groups in South Pasadena in 2018. The point in time count of persons experiencing homelessness was last collected in 2020. Additional analysis of each of these special needs groups follows.

Table VI-16
HOUSEHOLDS WITH SPECIAL HOUSING NEEDS

SPECIAL -NEEDS GROUP	NUMBER OF PERSONS OR HOUSEHOLDS	% OF TOTAL POPULATION OR TOTAL HOUSEHOLDS
Senior Households**	2,167	22.1%
Large households - 5 or more members	561	5.6%
Single-parent households	766	7.7%
Persons age 18 or over with a disability**	1,750 (18 to 64 years 700 or 2.7% 65 and over 393 or 1.5%)	6.9%
Persons employed in agriculture, forestry, and fishing occupations**	43	<1%
Unhoused (Homeless) persons*	15	<1%

Source: ACS, 2014-2018-2011: B17012 Poverty Status in the Past 12 Months of Families by Household Type by Number of Related Children Under 18 Years; B25009 Tenure by Household Size;
**2015-2019: B25007 Tenure by Age of Householder; DP03 Selected Economic Characteristics; S1810 Disability Characteristics;* Los Angeles Homeless Services Authority Point-in-Time Count 2020

Persons with Disabilities

The Americans with Disability Act (ADA) defines a disability as a physical or mental impairment that substantially limits one or more major life activities. This segment of the population, which includes individuals with mental, physical, and developmental disabilities, needs affordable housing that is conveniently located to essential services and, where necessary, has been specially adapted for accessibility or other accommodations such as wheelchair ramps, elevators, wide doorways, and modified fixtures, cabinetry, and appliances. Other appropriate features of housing for persons with physical disabilities include very low-cost units in large group home settings near retail services and public transit, supervised apartment settings with on- or off-site support services, outpatient/day treatment programs, inpatient/day treatment programs, single-room occupancy units, crisis shelters, and transitional housing.

Most people with disabilities live on an income that is significantly lower than the non-disabled population, which severely limits their ability to pay for housing. Persons with disabilities have higher rates of unemployment relative to other groups. For most, their only source of income is a small fixed pension afforded by Social Security Disability Insurance (SDI), SSI, or Social Security Old Age and Survivor's Insurance (SSA), which, in many cases, does not adequately cover the cost of rent and living expenses, even when shared with a roommate. In addition, persons with disabilities oftentimes experience discrimination in hiring and training. Employment can tend to be unstable and at the lower-wage brackets.

The 2015-2019 ACS identified 1,750 persons aged 18 and over living with a disability (3,569 disabilities tallied) in the City of South Pasadena. Of these, 700 are between the ages of 18 and 64 (1,217 disabilities tallied) and 393 are 65 and older (2,352 disabilities tallied). The most common disabilities in South Pasadena for those under 65 are cognitive disabilities (319), followed by independent living disabilities (248), and ambulatory disabilities (225). Among seniors, the most common disabilities include ambulatory disabilities (743), followed by independent living disabilities (546), and hearing disabilities (393). In 2019, there were 441 employed and 16 unemployed persons with disabilities in the City's labor force, representing about 3 percent of the City's working-age population. There were also 243 persons with disabilities, or 2 percent of the City's working-age population, that were not in the City's labor force. Table VI-17 provides information about South Pasadena residents with disabilities by disability type and age. Table VI-18 demonstrates the employment characteristics of this group within the context of the overall South Pasadena labor force.

Table VI-17
DISABILITIES BY TYPE AND AGE OF RESIDENT

Total Disabilities Tallied	**3,854**
Total Disabilities Tallied for People 17 Years or Under:	**285**
Hearing Difficulty	6
Vision Difficulty	12
Cognitive Difficulty	222
Ambulatory Difficulty	0
Self-Care Difficulty	45
Total Disabilities Tallied for People 18 to 64 Years:	**1,217**
Hearing Difficulty	204
Vision Difficulty	147
Cognitive Difficulty	319
Ambulatory Difficulty	225
Self-Care Difficulty	74
Independent Living Difficulty	248
Total Disabilities Tallied for People 65 Years and Over:	**2,352**
Hearing Difficulty	393
Vision Difficulty	186
Cognitive Difficulty	167
Ambulatory Difficulty	743
Self-Care Difficulty	317
Independent Living Difficulty	546

Source: 2015-2019 ACS: S1810 Disability Characteristics.

Table VI-18
EMPLOYMENT AMONG POPULATION WITH DISABILITY

POPULATION GROUP	NUMBER	PERCENTAGE
Total Population Ages 18 to 64	**15,748**	**100%**
In the labor force	**13,269**	**84%**
Employed	*12,714*	*81%*
With a disability	441	3%
No disability	12,273	78%
Unemployed	555	4%
With a disability	16	<1%
No disability	539	3%
Not in the labor force	**2,479**	**16%**
With a disability	243	2%
No disability	2,236	14%

Source: ACS, 2015-2019: S1810 Disability Characteristics

Consistent with California law, group homes or residential care facilities with six or fewer residents per facility are allowed by right in all of South Pasadena's residential zones. However, group homes or residential care facilities with seven or more persons require a conditional use permit in the RM and RH residential districts. As part of the approval of conditional use permits for residential care facilities, the City is able to grant an exception to the parking requirements established in the Zoning Code. As part of Program 5.b, to address new state fair housing requirements, the City will amend the zoning code to allow residential care facilities with seven or more persons to be permitted with the same requirements that apply to other residential uses in the same zone.

Housing opportunities for individuals with physical disabilities can be addressed through the provision of affordable, barrier-free housing. Currently, such units are in limited supply in South Pasadena due to the large proportion of older housing stock built under previous codes. In addition to the development of new accessible units, rehabilitation assistance can be provided to renters and homeowners with disabilities to modify existing units to improve accessibility. The living arrangements needed by persons with disabilities depend on the severity of the disability. While some living with disabilities may live at home in an independent environment with family support, others may require assistance to maintain independent living. This can be provided in the form of special housing design features for those with physical disabilities, income support for those who are unable to work, and in-home supportive services for persons with medical conditions. Accessible housing can also be provided through senior housing developments.

In 1982 (and effective since September 15, 1984), Title 24 of the California Uniform Building Code mandated that all multifamily residential construction projects containing more than five units conform to specific disabled adaptability/accessibility regulations. In 1988, the federal government enacted the U.S. Fair Housing Amendment Act, with the intent of increasing the number of accessible rental units. In July 1993, the State of California issued "California Multifamily Access Requirements" based upon this Act. Both federal and state housing laws require certain features of adaptive design for physical accessibility in new multifamily residential buildings with four or more units built for first occupancy starting March 13, 1991. However, numerous buildings built before these state and federal mandates do not comply with these standards. These laws do not apply in many cases to assist individuals, particularly seniors who "age in place" in their homes rather than move to assisted living facilities and/or other newly constructed units.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility as part of its building plan check and inspection process. The City does not require special building codes or onerous project review to construct, improve, or convert housing for persons with disabilities. Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land-use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to allow covered ramps in the setbacks of properties that have already been developed to accommodate residents with mobility impairments. In 2013, South Pasadena amended the Zoning Code to establish a process for reasonable accommodations (SPMC Section 36.410.110). (See also Section 6.6 Housing Development Resources).

The physical modification of housing is not necessary to accommodate persons with other kinds of disabilities (non-physical disabilities), but they generally require special services and monetary support. Since jobs and higher earning potential are often limited for such individuals, affordable housing is important to maintain their quality of life. Group homes with a live-in resident assistant may be one solution for providing affordable housing to those with non-physical disabilities.

Persons with Developmental Disabilities

State law also requires that the Housing Element address the housing needs of persons with developmental disabilities. As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that originates before an individual is 18 years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual, which includes mental retardation, cerebral palsy, epilepsy, and autism. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. The Eastern Los Angeles Regional Center serves residents with developmental disabilities in South Pasadena and the surrounding cities. Table VI-19 provides the number of persons in South Pasadena with a developmental disability in 2019 by type of residence.

Table VI-19
PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE

RESIDENCE TYPE	PATIENT COUNT*
Home of Parent/Family/Guardian	178
Independent/Supported Living	<11
Community Care Facility	<11
Intermediate Care Facility	0
Foster/Family Home	0
Other	0
Total Residential Population	**180 to 198**

Source: California Department of Developmental Services – Consumer Count by California ZIP Code and Residence Type: ZIP Code 91030 September 2019

*Because the California Department of Developmental Services does not provide data in amounts smaller than 11 patients per category, the real count of patients living with a disability cannot be definitively determined. As such, the total count is reported as a range based on the data available.

Housing types appropriate for people living with a developmental disability include rent-subsidized homes, licensed and unlicensed single-family homes, and group homes. Programs appropriate for providing housing for developmentally disabled persons include Section 8 vouchers, inclusionary housing, special programs for home purchase, U.S. Department of Housing and Urban Development (HUD) housing, and SB 962 homes. Considerations that are important in serving this need group include the design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities. Program 2.h in the Housing Element addresses the needs of those in the South Pasadena community with developmental disabilities.

Senior Households

Many senior households, defined as those with at least one member over the age of 65, at some point will have special needs due to relatively low fixed incomes, physical and mental disabilities, health problems requiring hospitalization or ongoing treatment, and other issues that result in increasing dependency on family or caretakers. Although many seniors continue to drive into their 70s or beyond, many begin to rely on public transportation at some point, particularly those with disabilities. While some data sources reference seniors as one group, the need for support becomes more acute as people age within the cohort.

According to the 2015-2019 ACS, in 2019, the City of South Pasadena had 3,574 persons aged 65 and over, of which 2,167 were "householders," the primary rent or mortgage payer in a household. The senior population represents approximately 19 percent of the total City population and 22.1% of its households, but as shown in Table VI-20, they comprise 34% of the homeowner households. Approximately 16 percent of South Pasadena households that own their homes are over the age of 75. Overall, 1,593 or 74 percent of senior households in the City own their owned homes and 574 households or 26 percent of the City's senior households rent. In 2019, 39 percent of senior-headed households earned an income of $100,000 or more. Approximately, 51 percent earned an income that exceeded the Los Angeles County 2020 median income of $77,300, whereas an approximate 49 percent of senior households earned an income below the median income for the County. Out of the total 2,167 senior households in South Pasadena recorded in 2019, 791, or an approximate 37 percent, earned an income that was below the very-low income limit of $45,050 for a two-person household in Los Angeles County. As seen in the data below, those seniors are likely a significant cohort of the households who own their own homes in South Pasadena and are overburdened by housing costs.

Table VI-20
HOUSING UNIT TENURE BY AGE OF HEAD HOUSEHOLDER

AGE	UNITS	PERCENT
OWNER-OCCUPIED		
15 to 24 Years	0	0%
25 to 44 Years	811	17%
45 to 64 Years	2,255	48%
65 Years or older	1593	34%
Total Units	4,659	100%
RENTER-OCCUPIED		
15 to 24 Years	103	2%
25 to 44 Years	2,655	51%
45 to 64 Years	1,836	36%
65 Years or older	574	11%
Total Units	5,168	100%

HOUSEHOLD INCOME	SENIOR HOUSEHOLDS	PERCENT
Less than $25,000	386	18%
$25,000 to $59,999	539	25%
$60,000 to $99,999	396	18%
$100,000 or more	846	39%
Total Senior Householders	2,167	100%
Total Households	9,827	22.1% (Senior Households of all Households)

Source: 2015-2019 ACS: B25007 Tenure by Age of Householder; B25009 Age of Householder by Household Income in the Past 12 Months

Senior housing needs typically include affordable housing close to commercial shopping areas, medical facilities, and public transportation services. As shown above, single-family homes are disproportionately occupied today by seniors. Although many seniors opt to age in place and can afford to remain in their homes, others will need to find different accommodations at some point due to the economic or the functional burden of home ownership. This underscores the necessity of building appropriate housing types within the South Pasadena community that would offer more attractive and convenient options for seniors to support decisions to downsize. As more seniors vacate single-family housing units, this housing stock would become more available for larger households.

Considering its relatively small size, South Pasadena offers a fair number of apartment complexes and assisted living facilities for senior residents for its relatively small population. Senior living facilities include the Golden Oaks Apartments with 65 independent living units, Meridian Manor with 6 beds for assisted living, and Prospect Manor with 99 beds for assisted living.

Since 1982, the South Pasadena Senior Citizens' Center has served as a meeting place for services and activities for the community's seniors and others living with disabilities that require similar support services. Although closed for an extended period during the COVID-19 pandemic, the center reopened on June 7, 2021, and continues to operate with support from the City and the non-profit Senior Citizens Foundation of South Pasadena and other community sponsors. Center programs and activities are designed to enhance and support senior citizen independence and encourage involvement in and with the community.

The wide range of services offered at the Senior Citizens' Center include daily lunches, interest classes, recreational activities, and health services, such as health assessments and blood pressure measurement. The City also operates a Dial-A-Ride Program through the Senior Citizens' Center, providing South Pasadena senior citizens transportation anywhere within the City limits, to nearby medical offices, grocery stores, and to Huntington Memorial Hospital. The Senior Citizens' Center also operates a Meals-On-Wheels program for qualifying individuals.

Group homes with a live-in resident assistant may be one solution to providing affordable housing to seniors. Consistent with California law, group homes with six or fewer residents per facility are allowed by right in all residential zones of the City. Residential Care Facilities for the Elderly (RCFE) are permitted in the RM and RH residential districts, subject to approval of a conditional-use permit. As part of the approval of conditional-use permits for RCFE facilities, the City is able to provide an exception to the parking requirements established in the Zoning Code for projects accommodating senior citizens. Note, that to address constraints related to review of residential care facilities, Program 5.b is proposed to remove discretionary review of large residential care facilities.

Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through agricultural labor. They have special housing needs because of their relatively low income and in some cases, the unstable seasonal nature of their job.

As indicated in Table VI-15, the 2014-2018 ACS identifies 54 individuals in South Pasadena employed in the category of agriculture, forestry, and fishing occupations, which accounted for less than one percent of the City's employed residents. Given that there are so few persons employed in agricultural-related industries, the City can address their housing needs through its overall programs for housing affordability, and there is no need to create and administer a special program targeting farmworkers. However, farmworkers are addressed under Program 2.h which serves all Special Needs groups in the City.

Large Households

Large households are those consisting of five or more persons. Large families can have special housing needs if they cannot find affordable large housing units. In that case, their living conditions may become overcrowded.

The highest percentage of owner-occupied housing units is for a two-person unit (35 percent). About 7 percent of the owner-occupied households are occupied by five or more persons. For renter-occupied units, one-person households are the most common (37 percent). About 4 percent of the renter-occupied units are occupied by five or more persons. These numbers are generally low compared to the County as a whole. In Los Angeles County, the occurrence of households with five or more members is 15 percent for owner-occupied units and 13 percent for renter-occupied units. Program 2.h addresses the needs of large households.

Single-Parent Households

The housing needs of single parents may differ from two-parent households and should be considered as new housing is developed based on the programs of this housing element. Such households have a greater need for housing with convenient access to childcare facilities, public transportation, and other public facilities and services. Because the earning power of single-parent households is generally less than that of two-parent households that have potential for more than one income, single parents constitute a "special needs" group as they will tend to spend a higher percentage of their household income on housing that meets their families' needs. In particular, women's incomes continue to be statistically lower than their male counterparts despite some advancements made in recent years, and the historic discrimination in pay levels impacts the ability of female-headed single-parent households to afford appropriate housing.

Table VI-21 provides a detailed breakdown of the City of South Pasadena's household composition in 2018. The total number of single-parent households with children in South Pasadena is 766, approximately 12 percent of all family households in the City. This represents a decline of approximately 17 percent from the 924 single-parent households reported in 2010. Female-headed households with children represent 480 or approximately 8 percent of all family households. Male-headed households with children represent 286 or approximately 4 percent of all family households. Specifically, female householders with children declined by an approximate 31 percent from 2010 to 2018. Female householders with no children also declined approximately 21 percent over the same period. Single-male householders with children, on the other hand, increased approximately 24 percent from 2010 to 2018, though male-headed households without children declined by

approximately 19 percent over the same period. These contrasting trends indicate that all kinds of female-headed households have chosen to leave South Pasadena along with single-male householders without children over the last decade though the motivations for these decisions are unknown. Housing opportunities for lower-income single-parent households with children can primarily be addressed through rental assistance and the provision of affordable rental units. Program 2.d specifically addresses the need for vouchers for rental assistance and multiple other programs in this Housing Element address the provision of affordable rental units.

Table VI-21
FAMILY HOUSEHOLD COMPOSITION

FAMILY HOUSEHOLD SIZE AND TYPE	NO. OF FAMILIES	% TOTAL FAMILIES
Total Households (including family households)	**10,007**	**--**
Total Families	**6,388**	**100%**
Two or More Persons in Family Households:	**5,757**	**90%**
Married Couple with Related Children	2,782	44%
Married Couple with No Related Children	2,209	35%
Female Householder, No Husband Present with Related Children	480	8%
Male Householder, No Wife Present with Related Children	286	4%
Unmarried Householders with No Related Children	**631**	**10%**
Female Householder, No Husband Present with No Related Children	451	7%
Male Householder, No Wife Present with No Related Children	180	3%
Total Families below the Poverty Level	**333**	**5%**
Female-Headed Households below Poverty Level	109	2%
Male-Headed Households below Poverty Level	156	2%

Source: 2014-2018 ACS: B17012 Poverty Status in the Past 12 Months of Families by Household Type by Number of Related children Under 18 Years

Unhoused (Homeless) Persons

In February 2022, the Greater Los Angeles Homeless Count was conducted by the Los Angeles Homeless Services Authority (LAHSA) in South Pasadena. This Point in Time (PIT) study identified a total population of 50 unsheltered persons in the seven census tracts that comprise the City (Figure VI-2). This represents an increase of 35 individuals from the 2020 PIT count. The City has zero unhoused residents in shelters. Program 4.a has been updated to ensure that the Code allows for emergency shelters to accommodate the increased number.

Figure VI-2
2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA

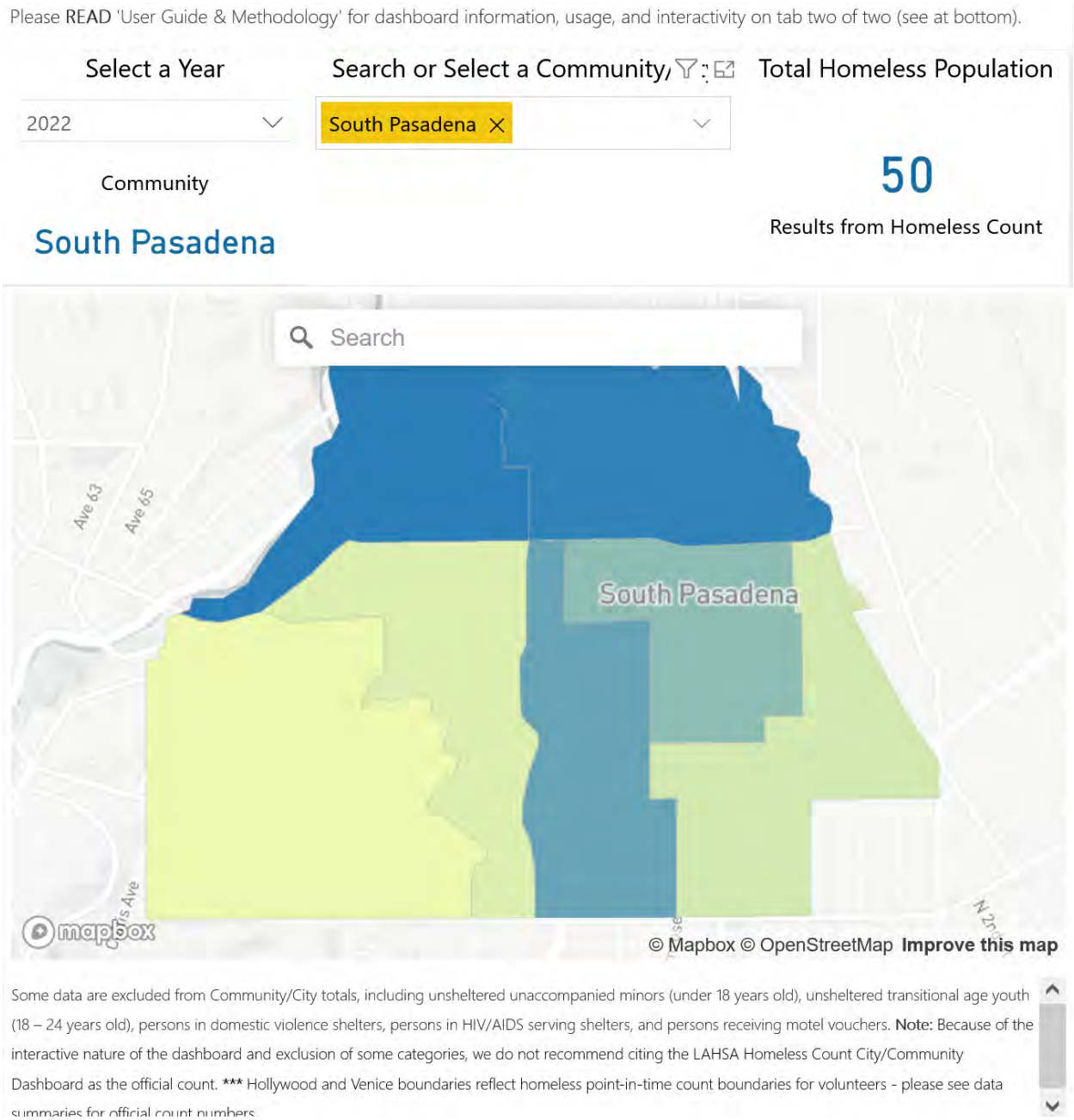
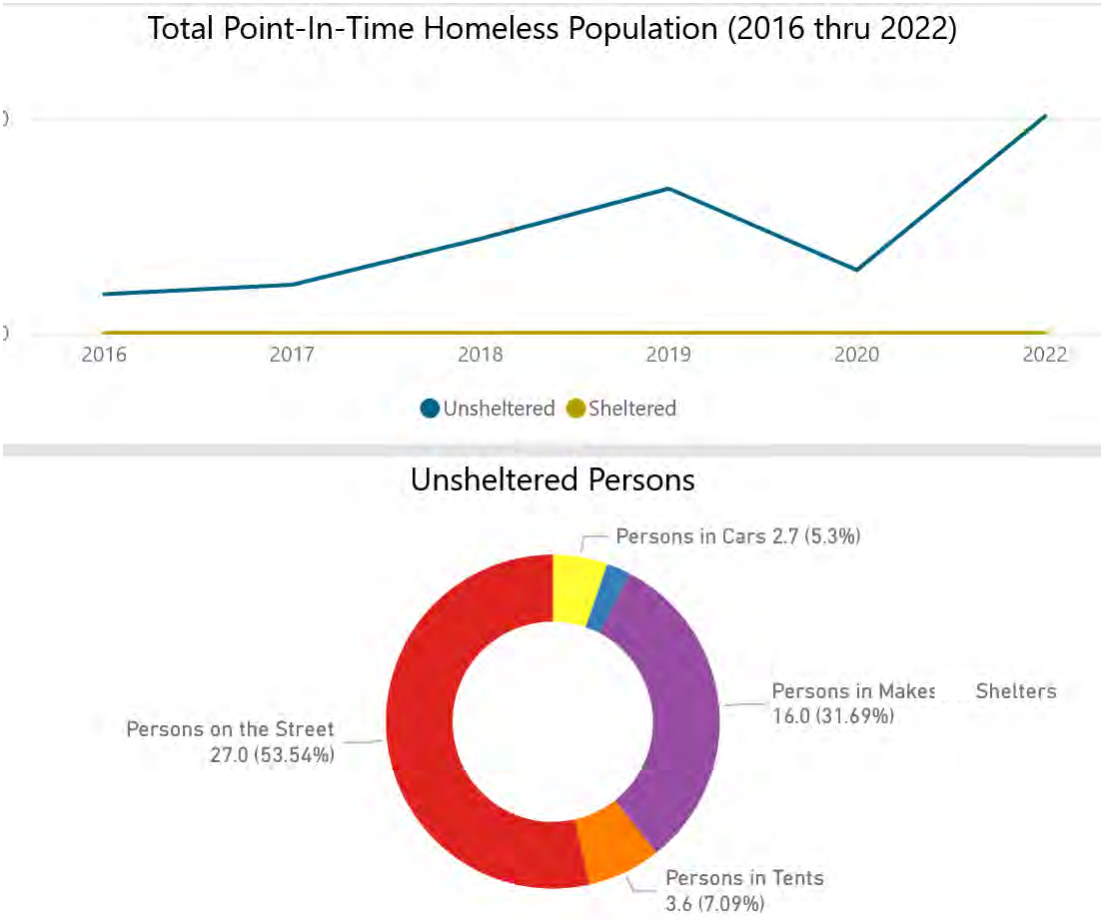


Figure VI-2 (continued)
2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA



There are no homeless shelters operating within the City of South Pasadena. Typically, unhoused individuals in South Pasadena find shelter in Arroyo Park, under the Oaklawn Bridge, and at other locations in the City. While there are no shelters within the City limits, the following shelters are located in the adjacent City of Los Angeles:

- SRO Housing Corporation
- Testimonial Community Love Center
- United States Veterans Initiative, Inc.
- Volunteers of America of Los Angeles
- Weingart Center Association
- Los Angeles Mission
- Midnight Mission
- People Assisting the Homeless
- Union Rescue Mission

Within the adjacent City of Pasadena, the following shelters and hotlines offer assistance to the homeless:

- All Saints Pasadena Church
- Friendship Indeed
- Union Station Homeless Services
- Door of Hope
- Haven House
- Emergency Shelter Line (211)
- LAHOP.ORG referral service, affiliated with Union Station

The Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. This led to many unsheltered persons making contact with service providers and finding additional appropriate resources. Part of the housing navigator service works with the City's Police Department through an informal referral services program with Union Station Homeless Services, a homeless shelter and service provider located in the City of Pasadena. The service provides transportation to the shelter and referrals of homeless individuals to the Union Station service programs. Additionally, the City's Police Department conducts regular outreach to unhoused individuals who are present in the City during different daytime and evening hours and maintains family contact notification information for those that request this service. This outreach is coordinated with agencies in nearby cities to streamline resources and serve unhoused clients in the best and most efficient way.

In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities, and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provided one-time rental assistance to eligible low-income residents during the pandemic state of emergency in 2020-2021. A public education video funded by the SGV COG about how to help the unhoused is in preparation and other initiatives will continue through 2022.

The City Zoning Code permits homeless shelters and single-room occupancy housing in the BP zone by right and transitional and supportive housing by right in all residential zones. (South Pasadena City Code sections 36.230.030, Table 2-3; 36.250.250; and 36.250.260). Programs 4.a and 4.b are proposed to address compliance with current state law requirements regarding emergency shelters and transitional and supportive housing.

6.3.7 Housing Profile

A housing unit is defined as a house, apartment, or single room, occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters. Separate living quarters refer to those units in which the occupants live and eat separately from any other person in the building and that have direct access from the outside of the building or through a common hall. A community's housing stock is the compilation of all its housing units.

Number of Housing Units

As described in Table VI-22, there were 10,678 housing units in the City per the 2015-2019 ACS or 11,118 housing units according the California Department of Finance (DOF)'s E-5 projections for 2019.[1] Of this total reported by the ACS, approximately 48 percent were renter-occupied, approximately 44 percent were owner-occupied, and approximately 8 percent (851 units) were vacant, an absolute increase in the city's vacancy rate of 2 percentage points (from 6 to 8 percent) over the last eight years, compared to data provided in the 2014-2021 Housing Element. Approximately 4 percent of the city's housing units were vacant rentals and 1 percent were vacant homeowner units. An approximate 1% (5 units) of vacant units were identified as being used for seasonal, recreational or occasional use. South Pasadena's 2019 vacancy rate reported by the ACS was only slightly higher than the vacancy rate for Los Angeles County at 6.4 percent. According to DOF, the County's vacancy rate for 2019 was 6.1 percent, a marginal increase from the 5.9 percent reported for 2010. Of the County's entire housing unit stock of 3,542,800 counted in the 2015-2019 ACS, an approximate 2.3 percent were vacant rental units and an approximate 1.7 percent were vacant homeowner units. South Pasadena thus has a higher overall vacancy rate compared to the County, has experienced a larger increase in vacancy from 2010, and has higher vacancy rates among both rental and owner-occupied housing types.

[1] Because the ACS is a federal survey and relies upon limited sampling over a 5-year period the numbers reported differ from those reported by the California Department of Finance which incorporates data submitted by other state agencies as well as by local jurisdictions to develop the final count of housing units. For more information on the methodology of the E-5 estimate data please refer to the California Department of Finance: https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/

Table VI-22
HOUSING UNITS BY OCCUPANCY STATUS

HOUSING UNITS BY OCCUPANCY STATUS	HOUSING UNITS	PERCENTAGE
Occupied Housing Units:	9,827	92%
Owner-Occupied	4,659	44%
Renter-Occupied	5,168	48%
VACANT HOUSING UNIT SUBCATEGORIES	**HOUSING UNITS**	**PERCENTAGE**
Vacant Housing Units	851	8%
For rent	284	3%
Rented, not occupied	100	1%
For sale only	111	1%
Sold, not occupied	41	<1%
For seasonal, recreational, or occasional use	55	1%
All other vacant	260	2%
Vacancy Rate	8%	--
Vacancy rate minus seasonal units	7%	--
Homeowner vacancy rate	1%	--
Rental vacancy rate	4%	--
Total	**10,678**	**100%**

Source: 2015-2019 ACS: B25002 Occupancy Status. 2015-2019 ACS: B25003, Tenure. 2015-2019 ACS: B25004 Vacancy Status.

Housing Growth

According to California DOF data, the City's housing stock increased from 10,349 to 11,186 between 1980 and 2020 (Table VI-23). Between 2012 and 2020, approximately the period of the last housing element RHNA, 63 new residential dwelling units were constructed, representing a 0.5-percent growth increment over the eight-year period.

Table VI-23
HISTORIC HOUSING TRENDS: 1980-2019

YEAR	SINGLE-FAMILY		MULTIFAMILY		TOTAL UNITS
	UNITS	PERCENT	UNITS	PERCENT	
1980	6,520	63.0%	3,829	37.0%	10,349
1990	5,434	50.7%	5,285	49.3%	10,719
1994	5,456	50.6%	5,325	49.4%	10,780
2000	5,679	52.3%	5,181	47.7%	10,860
2012	5,605	50.4%	5,518	49.6%	11,123
2019	5,642	50.48%	5,534	49.52%	11,176
2020	5,652	50.53%	5,534	49.57%	11,186

Source: California DOF, 2019, 2020

South Pasadena has high standards for architecture and landscape preservation, and its residents take pride in its appearance. Much of the planning over the last few decades has utilized highly discretionary processes, which may have slowed residential development. Development may have also been hindered by the City's decades-long struggle to reverse the planned 710 Freeway extension, which was finally cancelled by Caltrans. Today, South Pasadena's leadership is taking a different approach to encouraging housing as reflected in the housing programs in this document. Although many discretionary processes are still in place, the City has already implemented quicker and more ministerial permitting through the inclusionary housing ordinance to provide more flexibility for

residential projects, particularly through incentives that are offered along with density bonuses for projects that provide affordable housing units. These incentives include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects.

The Zoning Code includes further provisions for approval of modifications to standard development standards, as further described in Section 6.6.1, Zoning Code Resources.

Although South Pasadena complied with its RHNA for market-rate units in the previous housing element cycle, housing production fell short of the RHNA target for new affordable housing units. It is clear that policies over the last decade have not promoted housing development as required to meet housing needs and affordable housing units in particular. The policies of this housing element seek to change this trajectory.

Housing Type and Tenure

Table VI-24 describes occupancy status of units according to the number of units in the structure. Approximately 53 percent of all housing units are single-family homes.

Table VI-24
HOUSING UNITS BY TYPE AND OCCUPANCY STATUS

UNITS BY TYPE	SOUTH PASADENA	
	UNITS	PERCENT
Single-Family Detached	4,980	45%
Single-Family Attached	662	6%
2 to 4 Units	1,404	13%
5 or More Units	4,130	37%
Mobile Homes	0	0%
Total (Occupied)	10,567	95%
Grand Total (Occupied and Unoccupied Housing Units)	**11,176**	**100%**

Source: California DOF, 2019

Age and Condition of Housing Stock

Compared to more recently planned and developed cities in the state, South Pasadena has a disproportionately older housing stock, due to its proximity to central Los Angeles and early availability of public transportation. It was incorporated in 1888, among the first cities to do so in Los Angeles County. This can have implications on the overall condition of the housing stock regarding maintenance and repair needs. Policies beginning fifty years ago placed a value on historic preservation of those early built single-family homes, also contributing to the continued presence of many of these older structures, which were not required to be built to the standards required by more recent building codes for energy efficiency and seismic safety.

Additionally, there are 68 surplus residential properties that Caltrans took by eminent domain to build the 710 freeway, a project that has now been abandoned. The homes, which have been rented out during this period, have not been maintained adequately, and some are currently vacant and boarded up. The rehabilitation or replacement of these structures is addressed in Program 1.b – Housing Acquisition.

As illustrated in Table VI-25, approximately 45.9 percent of the city's occupied housing units were built prior to 1949. Since the last housing element, 315 housing units from this era (about 6 percent)

have been demolished. Today, nearly 94 percent of the occupied housing stock is over 30 years old, indicating likely rehabilitation needs.

Table VI-25
OCCUPIED HOUSING UNITS BY AGE OF HOUSING STOCK – AS OF 2018

YEAR STRUCTURE BUILT	TOTAL OCCUPIED UNITS		OWNER-OCCUPIED	RENTER-OCCUPIED
	NO.	%		
2010 or later	42	0.4%	28	14
2000 to 2009	211	2.1%	178	33
1990 to 1999	365	3.6%	126	239
1980 to 1989	541	5.4%	250	291
1970 to 1979	1,128	11.3%	448	680
1960 to 1969	1,658	16.6%	508	1150
1950 to 1959	1,469	14.7%	678	791
1940 to 1949	915	9.1%	311	604
1939 or earlier	3,678	36.8%	2,143	1,535
Total	**10,007**	**100%**	**4,670**	**5,337**

Source: 2014-2018 ACS B25036: Tenure by Year Structure Built

In order to determine the overall condition of the housing stock, the City's Community Improvement Coordinator conducted a windshield survey of all residential properties in the city, nearly 11,000 properties. The exterior condition of each home was noted, including the condition of the roof, chimney, and gutters; porches, stairs, and garage; doors and windows; exterior surfaces; and foundation.

The City of South Pasadena is proactive in encouraging landlords to maintain, rehabilitate and remodel their units. The windshield survey did not identify any multi-family buildings in need of rehabilitation at the Moderate, Substantial or Dilapidated levels.

While the vast majority of the housing surveyed (nearly 98 percent) was found to be in above-average to excellent condition, 232 units (2.07 percent) were found to need some form of rehabilitation (see Table VI-26, below). 186 of these units needed repainting and are classified as minor. Typical moderate or substantial structural defects observed included roofs in need of replacement (missing or peeling asphalt shingles, asphalt tiles and roll roofing worn down to fiberglass, etc.), sagging eaves and significant dry-rot, damaged siding, peeling paint, broken steps, and sagging and detached roof gutters. A number of the homes had outbuildings (such as detached garages or sheds) that were in poor condition or potentially structurally unsound. The majority of homes requiring maintenance or abatement are owned by longtime residents.

Eight of the 232 units were considered dilapidated and in need of replacement, of which five were occupied. Four of these homes were located on one street within the City's Southwest Monterey Hills community, where many of the houses identified as requiring some level of repair were located. The units were constructed during 1920-1930 on very steep hillside lots, with frame on slab foundations. Many of the foundations have cracked from shifting soils and erosion. While this neighborhood offers many attractive features, the geography results in unique challenges to redevelopment.

The City has authority to enforce Code violations on residential properties exhibiting characteristics of blight. In the past, enforcement has mostly proceeded based on receiving a complaint. Property owners are first informed to bring the property into compliance with city codes, with additional steps

and citations issued if necessary to achieve compliance. Where homeowners are eligible, the City strives to identify programs and to assist lower-income and elderly homeowners to access them.

The City is moving toward having the capacity to proactively seek compliance for residential habitability. Program 1.c aims to address the condition of properties identified as being in need of repair, particularly the 46 properties identified below as moderate, substantial and dilapidated, as well as other properties identified over the coming years.

Table VI-26
HOUSING CONDITION SURVEY SUMMARY 2022

HOUSING TYPE	SOUND	MINOR	MODERATE	SUBSTANTIAL	DILAPIDATED	TOTAL
Single	5,425	171	30	8	8	5,642
Mobile	**0**	**0**	**0**	**0**	**0**	**0**
2 to 4 Units	1,389	15	0	0	0	1,404
5 or More Units	4,130	0	0	0	0	4,130
Total	**10,944**	**186**	**30**	**8**	**8**	**11,176**
Percent	97.92%	1.66%	0.26%	0.07%	0.07%	100.00%

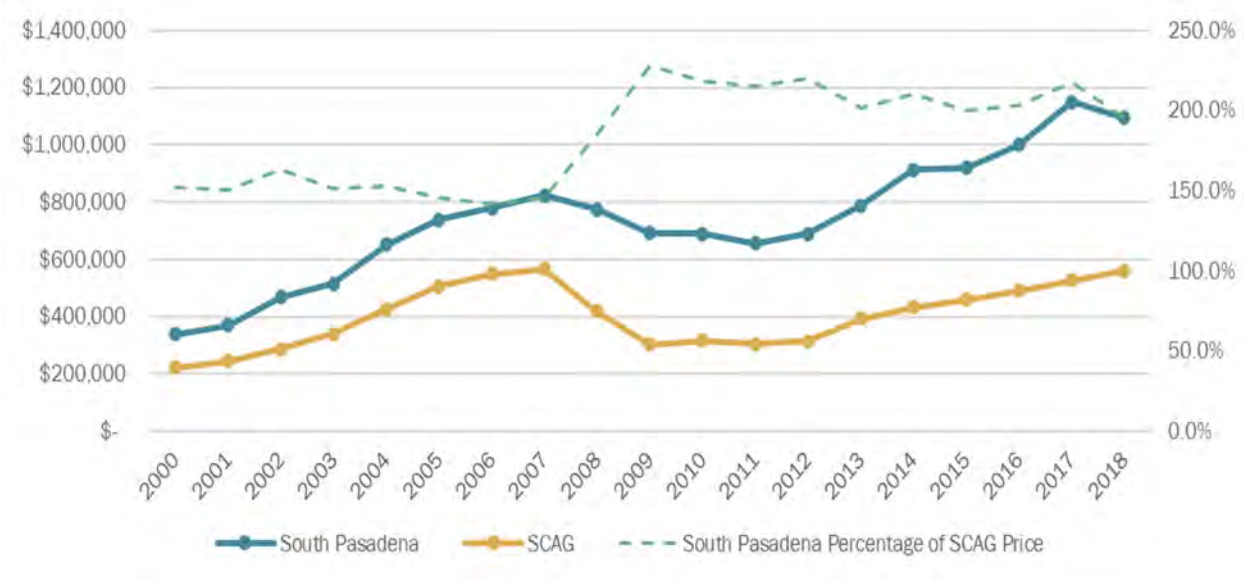
Source: City of South Pasadena Community Development Department, 2022

Home Prices

Income is a major factor influencing the demand for housing and to a large extent, reflects the affordability of housing in a community. Between 2000 and 2018, median home sale prices in South Pasadena increased 223 percent, while prices in the SCAG region increased 151 percent (see Figure VI-3). Prices in South Pasadena have ranged from a low of 142.1 percent of the SCAG region median in 2006 and a high of 228.1 percent of the SCAG region median in 2009.

National policies of historically low interest rates, combined with low supply, have led to ever-increasing home prices throughout the region, state, and most places in the country. This has been particularly acute in South Pasadena with home values continuing to rise in 2020-2021 throughout the pandemic. While the 2018 median home sales price in South Pasadena included in SCAG's Community Profile (prepared in 2020) was $1,095,000, a steep upward trend for housing prices has continued. In September 2021, as a point-in-time, the Zillow website estimated a median home value of more the $1.4 million, reflecting a 17.5% increase in the past year.

Figure VI-3
MEDIAN HOME SALES PRICE FOR EXISTING HOMES



Source: SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians, 2020.

Rental Rates

As a snapshot of rental rates for properties in South Pasadena, a search of Zillow.com listings was conducted in April 2020 and again in June 2021, in order to see whether the COVID-19 pandemic had measurably impacted housing affordability in one direction or the other. As seen in Table VI-27, there were some minor fluctuations, with a reduction in the lower end of one-bedroom apartments, from $1,675 to $1,400. However, there was little change in two-bedroom units and the lower end of three-bedroom unit rates had increased. The number of units advertised for rent was nearly the same. While the market was relatively stable during the pandemic throughout the emergency order period, it remains to be seen whether this situation will change with the removal of emergency orders, government subsidies and the eviction moratorium.

Table VI-27
RESIDENTIAL RENTAL PRICES

TYPE OF UNIT	NUMBER OF UNITS SURVEYED	2020 LOW	2020 HIGH	NUMBER OF UNITS SURVEYED	2021 LOW	2021 HIGH
1 Bedroom	15	$1,675	$2,500	13	$1,400	$2,600
2 Bedroom	9	$1,795	$3,100	12	$1,795	$3,450
3 Bedroom	5	$2,800	$5,950	3	$3,550	$5,200
Total Listed Units	**29**			**28**		

Source: Online survey of rental price listings on Zillow (accessed April 2, 2020 and June 2, 2021).

Housing Costs and Affordability

"Affordability" is a measure of whether monthly housing costs constitute a burden on households in relation to ~~the~~ their incomes. Overpayment refers to spending more than 30 percent of a household's gross income for shelter. Overpaying for housing eventually causes fixed-income seniors and lower-income households to make choices that negatively affect their standard of living, and can trigger related financial problems resulting in deterioration of housing stock when maintenance is sacrificed for more immediate expenses, such as food, clothing, medical care, and utilities. By definition, housing is "affordable" if the monthly payment is not more than 30 percent of a household's gross income.

Tables VI-28 and VI-29 examine the costs of home ownership or renting compared to the HUD household income categories to get a picture of housing affordability in South Pasadena based on 2014-2018 CHAS data, the most recent data available that is broken down to support this type of analysis. The tables show the overpayment burdens by housing costs that are either 30 percent and above, moderate overpayment or 50 percent and above, severe overpayment (the moderate overpayment data includes people severely overpaying). The data show that more than 85 percent of extremely low, 94 percent of very low, and 59 percent of low income households that own their homes pay more than 30 percent of their incomes for housing and are therefore burdened by housing costs. Many may be fixed-income seniors, given the high percentage of seniors in the home ownership data. The rental burden is higher, with 77 percent of extremely low, 95 percent of very low and 77 percent of low-income households paying more than 30 percent of their incomes for housing.

Table VI-28
HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018
OWNER-OCCUPIED HOUSING UNITS

INCOME GROUP	TOTAL	MORE THAN 30%		MORE THAN 50%	
EXTREMELY LOW-INCOME	265	225	85%	175	66%
Less than $33,800					
VERY LOW-INCOME:	250	235	94%	205	82%
Between $33,801 and $56,300					
LOW-INCOME:	365	215	59%	130	36%
Between $56,301 and $90,100					
MODERATE-INCOME:	335	130	39%	80	24%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	4,670	1,370	29%	680	15%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

Table VI-29
HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2016
RENTER-OCCUPIED HOUSING UNITS

INCOME GROUP	TOTAL	30% OR MORE		50% OR MORE	
EXTREMELY LOW-INCOME	760	584	77%	580	76%
Less than $33,800					
VERY LOW-INCOME:	435	415	95%	255	59%
Between $33,801 and $56,300					
LOW-INCOME:	755	585	77%	90	12%
Between $56,301 and $90,100					
MODERATE-INCOME:	725	390	54%	45	6%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	2,665	100	4%	0	0%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

Table VI-30 provides regional household incomes and maximum housing costs that are considered affordable for Extremely Low/Very Low /Lower/Moderate Income households applicable to Los Angeles County jurisdictions. A typical four-person extremely low-income household can afford no more than a maximum sales price of $83,666, a four-person very-low income household can afford no more than $184,513, a four-person low-income household can afford no more than $335,494, and a four-person moderate-income household can afford no more than $403,212 on a home for sale. Table VI-30 shows projected affordable housing costs for extremely low-income, very low-income, low-income, and moderate-income households in South Pasadena by household size.

Table VI-30
AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS

EXTREMELY LOW- INCOME	1 PERSON	2 PERSON	3 PERSON	4 PERSON
Annual Income Limit	$23,700	$27,050	$30,450	$33,800
Monthly Income	$1,975	$2,254	$2,538	$2,817
Maximum Monthly Rent	$593	$676	$761	$845
Maximum Sales Price	$38,568	$53,562	$68,730	$83,666
VERY LOW-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$39,450	$45,050	$50,700	$56,300
Monthly Income	$3,288	$3,754	$4,225	$4,692
Maximum Monthly Rent	$986	$1,126	$1,268	$1,408
Maximum Sales Price	$109,022	$134,321	$159,446	$184,513
LOWER-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$63,100	$72,100	$81,100	$90,100
Monthly Income	$5,258	$6,008	$6,758	$7,508
Maximum Monthly Rent	$1,578	$1,803	$2,028	$2,253
Maximum Sales Price	$214,674	$254,967	$295,260	$335,494
MODERATE-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$64,900	$74,200	$83,500	$92,750
Monthly Income	$5,408	$6,183	$6,958	$7,729
Maximum Monthly Rent	$1,623	$1,855	$2,088	$2,319
Maximum Sales Price	$259,451	$307,284	$355,379	$403,212

Source: 2020 HCD Income Limits
Notes: Calculated using Chase Bank Mortgage Calculator (https://www.chase.com/personal/mortgage/calculators-resources/affordability-calculator). Assumes monthly expenses total $500, a down payment of 10% (or 20% for moderate income households), a 4.5% interest rate, property taxes/fees of 2%, and property insurance of 1%.

Assisted Housing at Risk of Conversion

The Housing Element must identify, analyze, and propose programs to preserve housing units that are currently restricted for low-income housing and that could become unrestricted and possibly lost as low-income housing. In South Pasadena, there are no federally-assisted housing units currently restricted to low-income housing use, and therefore there are no federally-assisted units at risk of conversion from affordable rental units to market rate rental units.

There are a few smaller projects with deed-restricted affordable units, however, including one entitled in 2020. As new projects are developed in compliance with the recently-adopted Inclusionary Housing Ordinance requirements, and when affordable projects built by non-profit housing corporations build based on new incentives, the City will update and maintain a list of all dwellings in the City that are subsidized by government funding or low-income housing developed through local regulations or incentives and their covenant expiration dates (Program 1.d), in compliance with state law. The City will contact all property owners and notify them of the legal requirements to provide notice prior to the conversion of any units for lower-income households to market-rate units, although this will not be within the planning period of this housing element.

6.3.8 Summary of Housing Needs

To conclude this section, Table VI-31 and the paragraphs that follow summarize and highlight the areas of greatest need for housing assistance in South Pasadena.

Table VI-31
SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS

OVERPAYING HOUSEHOLDS		SPECIAL-NEEDS GROUP*	
	Total	**Senior Households**	**2,218**
Renter	2,074	Disabled Persons	1,859
Owner	1,370	Single-Parent Households with Children	766
		Large Households	561
		Homeless Persons	34
OVERCROWDED HOUSEHOLDS		**REGIONAL HOUSING ASSESSMENT 2021-2029**	
	Total	**Total Construction Need**	**2,067**
Renter	213	Very Low Income	757
Owner	42	Low Income	398
		Moderate Income	334
		Upper Income	578

Sources: US Department of Housing and Urban Development CHAS Data Sets 2014-2018; SCAG RHNA March 2021; 2014-2018 ACS B25014 Tenure by Occupants per Room
*References data from Table VI-15.

Note: Special-needs figures cannot be totaled because categories are not exclusive of one another.

Households Overpaying for Housing – Approximately 36 percent of all households in South Pasadena spend 30 percent or more of their income on housing. Of these overpaying households, 36 percent were owners. Renter-households have the highest incidence of overpayment, with 64 percent spending more than 30 percent of their household income for housing. Of these, 86 percent of renters earning 80 percent or less of the County median income are paying more than 30 percent of their incomes for housing costs. More than 72 percent of low-income households who own their homes overpay for housing.

Special-Needs Households – The Housing Needs Assessment documents the following groups with special housing needs:

- 2,218 households (22 percent) headed by seniors;
- 1,859 persons (7.2 percent) aged 16 and over with physical disabilities;
- 766 single-parent households (4.8 percent) with children;
- 561 large households consisting of five members or more
- 15 unhoused persons in the City, constituting less than 1 percent of the City's population.

The percentage of seniors has increased from 12 percent in 2012 as reported in the 2013-2021 Housing Element to the 22 percent detailed above. The needs of this group are therefore more prominent than at the time the last Housing Element was adopted.

Age and Condition of Housing Stock – Approximately 97 percent of the City's housing units are 30 years of age or older, when most housing units typically begin to require major repairs. In general, most of the City's housing stock does not show signs of deferred maintenance. However, housing habitability is investigated by the City when reported, including older apartment buildings. Single-family homes owned by seniors, who often live on a fixed income, represent a subset of the population that there may be need for financial support for repairs.

Housing Affordability for Low to Moderate Income Households – Affordability projections (Table IV-30) indicate that home ownership is not feasible for households that fall into the categories of extremely low-income, very-low income, or lower-income. Moderate income households may be able to pay just over $400,000, a price that would require subsidy through the inclusionary housing requirement or an affordable housing developer. Rental prices in South Pasadena are similarly not feasible for lower income households, although the lower end of available rentals is within reach for moderate income households. This analysis is consistent with the high level of overpayment shown by the data for lower income households.

Overcrowded Households – Household overcrowding in South Pasadena is relatively nominal, with less than 2 percent of the City's households having greater than 1.5 persons per room.

Fair Housing – The history of discrimination in South Pasadena has led to some of the patterns of today in the City. Affording housing in the City is expensive for most and the incomes of those who live in South Pasadena are on average high compared to the regional average. In general, those who already live in South Pasadena have good access to resources and opportunities including schools, transportation, and environmental amenities. Issues analyzed in the Fair Housing Assessment that are impacting current South Pasadena residents are overpayment and some discrimination towards those with disabilities.

6.4 FAIR HOUSING ASSESSMENT

Assembly Bill (AB) 686 requires that all Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

In compliance with AB 686 and AB 1304, the following analysis is provided to complete three major requirements:

1. Include an AFFH program that promotes housing opportunities throughout the community for protected classes.

2. Conduct an AFH, which includes a summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify and address patterns of segregation or other barriers to fair housing, and prioritization of contributing factors to fair housing issues.

3. Prepare the Housing Element Sites Inventory to identify sites through the lens of AFFH.

To comply with AB 686, the City has completed the following outreach and analysis.

6.4.1 Outreach

As discussed in Section 6.2.4, Public Participation, multiple workshops, surveys, and hearings were conducted in conjunction with the preparation of this Housing Element. Translation was offered to participants; however, no translation requests were received for meetings for the Housing Element Update. Two rounds of workshops were held in spring and fall of 2020 and 14 public hearings took place between July 2020 and November 2022. A workshop and three public hearings were held in Fall 2021 after release of the public draft Housing Element. Members of the public, organizations providing community service in the City, and affordable housing developers were invited to participate in all outreach events. Public participants at the workshops included housing advocates, community members, those who work in South Pasadena, and renters and homeowners. In addition to these meetings, two surveys were conducted, one of which ran from May to September of 2020, and the second from September through October of 2020. Letters were received from members of the public, including some that described issues related to housing discrimination, urging the City to acknowledge and address the history and a legacy of fostering a community that lacks diversity. In response to these letters, the City has included Section 6.4.6 in this Assessment of Fair Housing, discussing South Pasadena's history.

During the months of January through March 2022, staff researched affordable housing developers and homeless service providers and added them to the list of interested stakeholders. Additionally, staff had meetings with the San Gabriel Valley Habitat for Humanity Executive Director and the Director of Real Estate Development to explore opportunities for potential future partnerships. Staff also met with the Los Angeles County Development Authority to explore use of Permanent Local Housing Allocation funds to benefit South Pasadena residents in need of affordable housing. Finally,

staff held several meetings with local developers, including a church, to discuss affordable housing development.

Additional details about all public outreach efforts can be found in Appendix B of this Housing Element.

Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops prior to and during the initial drafting of the Housing Element were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation.

The City held five public workshops during the initial draft Housing Element update process: two in Spring 2020, two in Fall 2020, and one in Fall 2021. The Spring 2020 workshops were held online on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. Each workshop had about 30 participants. During each workshop, the City began by providing an overview of the 6th-cycle Housing Element Update process and facilitating a question-and-answer session. Following this, the City discussed the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. No comments or questions related to fair housing were raised during these workshops.

A second round of two online public workshops were held on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m., with a short survey and ability for participants to send in email commentary. The workshops repeated a brief overview of the 6th Cycle Housing Element Update process, followed by a discussion of strategies under consideration to address the City's RHNA. Following the presentation, the 12 participants at the September 23rd workshop and the 15 participants at the September 26th workshop, were separated into virtual breakout rooms to discuss questions about RHNA strategies. Fair housing feedback included:

- Provide housing for everyone citywide and ensure that pockets of poverty are not sustained or created;
- Facilitate design flexibility for low-income housing;
- Promote different types of housing for families;
- Consider the benefits of siting housing in proximity to public transit, High Quality Transit Area, along the Huntington Drive/Fair Oaks/ Mission District/L-Line (formerly the Gold Line) Station corridors, Downtown, and the Vons Center, such as walkability and proximity to amenities and resources;
- Identify housing sites that are dispersed throughout the City and not concentrated in certain areas; include single family neighborhoods and lower density multi-family;
- Initiate more proactive code enforcement;
- Address the limited rental housing availability and affordability issues;
- Address the demand for more permanent supportive housing as well as housing designed for specific populations.

- Implement more tenant protections; and
- Recognize and condemn previous race-based exclusionary practices of redlining and other racist practices that were prevalent in South Pasadena.

The fifth workshop was held on the evening of Thursday, October 21, 2021 and offered attendees both in-person and virtual options to participate. Approximately 10 people joined via Zoom, and 2 attended in-person. Following a presentation providing an overview of the Public Review Draft of the 2021-2029 Housing Element, participants asked for confirmation that Junior Accessory Dwelling Units (JADUs) would count toward the City's RHNA and emphasized the importance of planning for infrastructure capacity, including schools, water, wastewater, etc., to support housing development.

A sixth workshop was held on August 15, 2022 with developers that are active in South Pasadena. This Developer Workshop including eight community members, including two Planning Commissioners. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics related to development in the City and received the following responses.

A seventh workshop was held on August 18, 2022 at the South Pasadena Farmers' Market. The Community Development Department set up a booth in the South Pasadena Farmers' Market from 4:00 to 8:00 pm to discuss the Housing Element. The late afternoon/evening market attracts hundreds of residents and many local employees and is a casual atmosphere for sharing ideas. Over the four-hour duration of the Market, Community Development staff discussed various aspects of the housing element with visitors to the booth, including: the sites inventory; ADUs; the regional housing crisis; the need for rezoning and mixed-use development and where it would be located; and reconsideration of the voter-approved height maximum through a new ballot initiative within the next two years. Those who stopped by expressed appreciation for the opportunity to talk to City staff about the issues.

An eighth workshop was held on Saturday, August 20, 2022 at City Hall and virtually. The purpose of the forum was to provide a brief overview of the Housing Element process; provide an update to the community on the status of addressing HCD's comments to the second draft of the Housing Element; and to solicit feedback from the community on the draft document and proposed programs. After a brief overview of the housing element process, the presentation focused on the bigger issues that needed to be addressed in the Housing Element, including the site analysis, development constraints including the height limitations, and Affirmatively Furthering Fair Housing.

A ninth workshop was held on November 9, 2022 in conjunction with the City's First Annual Social Services and Social Justice Forum. City staff and the City's Housing Element consultant were on hand to discuss the Housing Element with members of the public and service agencies present for the Social Justice Forum.

Community Surveys

A short online survey about Housing Elements was available before, during, and after each workshop to solicit feedback from participants and included an option for respondents to submit comments and questions via email.

The first survey was made available on the City's website in May 2020 and was open until September 2020 and also sent to all registered attendees of the Spring 2020 Workshops. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to ascertain their perspective on housing issues. A total of 33 responses were received. Of these 60 percent of respondents were renters, 35 percent homeowners, and 3 percent other. The survey asked respondents to rank four issues facing the City in order of importance. The options most relevant to fair housing issues in order of priority, identified by respondents, were: (1) providing a diverse cost range of housing opportunities, (2) creation of economically sustainable neighborhoods, (3) preservation of existing housing stock, and (4) production of additional housing stock (mobility). However, it should be noted that most respondents chose all four options as priorities. Approximately 55 percent of respondents identified that they have been impacted by housing affordability.

The second survey was made available on the City's website in September 2020 until October 2020, with links sent to participants registered for the Fall 2020 Workshops. The main purpose of the survey was to identify the housing strategies primarily associated with sites analysis and land use controls slated for discussion at the Fall 2020 Workshops and to yield preliminary insight into the public's opinion of these topics in preparation for the workshops. A total of 17 responses were received. When asked to identify their support for strategies to meet the RHNA, 53 percent of respondents supported increased density in specific areas, 47 percent supported upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development, and 35 percent supported an aggressive program to incentivize development affordable ADUs. These strategies would help to expand available areas for housing to meet the lower-income RHNA. Individual respondents also emphasized a need to support and facilitate higher density and affordable development, citing the lack of affordable units approved recently and expressing concern that development adjacent to transit is financially unattainable for populations most dependent on public transportation for access to employment.

Specific responses to all questions included in the survey are included in Appendix B: Public Participation Summary.

Public Hearings

The City also presented on or discussed the Housing Element at 14 public hearings. At each of these meetings, the public was invited to attend and share comments on the Housing Element update and process.

July 21, 2020 - Planning Commission: Presented the City's RHNA allocation and options for addressing sites inventory needs and other policy options. No comments specific to fair housing issues were received.

August 5, 2020 - City Council: Considered a ballot measure to propose allowing increased height. No fair housing issues were discussed at this meeting.

August 11, 2020 - Planning Commission: Presented new analysis and specific sites to be included in the Housing Element sites inventory. Commissioners discussed the importance of integrating supporting resources to make neighborhoods more walkable and self-sustaining neighborhood, including transit access.

September 8, 2020 - Planning Commission: Presented on updates the City's ADU zoning regulations and associated programs in the draft Housing Element.

December 15, 2020 - Planning Commission: Presented design and economic analysis for specific sites to assess feasibility of different housing types and density.

January 26, 2021 - Planning Commission: Considered the proposed Inclusionary Housing Regulations.

May 26, 2021 – Planning Commission: Presented an update on Housing Element project.

October 12, 2021 – Planning Commission: Presented the Public Draft Housing Element.

November 9, 2021 – Planning Commission: Presented the Public Draft Housing Element

November 17, 2021 – City Council: Presented the Public Draft Housing Element

May 10, 2022 – Planning Commission: Presented 2nd Public Review Draft and discussed the revisions made to the new draft (in person/virtual hybrid format).

July 20, 2022 – City Council: Information Item on the HCD review letter for the 2nd Public Review Draft.

July 26, 2022 – Planning Commission discussion of 2nd Draft Housing Element HCD review letter.

November 9, 2022 – Joint City Council and Planning Commission: Provided an overview of the California Department of Housing and Community Development's response letter regarding the Third Draft Housing Element, discussed anticipated responses to address the comments in the letter, and received feedback from the community, Planning Commission, and City Council on the comments and proposed responses.

February 1, 2023 – City Council: Provided a summary of HCD's review letter regarding the 4th Draft Housing Element. Presented options for addressing remaining comments, including missing middle housing, identification of additional city-owned sites for lower income homes, increased zoning capacity along arterial corridors, and tenant protections.

February 9, 2023 – City Council: This meeting was intended to be a community meeting focused on the Housing Element, but a majority of the City Council wanted to attended so was noticed as a City Council meeting. Meeting was conducted as a workshop to further discuss revisions to the Housing Element and collect resident feedback.

February 15, 2023 – Joint City Council and Planning Commission: Presented refined ideas for addressing remaining comments based on feedback received from the Council and community over the preceding two meetings. Received direction from City Council and Planning Commission on how to revise the Housing Element.

Outreach Summary

Throughout the Housing Element update process, feedback was received from members of the public, stakeholders, elected officials, and others. With respect to barriers to access affordable housing, attendees at the four workshops identified that a need to increase the supply of affordable housing, while at the same time emphasizing the desire to maintain the historic small-town character and single family nature of South Pasadena. Respondents to surveys, phone call messages, and attendees at meetings focused primarily on the RHNA process, potential sites, strategies for meeting the RHNA, and ADUs. While some workshop attendees noted the needs of sensitive populations, issues faced by lower-income residents, and potential for displacement at a high level, they were not commented on or discussed further by attendees.

The majority of the discussion at the workshops and Planning Commission and City Council meetings focused on possible solutions to increase the stock of housing options, particularly higher density development, to provide a range of affordability. Modification of the City's zoning and development regulations was at the center of discussion, including: increasing height potential, increasing density thresholds throughout City; upzoning select single family residential neighborhoods, establishing strong design standards in conjunction with higher density project proposals, reducing parking requirements in select areas of the City, ADU guidelines, and providing fee reduction and other incentives for provision of ADUs, particularly units with rents affordable to lower income residents.

Participants in the outreach process also noted concern for the potential for creating an uneven distribution of lower-income housing based on currently available sites. Participants noted that the City's fabric currently is woven from a mix of densities within neighborhoods, and expressed that quality is part of what makes South Pasadena so attractive to residents. Overall, community members identified a need to disperse affordable housing in neighborhoods citywide to avoid concentrations of higher density, low-income neighborhoods or create pockets of poverty.

One major discussion topic revolved around transit accessibility, which is an important fair housing indicator. Participants supported the strategy for increasing housing opportunities along major transportation corridors and in the vicinity of the L-Line (formerly the Gold Line) station. General concern about traffic impacts and parking associated with increased density, and impacts on the historic district, countered comments acknowledging that lower-income residents may have a greater dependence on public transit which should be taken into account for site identification.

Finally, participants felt strongly that the historic trends in South Pasadena of redlining and race-based exclusionary practices should be recognized officially by the Council and addressed in the Housing Element. Section 6.4.6 of the Assessment of Fair Housing describes the history of the development of South Pasadena, jurisdictional controls that have impacted the growth pattern, and other relevant practices that have influenced the availability and affordability of housing in the City, inclusive of redlining and similar restrictions to fair housing choice.

The comments received during the outreach process were incorporated into the programs in this Housing Element, including those identified in Table VI-32A to address fair housing issues.

6.4.2 Assessment of Fair Housing Issues (Affirmatively Furthering Fair Housing)

California Government Code Section 65583(c)(1)(C)(10)(A)(ii) requires the City of South Pasadena to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. According to the California Tax Credit Allocation Committee (TCAC)/HCD 2020 Opportunity Areas Map, the entirety of the City of South Pasadena is considered a "Highest Resource" area (Figure VI-4). Highest Resource areas are those with the highest index scores for a variety of educational, environmental, and economic indicators. Some of these indicators include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentrations of poverty, and low levels of environmental pollutants, among other factors. The universal designation of Highest Resource areas across the entirety of South Pasadena is likely a result of strong educational institutions and good environmental indicators in most, if not all, of the City, which have resulted in high property values.

To address prior trends that deterred location of persons with lower incomes from living in the City, the Housing Element includes Program 3.a, Program 3.b, Program 4.a, and Program 4.b to help provide additional housing, with an emphasis on affordable and supportive housing.

Unless otherwise noted, the following maps and analysis rely on data provided at the Census-tract level by various state and federal agencies, including the California Tax Credit Allocation Committee and Department of Housing and Community Development[2]; 2010 Census[3]; 2006-2010[4], 2010-2014[5], and 2015-2019[6] American Community Surveys; Esri's 2018 Updated Demographic estimates[7]; California School Campus Database (CSCD)[8]; 2014 Longitudinal Employer-Household Dynamics (LEHD)[9]; and the California Health and Human Services Agency[10]. All data presented in the maps included in this assessment was collected through the AFFH Data Viewer mapping tool, a tool developed and approved by HCD for use in assessment of fair housing analyses as the most current and accurate data available[11]. The tract level was selected because geospatial and demographic data were most consistently available at this scale for South Pasadena, and the scale remained detailed enough to allow for neighborhood-level consideration of fair housing issues. This approach was developed in consultation with HCD and in conjunction with efforts to develop standardized state-wide datasets for fair housing analyses.

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[2] California Tax Credit Allocation Committee and Housing and Community Development Department. *2020 TCAC/HCD Opportunity Map*, 2020. https://belonging.berkeley.edu/tcac-opportunity-map-2020

[3] U.S. Census Bureau. *2010 Decennial Census*. 2020. https://hudgis-hud.opendata.arcgis.com/

[4] U.S. Census Bureau. *2006-2010 American Community Survey*. 2010. https://hudgis-hud.opendata.arcgis.com/

[5] U.S. Census Bureau. *2010-2014 American Community Survey*. 2014. https://hudgis-hud.opendata.arcgis.com/

[6] U.S. Census Bureau. *2015-2019 American Community Survey*. 2019. https://hudgis-hud.opendata.arcgis.com/

[7] Esri. *Methodology Statement: 2018/2023 Esri US Updated Demographics*. July 2018. https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2018-2023_Esri_US_Demographic_Updates.pdf

[8] GreenInfo Network. *California School Campus Database*. 2021. http://www.mapcollaborator.org/mapcollab_cscd/?base=map&y=37.34396&x=-123.48633&z=6&layers=notes%2Cpolygons%2Cschoolboundaries%2Cschoolcentroids&opacs=100%2C25%2C100%2C100

[9] U.S. Census Bureau. *Longitudinal Employer-Household Dynamics*. 2014. https://lehd.ces.census.gov/

[10] California Health & Human Services Agency. *Percent of Household Overcrowding (> 1.0 persons per room) and Severe Overcrowding (> 1.5 persons per room)*. October 2020. https://data.chhs.ca.gov/dataset/housing-crowding

[11] California Department of Housing and Community Development. *Affirmatively Furthering Fair Housing Data and Mapping Resources*. 2021. https://affh-data-resources-cahcd.hub.arcgis.com/

6.4.3 Patterns of Integration and Segregation

Since 2017, the California Tax Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, including proximity to job opportunities; quality of schools; environmental health and safety; and other economic, social, and environmental indicators—in an effort to provide evidence for policy recommendations[12]. This effort has been dubbed "opportunity mapping," and it is available to all jurisdictions in California to evaluate access to opportunities within their communities. As previously stated, the City of South Pasadena has been categorized as "highest resource" by TCAC and HCD, compared to Los Angeles County (see Figure VI-4), meaning that South Pasadena has been identified as having strong educational opportunities, a balanced jobs-housing ratio, high property values, a high median income, and other positive conditions. In areas with lower resource designations than South Pasadena, these indicators of success do not present as strong of opportunities, which may include more limited access to jobs, lower home values, a shortage of outdoor recreational space, and more. The trends and factors that resulted in these patterns of access to resources and other fair housing issues may stem from historical patterns or current practices.

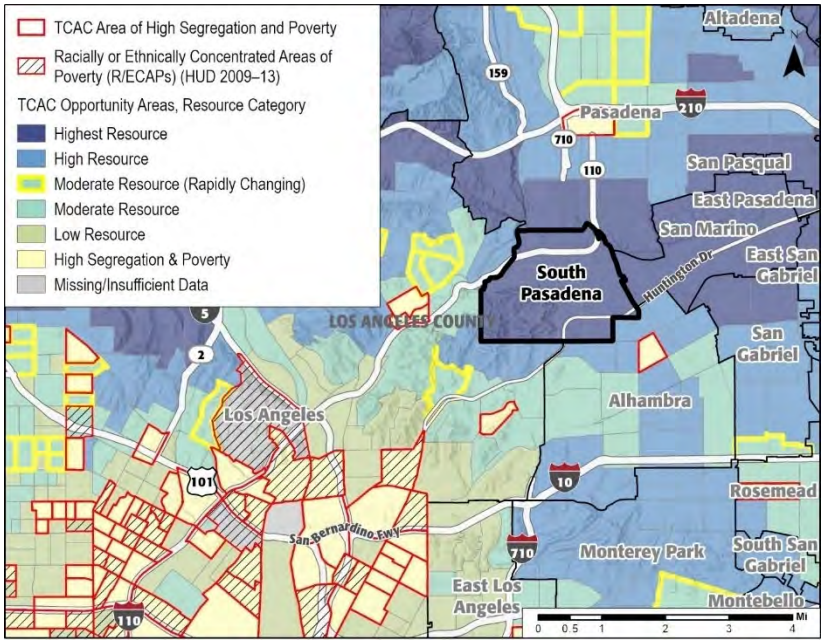
Areas of High Segregation and Poverty

Figure VI-4 also shows that South Pasadena does not include any federally designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)[13] or TCAC-designated Areas of High Segregation and Poverty. However, there are some TCAC Areas of High Segregation and Poverty located in relatively close proximity to South Pasadena, and numerous Areas of High Segregation and Poverty as well as R/ECAPs located further to the south and west in the City of Los Angeles. As shown in Figures VI-5 through VI-7, the City of South Pasadena has relatively low rates of poverty, especially when compared to the surrounding region. Areas with higher rates of poverty surrounding South Pasadena include the City of Los Angeles to the south and west; Pasadena to the north; Glendale to the northwest; and Alhambra, San Gabriel, and Rosemead to the south and east. San Marino to the east has poverty rates that are roughly equivalent to or lower than South Pasadena.

[12] California Tax Credit Allocation Committee and Housing and Community Development Department. *California Housing Task Force: Methodology for the 2020 TCAC/HCD Opportunity Map*, June 2020. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf

[13] The U.S. Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the non-white population comprises 50 percent or more of the total population and (2) the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower.

Figure VI-4
TCAC/HCD OPPORTUNITY AREAS



Source: TCAC/HCD Opportunity Map, 2020[4]

In contrast to R/ECAPs, a racially concentrated area of affluence (RCAA) was defined in 2019 in the HUD's Cityscape periodical by Goetz et al. in *Racially Concentrated Areas of Affluence: A Preliminary Investigation* as a census tract in which 80 percent or more of the population is White and has a median income greater than $125,000 annually. Using this definition, there are no individual census tracts in, or overlapping with, the City of South Pasadena that can be identified as a RCAA. However, throughout South Pasadena, the median income is relatively high compared to many communities in the SCAG region, making the large portions of the city possible areas of affluence. There are three areas of the city in which the median income is less than the State median income, the neighborhood between Meridian Avenue and Fair Oaks Avenue ($80,996), the central area between Grevelia Street and Monterey Road ($74,107 to $85,962 depending on neighborhood), and a western neighborhood adjacent to Arroyo Seco Golf Course ($86,442). While the median income in these areas fall well below what would qualify as a concentration of affluence, most other neighborhoods have median incomes within reach, or greater than, the qualifying $125,000 annually. The neighborhood with the highest median income in South Pasadena is in the southwest corner, south of Monterey Road and west of Meridian Avenue. In this area, the median income ranges from $136,771 to $197,000. While the area is not predominantly White, it is still a concentration of affluence.

These patterns of high median income throughout the city run counter to many areas in Los Angeles County, particularly those south of South Pasadena. As shown in Figure VI-7, poverty rates increase significantly immediately adjacent to South Pasadena in neighborhoods within the City of Los Angeles. In the SCAG region, most concentrations of affluence are located in coastal communities while inland suburban communities typically have a lower median income. South Pasadena does not follow this trend. Therefore, while not by definition an RCAA, the concentration of affluence may be a result of exclusion of lower-income households due to the available housing types, housing costs, or other factors. An analysis of historic policies that may have contributed to existing patterns of affluence is discussed further in Section 6.4.6 South Pasadena History. To ensure that there are

housing opportunities for all current and prospective residents, regardless of income, the City will undertake the following programs as part of this Housing Element:

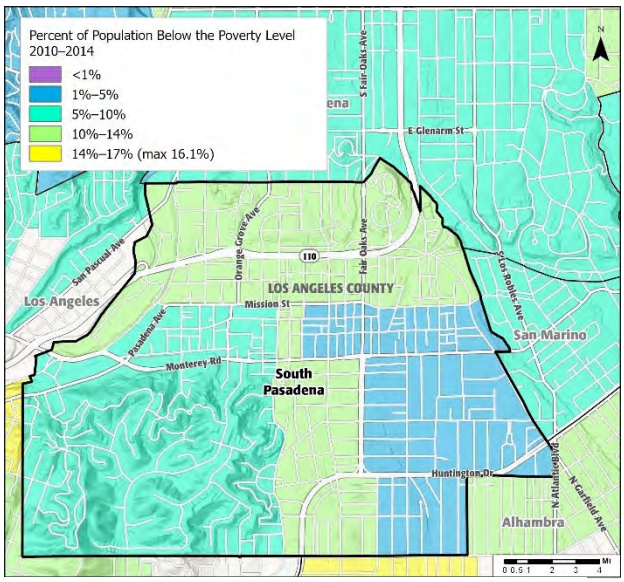
- **Program 1.b.** Purchase surplus properties and support affordable housing developers to create new and rehabilitated deed-restricted, affordable housing units, using any profit from the proceeds of historic properties to generate additional affordable housing.
- **Program 2.b.** Increase funding for affordable housing through the City's membership with the San Gabriel Valley Regional Housing Trust (SGVRHT).
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.
- **Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.
- **Programs 3.h and 3.k.** Encourage the construction of ADUs and monitor construction to track affordability
- **Program 4.d.** Revise the zoning code to require a minimum proportion of units in new construction be ADA accessible.

Poverty Rates

South Pasadena's poverty rate is relatively low for the Los Angeles region, and tends to be more similar to other nearby suburban communities to the north and east than to the nearby urban communities to the south and west (Figure VI-7).

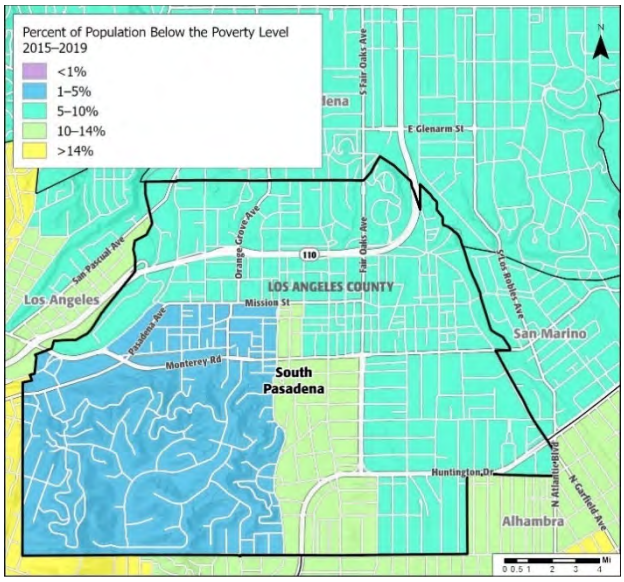
The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less than 5 percent in neighborhoods immediately to west with larger homes on larger lots and hillsides. Figures VI-5 and VI-6 show that these patterns have generally been stable over recent years with no dramatic changes evident in the geographic data available for the period from 2010–2014 to the current 2015–2019 dataset. Although some areas of the City saw increased poverty rates, other areas saw their poverty rates fall, and all changes were within the range of 1–10 percent. Additionally, it should be noted that there may be some areas of relatively higher poverty rates along the eastern and northern boundary of South Pasadena, including areas of multifamily homes in the vicinity of Raymond Hill. These patterns would be consistent with the concentration of potentially more affordable multifamily housing units and larger apartment complexes in the central and northeastern portions of the City, with less affordable single-family and larger-lot homes predominating in other areas.

Figure VI-5
LOCAL POVERTY RATES 2010–2014



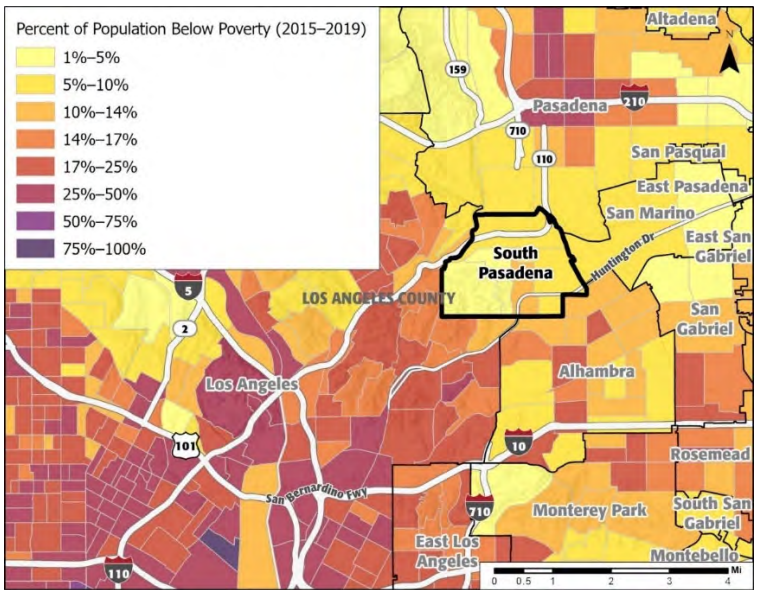
Source: U.S. Census Bureau, 2010-2014 American Community Survey[7]

Figure VI-6
LOCAL POVERTY RATES 2015–2019



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-7
REGIONAL POVERTY RATES 2015–2019

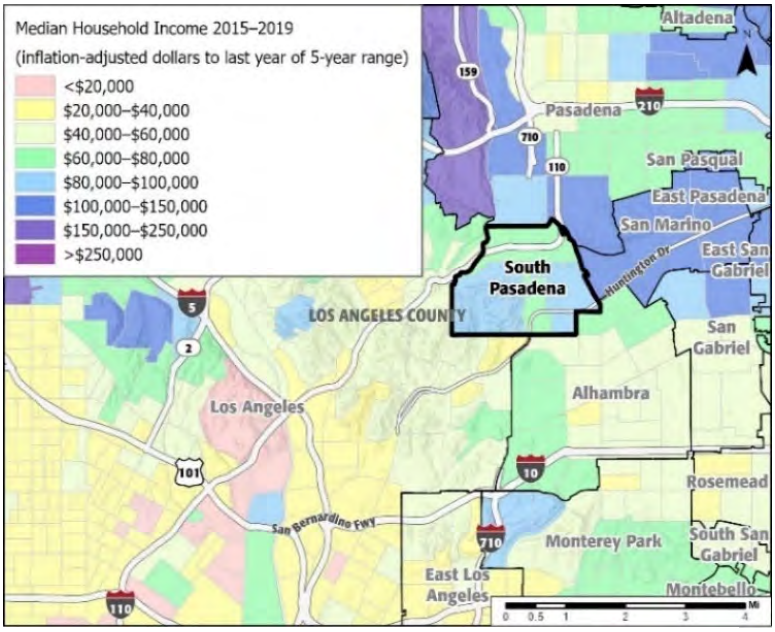


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

South Pasadena Household Income and Affordability as a Fair Housing Consideration

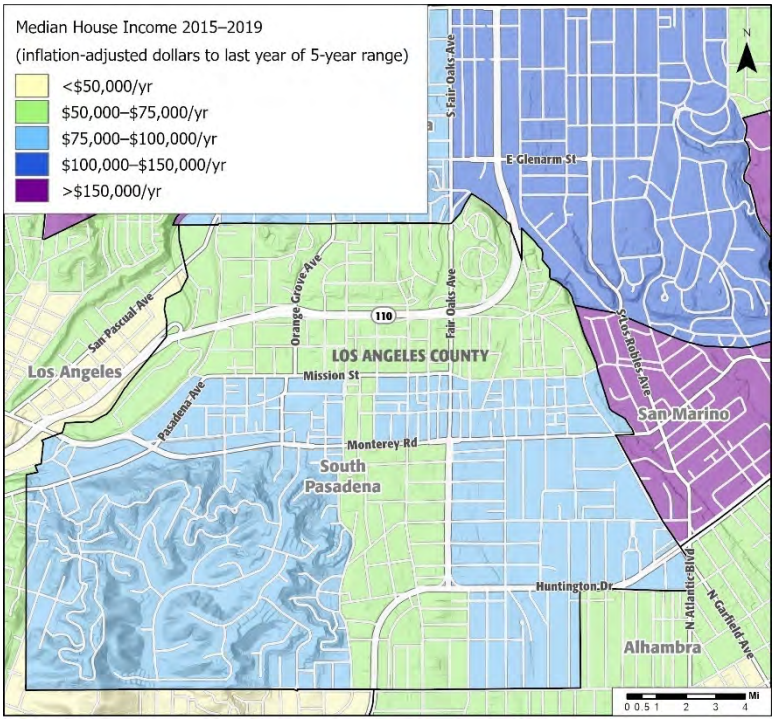
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes are lower than in San Marino, immediately to the east, they are considerably higher than in communities to the south and west, especially toward Downtown Los Angeles. As noted earlier, the median household income for the City in 2018 was $96,579, well above the County median of $64,251. Although South Pasadena experiences low rates of poverty and high household incomes relative to much of the surrounding region, this may be an indication that instead of effectively including opportunities that may lift people out of poverty through local policies, South Pasadena has remained generally unaffordable to those living in poverty, forcing lower-income households to live elsewhere. To address these potential fair-housing issues with respect to both poverty rates and exclusionary factors based on income level, the City in 2021 adopted its first inclusionary ordinance to address RHNA objectives and will implement Programs 3.a, 3.c, 4.a, and 4.b to meet its regional housing obligations, prevent residential demolitions, provide emergency shelter and transitional housing, and encourage a variety of housing types.

Figure VI-8
REGIONAL MEDIAN INCOME 2015–2019



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-9
LOCAL MEDIAN INCOME 2015–2019

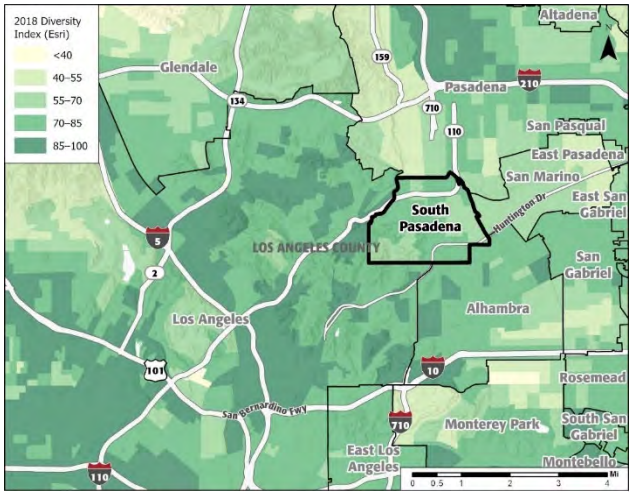


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Ethnic Diversity

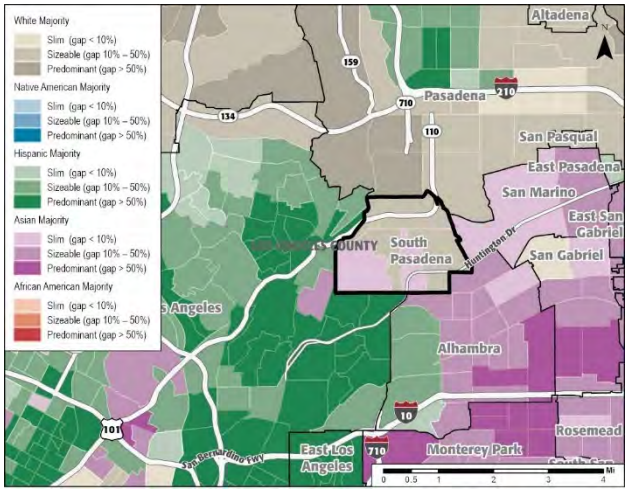
With respect to ethnic diversity, as shown in Figure VI-10, most areas of South Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the north, such as Pasadena. Additionally, Figure VI-10 shows that in much of South Pasadena, the white population is a majority in terms of ethnic composition, with some areas featuring Asians as a majority. This contrasts with cities and communities within the City of Los Angeles to the south and west of the City of South Pasadena, which tend to have more significant majorities of Asian and Latino populations. Of note, in contrast to its neighboring cities, South Pasadena does not have any ethnic group that shows up as a "predominant" gap (more than 50% of the population) as shown in Figure VI-11, although about three-quarters of the city has a "sizeable" gap of white population (between 10% and 50%). As shown in Figure VI-12; the emerging trend is that South Pasadena is experiencing rising levels of diversity, with most of the City seeing increases in diversity index levels from 2010 to 2018. To ensure that racial/ethnic background does not present a barrier to fair housing opportunities, the City will continue to partner with regional organizations to educate tenants, property managers, and real estate professionals about fair housing regulations, serve to mediate/enforce with respect to fair housing issues, as described in Program 5.a, Fair Housing Education, Outreach, and Services. With Council's adoption of the "Sundown Town" resolution in February 2022, the City is also taking measures to address past exclusion by actively including all groups in the city in civic activities, such as advisory boards and commissions, and community recreational and cultural events.

Figure VI-10
REGIONAL DIVERSITY INDEX 2018



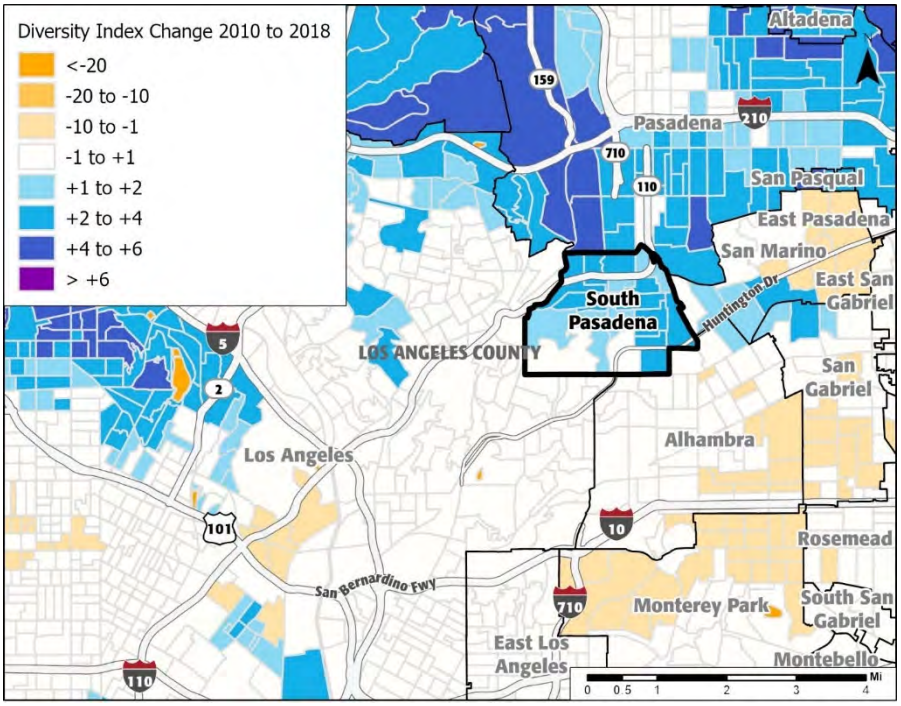
Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Figure VI-11
REGIONAL ETHNIC PREDOMINANCE



Source: U.S. Census Bureau, 2010 Decennial Census[5]

Figure VI-12
REGIONAL CHANGE IN DIVERSITY INDEX 2010-2018

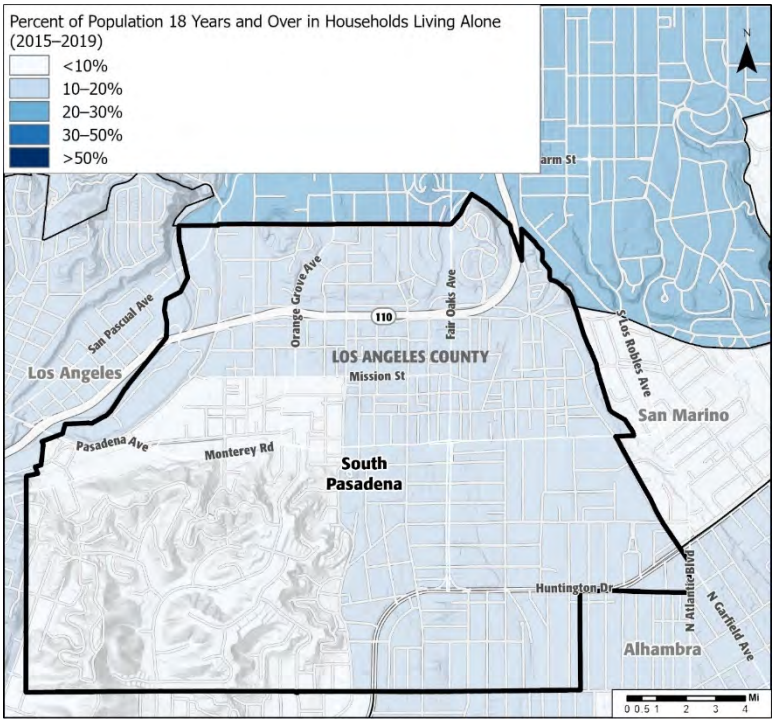


Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Single-Person Household Distribution

As with much of suburban Los Angeles County, South Pasadena was historically developed with a development pattern that allowed only single-family housing in many parts of the City. As shown in Figure VI-13, although different areas of South Pasadena feature varying levels of households living alone versus with a spouse or with children, there is no part of South Pasadena that features especially high levels of individuals living alone. No census tract in South Pasadena features a percentage of individuals over 18 living alone that exceeds 17 percent. This relatively even distribution of single-person households and the relatively low level of single-person households overall would tend to indicate that South Pasadena does not feature any areas of excessive concentration of single-person households, which, if they existed, could be an indicator of discriminatory practices or uneven distribution of unit types. Instead, the trend observed is likely due to an aging population with children leaving the home and couples becoming separated or widowed. As this trend goes to the next logical conclusion, an unknown proportion of the homes are repopulated with family units and are no longer single-person households. Due to the costs associated with purchasing a home, the likelihood is high that such housing units will be populated at some point with a non-single person household.

Figure VI-13
PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING ALONE

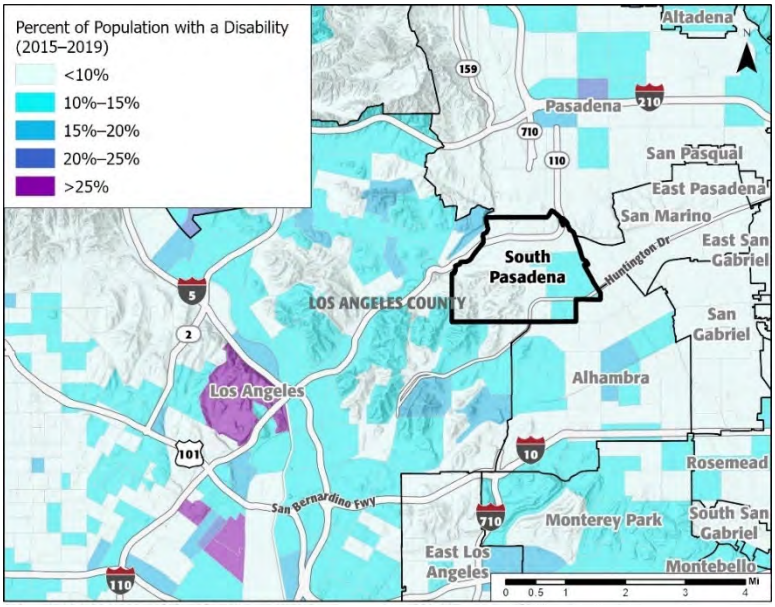


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Persons Living with Disabilities

Similarly, as shown in Figure VI-14, South Pasadena does not feature any areas with high concentrations of individuals living with disabilities that would be especially vulnerable from a fair housing perspective due to accessibility concerns or risk of discriminatory actions. However, while South Pasadena features a lower proportion of residents with disabilities than some nearby areas in the City of Los Angeles, resulting in fewer access concerns for current residents, it may be worth considering whether there are factors, such as transit access, cost, or Americans with Disability Act (ADA)-accessible units, that are tending to preclude such individuals from residing in South Pasadena. For these reasons, this Housing Element includes a robust set of programs to ensure that existing housing may be retrofitted for ADA accessibility and new units are designed for ADA or perhaps even "universal" accessibility. Programs 2.g, 4.d, and 4.e would serve to address senior housing, ADA accessibility, and education and incentives for universal design.

Figure VI-14
REGIONAL PERCENT OF POPULATION LIVING WITH A DISABILITY



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Seniors

To meet the needs of the older population and other individuals with disabilities, there are three assisted living facilities in South Pasadena, all located near the historic Downtown. Additional assisted living facilities are available in surrounding communities. Additionally, the City of South Pasadena offers "Dial-A-Ride," a reservation-based, curb-to-curb paratransit service, to residents within City limits, with service to medical offices in Pasadena, San Marino, Arcadia, and Alhambra. The City requires new developments to comply with Title 24 of the California Building Code to ensure that all new construction meets accessible design standards, thus ensuring that all new multifamily housing is accessible for all residents regardless of disability and promoting accessibility in all housing design. Furthermore, the City ensures that existing housing that may not meet the same accessibility requirements can be adapted as needed through their reasonable accommodation process, discussed

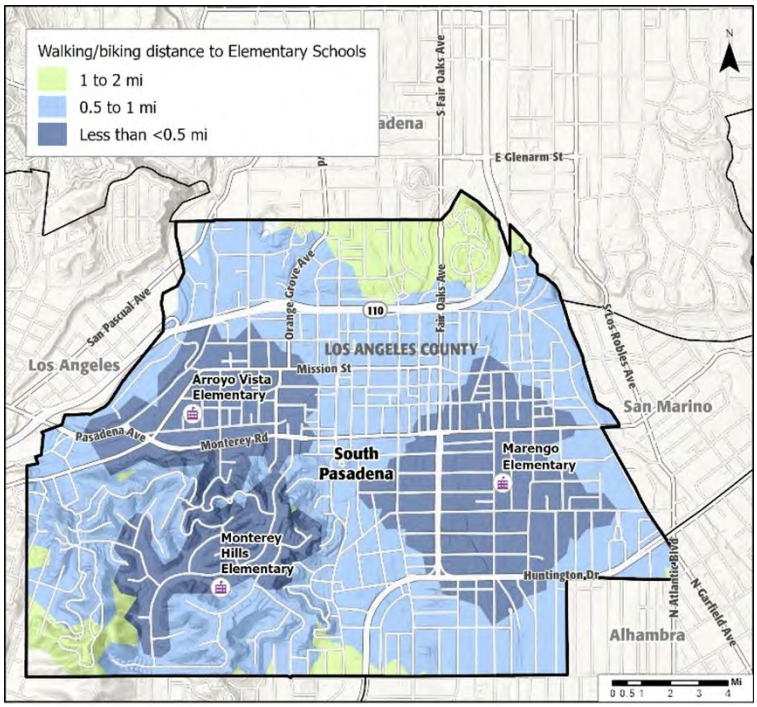
in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.4 Access to Opportunity

Education Resources

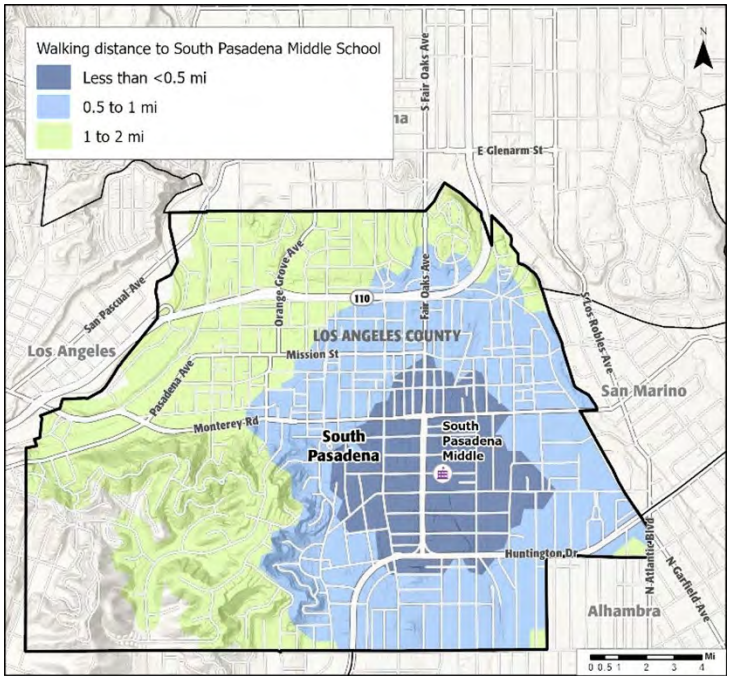
In a statewide review of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, all of South Pasadena's public schools, including all of its elementary schools as well as its middle and high school, are ranked in the 95th percentile or higher. As shown in Figures VI-15 through VI-17, South Pasadena's elementary schools are distributed relatively evenly throughout the City and its middle and high school are centrally located. Overall, nearly all of South Pasadena is within one mile of a well-ranked public elementary school and within two miles of well-ranked middle and high schools. This generally even geographic distribution of highly ranked schools indicates that new housing anywhere in the City would have good access to educational opportunity in grades K–12, with the highest levels of access in central portions of the City. In addition, South Pasadena is located in close proximity to a number of public and private higher education institutions, including Pasadena City College; California State University, Los Angeles; and the California Institute of Technology; among others. Altogether, this means that virtually the entirety of South Pasadena enjoys strong access to educational opportunity at all grades and education levels.

Figure VI-15
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA ELEMENTARY SCHOOLS



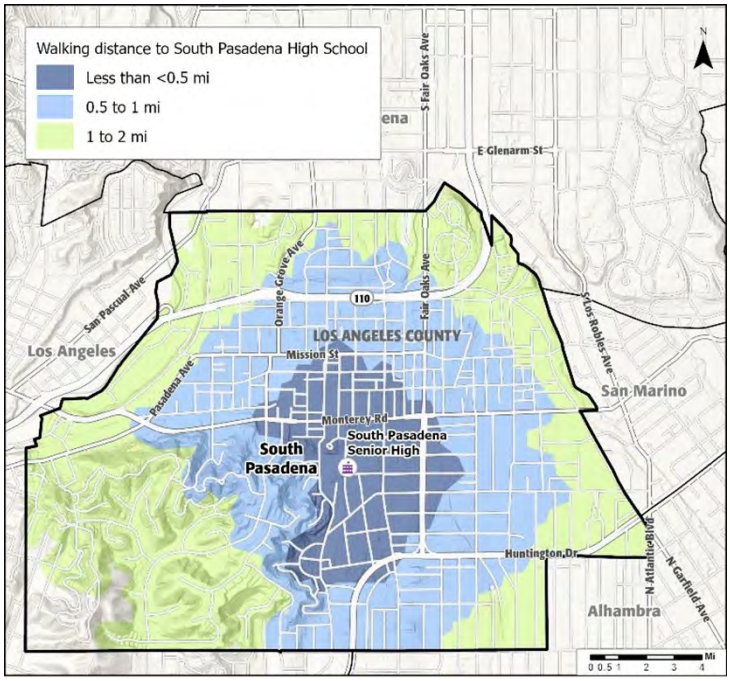
Source: GreenInfo Network, California School Campus Database, 2021[10]

Figure VI-16
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA MIDDLE SCHOOL



Source: GreenInfo Network, California School Campus Database, 2021[10]

Figure VI-17
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA HIGH SCHOOL



Source: GreenInfo Network, California School Campus Database, 2021[10]

Public Transportation Resources

South Pasadena residents are served by the Los Angeles County Metropolitan Transportation Authority (Metro) system, which offers light rail, rapid bus, and local/limited bus lines serving South Pasadena and the surrounding area. A variety of transit types and routes are available to residents of South Pasadena to connect them to the historic Downtown, downtown Los Angeles, and crosstown destinations such as medical facilities, jobs, and other services and resources. Areas along Fair Oaks Avenue and Mission Street, especially near the Metro L Line stop, tend to have the best transit service in South Pasadena, while areas in the Monterey Hills neighborhood in the southwest portion of the City have less accessibility to public transportation. However, despite these minor differences in access to transit, AllTransit has given transit in the City of South Pasadena a performance score of 8.5 out of 10, compared to scores of 6.8 in Los Angeles County overall and 5.5 for the SCAG region as a whole[14]. In addition to a strong transit performance score, LA Metro has also approved and begun to implement a program to phase in free travel for all patrons by 2023, as opposed to a standard fare of $1.75 for buses and trains currently or discounted rates for seniors, individuals with disabilities, and college and K-12 students.

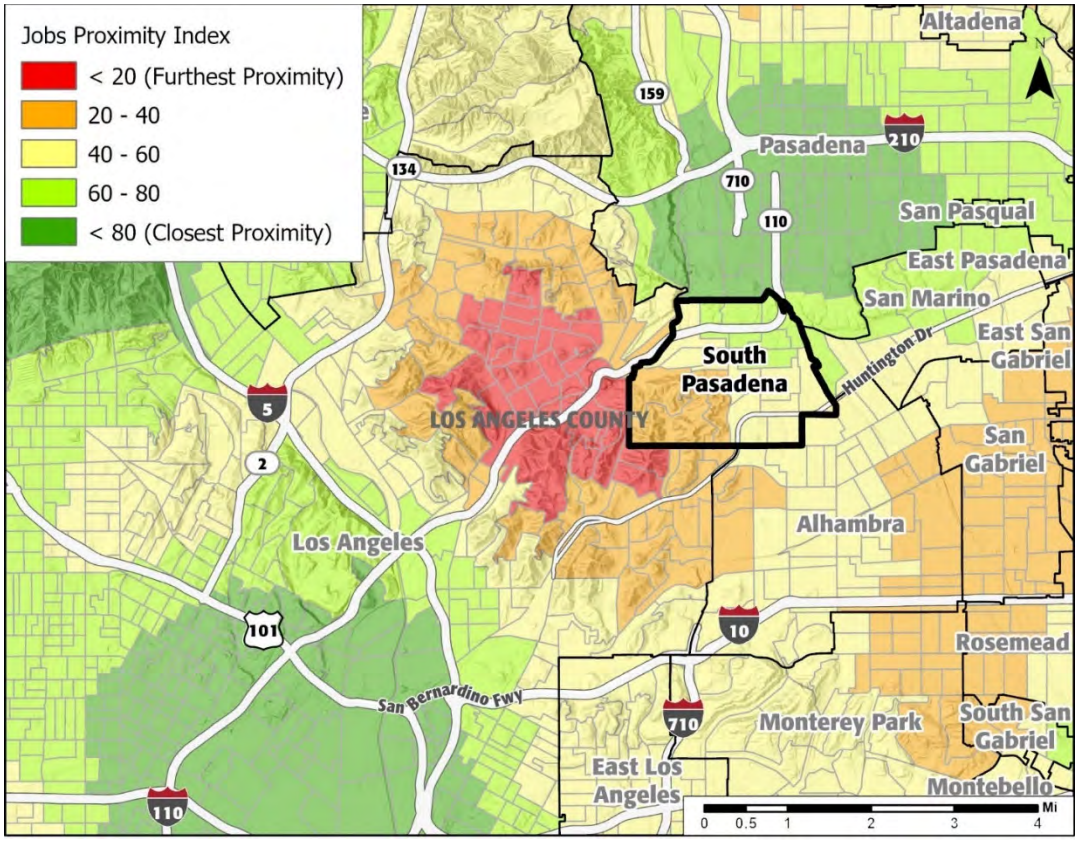
With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station in Downtown Los Angeles is approximately 17 minutes from South Pasadena and approximately 6 minutes to Pasadena on weekdays. The 260/762 Rapid lines provide service from roughly 5 a.m. to 11 p.m. on weekdays, with later starts on weekends and Sundays, and peak headways of roughly 20 minutes and off-peak headways of roughly 30 minutes. Overall, much of the City's planned housing, including affordable housing, is in close proximity to these transit lines.

Employment Proximity

In 2017, HUD developed the Jobs Proximity Index as an assessment of accessibility to jobs from a given residential census block neighborhood[15]. The index measures the distance to jobs from each neighborhood, placing a higher weight on larger employment centers that offer more job opportunities. This function provides a general estimate of residential neighborhoods proximity to a large number of job opportunities. As shown in Figure VI-18, most residential neighborhoods in South Pasadena have moderate access to jobs compared to the region, with no areas of the City having the "closest" or "furthest" proximity to jobs. The southwest portions of the City have the most limited access to jobs according to HUD's analysis, and areas in the northern portions of the City have closer access, most notably to job centers to the north in Pasadena. With an average commute time of 31 minutes, South Pasadena has somewhat longer commutes than the national average, but a similar average to Los Angeles County and California overall, according to American Community Survey estimates. Neighboring cities, including Los Angeles, San Marino, and Pasadena, have respective average commute times of approximately 31, 30, and 29 minutes.

[14] AllTransit is a data tool developed by the Center for Neighborhood Technology (CNT) that includes stop, route, and frequency information for 902 transit agencies in metropolitan areas. https://alltransit.cnt.org/about-the-data/
[15] United States Housing and Urban Development Department. *Jobs Proximity Index*, August 10, 2017. https://www.arcgis.com/home/item.html?id=4e2ef54b88084fb5a2554281b2d89a8b

Figure VI-18
REGIONAL JOBS PROXIMITY INDEX



Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, 2014[11]

Environmental Health

A disadvantaged community or environmental justice community ("EJ Community") is identified by the California Environmental Protection Agency ("Cal EPA") as "areas that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need.[16] In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25 percent highest score census tracts) are those that have been designated as disadvantaged communities under SB 535.[17] The cumulative score for each census tract includes an exposure score, with a low score being a positive outcome, for each of the following:

[16] California Health and Safety Code § 39711
[17] California Office of Environmental Health Hazard Assessment. *SB 535 Disadvantaged* Communities, June 2017. https://oehha.ca.gov/calenviroscreen/sb535

- "Ozone concentrations
- PM2.5 concentrations
- Diesel particulate matter emissions
- Drinking water contaminants
- Children's lead risk from housing for children
- Use of certain high-hazard, high-volatility pesticides
- Toxic releases from facilities
- Traffic impacts[18]"

Communities that are identified as disadvantaged communities based on their cumulative pollution exposure score are targeted for investment through the State cap-and-trade program. However, the condition of these communities pose fair housing concerns due to disproportionate exposure to unhealthy living conditions. In the City of South Pasadena, the cumulative scores of each census tract range from a high of the 34th percentile (north of Mission Street) to a low of the 9th percentile (southwestern corner of the city and southeastern corner of the city). These scores indicate that there are no areas within the City of South Pasadena that meet the criteria to be identified as a disadvantaged community by COEHHA and CalEPA and are not disproportionately exposed to high levels of pollutants compared to other census tracts in the State.

OEHHA's CalEnviroScreen 4.0 Indicator Map reports that pollution burden scores in South Pasadena closely reflect neighboring jurisdictions. Throughout the City, all census tracts score in the 84th percentile or higher for impaired drinking water, while groundwater threats are isolated in the southeastern portion of the City (south of Mission Street and east of Meridian Avenue), and diesel particulate matter exposure is concentrated in the northern portion of South Pasadena (north of Mission Street). While exposure to these pollutants and environmental effects may have a negative impact on residential uses and living conditions, the City's cumulative scores below the 35th percentile indicate that environmental contaminants are not a significant threat to residents. Sources of contamination are likely results of previous activities that have since been, or are in the process of being, mitigated and resolved, therefore removing threats to the city's drinking water. In 1979, industrial solvents and other contaminants were identified in groundwater in the San Gabriel Valley, from which South Pasadena extracts the City's drinking water. The contamination at the site is believed to be the result of decades of improper chemical handling and disposal practices. As a result, water suppliers shut down their wells, and large portions of the basin were placed on the federal Superfund cleanup list in 1984. The subsequent cleanup has cost approximately $500 million, sourced from public funds and the parties responsible for the contamination. Due to this groundwater contamination, the City of South Pasadena has constructed organics treatment systems at the Wilson Reservoir in San Gabriel and the Graves Reservoir in San Marino, where groundwater is extracted and treated to State drinking water standards, then pumped into the City of South Pasadena. The San Gabriel Basin Water Quality Authority has assisted South Pasadena in obtaining substantial grant awards, including $589,000 in 2018 that was expended toward the Wilson Reservoir granulated active carbon (GAC) Treatment System construction, and more recently $2,251,000 from the State Water

[18] California Environmental Protection Agency, California Office of Environmental Health Hazard Assessments. *Update to the California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0 Public Review Draft*, February 2021. https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40reportd12021.pdf

Board Proposition 68 Grant Fund for the Wilson Reservoir treatment construction and operations and maintenance costs.

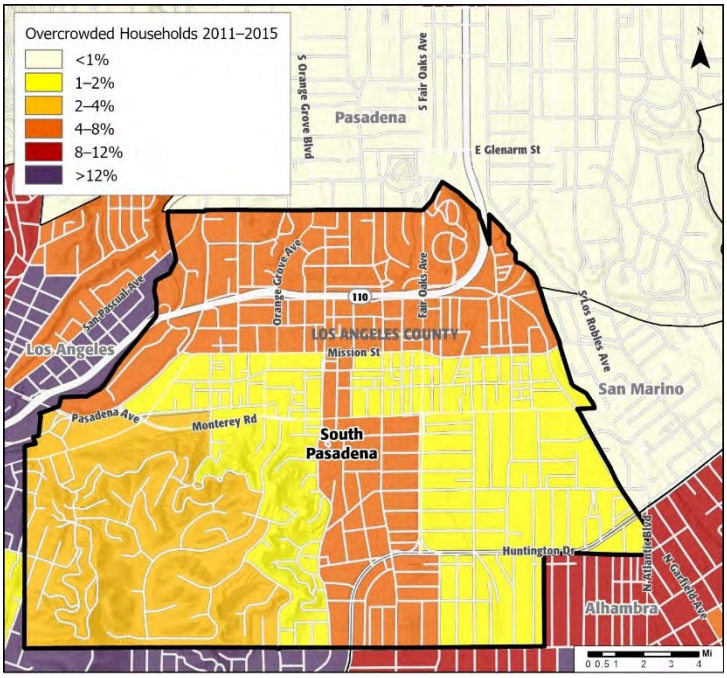
In order to address the potential for any negative living conditions and fair housing concerns that may continue to result from environmental hazards and pollutants, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino (Program 1.e). The City will also review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination to reduce exposure to these environmental threats (Program 1.e).

6.4.5 Disproportionate Housing Need and Displacement Risk

Overcrowding as a Fair Housing Issue

As discussed in Section 6.4.3, overcrowding is not a significant issue in South Pasadena, with less than 2 percent of households living in an overcrowded situation citywide. Although it is a minor difference that is not statistically significant, overcrowding is more prevalent among renter households (2 percent) than in owner households (less than 1 percent). As shown in Figures VI-19, the rate of overcrowding is higher in central and northern portions of South Pasadena, generally centered along Fremont Avenue, and in the areas north of Mission Street. Severe overcrowding is generally low except for the central portion south of Mission Street, along Fair Oaks Avenue, where approximately six percent of households are severely overcrowded. The areas with the highest rates of overcrowding and severe overcrowding also tend to have somewhat higher levels of poverty than the remainder of South Pasadena. This pattern of overcrowding matches the region, with slightly higher levels of overcrowding in areas characterized by higher amounts of multifamily housing, which tends to be more affordable. The rate of overcrowding in central and northern portions of South Pasadena may indicate that appropriately-sized housing is unaffordable to current residents, or that the type of housing available does not meet needs. In either case, overcrowding means there is a somewhat greater need for affordable, larger housing units for residents in these areas. The City anticipates that Programs 2.j, 2.k, 3.a through 3.m will serve to ensure adequate housing sites are provided and will encourage a variety of housing types to meet the needs of diverse households and family structures.

Figure VI-19
LOCAL HOUSING OVERCROWDING



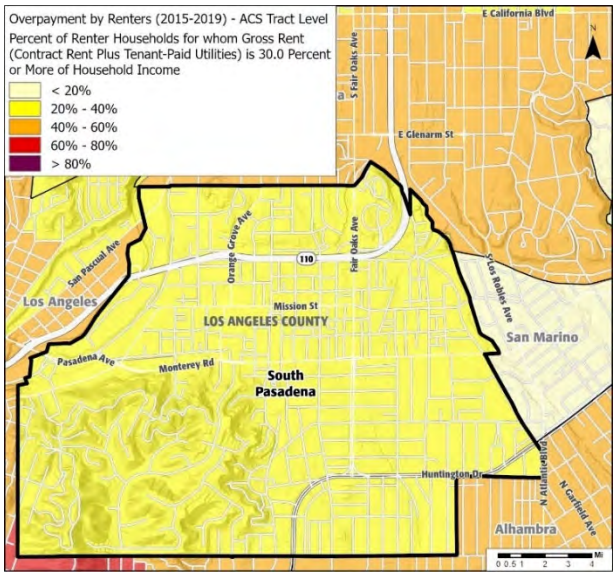
Source: California Health & Human Services Agency, 2020[12]

Overpayment for Housing as a Fair Housing Issue

Not surprisingly, overpayment for housing, which increases a household's risk of displacement, is most commonly experienced by lower income households in South Pasadena, as shown in Tables VI-28 and VI-29, above. For these income groups, more than 86% of owners and more than 72% of renters are considered to be overpaying for shelter, defined as spending more than 30% of their incomes on housing. Geographically, as seen in Figure VI-20, below, the rate of renter households overpaying for housing is within the same range, with an estimated 20–40 percent overpaying for housing. As Figure VI-20 shows, overpayment for this group has decreased over the last five years, except in the southwestern portion of the city where overpayment as increased 0-5%.

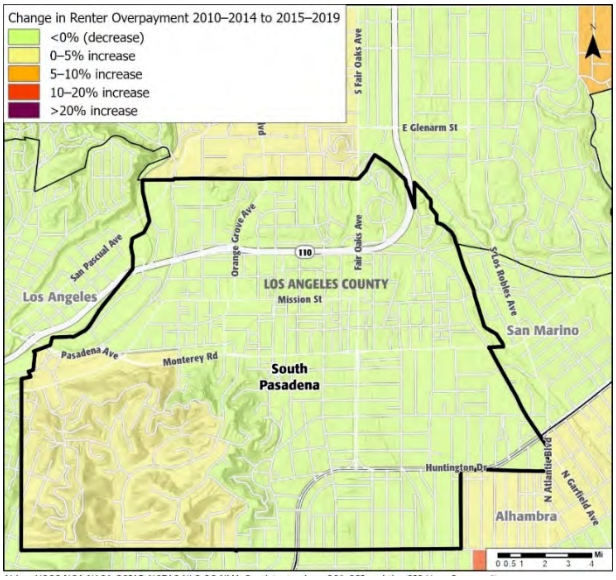
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-20). As shown in Figures VI-20 through VI-23, overpayment for housing has increased in two areas of the city, in the central corridor by less than 5%, and in southeast area where the percentage of overpaying households rose 5 to 10 percentage points. The City will seek to address overpayment by creating below-market-rate housing and addressing the overall need for increased housing and affordability. The following programs, enumerated in greater detail in other sections, are designed to work together to address housing creation and affordability through land use changes, inclusionary housing requirements, density bonuses, zoning overlays, Section 8 rental assistance, and other means: Programs 1.b, 1.c, 2.b, 2.c, 2.i, 2.j, 2.k, 3.a, 3.b, 3.e, and 3.k.

Figure VI-20
LOCAL OVERPAYMENT BY RENTERS



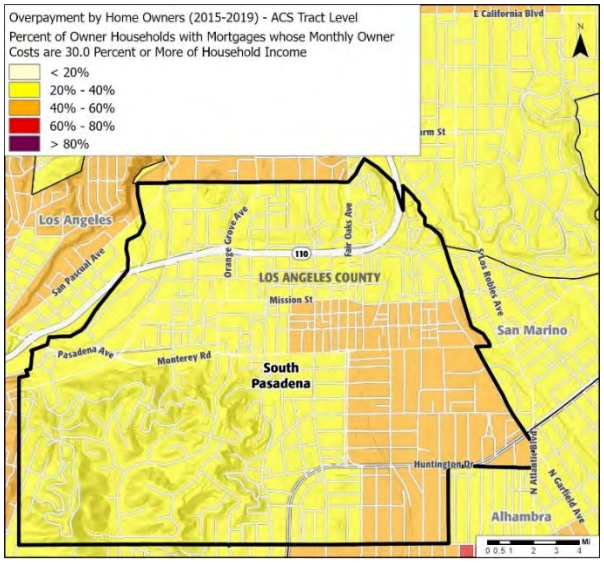
Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-21
CHANGE IN RENTER OVERPAYMENT OVER A FIVE-YEAR PERIOD



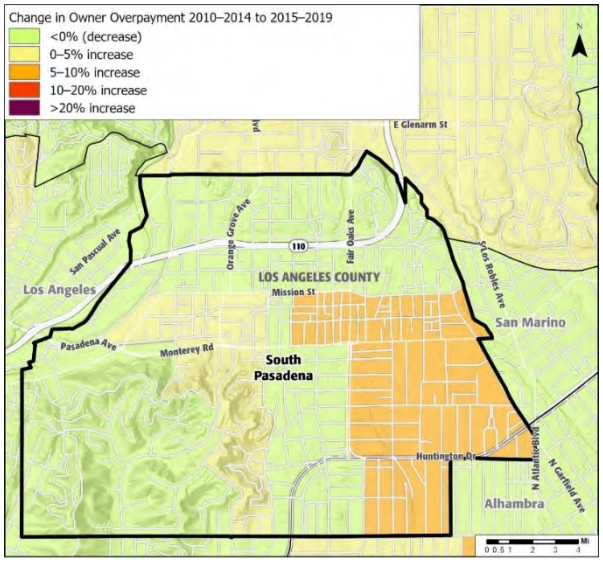
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Figure VI-22
LOCAL OVERPAYMENT BY OWNERS



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-23
CHANGE IN OWNER OVERPAYMENT OVER A FIVE-YEAR PERIOD



Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Housing Stock Concerns for Fair Housing

Although South Pasadena's housing stock tends to be somewhat older, the City is not characterized by major deficiencies regarding housing deterioration or livability issues. As discussed previously in this section (see "Age and Condition of Housing Stock"), approximately 37 percent of the City's housing units were built in 1939 or earlier and 94 percent of the housing stock is over 30 years old, with 1952 being the median year of construction (see Table VI-25). Nevertheless, the majority of South Pasadena's housing stock is well maintained and in good condition, with only some instances of residential properties with signs of deterioration and deferred maintenance. As the housing stock ages, need for repair and rehabilitation may become more common, thus increasing the risk of displacement for occupants of those units, and in particular for low-income seniors. This would be addressed with a Housing Rehabilitation for low- and moderate-income households, and other programs designed to support seniors to stay in their homes or to find other housing within South Pasadena that meets their needs (Programs 1.c and 2.g). Additionally, the City will continue to use its code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena (Policy 1.2), particularly for rental units. Additionally, the City's contracted housing rights and tenant protection agency assists tenants with disabilities by enforcing Fair Housing requirements to grant reasonable accommodation or modification requests.

Homelessness

The Los Angeles Homeless Services Authority (LAHSA) divides Los Angeles County into eight Service Planning Areas (SPAs) so the organization and individual jurisdictions can better serve and meet the needs of the communities in these areas. The City of South Pasadena is within Service Planning Area 3 (SPA-3): San Gabriel Valley, which includes communities located in the eastern portion of Los Angeles County. The 2022 Homeless Point-in-Time (PIT) count conducted by LAHSA counted a total of 4,661 homeless persons in SPA-3, of which 50 identified as residing in the City of South Pasadena (less than 0.01 percent of the SPA-3 homeless population). Approximately 64 percent of the total homeless population of SPA-3, or 2,985 people, were considered unsheltered and 36 percent, or 1,676 people, were sheltered. Additionally, approximately 228 households in SPA-3, or 5 percent of households, had at least one child under 18 and one adult over 18; there was one unaccompanied minor recorded in a shelter in SPA 3.

According to the LAHSA in 2022, approximately 56 percent of the total homeless population in SPA-3 identified as Hispanic or Latino, 17 percent identified as Black or African American, under one percent identified as American Indian, Alaska Native, Asian, and multi-racial. Additionally, 21 percent were experiencing serious mentally illness, 18 percent had a physical disability, ten percent had a developmental disability, 6 percent were seniors, and six percent were veterans. Of the homeless population in SPA-3, four percent identified as gay or lesbian, four percent as bisexual, and three percent as questioning their sexual orientation. Given the small size of South Pasadena's homeless population, it is unlikely that all of these protected classes are represented. However, without data available at the city-level, it is assumed that the percentages of each protected class applies to the 50-person homeless population in the city. Under this assumption, the following groups may be disproportionately represented as part of the homeless population compared to the total city population:

- Non-White persons, including those that identify as Hispanic or Latino and Black or African American (45 percent of city population).
- Persons with disabilities (Seven percent of the city population).
- Persons with developmental disabilities (One percent of city population).

Citywide data regarding sexual orientation is unavailable to compare to the percentage of the SPA-3 homeless population. However, while the percentages of each protected class identified here may not be the exact demographic composition of the homeless population in South Pasadena, as part of the SPA-3 region, there is a need for targeted assistance and outreach of each of these populations.

In order to address the needs of the homeless population, the City has identified Program 2.f to continue its emergency shelter referral program and use multi-jurisdictional grand funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. Additionally, under Policy 4.4., the City will incentivize housing providers to meet the housing needs of extremely low-income persons, persons with mental and physical disabilities, and other special needs groups. Moreover, the City has included Program 4.b to amend the Zoning Code to fully address SB 2 requirements regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Gentrification and Displacement Risk

The Urban Displacement Project identified neighborhoods in the Los Angeles region that have experienced gentrification since 2000 as a part of their project to predict trends of gentrification and displacement based on a community-engaged research process of market trends, housing, and jobs growth. The Urban Displacement Project defines gentrification as "a process of neighborhood change that includes economic change in a historically disinvested neighborhood — by means of real estate investment and new higher-income residents moving in — as well as demographic change — not only in terms of income level, but also in terms of changes in the education level or racial make-up of residents".[1] Renewed interest in city neighborhoods can lead to or accelerate the displacement of residents, typically low-income communities of color, due to rising commercial and residential rents and property values.

In South Pasadena, the Urban Displacement Project identified the area east of Fair Oaks Avenue and the area south of Mission Street between Meridian Avenue and Indiana Avenue as "Stable/Advanced Exclusive," meaning that the census tracts in these areas are high income, housing is only affordable to high-income households, and there has been a notable increase in housing costs since 2000. These neighborhoods are noted to have already gentrified and to exclude lower- and moderate-income households. The remaining areas south of Mission Street, west of Indiana Avenue and between Meridian and Fair Oaks Avenues, are considered "At Risk of Becoming Exclusive" and "Becoming Exclusive," respectively. These both indicate a trend toward moderate- and high-income households, increasing housing costs, and increasing unaffordability. All of these areas suggest historic displacement of lower- and moderate-income households as neighborhoods gentrified, and now may present a barrier to entry for these households. Paired with racially and ethnically exclusive practices discussed in Section 6.4.6, displacement of lower- and moderate-income minority households was particularly exacerbated during the mid-20th century. While the area north of Mission Street and west

of Fair Oaks Avenue is considered "Stable Moderate/Mixed Income," suggesting lower displacement risks due to housing costs and incomes, most of the City of South Pasadena is exclusive or becoming exclusive according to the Urban Displacement Project.

Displacement risk can also be identified by comparing annual rates of increase in average home value or rental price compared with annual changes in the average income. If home costs outpace wage increases, displacement risk increases. As shown in Figure VI-3 of Section 6.3.7 of this Housing Element, the median home sales price in South Pasadena increased 223 percent between 2000 and 2018, compared to 151 percent in the SCAG region. This results in an average annual increase of 12.4 percent in South Pasadena and 8.4 percent in the SCAG region. Rental prices have also increased significantly since 2015, with an average annual increase ranging from 5.7 percent for studio apartments to 8.7 percent for 3-bedrooms according to Zumper, an online database of rental prices for houses, condominiums, apartments, and other housing types. Currently, home prices for ownership units are affordable only to above moderate-income households while studio and one-bedroom units priced at the lower end of the spectrum are affordable to lower-income households while all larger units are affordable only to above moderate-income households.

In comparison to housing prices, wages have increased at a slower rate. The median income in South Pasadena has increased approximately 3.4 percent annually, from $82,340 in 2010 to $109,927 in 2020 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in South Pasadena, as is the case throughout the region and state. In order to address affordability challenges, the City has identified the following programs to incentivize development of affordable units, facilitate mobility options, and reduce displacement risk for lower- and moderate-income households throughout South Pasadena:

- **Program 1.c.** Proactively pursue abatement of substandard housing conditions to reduce displacement of tenants from these units.
- **Program 1.d.** Monitor deed-restricted housing units in the city and work with property owners and, if necessary, local service providers to preserve affordability.
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.
- **Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.
- **Programs 3.h and 3.g.** Encourage the construction of ADUs and monitor construction to track affordability

6.4.6 South Pasadena History

The following history provides some context and acknowledgement of discrimination in the past to recognize that South Pasadena must reckon with past racism within the community that precluded the opportunity to become a homeowner in the City based on race, as discussed further below. The City Council acknowledged and condemned these past practices in Resolution No. 7750 (The "Sundown Town" resolution), which was unanimously adopted on February 2, 2022. The Council directed staff to take specific steps, including removal of racially-based restrictive covenants that may still exist (but are not enforced) on property titles throughout the city, beginning with those owned by the City (see Program 5.c). This important step of acknowledgement demonstrates a shift that has occurred within the community over time, and the Council's growing commitment to affirmatively advance equality in housing opportunities to all persons regardless of ethnic group or race, so that all are offered the opportunity to live in and benefit from the high level of resources and quality of life available in South Pasadena.

Historic Land Development Patterns

Incorporated in 1888, South Pasadena was one of the first municipalities in the Los Angeles area and has featured relatively stable boundaries since initial incorporation, even as its population has grown dramatically. With roots as an agricultural community growing mostly citrus, South Pasadena eventually become a streetcar suburb of Los Angeles with the extension of a Pacific Electric transit line to the City in the early twentieth century. The City grew quickly, seeing high double-digit and even triple-digit decadal growth rates between 1900 and 1930. Low double-digit decadal growth continued until the mid-twentieth century, when most of South Pasadena's land was almost completely built out. Since that time, the population of South Pasadena has generally fluctuated within a range of approximately 22,000 to 25,000 residents. These historical trends are reflected in South Pasadena's development pattern, with the oldest neighborhoods lying close to the former streetcar lines and newer development in more distant and hilly areas that would, in earlier times, have been less accessible or not feasible for construction. The more central portions of the City that were close to the historical streetcar lines are also the areas that feature most of the City's multifamily housing, including units that may be more affordable to households with medium or lower incomes. Additional areas of multifamily housing are found in the northern and especially northeastern areas of the City.[19] The City grew at a time when single-family housing dominated residential development in Los Angeles County, including construction of large estates built when land was relatively inexpensive in the area north of Downtown Los Angeles. Thus, a large portion of the city is designated as single-family. While this has checked population growth for more than half a century, as described above, the City does not have directive growth control policies in place. However, the City's voter-approved height limit presents a physical constraint to multifamily housing development that reduces the number, size, and quality of units that can be built even if the density allows more. Projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, are eligible for waivers of this limit, which will support more affordable housing in the 6th Cycle period.

[19] City of South Pasadena. "History." City of South Pasadena Website. Retrieved February 22, 2021. https://www.southpasadenaca.gov/visitors/history

Mid-20h Century Racial Exclusion

Historically, "Sundown Towns" are communities, neighborhoods, or counties that excluded African Americans and other minority groups through the use of discriminatory laws, harassment, and the threat or use of violence. The name is derived from the posted and verbal warnings issued to such groups – particularly African Americans – that although they might be allowed to work or travel in a community during the daytime, they must leave by sundown. No official ordinance or law of the City of South Pasadena has been found imposing sundown restrictions, but the collective oral and written history, public accounts, and newspaper articles explicitly demonstrates South Pasadena's history as a "sundown town" for a significant portion of the 20th century.

The years during and after the Second World War witnessed open racial exclusion in the South Pasadena community. A newspaper account that appeared in the California Eagle on Thursday, September 12, 1946, *(So. Pasadena for 'Whites Only,' Says City Mgr. Telling of Racial Bars*) reported that South Pasadena City Manager Frank Clough had revealed that week that since 1941, the City had been "writing restrictive covenants into the deeds of all property obtained by the city through delinquent taxes." The article further quotes Clough as saying:

> "We do not have any negroes nor do we have any other non-Caucasian people in South Pasadena. To ~~insure~~ensure the continuance of this policy, several years ago the city council instructed the city attorney to draw up a restrictive clause and insert it into all properties coming into possession of the city."

Clough acknowledged that the Council had not officially adopted such a policy and indicated that the actions had been requested through an internal memo to the city manager and city attorney.

The article goes on to refer to a campaign conducted by a group called the South Pasadenans, which Clough said was "headed by some prominent persons" to develop a system of racial exclusion through property deed restrictions. That campaign is also noted in an article in the South Pasadena Review (*Satisfactory Progress Being Made in Race Restriction Campaign*, December 26, 1941), which reports, from a very different perspective than The Eagle, that South Pasadenans Inc., a city-wide non-profit organization "with a membership of several hundred civic-minded citizens for the purpose of sponsoring an improvement program" that would "restrict the use of property in South Pasadena to members of the Caucasian race" had met at city hall. At that time, prior to the 1948 Supreme Court ruling in Shelley v. Kraemer, these covenants were not illegal, as the leader of South Pasadenans, Inc. assured property owners in the South Pasadena Review. According to the California Eagle article, by 1946, the City Manager announced that 85% of all land in the city had been recorded with the restrictive deeds, for which property owners paid the South Pasadenans a fee of $5 "for the recording and operating expenses of the group." Two years later, those deeds became legally unenforceable, but were not necessarily removed.

Earlier in the decade, in 1942, in response to Executive Order 9066 requiring the relocation of persons of Japanese ancestry to internment camps, 165 Japanese-American residents of South Pasadena were forced to evacuate South Pasadena. There is not clarity as to what happened to homes that were evacuated by these residents. The South Pasadena Review (*What will Become of Homes Vacated By Japanese Families?*, April 3, 1942) reported on a Chamber of Commerce meeting at which the attendees' primary concern in regard to the imminent deportation of the Japanese community that would leave 47 homes vacant was the prospect that these homes would become occupied by

"undesirables" and would "soon be snapped up by colored families moving down from Pasadena or surrounding communities." Mayor Andrew O. Porter, present at the meeting, responded to suggestions that properties be improved so as to be too expensive for such families, by saying that the City cannot exercise any control over these properties and that the responsibility for improvement rests with the owner of the property. The group's effort to keep blacks and other minority groups out of South Pasadena appears to have been effective, given City Manager Clough's declaration in 1946 (above) in regard to the racial profile of the city's residents.

Though racial covenants had been allowed and upheld by earlier Supreme Court rulings, they were challenged through many lawsuits, and the 1948 Supreme Court ruling in Shelley v. Kraemer determined them to be a violation of the 14th amendment, which guarantees equal protection under the law. While existing covenants were not allowed to be enforced by the courts, actions by private sellers persisted covertly throughout the Los Angeles region for many years afterward in the mid-twentieth century, and it took many years for non-whites to slowly begin to be able to buy homes in areas with histories of overt racial exclusion, including South Pasadena. Such government-sanctioned forms of discrimination have long-since been eliminated and the racial and ethnic population in South Pasadena has significantly diversified over time. However, the prior race- and ethnic-based socio-economic discrimination had a long-term impact on racial diversity in the City. With the current high residential property values discussed earlier in this chapter, the cost of moving into South Pasadena is now the primary barrier for households seeking to locate within South Pasadena.

The 1963 General Plan

The City adopted a new General Plan in 1963, which forecast a population that would grow to between 28,050 and 31,270. The new units in the city were anticipated to come from build-out of the Monterey Hills area (low density single-family), and some new apartment development. The first three objectives of the Land Use Plan were stated as:

- To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential, where stability and exclusiveness are desired;

- To guide orderly transition of older residential areas from a lower to a higher density – where increased density is desirable.

- To establish a scale of densities and development standards which are in keeping with the kinds of housing that should be encouraged in the future.

The language of these objectives appears to indicate that the South Pasadena community was holding onto its perceived "stability and exclusiveness," terms that are often proxies for racist intent to keep people out of the community. The plan did allow for additional multi-family residential uses, built on a principle that allowed increased density with increased parcel size to produce a more suburban approach with lower heights and higher setbacks from surrounding development.

Thirty-five years later, in 1998, the City's population remained well below the 1963 forecast, as it does today. The Vision Statement in the 1998 General Plan, excerpted from a 1990 Task Force, which became the basis for the guiding principles, included the following:

As the new decade begins, however, South Pasadena is faced with the ***twin threats of burgeoning multi-residential growth*** *and continued deterioration of its commercial areas and business tax base. In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added).*

The community's self-reflection and desire for the future was clearly rooted in maintaining a status quo, as demonstrated by the perception that multi-family housing was a "threat." The 1998 General Plan Update also came in the midst of the 710 Freeway fight against CalTrans, and focused on the City's proud independence as a "distinct – and distinctive – community" with a small town character. Like the 1963 plan, a focus on neighborhood protection was a guiding principle, incorporating the historic preservation movement that had grown in importance since the previous General Plan was adopted.

The 1998 Plan incrementally downzoned residential land, reducing the number of acres designated as high density residential use and increasing the medium density zoning along with more land area for low density and estate. Transition areas were identified to absorb most of the change. Using terms like "managed change" and (single-family) "neighborhood protection," the plan sought to maintain a balance that would support the vision of a small town atmosphere. With that in mind, most new units were anticipated to be in the multi-family areas, with an expectation that about 870 units would be added by 2010.

More Recent Exclusion

Illegal real estate practices against minority persons buying homes persisted in South Pasadena past the mid-20th century. In the mid-1960s the Federal government provided funding for affordable housing within the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents. South Pasadena has enacted slow growth regulations more recently than the mid- to late-20th century including in the 1980s when the City reduced the allowed residential densities across the city, thus decreasing the City's target population from over 60,000, assumed in the City's first General Plan in 1960, to less than 30,000 in the 1998 General Plan. While not a direct growth management strategy, such as urban limit lines or annual caps on building permits, the result of downzoning was slowed residential growth in South Pasadena. Slow-growth strategies often have indirect racist overtones, particularly slow-growth furthered by reducing densities, by prioritizing lower density housing types, which often are more expensive to purchase or rent than smaller, middle- and high-density housing types. While not directly discriminatory, this prioritization can present a barrier to lower- and moderate-income households to live in the city, which can result in both income and racial isolation. As such, slow-growth efforts may have influenced demographic characteristics in South Pasadena, as discussed in the excerpt from the Colorado Boulevard, below.

"Compared to other local sundown towns, South Pasadena held out a little longer before finally denouncing and condemning its historical systems and policies and cultural norms that had been used to fashion South Pasadena into a 'Sundown Town.' It held onto this heritage and often fought for it for 74 long and event-filled years after the Supreme Court had made its decision. Underlying the 100 years of prejudicial laws were the attitudes of the individuals behind them. The South Pasadenans Inc., the Chamber of Commerce, the Race Restriction committees, the realtors, the police, the title and deed companies, the bankers, the lawyers and the politicians who fought to develop and defend these policies reflected the racists who dominated the political landscape of South Pasadena for over 100 years. It may sound simplistic, but it needs to be stated: It is racist people that make and support racist laws, policies and practices. Laws supporting racism can be struck down, 'official documents' can be scrubbed of evidence, history can be un-written, but what impact does that have on the racism that thrived there for so long?

Currently, while the City of South Pasadena is attempting to legally move from its past, racists are still agitating there, trying to promote an agenda of race-based hate and separation. Fewer in number, 2018 saw them reduced to creeping in the shadows, targeting the South Pasadena High School with 'stickers' to promote their fear. In 2020, similar expressions of white nationalist fear were distributed as slogans found on leaflets, and nails were placed in the driveways of South Pasadena residents who exhibited support for the Black Lives Matter movement.

Today, most residents of South Pasadena would not support the racist laws and policies of the past, but clearly there is still much more work to be done. Understanding the past is a critical part of the process of reflection and growth. The City of South Pasadena lagged behind and did not take a lead role. Now, more than ever it's up to the residents of South Pasadena to push the City toward a new and different future that better represents the current population."

Excerpt from "When South Pasadena Was a Sundown Town", authored by Jerry Friedman and published April 17, 2022 in the digital Colorado Boulevard newspaper.

Investment Patterns

Investment can be for routine maintenance of public infrastructure, such as roadways, as well as larger projects that address public need, such as parks and recreation facilities, office buildings, and more. Historically, investment in the City of South Pasadena has been prioritized based on physical need and condition of the existing public infrastructure or facilities which has prevented disinvestment in any particular area of the city. Investment is based on public demand and benefits all residents. Projects in the 2022-2023 Capital Improvement Program (CIP) that specifically target increased access to resources and neighborhood revitalization in areas with slightly higher rates of poverty include:

South Pasadena Library: The South Pasadena Library projects include repairs, remodeling, and upgrades within the library that offer amenities to visitors. The South Pasadena Library complex also serves as a cooling center for those that do not have access to, or cannot afford, residential air conditioning (AC), and the CIP lists a backup AC unit and sustainable solar power system as proposed projects. These projects have not been completed yet and may be funded in part by a State Library infrastructure grant, requiring matching funds from the City.

Fremont/Huntington Mobility Active Transportation Project: The mobility improvements along Huntington Drive and Fremont Avenue include bike facilities, curb ramp improvements for safer pedestrian crossings, high visibility crosswalks that include flashing beacons, and modification of the medians to install bike facilities and provide refuge island areas for safer crossings. The project will also add street fixtures like bus benches, trash receptacles, and bus shelters. This project is in progress with some short-term measures, such as adding striping and signage and activating the northbound right turn traffic signal at Freemont Avenue and Huntington Drive, with most other measures still underway.

North-South Corridor (Fair Oaks) ITS Deployment: The project includes a traffic study on Fair Oaks Avenue and the design and construction of signal synchronization including intelligent transportation system (ITS) to facilitate vehicular, bicycle, and pedestrian movement along the Fair Oaks Avenue corridor and adjacent corridors/streets – including transit bus prioritization. The project components include an advanced adaptive traffic management system, a travel time and delay monitoring system, a queue detection system, an infrared bike, pedestrian and vehicle detection, an adaptive pedestrian warning system, a dilemma zone detection system, emergency vehicle detection, transit system prioritization, and an update of the traffic systems and controllers to accommodate the ITS components. This project is projected for fiscal year 2023 and beyond.

Slow Street Program: Though not a CIP project, the Slow Street Program targets major transportation corridors, including Hermosa Street, Grand Avenue, Mission Street, and Oak Street. The intent of this program is to invest in place-based revitalization through placemaking, improved pedestrian experiences, and active transportation spaces. The City engaged the public in designing this program through a residential survey and door-to-door canvassing to identify the target corridors and assess resident desire for slower streets, one-on-one meetings with Mission Street stakeholders, a focus group with the Chamber of Commerce Economic Development Committee, and a community tour of Glendora Village. The public expressed a desire for a program to slow vehicle speeds, create safer pedestrian crossings, add greening and shade, create consistent east-west design across Mission Street, and maintain or add vehicle parking. The program includes temporary demonstrations including temporary striping, curb extensions using reflective delineators, and bicycle lanes using short-term paint/tape and signs. Temporary parklet structures are added to create usable street space, and other placemaking elements like furniture, plants, and art pieces are also incorporated. The goal of the program is to provide the community an opportunity to envision potential permanent reconfigurations of Mission Street and other major corridors.

The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles.

Land Use and Zoning Practices

The Othering & Belonging Institute, a University of California Berkeley research center, published a report in March 2022 analyzing the characteristics of 191 communities in the Greater Los Angeles region in relation to the degree of single-family zoning. The report found that jurisdictions with the highest proportion of exclusively single-family zoning had the highest percentage of White residents, lower rates of diversity generally, higher median incomes, higher home values, proficient schools, and

concentrations of other amenities and resources that are associated with the high and highest resource designations in TCAC/HCD opportunity maps. The Othering & Belonging Institute divided the zoning in each jurisdiction into three categories for the analysis, defined as follows:

- **Single Family Residential**: Land designated for detached, single-family residential land use (one or two dwelling units per parcel of land).
- **Other Residential:** Land designated to allow for multiple dwelling units per parcel of land or a blend of multiple uses that includes residential use.
- **Non-Residential:** Land designated for non-residential uses such as parks and open space, commercial, and industrial.

As part of the analysis, land that is not developable, such as streets, waterways, and other similar areas, were removed.

Zoning data for the City of South Pasadena was accessed in August 2021 and it was found that approximately 75.0 percent of all residentially zoned land is zoned exclusively for one or two dwelling units per parcel. While these zones do allow ADUs, JADUs, transitional and supportive housing, and are now subject to lot-splits under Senate Bill (SB) 9, they do not currently allow higher density housing such as apartments or condominiums which likely resulted in the socio-economic patterns identified in this Assessment of Fair Housing. Across the SCAG region, approximately 77.7 percent of residential land is currently zoned for single-family uses, with an average of 72.0 percent of land in each jurisdiction falling into this category. Therefore, while South Pasadena is slightly higher than average, it is reflective of zoning and land use patterns throughout the region.

However, this does not negate the potential impacts on fair housing and socio-economic patterns that result from the dominance of single family zoning in South Pasadena. Therefore, in an effort to combat past patterns and affirmatively further fair housing, the City has included the following programs:

- Program 2.e to encourage density bonuses in conjunction with the Inclusionary Housing ordinance to increase the supply of affordable units.
- Program 2.k to create and apply an Affordable Housing Overlay outside of the Downtown and Mixed Use districts to allow up to 30 dwelling units per acre in these areas.
- Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k to encourage production of ADUs to increase density in existing single-family neighborhoods.
- Program 3.m to adopt a permanent ordinance to increase the supply of affordable units in high opportunity neighborhoods.

6.4.7 Enforcement of Fair Housing and Outreach Capacity

The City enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of City policies and code for compliance with California law and referring fair housing complaints to appropriate agencies. The City of South Pasadena refers fair housing complaints to the housing rights and tenant protection agency contracted with the City and maintains a Housing Support page on the City's website to assist access for community members. The role of the housing rights and tenant protection agency is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by

the housing rights and tenant protection agency include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs.

Over the past five years, Housing Rights Center (HRC) has provided fair housing services as the City's contracted housing rights and tenant protection agency. As part of outreach efforts, HRC provided the City with fair housing cases and inquiries managed by the organization in the last 5 years to identify patterns and specific housing needs. Discrimination towards those with mental and physical disabilities was the most common subject of inquiries and cases across all years, as shown in Table VI-32A. Discrimination cases have remained relatively low since fiscal year 2016/2017, with a peak of 7 cases during fiscal year 2019/2020. While cases and inquiries specifically related to discrimination are relatively low in South Pasadena, HRC provided other housing services to 410 individuals during the five year period. These services included providing information and counseling on a variety of tenant-landlord rights and obligations, including, but not limited to, rent increases, lease terms, repairs, and pets. The most common issue raised is regarding noticing (20 percent of questions), followed by rent increases (17 percent) and substandard conditions (13 percent). Across both housing issues and discrimination cases and inquiries, approximately 84 percent of calls were made to HRC by in-place tenants, followed by seven percent of calls from those seeking rental housing. HRC also received calls from landlords, realtors, managers, and homebuyers. Of the hundreds of South Pasadena cases and inquiries, the HRC confirmed that none were made against the City of South Pasadena, LA County, or any public housing authority.

As part of the Fair Housing Assistance Program (FHAP), the California Department of Fair Employment & Housing (DFEH) files fair housing cases with HUD's Region IX Office of Fair Housing and with the Equal Opportunity (FHEO); HUD FHEO reported that just 10 cases were filed by residents of the City of South Pasadena between January 1, 2013, and March 23, 2021. Among these cases, four were based on disability, three were based on national origin, two were based on familial status, and one was based on familial status and race. Of these 10 cases, 8 resulted in a no-cause determination, one was withdrawn after external settlement, and one, which was based on a complaint regarding physical disability, had a successful conciliation/settlement. No cases were made against the City or other public entities in South Pasadena.

None of these fair housing agencies provided specific location information for cases, either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Policy 5.1 has been included to participate in the

Table VI-32A
HRC DISCRIMINATION INQUIRIES AND CASES

PROTECTED CLASS	FISCAL YEAR 2016/2017		FISCAL YEAR 2017/2018		FISCAL YEAR 2018/2019		FISCAL YEAR 2019/2020		FISCAL YEAR 2020/2021	
	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL
Discrimination Inquiries										
Gender	0	0%	0	0%	1	14%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	1	5%	0	0%
Mental Disability	4	44%	2	18%	1	14%	5	25%	1	13%
Physical Disability	3	33%	6	55%	5	71%	10	50%	5	63%
Familial Status	0	0%	3	27%	0	0%	4	20%	2	25%
Race	1	11%	0	0%	0	0%	0	0%	0	0%
Other	1	11%	0	0%	0	0%	0	0%	0	0%
Total	9	100%	11	100%	7	100%	20	100%	8	100%
Discrimination Cases										
Gender	0	0%	0	0%	1	50%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	0	0%	0	0%
Mental Disability	1	50%	0	0%	0	0%	2	29%	0	0%
Physical Disability	0	0%	1	100%	1	50%	3	43%	0	0%
Familial Status	0	0%	0	0%	0	0%	2	29%	1	100%
Race	1	50%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%
Total	**2**	**100%**	**1**	**100%**	**2**	**100%**	**7**	**100%**	**1**	**100%**

Source: Housing Rights Center, 2016-2021

programs offered by the HRC and provide public information at City Hall or through the City's website, regarding fair housing issues and HRC consultation.

While historically, exclusionary policies and practices may have resulted in fair housing lawsuits against the City, this has not been the case in recent decades. As described in Section 6.4.6, the City is actively addressing historically exclusive policies and has set the path for an inclusive city. These efforts are furthered by policies that reinforce fair housing through access to sound and affordable housing consistent with the goals of this housing element update (Goal 5). These goals, policies, and programs will be adopted in association with the General Plan update, the Downtown Specific Plan, or other policy documents, and implemented through approval of individual development proposals.

In addition to direct actions to affirmatively further fair housing, the City demonstrates compliance or intention to comply with fair housing law through the following:

- Although the City implements Density Bonus Law (Gov. Code, §65915.) per recent legislative updates, the City has included Program 2.e to update the Zoning Code to reflect the changes and comply with current State law.
- The City intends to comply with No-Net-Loss (Gov. Code §65863) through identifying a surplus of sites available to meet the City's RHNA allocation. In total, the City's surplus unit capacity is 289, composed of 13 lower-income units, 96 moderate-income units, and 180 above moderate-income units.
- The City complies with the Housing Accountability Act (Gov. Code, § 65589.5) by allowing emergency shelters by right in the Business Park (BP) zone district.
- The City will comply with SB 35 (Gov. Code §65913.4) by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by March 2023 (Program 4.f).
- The City complies with SB 330 (Gov. Code § 65589.5) with an established pre-application process for development projects.
- The City complies with the California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act of 1968 by referring fair housing cases to the City's contracted housing rights and tenant protection agency, prohibiting enforcement of racially restrictive covenants still in place, and including Program 5.c in this Housing Element to proactively remove these covenants from property deeds citywide.

6.4.8 Analysis of Sites Inventory for Fair Housing

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 and AB 1304 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. As shown in Figure VI-4, all of South Pasadena is designated as a highest opportunity area, though access to opportunity varies slightly throughout the community as identified in this assessment of fair housing.

The locations of South Pasadena's proposed housing opportunity sites are not anticipated to contribute to the reinforcement or worsening of any fair housing issues. (A full listing and descriptions of South Pasadena's housing sites are contained in Tables VI-44, VI-50 and Appendix A, Sites Exhibits.) All census tracts within South Pasadena feature at least one larger housing opportunity site (Figure A-1 in Appendix A), with some degree of concentration as mixed-use developments in central areas that feature access to jobs, transit, and schools, as well as higher levels of large vacant or underutilized parcels. Although the moderate concentration of housing opportunity sites in central areas of South Pasadena could be perceived as less equitable than a more even or purely random distribution of housing sites, this alternative approach could serve to worsen fair housing issues by placing new homes further from access to transit, jobs, educational opportunity, and walkable neighborhoods. Additionally, attempting to place housing opportunity sites in areas without larger vacant or underutilized parcels would likely involve more displacement of existing residents and could negatively impact the ability of sites to be feasibly redeveloped within the horizon year of the Housing Element.

In an effort to ensure that new lower-income housing is not disproportionately located in areas with more limited access to resources or concentrated in a way that results in income segregation, the City has identified sites with potential for mixed-income development on all but 5 sites that have been identified for lower-income housing to affirmatively further fair housing through mixed-income development.

Mixed-income sites have the benefit of integrating a variety of housing types and sizes at a range of prices to provide opportunities, regardless of income, for households to have the same access to resources offered in the development. Additionally, the City has identified Program 3.k to promote construction of ADUs in high resource areas and areas with lower density zoning to facilitate more affordable units in those neighborhoods. This multi-pronged approach has been taken to promote integration of income groups in all neighborhoods and combat fair housing issues associated with income distribution.

In addition to the development potential of the sites identified in the inventory, the City adopted an Inclusionary Housing ordinance in May 2021, as discussed in Section 6.6.1 of this Housing Element, to promote construction of affordable units in the city. As the ordinance is relatively new, there have not yet been opportunities to assess its effectiveness in increasing the supply of affordable housing, particularly in higher resource areas. However, the City has included Program 2.m to revise the ordinance to 15% inclusionary set-aside to support project feasibility and Program 2.i to monitor the number of units approved and built as a result of the ordinance and recommend revisions, as needed, to increase effectiveness in achieving the City's goals.

Table VI-32B presents the number of units by income group and location within census tracts in the City, and the existing conditions of each tract as they relate to indicators of fair housing, to assess the location and impact of sites by all income groups on existing patterns and conditions. Sites with capacity for all income categories have been identified in all tracts, with a relatively even distribution across tracts, to facilitate mixed-income and to disperse new housing throughout the city and combat any potential for isolation of housing for any income group. For example, tract 4806.00, which encompasses the area north of Mission Street and Arroyo Drive, includes approximately 28 percent of the total lower-income capacity, 25 percent of the moderate-income capacity, and 26 percent of

the above moderate-income capacity. The only exception to this is in tract 4807.03, located in the central and southwestern portions of the city, which has a lower proportion of above moderate-income units (14 percent) than lower- and moderate-income units (28 percent and 24 percent, respectively).

As seen in Table VI-32B, census tract 4807.02, located in the southwest corner of the city, has the highest median income range and lowest poverty rate, though not the lowest ratio of low-to-moderate-income households. This area also has the highest rate of non-White households and includes predominantly single-family housing. In this tract, the City has identified capacity for 168 lower-income units and 53 moderate-income units, in addition to 116 above -moderate-income units, in an effort to reduce the concentration of affluence through income-integrated development, therefore promoting housing mobility opportunities for lower- and moderate-income households. However, this tract also has the lowest jobs proximity index score in the city, so a larger share of lower-income units have been identified in neighborhoods with higher scores, and thus closer proximity to transit, jobs, and services.

Census tract 4806.00 has capacity for 286 lower-income units, 92 moderate-income units, and 137 above moderate-income units. In this tract, the current median income ranges from $74,107, which is considered low-income, to $117,955, which is considered above moderate-income, indicating relatively strong income-integration already. This tract has the highest overcrowding rate and the second highest poverty rate in the city, both of which the City aims to alleviate through the addition of 28 percent of the total lower-income capacity to reduce displacement risk through additional housing opportunities. While this tract has the highest environmental score, indicating the poorest conditions, the score is still in the 34th percentile, indicating strong conditions compared to other areas of the state. However, to prevent concentration of lower-income households in this area, the sites inventory facilitates maintained income-integration. Further, the City has identified Program 1.e to improve environmental conditions to affirmatively further fair housing.

Similar existing median incomes, poverty rates, jobs access, renter overpayment, and proportion of non-white residents exist in tract 4805.00, located south of Mission Street on the eastern side of the city, as compared to tract 4806.00. A balanced proportion of units has also been identified here, including 167 lower-income units (16 percent of total capacity), 64 moderate-income units (18 percent of total capacity), and 69 above moderate-income units (13 percent of total capacity), with the intent of resulting in the same benefits as identified for tract 4806.00.

Tracts 4807.03 and 4807.04, located adjacent to each other in the center of the city, south of Mission Street, have similar demographic characteristics, jobs proximity, and homeowner overpayment. However, in tract 4807.04 there are significantly higher poverty and renter overpayment rates, resulting in increased displacement risk. To reduce this concentration of poverty and combat isolation of this income group, a larger share of lower-income unit capacity has been identified in tract 4807.03, and other areas of the city, and in areas with greater access to jobs.

In addition to the impact on existing characteristics, Figures VI-24 through VI-31 compare the number of units by income category to citywide indicators of fair housing for a comprehensive comparison of how increased residential capacity and approved projects will influence existing patterns.

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Table VI-32B
DISTRIBUTION OF RHNA CAPACITY BY CENSUS TRACT

CENSUS TRACT	EXISTING HOUSEHOLDS	RHNA CAPACITY			AFFH INDICATORS											
					SEGREGATION/INTEGRATION					ACCESS TO OPPORTUNITY			DISPLACEMENT RISK			
		LOWER	MODERATE	ABOVE MODERATE	MEDIAN INCOME	POVERTY RATE	LOW-TO-MODERATE INCOME	NON-WHITE POPULATION	DISABILITY RATE	RESOURCE DESIGNATION	JOBS PROXIMITY INDEX	CALENVIROSCREEN SCORE	OVERCROWDING RATE	RENTER OVERPAYMENT RATE	HOMEOWNER OVERPAYMENT RATE
4805.00	2095	167	64	69	$85,962 - $133,750	7.6%	19.1%	44.1% - 55.4%	11.1%	Highest	47 - 63	9.97	1.19	38.3	51.1
4806.00	3344	286	92	137	$74,107 - $117,955	9.1%	32.8%	49.4% - 64.1%	8.0%	Highest	55 - 78	34.04	6.16	39.8	30.2
4807.02	1724	168	53	116	$136,771 - $197,000	2.5%	34.2%	67.6% - 74.76%	6.5%	Highest	25	9.51	3.25	36.9	28.4
4807.03	1329	291	86	74	$86,442 - $129,427	3.9%	22.6%	54.1% - 66.8%	7.0%	Highest	39 - 53	14.44	1.81	20.7	38.7
4807.04	1931	124	68	124	$80,996 - $133,523	12.7%	36.7%	61.3% - 70.9%	5.6%	Highest	43 - 51	30.09	4.76	36.4	39.3

Sources: 2015-2019 ACS; Esri, 2018; TCAC/HCD 2021; HUD, 2020; OEHHA, 2021; CHHS, 2022

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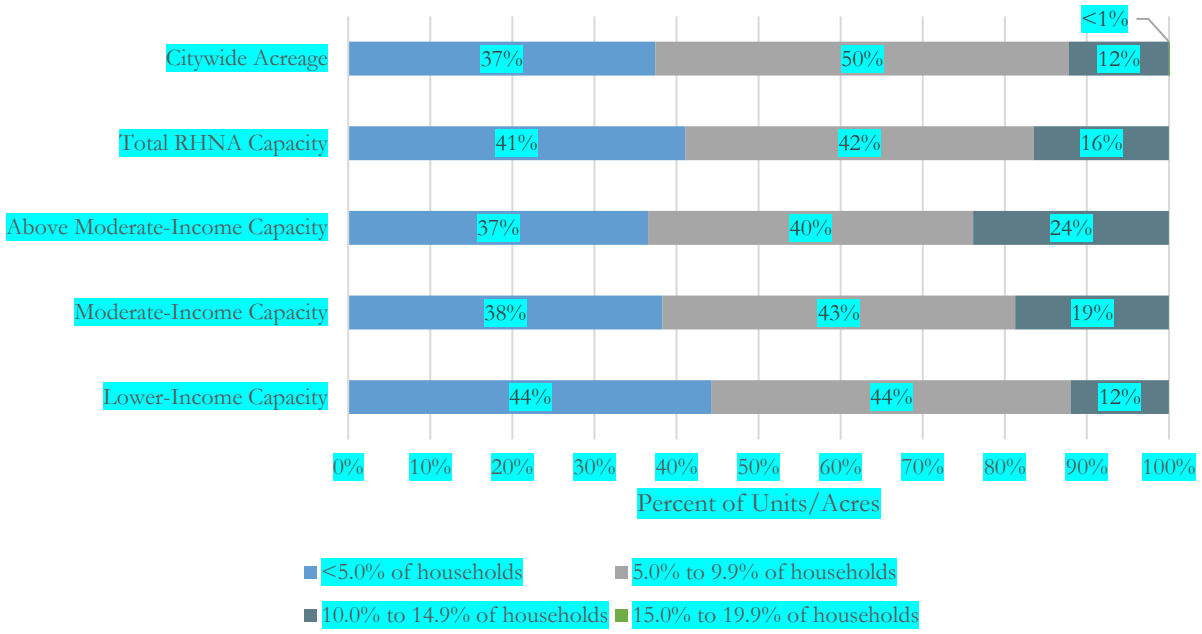
Potential Effects on Patterns of Integration and Segregation

Income

The locations of South Pasadena's housing opportunity sites are not anticipated to reinforce or exacerbate patterns of segregation and integration, whether with respect to race or economic status. As shown in Figure VI-24, South Pasadena has relatively low rates of poverty, with approximately 87 percent of the city's geographical area having a poverty rate of less than 10 percent. While poverty rates are slightly higher in the central portion of the city south of Mission Street (Figure VI-6), housing opportunity sites are located across South Pasadena in a distribution that closely reflects the rate of poverty in the city, with approximately 16 percent of the projected RHNA capacity located in areas with a poverty rate of greater than 10 percent, compared to 12 percent of the city's land falling into this category. Additionally, in this neighborhood with slightly higher poverty rates, the City has identified mixed-income sites to meet the need of existing and future lower-income areas while also alleviating concentration of lower-income households by integrating moderate- and above moderate-income units.

Approximately 88 percent of lower-income units are projected in neighborhoods with fewer than 10 percent of households below the poverty line, ensuring that future lower-income units are not concentrated in areas of higher poverty rates, thus affirmatively furthering fair housing by facilitating housing mobility to areas of affluence. The few sites for lower-income units identified in an area with a higher poverty rate are all located along major transit corridors, as shown in Figures A-1.a through A-1.g, thus providing the best possible access to transit, direct access to employment opportunities, and other resources. As Figure VI-24 demonstrates, although there are modest differences in poverty rates throughout South Pasadena, housing opportunity sites are distributed in such a manner as to promote mixed-income communities and encourage lower-income units in areas of affluence and moderate and above-moderate units in areas with slightly lower median incomes, thereby serving to dilute any potential effects with respect to concentration of poverty. As stated previously, the identification of mixed-income sites and Program 3.f, in addition to other programs, serves to address income patterns through integration of a variety of housing types to meet a range of income needs in all neighborhoods where sites have been identified. Further, the inclusionary housing requirement will also ensure that new developments serve a variety of household income categories within the same site.

Figure VI-24
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY POVERTY RATES



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which more than 16.5 percent of households are below the poverty line.

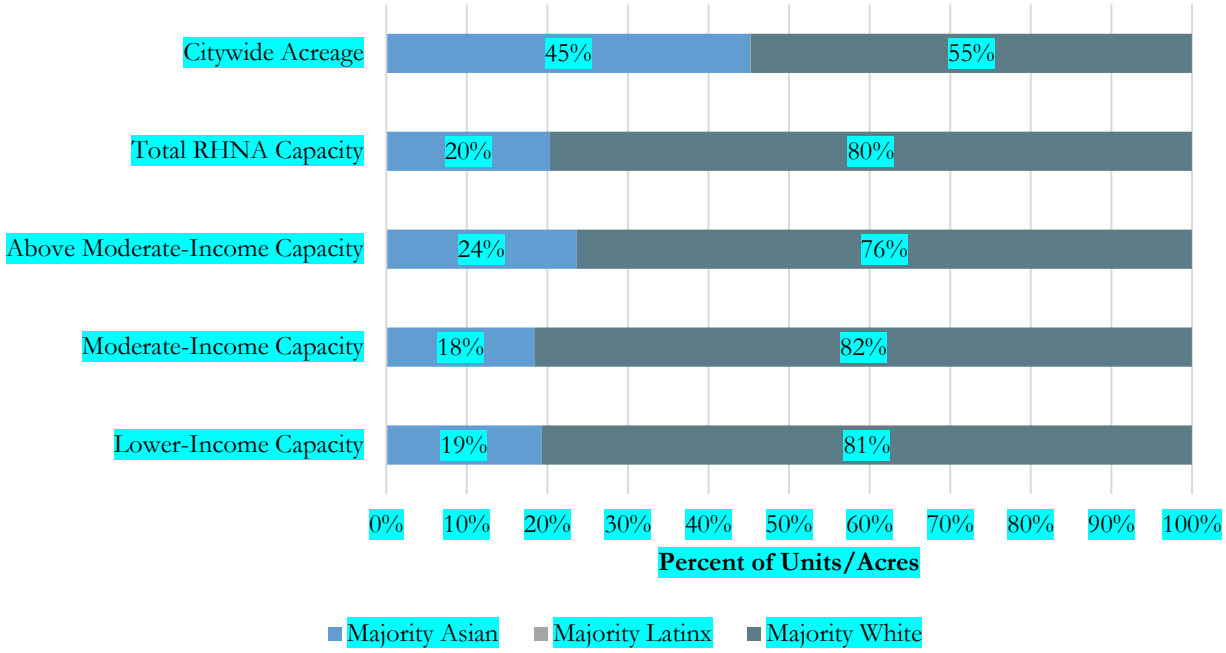
As shown in Figure A-1.e in Appendix A, southwest South Pasadena is dominated by single-family homes and most sites are in the RS zone. While many of these sites have been identified to meet the above moderate-income RHNA, the City has included Program 3.f to facilitate production of ADU resources in this neighborhood and to streamline the permitting process in an effort to increase the supply of lower- and moderate-income opportunities in neighborhoods such as this. The sites identified to meet the RHNA address income patterns through mixed-income opportunities while programs and policies further these efforts by encouraging affordable housing in existing neighborhoods.

Race and Ethnicity

The sites inventory includes housing opportunity sites for all income categories across all of the South Pasadena census tracts, to avoid the potential of reinforcing or exacerbating any patterns of racial segregation. Although population trends in South Pasadena historically had strong patterns of racial disparity, diversity indices within all South Pasadena census tracts are currently holding steady or increasing (Figure VI-12), and no census tracts currently feature racial majority gaps in the "predominant" category (Figure VI-11). Additionally, because there are neither any TCAC identified Areas of High Segregation or Poverty nor any HUD-identified R/ECAPs in South Pasadena (Figure VI-2), the location of the City's housing opportunity sites would not affect any issues relating to these classifications.

While there is a concentration of Asian residents in the southern portion of the city, south of Mission Street (Figure VI-11), other indicators in this area such as quality of schools, median income, and familial status suggest that this population is not negatively isolated and has equal access to economic, educational, and environmental opportunities compared with residents of other areas of the city. As presented in Figure VI-25 the majority of the population identify as Asian in approximately 45 percent of the city, while the majority of residents identify as White in the remaining 55 percent. Approximately 80 percent of the sites inventory is in areas with a population that identified as majority white, which offer quality schools, have higher jobs proximity index scores, and are closer to the resources, services, and amenities of commercial corridors along Fair Oaks Avenue and Mission Street.

Figure VI-25
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RACIAL IDENTIFICATION



Source: 2015-2019 ACS; City of South Pasadena, 2022

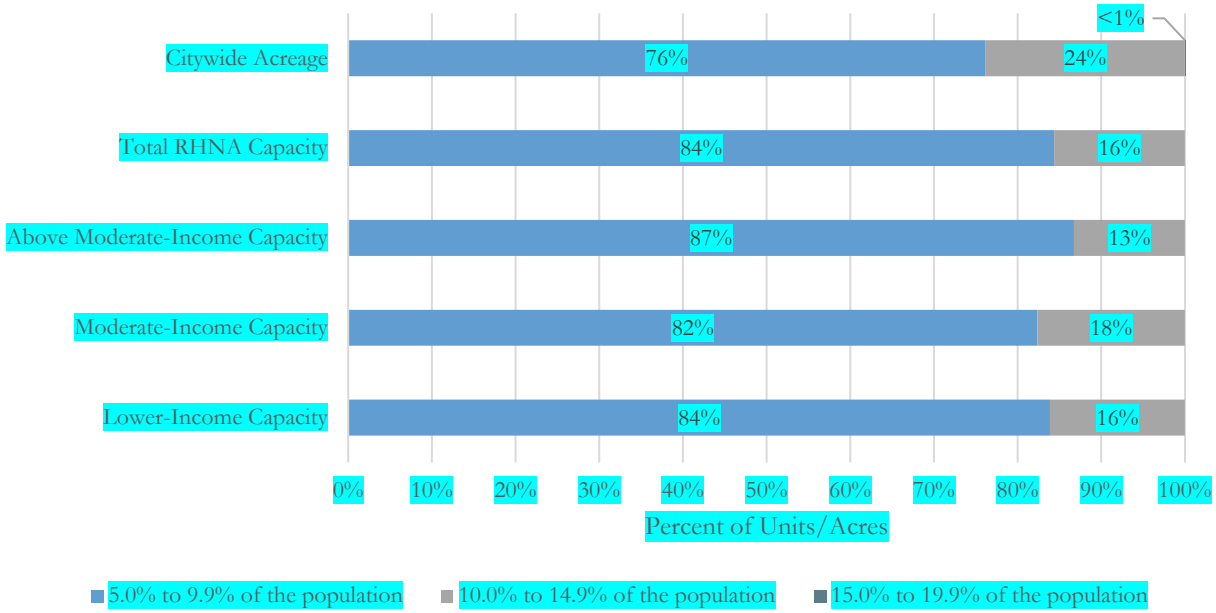
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

Disability

Approximately seven percent of South Pasadena's population lives with at least one disability, a rate that is relatively low compared to the region. As shown in Figure VI-26, approximately 84 percent of the total RHNA capacity identified in the sites inventory is in areas in which 5.0 to 9.9 percent of residents have a disability, closely reflecting the distribution of land in South Pasadena by disability rate. Locating units affordable to lower- and moderate-income residents near and along commercial corridors will help to improve access for, and accommodate the needs of, persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit.

Additionally, mixed housing types viable in the high-density and mixed-use zones can help accommodate the needs of residents living with disabilities by integrating services or amenities on-site.

Figure VI-26
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY DISABILITY RATE



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 5.0 percent or more than 14.9 percent of the population has a disability.

Potential Effects on Access to Opportunity

With respect to access to opportunity, the locations of South Pasadena's housing opportunity sites would serve to maximize resident access to economic and educational opportunity. As shown in Figure VI-4, the entirety of South Pasadena is identified as a Highest Resource area, indicating high levels of opportunity throughout the City. Additionally, regional place- and people-based indices indicate that South Pasadena features a high level of opportunity in all census tracts.

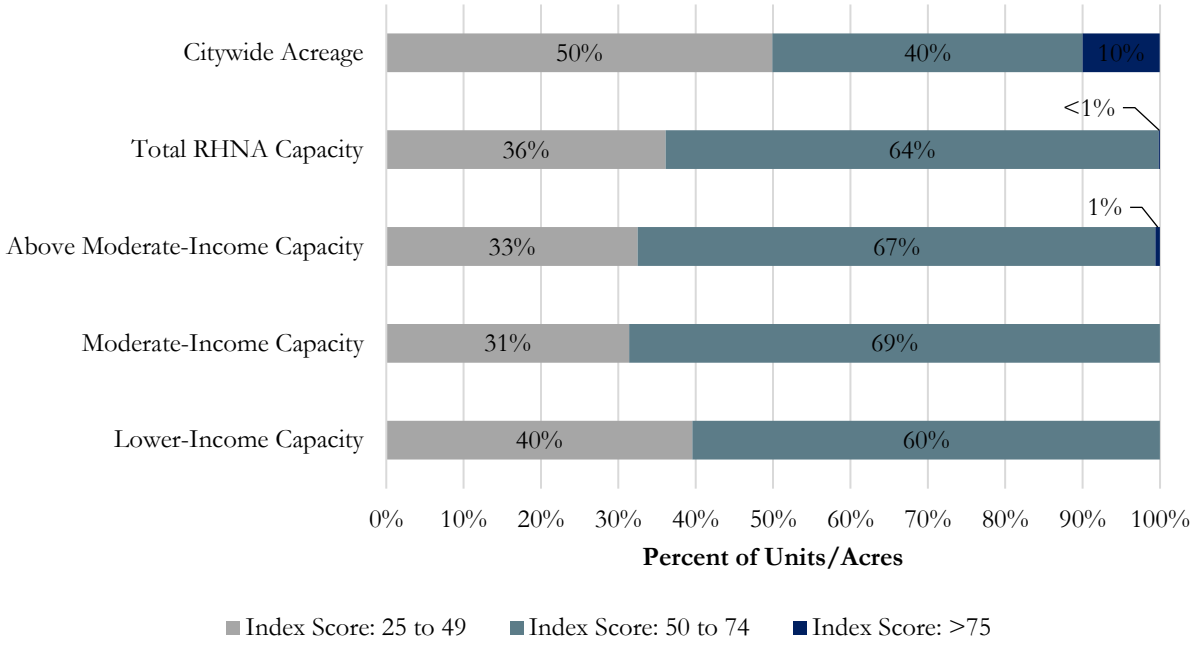
Jobs and Transit Proximity

Based on the data presented in Figure VI-18, the majority of South Pasadena's housing opportunity sites would feature moderate to good access to jobs, and would also have good access to bus stops along Fair Oaks Avenue, as well as the South Pasadena Metro L Line light rail station. As shown in Figure VI-27, approximately 64 percent of the RHNA capacity is located in areas scoring 50 or above for job proximity, compared to 50 percent of the citywide acreage. Approximately 60 percent of lower-income units and 69 percent of moderate-income units are located in areas scoring 50 or above, suggesting that these units will offer strong access to employment opportunities. Sites identified in the Garfield Park and central South Pasadena neighborhoods, where there are the highest jobs

proximity index scores (Figure VI-18), include lower-income and mixed-income sites. These neighborhoods have the strongest access to jobs and transit and will therefore promote mobility opportunities for new residents. The identification of sites is expected to support housing opportunities for current and future South Pasadena residents near jobs and transit to support a strong economy and provide economic mobility opportunities, therefore positively impacting the neighborhood.

While not all units are planned in the areas of highest job proximity, the remaining units offer mobility opportunities for households that choose to live further from existing job opportunities. The location of several lower-income sites along the Fair Oaks Avenue and Mission Street corridors will provide close proximity to employment opportunities in these areas as well as the regular transit stops located along both of these thoroughfares.

Figure VI-27
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH JOB PROXIMITY INDEX SCORE



Source: 2014-2017 HUD; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which fewer the jobs proximity index score is less than 25.

Educational Opportunities

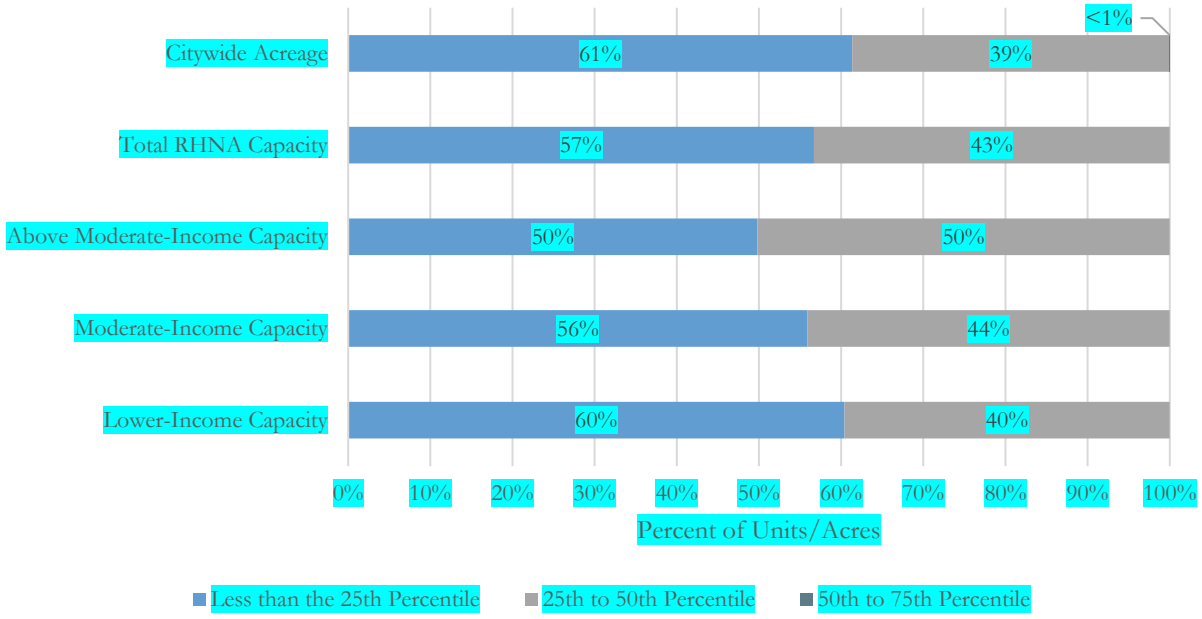
As discussed in Section 6.4.4 (Access to Opportunity), all public schools in the City of South Pasadena score in the 95th percentile or higher compared to the rest of the state. Additionally, Figures VI-15 through VI-17 demonstrate that nearly all parcels in the city are located within a mile of an elementary school and that the middle and high schools are centrally located. Given the location, access, and proficiency of schools in South Pasadena, the sites identified in this Housing Element to

meet the RHNA will provide housing opportunities for new and existing households, including lower-income households, near good schools. As school quality is often tied to housing based on both public and private investments, the identification of sites in central South Pasadena neighborhoods for mixed-income housing will facilitate this investment that is typically associated with higher income areas and single-family neighborhoods. Therefore, the sites inventory will continue to support strong school opportunities for all residents within the area schools serve. TCAC and HCD have identified all of South Pasadena as scoring in the 82nd percentile or higher, further supporting that the location of sites will not limit access to proficient schools for any socioeconomic group.

Environmental Health

Despite historic contamination of drinking water sources, all census tracts in South Pasadena score between the 9th and 34th percentiles for OEHHA's assessment of environmental pollution, likely as a result of extensive efforts to mitigate past contamination in the San Gabriel Valley. As shown in Figure VI-28, 57 percent of the unit capacity to meet the City's RHNA is located in areas that score below the 25th percentile, or the best environmental conditions. This includes 60 percent of lower-income units and 56 percent of moderate-income units. Though 43 percent of the RHNA capacity is located in areas with slightly higher scores, the generally low scores throughout the City indicate that all residents across the City will have similar access to healthy environmental conditions. The distribution of units at each affordability level will not create a discrepancy in access to positive environmental conditions.

Figure VI-28
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CALENVIROSCREEN PERCENTILE



Source: CalEnviroScreen 4.0, 2021; City of South Pasadena, 2022

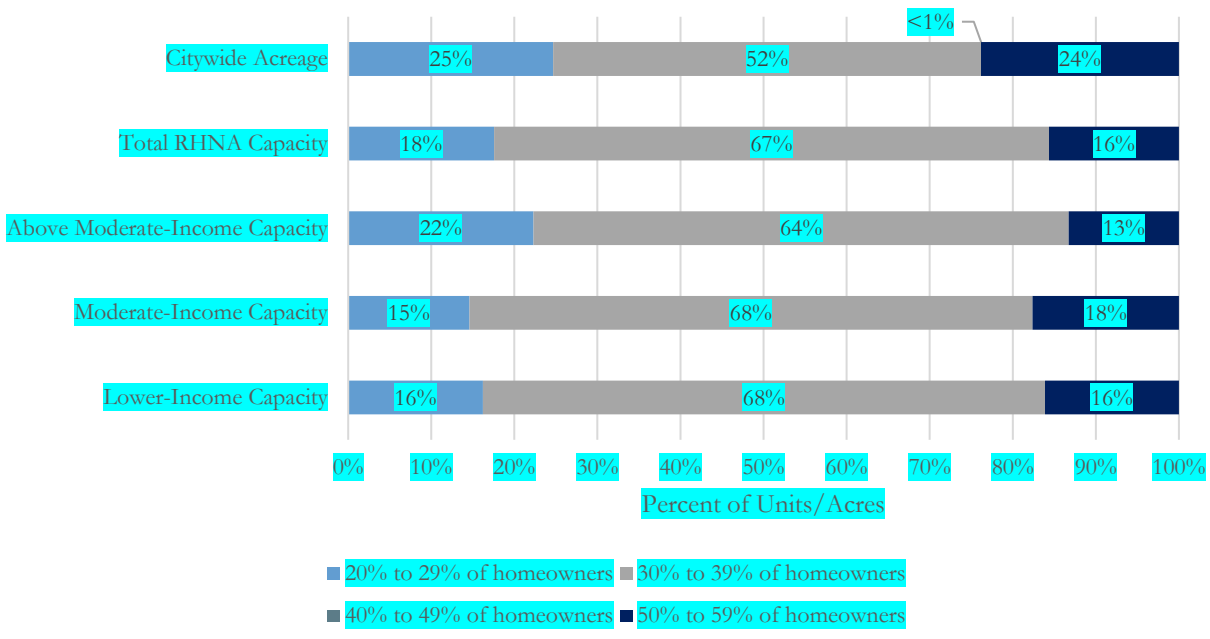
Note: There are no areas in the City of South Pasadena that score above the 34th percentile.

Potential Effects on Disproportionate Housing Need

Overpayment

While overpayment rates are lower in South Pasadena than many nearby jurisdictions, as shown in Figures VI-20 and VI-22, owners and renters throughout the city, and the greater Los Angeles area, are overpaying for housing because of rapidly increasing housing costs that outpace wage increases. With a large supply of lower- and moderate-income households in the central portions of South Pasadena with good access to schools, transit, and commercial districts, the sites inventory guides new housing toward opportunities to alleviate pressure for households to relocate to less accessible and/or less affordable areas of the City due to housing costs. As shown in Figure VI-29, the allocation of the total RHNA capacity closely reflects the patterns of overpayment among homeowners. A greater percentage of the units to meet the lower- and moderate-income RHNA have been identified on sites located in areas in which more than 30 percent of homeowners are overpaying for housing, therefore reducing displacement risk for these households by expanding the supply where there is greatest need. In contrast, there is a larger share of above moderate-income units (22 percent) in the southwestern portion of the city where overpayment is lower, likely due to the high median income. Approximately 16 percent of lower-income units have also been identified in areas of lower homeowner overpayment rates, including along Monterey Road and Pasadena Avenue, to encourage mixed-income neighborhoods and facilitate housing mobility opportunities for these households.

Figure VI-29
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF HOMEOWNER OVERPAYMENT

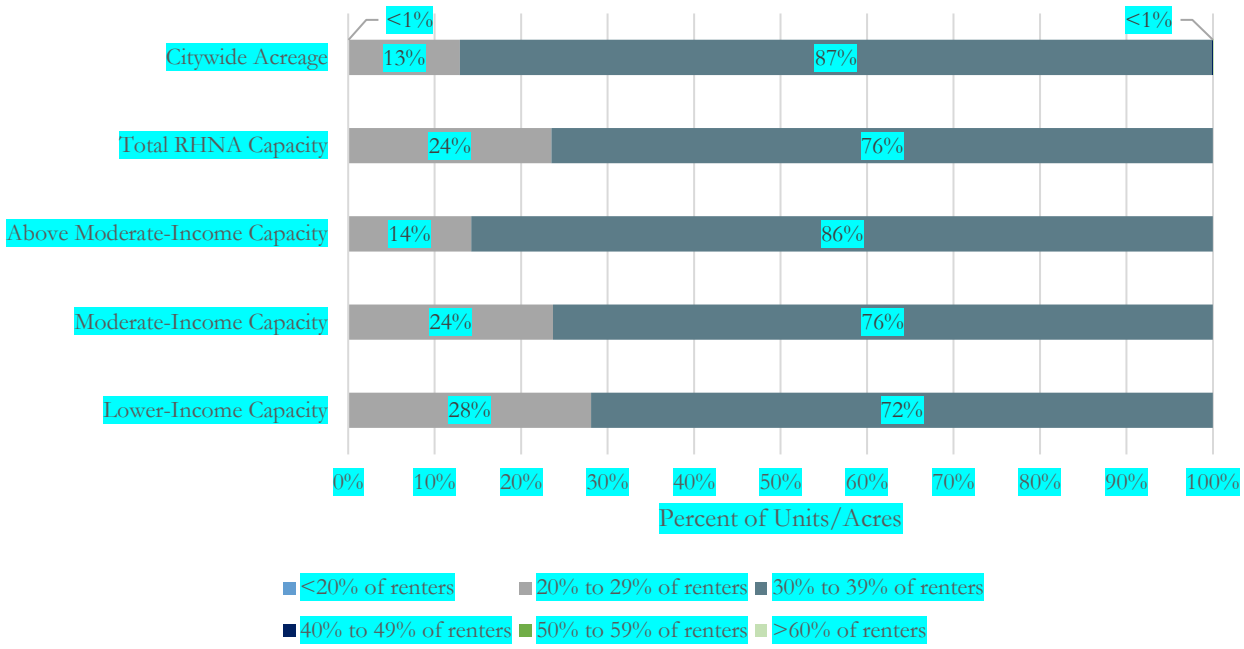


Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 59 percent of homeowners are overpaying for housing.

Renter overpayment in South Pasadena is notably lower than in surrounding jurisdictions, as seen in Figure VI-21. The rate of overpayment among renters ranges from 20 to 39 percent throughout the City (Figure VI-30). As with homeowner overpayment, the distribution of the total RHNA capacity by renter overpayment rates closely mirrors the citywide rates, with approximately 24 percent of units in areas in which 20 to 29 percent of renters are cost burdened and 76 percent in areas in which 30 to 39 percent of renters are cost burdened. Relatively low overpayment rates among renters likely reflect a barrier to entry to the South Pasadena housing market for lower- and moderate-income households, given the shortage of affordable rental housing. As such, the plan to build more rental housing specifically for these income groups will increase mobility opportunities while minimizing displacement risk due to overpayment.

Figure VI-30
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF RENTER OVERPAYMENT



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 39 percent of homeowners are overpaying for housing.

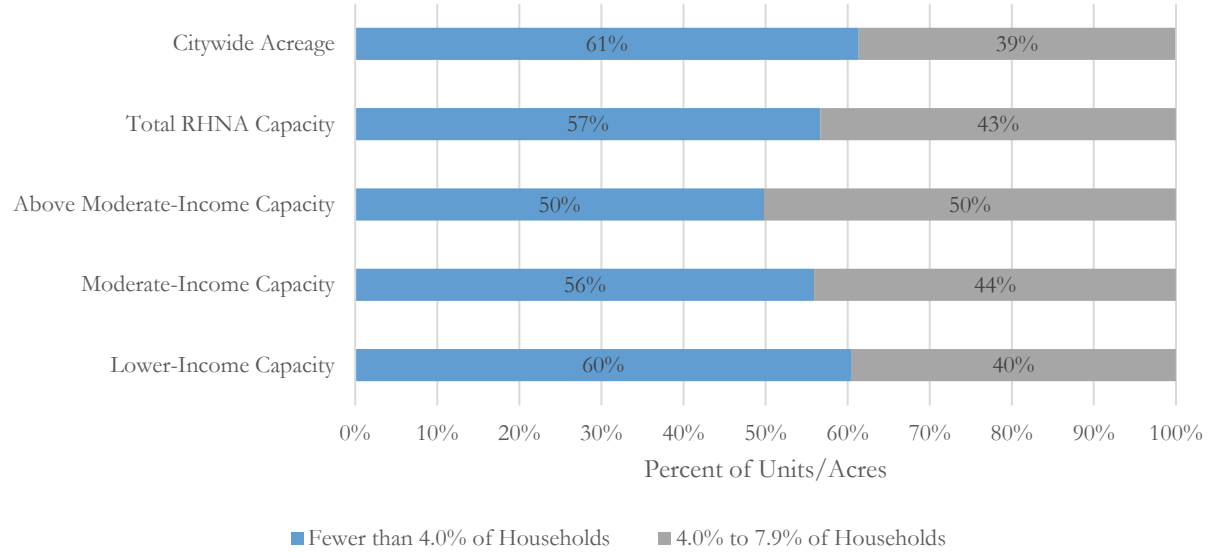
Typically, above-moderate income ownership units are unaffordable to lower- and moderate-income households in South Pasadena, although inclusionary units in ownership projects may offer those opportunities for moderate-income households in the coming years. Sites for new units have been identified across all geographic areas of the City where a range of overpayment levels exist for both owners and renters. The overall intent is to reduce risk of displacement due to overpayment for all South Pasadena residents.

Overcrowding

As discussed previously, overcrowding is not a significant problem in South Pasadena, with rates below eight percent throughout the City, as shown in Figures VI-19 and VI-20. The highest rate of overcrowding occurs in the area between Fair Oaks Avenue and the eastern edge of the Monterey Hills neighborhood, as well as in the northern areas of the City. However, even in these areas, overcrowded households account for less than eight percent of total households. This, combined with the fact that South Pasadena's housing opportunity sites are located across all City census tracts, demonstrates that patterns of planned new housing development would not serve to exacerbate existing overcrowding issues and may actually serve to reverse them.

The distribution of moderate income and above-moderate income units closely follows overcrowding patterns, with 56 percent of moderate-income unit capacity and 50 percent of above-moderate income unit capacity in areas where fewer than four percent of households are overcrowded. Approximately 60 percent of lower-income units are located in these areas, with the remaining 40 percent along Mission Street and adjacent to the Arroyo Seco Golf Course, where overcrowding is currently slightly higher. Given the low rates of overcrowding throughout the City, the identification of sites in all census tracts will help to alleviate overcrowding through increased mobility opportunities and a larger supply of lower- and moderate-income housing units in general, particularly near commercial corridors. Additionally, the construction of more above-moderate income units will expand the housing stock, offering new market-rate housing opportunities to potentially reduce displacement and overcrowding for these households as well.

Figure VI-31
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY RATE OF OVERCROWDING



Source: CHHS, 2020; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which more than 6.2 percent of households are overcrowded.

Altogether, these various considerations and analyses indicate that South Pasadena's planned housing opportunity sites would not only avoid exacerbating fair housing issues, but would actually serve to improve fair housing outcomes by: (1) avoiding concentrating new housing and affordable housing in areas characterized by economic/racial segregation; (2) placing new housing and affordable housing in areas with access to jobs, transit, and educational opportunity; and (3) allowing more housing in South Pasadena in general, thereby giving additional families access to the City's extensive high-resource areas.

6.4.9 Contributing Factors to Fair Housing Issues

The overall housing shortage in the Los Angeles region, and particularly the shortage of subsidized, affordable housing units with a range of sizes to meet the needs of all persons, is a contributing fair housing factor for South Pasadena and for all its surrounding jurisdictions. South Pasadena is part of a bigger housing market for above-moderate and for moderate and lower income households. The Housing Plan in Section 6.8 addresses South Pasadena's obligation to contribute its fair share toward addressing the regional shortage by identifying the local factors that contribute toward it.

Based on this assessment of fair housing, the priority issue that has emerged for South Pasadena is the lack of housing for lower- and moderate-income households, and the historic denial of access to the black community and others due to past-century racist practices. Addressing the continuing effects of exclusionary housing policies has been identified as the highest priority action to affirmatively further fair housing in South Pasadena.

It should also be noted that high rental rates and sales prices limit local housing options for seniors and individuals living with a disability, resulting in housing pressures for these vulnerable segments of the community. Housing for these groups is also of high importance and several strategies are identified in Section 6.8 to support them.

Prioritized contributing factors are **bolded** in Table VI-33 and associated actions to meaningfully affirmatively further fair housing related to these factors are ***bolded and italicized***.

Table VI-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Displacement/exclusion of lower-income residents and overpayment for housing by renters and homeowners	**Housing shortages in the City** **Lack of affordable and assisted housing units** Unaffordable rents and home prices Cost of rehabilitation or repair Shortage of sites that could be feasibly redeveloped **Currently limited partnerships with affordable housing developers**	Program 1.c - Housing Rehabilitation and Code Enforcement Program 2.a - Planning Assistance and Permit Processing Program 2.b - Affordable Housing Production Program 2.c - CalHome Program Program 2.d - Section 8 Rental Assistance Program 2.e - Density Bonus Program 2.f - Homeless Services ***Program 2.i Inclusionary Housing Regulations – Monitor for Effectiveness*** Program 2.k - Affordable Housing Overlay Zone Program 3.a - Rezone and Redesignate Sites to Meet RHNA Program 3.c – Replacement of Lost Units from Residential Demolitions ***Program 3.f - Allow and Facilitate ADUs*** Program 3.g - Monitor ADU Production ***Program 3.k - ADU Education, Promotion, and Homeowner Outreach*** Program 4.a - Land Use Controls – Emergency Shelters Program 4.b - Land Use Controls – Transitional and Supportive Housing ***Program 5.a - Fair Housing Education, Outreach, and Services***
Modest overcrowding in central and northern areas of the City	Availability of affordable units in a range of sizes	Program 2.n – Citywide Height Limit Ballot Initiative Program 3.b - Mixed-Use Developments and Adaptive Re-Use Program 3.d - Parcel Assemblage Program 3.f - Allow and Facilitate ADUs ***Program 5.b - Encouraging a Variety of Housing Types***
Displacement risk due to repair and rehabilitation need to maintain habitability and/or lack of accessibility for seniors and persons with disabilities	Aging housing stock **Cost of rehabilitation or repair** **Cost of retrofitting existing properties** **Shortage of accessible units** Need for higher levels of new, ADA-compliant development	Program 1.b - Housing Acquisition ***Program 1.c - Housing Rehabilitation and Code Enforcement*** Program 2.g - Senior Housing Program 3.f - Allow and Facilitate ADUs ***Program 4.d - ADA Accessibility Standards*** Program 4.e - Universal Design

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Potential housing discrimination against protected classes	**Existing racially restrictive covenants, though not enforced** **Historic discriminatory practices** Lack of education and mediation services for renters, buyers, property owners, and real estate professionals	Program 4.d - ADA Accessibility Standards ***Program 5.a - Fair Housing Education, Outreach, and Services*** ***Program 5.c - Removal of Racially Restrictive Covenants from Property Deeds Citywide***

6.5 HOUSING CONSTRAINTS

Market conditions, as well as governmental programs and regulations, affect the provision of adequate and affordable housing. Housing Element law requires an assessment of potential and actual governmental and non-governmental constraints affecting the development of new housing and the maintenance of existing units for all income levels. Potential market, governmental, and environmental constraints that contribute to housing development costs in South Pasadena are addressed herein.

6.5.1 Market Constraints

Construction Costs

Construction costs can constitute a constraint to affordable housing in the City that is largely outside of the City's control. Labor and materials costs have a direct impact as they comprise the main component of housing costs. If labor or material costs increase substantially, the cost of construction in the City could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and rehabilitation of existing housing.

The cost of construction is influenced by market demand and market-based changes in the cost of materials, which may also be affected by Building Code requirements. The cost of construction depends on the type of unit being built and on the quality of the product being produced. Labor-saving materials and construction techniques are available but they tend to reduce the quality of the finished product. The type of product largely determines the cost of construction. The cost of labor is based on a number of factors, including housing demand, competition for other construction projects, the number of contractors in an area, and whether construction workers are being paid based on union scales. Estimates of construction costs in the Los Angeles region from an online source (Building-Cost.net), published by the Craftsman Book Company, indicate that a typical 2,000-square-foot, wood-frame, single-family residence costs approximately $284,203 total (or approximately $142 per square foot) for labor and materials, not inclusive of land.[20] It is likely that construction costs in the City of South Pasadena would exceed this figure based on the high quality of design standards required by the community. In March 2020, the City estimated that the typical cost of construction for multifamily housing was $112.76 per square foot[21], although this figure is likely to have increased in the past 18 months. Reducing amenities and the quality of building materials, while maintaining the minimum requirements for health, safety, and performance, would reduce costs but would bring the developer a lower sales price.

The constraint of construction costs can be mitigated to some extent through economies of scale, reducing the overall cost per unit when a project contains a higher number of units. Components of the housing plan that increase unit density and facilitate state density bonuses in conjunction with the provision of affordable housing directly address the market-based constraint of housing cost.

[20] This estimate includes a two-car garage and forced air heating.
[21] M. Lin, personal communication, March 31, 2020.

Another component of construction cost is the cost associated with infrastructure improvements to serve the new development. New residential development projects are required to provide on-site water and sewer lateral connections to existing City mains and to construct new storm drain improvements, including National Pollutant Discharge Elimination System (NPDES) required components, and are factored into the usual cost of construction. In ~~addition~~addition, the City's Low Impact Development ordinance required by the regional water quality control board requires all developments of one acre or more to provide for subterranean drainage of stormwater, which is more expensive than connection to a storm drain.

Existing City services, including water, sewer, and storm drain facilities, are available to serve new housing development. The Program Environmental Impact Report being prepared for the Housing Element and the rest of the General Plan Update will further analyze the sufficiency of City services to address all of the units planned for in the Housing Element. Dry utilities (electrical and internet service) are also available to serve all the sites in the inventory.

In January 2015, the City Council adopted new development impact fees for new water and sewer connections for new developments. Previously, the common practice was for the cost of new connections to be absorbed by the service charges paid by existing South Pasadena utility customers, but changes in state law no longer allow this former practice to be conducted. Chapter 16B of the City's Municipal Code provides the legal basis for the imposition of development impact fees on development, describes which developments are exempt from the fee, and details how the fee should be calculated. When the Council adopted the connection fees in 2015, the cost for a new equivalent meter size of 5/8 by 3/4 inches—the most common household water connection—was $7,916. New sewer connection fees cost $2,094 per dwelling unit. California Government Code Section 66000 et seq. allows local jurisdictions, like South Pasadena, to charge water connection fees and South Pasadena's fees are similar to surrounding jurisdictions, like Pasadena to the north. These connection fees do not place a constraint on new housing development in South Pasadena.

Some of the vacant single-family parcels on the inventory are located in hillside areas, where an additional construction cost is incurred for required grading in association with stepping of the pad and providing retaining walls. There are a few hillside properties that may be appropriate for multifamily housing and the need to provide for multi-stepped pads on those sites could constitute a constraint.

Land Costs

The price of land is a key component of the total housing cost, and land prices in South Pasadena are high, and continue to increase. According to a survey of vacant residential land sales on Zillow in September 2021, vacant land costs range from $34-$118 per square foot in the City, depending on location, development capacity of the land, and whether planning approval has been approved for the project. This is not substantially changed as compared with $40-$100 per square foot documented in the 2013-2021 Housing Element. Over the past housing element period, most of the new housing units have been single-family homes and ADUs, with a few smaller multi-family projects completed. Many of these new homes were built in vacant, hillside areas, or replaced existing structures. The policies of this housing element focus on different land resources throughout the city, with an expectation of replacing non-residential uses with multi-family or mixed-use residential development. This will undoubtedly have an effect on land prices as the market adjusts to the changes in opportunity for land in different parts of the city.

Mortgage Financing

National policies and economic conditions determine interest rates, and there is little that local governments can do to affect these rates. First-time homebuyers ~~is~~are the group impacted the most by financing requirements. As of December 2020, interest rates for mortgages in South Pasadena generally ranged from 2 percent for a fixed-rate 15-year loan to 2.7 percent for a 7/6-month adjustable-rate mortgage. With interest rates remaining low for an extended period, sales prices have steadily increased, which, along with changes in lending practices in the last 10 years, has created a constraint to housing for some potential purchasers. Another more critical impediment to homeownership is the ability of potential buyers to fulfill down payment requirements, and the ability of buyers to receive a favorable credit rating. A conventional home loan typically requires 20 percent of the sale price as a down payment, which is the largest constraint to first-time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment required and a potential homeowner's available funds. The availability of financing for developers under current economic conditions also poses a constraint on development that is outside of the City's control. Historically, jurisdictions could offer interest rate write-downs to extend home purchasing opportunities to a broader economic segment of the population through the use of state and federal financing programs, when available.

6.5.2 Governmental Constraints

Housing affordability is also affected by the actions and policies through which the City and State can have an impact on the production of housing. Land use controls, site improvement requirements, California building codes, fees, and other local programs intended to improve the overall quality of housing may serve as constraints to the development of affordable housing.

General Plan Land Use Element and the Mission Street Specific Plan

The South Pasadena General Plan Land Use Element sets forth the City's policies for guiding local development by establishing the amount and distribution of land to be allocated for different uses within the City. The current (1998) General Plan Land Use Element acts as a constraint on housing production through limitations that preclude mixed-use and higher density multi-family housing. The comprehensive revision of the General Plan and preparation of a new Downtown Specific Plan that will replace the Mission Street Specific Plan will play a major role in addressing this constraint. The draft General Plan presents a community vision for South Pasadena through 2040 that aligns with the programs in this housing element. Adoption is anticipated at the same time as Housing Element adoption.

South Pasadena's current General Plan residential land use densities are shown in Table VI-34.

Table VI-34
GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES

RESIDENTIAL LAND USE DESIGNATIONS	DENSITY (DWELLING UNITS PER ACRE)
Estate & Very Low-Density Residential	1 – 3.5
Low-Density Residential	3.5 – 6
Medium-Density Residential	6 – 14
High-Density Residential	14 – 24
Altos De Monterey (Overlay Zone)	1 unit per lot

Source: Land Use & Community Design Chapter, *South Pasadena General Plan*, October 1998

The new plans anticipated to be adopted in 2022 will allow a range of densities, including mixed-use zoning with 30-70 dwelling units per acre.

Residential Zoning Regulations

Residential site development standards are summarized by zoning district in Table VI-35. The City maintains the current Zoning Code with zoning and development standards on the City website.

Table VI-35
RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Minimum lot size	***Minimum area and width for new parcels.***				
Area	12,500 sf	10,000 sf	10,000 sf	10,000 sf	As shown on Final Tract Map 25588, except for mergers and lot line adjustments, provided that such actions shall not cause any significant gain or loss in the area of the tract. The subdivision of any existing lot is prohibited.
Width	75 ft; 85 ft for a corner lot	50 ft; 60 ft for a corner lot		60 ft; 80 ft for a corner lot	Regular lots: 30 ft. Flag lot "pole": frontage width may be 25 feet for parcels 306 and 307 to accommodate a 10-foot wide path parallel to the flag lot stem.
Residential density	***Maximum number of dwelling units allowed in a project. The actual number of units allowed will be determined by the City through subdivision or land use permit approval, as applicable.***				
Allowable density	1 - 3.5 du/acre	3.51 - 6 du/acre	6.1 - 14 du/acre	14.1- 24 du/acre	1 du/lot
Minimum density allowed	Each legal parcel in a residential zoning district will be allowed one single-family dwelling regardless of lot area; parcels in zoning districts that allow single-family and multifamily residential districts may also be allowed an accessory dwelling unit in compliance with Section 36.350.200 (Residential Uses - Accessory Dwelling Units).				
Minimum lot area/ multifamily unit	N.A.		3,200 - 7,300 sf	1,900 - 3,200 sf	N.A.
Setbacks	***Minimum and, where noted, maximum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.***				
Front	25% of lot depth, with a minimum of 25 ft, and a maximum requirement of 35 ft		20 ft	20 ft; 85 ft from street centerline on Huntington Drive	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Front exception	If 60 percent or more of the lots on the same block face have structures with front setbacks different from the above, the required front setback shall be the average of the existing front setbacks, provided that no more than 45 feet shall be required in the RE district, and 35 ft shall be required elsewhere.				N.A
Sides, each	10% of lot width	10% of lot width, 4 ft minimum		10 ft	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Side, street side	20% of lot width, to a maximum requirement of 15 ft			15 ft	
Rear	25 ft		20 ft	15 ft, or 5 ft if abuts an alley.	25 ft
Garage	An attached garage shall be set back a minimum of 10 ft from the front of the main structure				N.A.

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Accessory structures	As required for primary structures, except that: A structure of 120 sf or less may be placed within a required side or rear setback, but not a front setback or in front of the frontmost dwelling unit on the lot; • A detached garage or carport or other accessory residential structure shall be located at least 5 ft from a side and/or rear property line, except if the required side yard setback for the dwelling/s is less than 5 ft, in which case the lesser side yard setback may be used for a detached garage or carport only. Such structures cannot be located in the front setback or in front of the frontmost dwelling unit on the lot; • Accessory structures shall be located at or beyond the required street-facing side yard setback for the dwelling/s, except if the Director determines that a lesser setback can be approved using the Administrative Use Permit process detailed in Section 36.350.170(C)(3)(e); • Private residential recreational facilities shall be located at least 5 ft from a side and/or rear property line and cannot be located in the front setback, or in front of the frontmost dwelling unit on the lot or in the street-facing side setback of a corner lot.				N.A.
Building separation	10 ft between structures on the same site.				
Lot coverage	***Maximum percentage of total lot area that may be covered by structures.***				
	40%		50%	60%	40%
Floor area ratio	***Maximum allowable ratio of building floor area to lot area. See Article 7 (Glossary) for a definition and illustration.***				
Requirement	0.35		0.50	Single-family dwellings - 0.40 Multifamily projects - 0.50	0.35 for main building area for multi-floor structures, maximum
Exception	Each dwelling unit may have an attached or detached garage or carport of up to 500 sf in addition to the above-listed FAR. Any square footage in excess of 500 sf is included in the FAR calculation.				N.A.
Height limit	***Maximum allowable height of structures in other than hillside areas (see Division 36.340 (Hillside Protection) for height limits in hillside areas). See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements. See also Section 36.350.170 (Residential Uses—Accessory Residential Structures).***				***Maximum height of structures, measured from a point 6 inches above the high point of the existing grade line at the existing, previously set front yard setback line to the highest point of the roof or parapet wall.***
Maximum Height	35 ft			45 ft	Primary Structure: 25 ft Detached Accessory Structure: 15 ft

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Multiple story exception	No portion of a structure shall encroach through a 45 degree angle projected perpendicularly from the front property line toward the rear property line. See Figure 2-1, page 14. Building height in addition to the above limits may be authorized by the DRB through Design Review (Section 36.410.040) to accommodate dormer windows and/or non-habitable roof structures where appropriate to the architectural style of the dwelling.				N.A.
Open Space	N.A.		As required by Section 36.350.190 (Multifamily Project Standards) and listed below this table		N.A.
Landscaping	As required by Division 36.330 (Landscaping Standards)				As required by Division 36.330 (Landscaping Standards). No impervious surface shall be allowed in a required front or street side setback area, except for a driveway or approved drainage structure. All trees shall comply with the requirements of Ordinance No. 1991.
Parking	As required by Division 36.310 (Parking and Loading) **(see detailed discussion on residential parking requirements below)**				• Dwellings require 3 off-street spaces (2 in a garage or carport), that are a minimum of 10 ft wide by 20 ft long, and entirely located to the rear of the front setback line. • No vehicle, trailer, boat, or component thereof shall be stored on any parking space or driveway, or access thereto, except in a garage or carport, or behind a solid wall or fence that screens the stored object from public view.
Signs	As required by Division 36.320 (Signs)				No more than one commercial sign with a maximum area of 6 square feet shall be displayed on any lot; non-commercial signs are not subject to this limitation.

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021

Note: This table has not yet incorporated any changes that may be required based on the adoption of Senate Bill 9.

Multi-Family Open Space Requirements

The following are the open space requirements for multi-family projects excerpted from SPMC Section 36.350.190.C.

"All multi-family residential projects except duplexes shall provide permanently maintained outdoor open space for each dwelling unit (private space), and for all residents (common space).

1. Area required. Private open space shall be provided at a ratio of 200 square feet per dwelling unit. Common open space shall be provided based on the size of the project, as follows in Table VI-36.

Table VI-36
MULTI-FAMILY COMMON OPEN SPACE

PROJECT SIZE	COMMON OPEN SPACE REQUIRED	PRIVATE OPEN SPACE REQUIRED
3 to 4 units	200 sf	200 sf per unit
5 to 10 units	500 sf	
11 to 30 units	1,000 sf	
31 and more units	2,000 sf	

1. Configuration of open space.
    a. Location on site. Required open space areas:
        i. Shall be located adjacent to the primary entrance;
        ii. Shall be provided as continuous, usable site elements, which shall not include setback areas but may be contiguous to required setbacks; and
        iii. Private open space shall be at the same level as, and immediately accessible from, a kitchen, dining room, family room, master bedroom, or living room within the unit. Variations from these dimensional and locational standards may be allowed where it can be shown that the required private open space meets the intent and purpose of this Section. Provision of private open space shall not reduce the common open space requirements of this Section.
    b. Dimensions. All open space areas shall be of sufficient size to be usable by residents.
        i. Private open space areas shall have a minimum dimension of eight feet on any side, and a configuration that would accommodate a rectangle of at least 100 square feet.
        ii. Common open space areas shall have a minimum dimension of 20 feet on any side.
    c. Elevation. A minimum of 60 percent of the required common open space shall be located at grade or the level of the first habitable floor.

d. Uncovered areas required. At least 33 percent of the perimeter of the private open space of each unit, or 100 percent of the roof of the open space of each unit, shall be open to the outdoors. Reference to this requirement shall be included in the Covenants, Conditions, and Restrictions of any common interest development.

2. Allowed uses. Required common open space:

   a. Shall be available for passive and active outdoor recreational purposes for the enjoyment of all residents of each multi-family project; and

   b. Shall not include driveways, setbacks, public or private streets, or utility easements where the ground surface cannot be used appropriately for open space, parking spaces, or other areas primarily designed for other operational functions.

3. Maintenance and control of common open space. Required common open space shall be controlled and permanently maintained by the owner of the property or by a homeowners' association. Provisions for control and maintenance shall be included in any property covenants of common interest developments.

4. Surfacing. Open space areas shall be surfaced with any practical combination of lawn, paving, decking, concrete, or other serviceable material.

5. Landscaping. The applicant shall submit a landscape plan for approval. Landscape design, installation, and maintenance shall comply with Division 36.330 (Landscaping Standards).

6. Slope. Required open space areas shall not exceed a slope of 10 percent."

The City will evaluate the SPMC Section 36.350.190.C standards as part of the zoning work called for in Program 3.a in Chapter 6.8 of this Housing Element and revise as needed to assure feasibility of projects at proposed densities on the sites in Table VI-50.

Residential Parking Requirements

The City's parking requirements are based on unit type and size and are shown in Table VI-37. Program 3.f updates the City's ADU ordinance, including parking requirements, to comply with current California law (already adopted in May 2021). The inclusionary housing ordinance (SPMC Chapter 36.350) also includes a streamlined process to waive parking requirements in conjunction with providing affordable housing units and utilizing the state density bonus.

Although subterranean parking is not required for residential developments, to achieve maximum densities and provide required parking, it is sometimes the only viable option. The visual simulation modeling conducted on selected sites in the proposed Housing Element inventory assumed underground garage parking in order to achieve multifamily projects under the highest densities allowed. Reduced parking is already offered as an incentive in the Code's provisions for inclusionary housing. As part of the review of zoning standards and revisions to zoning standards called for in Program 3.a in Chapter 6.8, the City will adopt parking requirements that facilitate the proposed maximum residential densities, for the sites listed in Table VI-50.

Table VI-37
RESIDENTIAL PARKING REQUIREMENTS

Duplex	4 spaces within a garage or carport, plus 1 guest space.
Live/work unit	2 spaces for each 1,000 sf of combined floor area.
Mixed-use development	As required for each individual land use.
Multifamily dwelling, condominiums, and other attached dwellings	1 bedroom unit—1 space; 2 bedrooms and/or greater—2 spaces within a garage or carport for each unit, plus 1 guest space per each 2 units. (1)
Organizational house	1 space for each bed.
Single-family housing	2 covered spaces
Accessory dwelling unit	1 space, covered or uncovered, unless within one-half mile of a transit stop (exempt from requirement)-.
Senior citizen residential Assisted living and group homes Independent Living	0.5 space for each residential unit, plus 1 space for each 4 units for guests and employees. 1 covered space for each unit, plus 1 uncovered guest parking space for each 10 units

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021

Cumulative Impacts of Development Standards

The City of South Pasadena current General Plan and Zoning Ordinance provide for a wide range of residential land use designations/zoning districts in the City, as illustrated in Table VI-35.- Under the land use controls single-family neighborhoods were the predominant type of development, with very limited amounts of high-density housing built. The cumulative impact of the land use controls in place during the buildout of what is now the City of South Pasadena is a limited variety of housing types to meet a range of incomes. The City has reviewed the cumulative impact of the land use controls on recent developments and recognized that development will benefit from the adoption of the new General Plan and the Downtown Specific Plan. The cumulative impact of the land use controls in the downtown, and mixed-use zone are potentially constraining for residential development as well has height requirement and the City's Inclusionary Ordinance. Therefore, per Program 2.j General Plan Affordable Housing Overlay, Program 2.m, Inclusionary Housing Ordinance revisions, Program 2.n, the Ballot Initiative to increase heights and the Program 3.b, Mixed-Use zoning the City will evaluate all these development standards including but not limited to open space requirements, lot coverage, and heights, as well as permit requirements for multifamily developments to ensure that development will occur throughout the planning period. The City is committed to amending development standards to ensure these requirements are not so restrictive that they constrain residential development.

Zoning Standards: Flexibility for Projects with On-site Affordable Housing

Compliance with all of the City's Zoning Code regulations, such as maximum height regulations, lot coverage, and/or floor area ratio restrictions, and parking standards could potentially present difficulties for the development of affordable multifamily housing. The South Pasadena Zoning Ordinance now includes two processes that offer waivers from strict application of the standards for projects that include affordable housing. These are:

- SPMC 36.375.080, Streamlined State Density Bonus Review. These provisions adopted with the inclusionary housing ordinance provide projects with on-site affordable housing the opportunity to incorporate strong architectural design and in return receive automatic approval of certain waivers including a height bonus, height averaging, parking reductions and flexibility in the unit size of the project's affordable units. The approach is standards-based to reduce discretionary approval, and is not a separate permit (no additional permit fee required).
- SPMC 36.410.100, Planned Development Permit. The planned development permit process allows the approving body to modify any development standard, such as the number of required parking spaces and maximum floor area ratio, to provide a quality design and facilitate the development of affordable housing.

With the ability to modify standards that can act as constraints to construction of housing, and by offering these waivers through a ministerial process for projects with affordable housing or through a process that is processed together with other required discretionary permits, the City's development standards and parking requirements would not impede residential development.

Hillside Development: The City's Zoning Code includes provisions for hillside protection applicable to lots with an average slope of 20 percent or greater. The sites included in Table VI-44 that are on slopes are all on slopes less than 20 percent and are developable in accordance with the City's hillside ordinance. The City views its hillsides as a valuable resource to the community, and therefore, the hillside protection provisions of the Zoning Code are intended to ensure safe and minimally damaging development of lots located on the City's hillsides through the application of strict development standards. Issuance of building or grading permits for the construction of any structure on any hillside lot requires approval by the Planning Commission of a hillside development permit for the project.

Development of the hillside area is costly due to the cost of grading, geotechnical engineering issues, the nature of the construction required, the public services that must be provided to these areas, and in some cases, substandard conditions of existing infrastructure available to serve the site. Some of these higher costs are attributable to provision of water for both consumption and fire prevention and compliance with strict construction standards. In addition, public and private access to hillside sites is expensive to construct and maintain. Despite the constraints associated with hillside development, the City continues to receive applications for homes on sloped lots. Seven recently approved and constructed projects have included homes on slopes between 22 and 54 percent. Details about the projects are provided in the table below:

PROJECT	LOT SIZE (SQ/FT)	SLOPE (%)	APPROVAL DATE
226 Warwick	4,465	35.7	December 2019
228 Warwick	4,352	37.8	December 2019
804 Valley View	7,500	38.0	October 2020
807 Rollin	9,970	22.1	January 2021
1502 Indiana	7,170	38.0	November 2021
1818 Peterson Ave.	3,740	54.0	October 2021

Building Codes and Enforcement

In addition to land use controls, California building codes also affect the cost of housing. The City has adopted and enforces the 2019 California Building Code and has made no local amendments. Program 1.c calls for the City to continue its complaint-based code enforcement program and to address identified sub-standard housing conditions surveyed in 2022. In addition, in the City's 2021-2026 Strategic Plan adopted in December 2021, an action was included to develop and present an Occupancy Inspection Program and Policy to the City Council. That work has been included in the Fiscal Year 2022-2023 workplan.

Development and Planning Fees

The City collects various fees from applicants to cover the costs of processing permits and providing necessary services and infrastructure. Table VI-38 describes South Pasadena's 2022 planning fee schedule. The City fee schedule is available on the City website.

Table VI-38
2022 PLANNING FEE AND IMPACT FEE SCHEDULE

PLANNING APPLICATION	FEE
Variance	$3,701.00 (first); $2,611.00 (each additional)
Conditional Use Permit; with first variance	$3,925.00; $5,048.00
Administrative Use Permit	$1,745.00
Temporary Use Permit (non-profit)	$258.00
Temporary Use Permit	$517.00
Tentative Parcel Map	$4,164.00
Tentative Tract Map	$11,291.00
Lot Line Adjustment/Parcel Merger/Certificate of Compliance	$ 2,244.00
Hillside Development Review; with variance	$2,224.00; $3,365.00
General Plan Amendment	$22,433.00
Vacation-Easements, Alley's, Streets	$1,978.00
Zone Clearance	$70.00
Cultural Heritage Commission-Landmark Review	$1,683.00
Cultural Heritage Certificate of Appropriateness for Additions/ Alterations	$1,683.00 (single-family); $3,365.00 to $10,095.00 (multifamily (3-8 to 100+ units))
Categorical Exemption	$158.00
Initial Study	$5,608.00

PLANNING APPLICATION	FEE
Environmental Impact Report	$28,041.00
Negative Declaration	$317.00
Mitigation Monitoring Inspection & Administrative Fee	Actual Cost
Zoning Text & Map Amendments	$11,216.00
Specific Plan Application	$11,216.00
Specific Plan Amendment	$22,433.00
Development Agreement Review	$11,216.00
Planned Development	$11,216.00
Technology Surcharge (Percentage Applied to Fire, Building, Engineering, and Planning Permits)	10%
General Plan Maintenance Fee (Percentage of Building Permit Feet)	15%
DEVELOPMENT IMPACT FEES	
Residential	$1.64 per sq. ft.
Park Impact Fee -- Residential	$7.65 per sq. ft.
Park Impact Fee – Residential Remodel	$7.65 per sq. ft. > 250 sq. ft.
Park Impact Fee – Senior Housing	$2.95 per sq. ft.
Public Art Development Fee – on-site	1% of total building valuation
Public Art Development Fee – in-lieu	1.5% of total building valuation
School Fees	$4.08 per sq. ft.
Water Connection	$7,916.00 per unit
Sewer Connection	$2,094.00 per unit
Los Angeles County Sanitation District	$3,980.00

Source: City of South Pasadena July 2021 Master Fee Schedule, SPUSD 2019-2020 Statutory School Fees, South Pasadena Building Division Estimated Fees for Residential Development, South Pasadena Public Works Department.

South Pasadena's development fee schedule is tied to the cost of providing necessary services. City fees may be waived as part of the incentive package for affordable housing or ADUs.

As discussed in the section above on construction costs, developers are required to pay development impact fees for City maintenance and improvement of the city's aging infrastructure of streets, sewers, storm drains, and water lines.

Typical Residential Project Fee Estimate

Table VI-39 includes an estimate for the development costs of single-family and multifamily housing scenarios in South Pasadena. The estimated totals assume one 1,200-square-foot single-family home or an 86-unit multifamily complex. To develop the single-family home, it would cost approximately $32,293 in fees. To develop an 86-unit multifamily complex consisting of 87,328 square feet of general living area, it would cost approximately $714,000 total in fees ($8,302 for each unit). In terms of total cost (i.e., fees, construction, and land costs), it would cost $330,495 per single-family unit and $548,449 per multifamily unit. The proportion of the fees to the total development cost of the multifamily scenario is less than 2 percent and would make up approximately 10 percent of the total development cost for the single-family scenario.

Table VI-39
ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING*

DEVELOPMENT COST FOR A TYPICAL UNIT	SINGLE-FAMILY (1,200-SQUARE-FOOT HOME)	MULTIFAMILY (86-UNIT COMPLEX)
Total Estimated Fees Per Unit	$32,293.70	$8,302.33
Estimated Development Cost Per Unit	$330,495.50	$548,449.45
Estimated Proportion of Fee Cost to Overall Development Cost Per Unit	10%	1.51%

* Fees estimated at time of housing element preparation; should be considered approximate and will vary by project.

Regulations Impacting Housing Supply

The City's 2021 inclusionary housing regulations will have a meaningful impact on the supply of affordable housing. They are discussed in detail in Section 6.6.1 of this Housing Element under Zoning Provisions to Encourage Affordable Housing. Impacts of the inclusionary housing requirements on development costs and affordable housing are included in that section. Additionally, the 2021 ADU ordinance amendments, including the Phase II regulations for historic properties, are expected to continue to increase ADU development. ADUs are prohibited for use as short-term rentals in order to keep them in the housing stock for year-round residential use. The City does not regulate short-term rentals in other ways. There are no other recent ordinances in the City that affect the cost and supply of housing. The other city regulation that impacts housing supply is the citywide height limit, discussed in more detail below.

City Height Limit Initiative

On July 12, 1983, the voters in South Pasadena approved a citywide height limit of 45 feet in a special municipal election (see Section 36.300.040 of the SPMC). The 1983 height limit (and parking variance restriction) reflected a backlash to a project ("Twin Towers") that would have created 10- and 12-story high-end office towers on the property at Fair Oaks and Magnolia. Protestors had also delayed a 9-story project at Fair Oaks/Grevelia next to the freeway, which was subsequently dropped. The Council favored the project, which would have provided significant tax revenues for the City. The initiative's backers focused on how this high-rise would change the City's small-town character. Opponents of the initiative focused on how a blanket 45 foot height citywide was too sweeping and would have unanticipated consequences, including scaring away anyone interested in investing in South Pasadena to create economic development activity.

The early 1980s was a time of recession and the State was cutting back on services. The City's finances were in bad shape. It seems that the mini-malls that lined the street were seen as eyesores and some were vacant, and the Council favored their replacement with higher quality development. Projects were being approved in compliance with the Zoning Code. Developer interest went away after the initiative. There is now a Bristol Farms on the Twin Towers site surrounded by a surface parking lot and some other, smaller retail buildings. The arguments in the paper at the time did not include any that related to residential/fair housing concerns.

This ballot initiative can only be amended or rescinded through another vote of the electorate. However, some projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, may request and receive a height increase beyond the ballot initiative limit, in order to comply with State law, which takes precedence.

The citywide height limit could act as a constraint on housing development. Sites proposed to receive the Affordable Housing Overlay to increase the options for density with affordable housing projects are discussed in Section 6.6.2 under Sites to Address the Lower Income RHNA. The other sites proposed for density increases are currently zoned Business Park (BP), Commercial General (CG), Residential Medium Density (RM) or are in the Mission Street Specific Plan (MSSP) district. All of these zoning districts currently have a maximum height of 35 feet (See Tables VI-35 and VI-42).

This section discusses the research that the City conducted to ensure that proposed density increases for sites to accommodate the lower-income RHNA (Section 6.6.2) are feasible in light of this constraint. The analysis accounted for existing height limits as well as increases proposed in the DTSP or through other zoning changes.

As part of the early outreach for the Housing Element Update, surveys and meetings were conducted to gauge public interest in a potential ballot initiative to increase the maximum allowed height in the city above 45 feet either citywide or in certain areas. The process to place an initiative on the ballot takes months of lead time so this was a priority for the early outreach as a positive result would have required placing the measure on the November 2020 ballot in order to maintain the housing element project timeline. Discussions with the Planning Commission in July 2020 and public testimony did not indicate support for pursuing a ballot measure. Rather, it was considered to be a better direction to research the potential for development within current limitations.

Following that decision, the analysis of increased densities for certain sites being considered for the Housing Element sites inventory focused on densities that could be accommodated within the existing 45 foot height limit. All types of multifamily or mixed use development on sites in the draft Downtown Specific Plan (DTSP) Area are proposed to allow 3 stories or 35 feet in height. In addition, the draft DTSP contains a height bonus for projects that include at least 20 percent deed-restricted affordable units of up to 45 feet, consistent with the inclusionary housing ordinance. For sites in Table VI-50 currently designated BP, CG and RM, outside of the proposed DTSP, development standards are proposed to be amended to increase the maximum height to 45 feet.

The project team undertook detailed analysis of higher density precedent projects, visual simulations of potential housing sites in South Pasadena, and mathematical analysis to determine feasible densities within the existing citywide height limit. Presentations about this analysis were made at multiple public hearings and workshops during the second half of 2020. The review of precedent projects in South Pasadena and throughout the region was one of the first steps in the analysis, reviewing more than 40 projects in the 2 to 3-story range, another 40 projects in the 4-story range, and dozens of others that were 5-stories or taller. The average density on the 2 to 3-story projects was 39 units per acre. The average density on the 4-story projects was 72 units per acre.

The City also analyzed the impact of the 45 foot height limitation on unit sizes and examined the development standards (besides height) that would be needed to achieve high quality design while achieving densities of 70 or 80 units to the acre. Two actual projects, one in Santa Monica (100%

affordable) and one in Hercules (market rate) in northern California were modeled for this analysis (see Figure VI-32). Both projects include a range of bedroom types. The Hercules project that was built at 76 units per acre average had an average unit size of 825 square feet. At 80 units per acre, the Santa Monica project had a smaller average unit size (732 square feet) although it included units with up to three bedrooms. Both projects achieved a level of design that avoided boxy massing that would not be compatible with South Pasadena's urban form. The analysis confirms that the densities and heights proposed in the sites inventory, to be implemented through rezoning, are reasonable and feasible.

Figure VI-32
HIGHER DENSITY PRECENT PROJECTS WITHIN 45 FOOT-BUILDINGS

Source: PlaceWorks, 2020

Visual simulation analyses were performed on representative inventory sites including the vacant site in Ostrich Farm (Site 1), the Tyco site in Ostrich Farm (Site 4), and Meridian site (Site 10), Site numbers in parentheses correspond to the numbering in Appendix A and Table VI-50. The analysis included modeling multiple densities and heights on each site. It also included identifying precedent projects from the list mentioned earlier in this section that could be suitable for the site in terms of design, scale and massing. These sites occur in different areas of the city and have different contexts so were chosen to represent what could happen on the whole range of sites chosen to receive higher densities. All of the representative sites analyzed are proposed to receive a maximum allowed density of 70 units per acre which is the highest base density proposed for sites in the Housing Element and in the city overall in the proposed General Plan Update. Some of the other sites with proposed density increases have lower proposed maximum densities so could also feasibly develop within the 45 foot height limit based on the analysis of higher density projects.

Based on the analysis and information previously discussed, that there are project examples in which the 45-foot height limit does not preclude the ability to build with densities of up to 70 units per acre. However, the South Pasadena community has need for a variety of unit sizes and values quality design. Therefore, Program 2.n is included in this housing element, requiring the City to place an initiative on a ballot by 2024 to ask the voters to increase the height limit for projects containing residential units in some areas of the City after conducting additional community outreach.

It should be noted that current development standards are not currently seen as a constraint to development. In anticipation for adoption of the General Plan reaching maximum densities could be considered a constraint. Implementation of Program 2.n will ensure the city is able to continue to allow for a variety of housing types.

Local Review and Permit Procedures

The Zoning Code stipulates the residential types permitted, permitted with an administrative use permit, conditionally permitted, or prohibited in each residential zone. Permitted uses are those uses allowed without discretionary review.

Typically, developers in South Pasadena build the maximum number of units allowed in the relevant zoning district. Until now, typical built density for RS sites has been one unit per buildable lot, but the development potential has recently changed with the enactment of SB 9. In zones that allow higher densities, parcels usually develop to the density allowed in that zone. It is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local codes.

Table VI-40 describes the allowable uses in each residential zone.

Table VI-40
ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS

ALLOWED USES AND PERMIT REQUIREMENTS FOR ZONING DISTRICTS THAT ALLOW RESIDENTIAL DEVELOPMENT	P - Permitted Use CUP – Conditional-Use Permit Required AUP – Administrative-Use Permit Required, Use not allowed.											
LAND USE (1)	**CF**	**OS**	**AM**	**MSSP**	**CO**	**CG**	**BP**	**RE**	**RS**	**RM**	**RH**	**SPECIFIC REGULATIONS**
Accessory dwelling unit	--	--	CUP	--	--	--		P	P	P	—	36.350.200
Accessory residential uses and structures	--	--	--	--	--	--		P(3)	P(3)	P(3)	P(3)	36.350.170
Bed & breakfast inn (B&B)	--	--	--	P	--	--		CUP	CUP	CUP	CUP	36.350.070
Child daycare center	--	--	--	--	--	CUP	CUP	—	—	CUP	CUP	36.350.080
Child daycare—Small family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Child day care—Large family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Emergency Shelter	--	--	--		--	--	P	--	--	--	--	36.350.250
Home occupation	--	--	--	--	--	--		P	P	P	P	36.410.030
Manufactured Homes (4)	--	--	P	P	--	--		P	P	P	P	
Medical services—Extended care	--	--	--	--	--	--	--	—	—	—	CUP(2)	
Mixed-use projects	--	--	--	P	CUP	CUP	--	--	--	--	--	36.350.120
Mobile Home Parks	--	--	--	--	--	--	--	--	--	--	--	
Multifamily dwellings	--	--	--	P	--	--		—	—	P	P	36.350.180, 190
Organizational house (sorority, convent, etc.)	--	--	--	--	--	--		—	—	CUP	CUP	
Residential care facility, 6 persons or less	--	--	--	--	--	--		P	P	P	P	
Residential care facility, 7 persons or more	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Residential care facility for the elderly (RCFE)	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Single-family dwelling	--	--	P	P	--	--		P	P	P	P	
Single room occupancy	--	--	--	--	--	--	P	--	--	--	--	36.350.260
Transitional and Supportive Housing	--	--	--	--	--	--		P	P	P (multifamily types located in the RM district are subject to specific use regulations 36.350.180,190)	P (multifamily types located in the RH district are subject to specific use regulations 36.350.180,190)	

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021
Notes:
(1) See Article 7 for land use definitions.
(2) Allowable locations restricted to El Centro Street between Fremont and Diamond; Fair Oaks Avenue; Fremont Avenue north of Monterey Road; and Huntington Drive.
(3) Permit required determined by Section 36.350.170.
(4) Per Article 7 of Chapter 36 "Zoning" of the South Pasadena Municipal Code, manufactured homes on permanent foundations are considered single-family land uses.

Permit Processing

The time it takes to process development permits and other governmental approvals contributes to the high cost of housing and is thus considered a constraint for housing development. South Pasadena recognizes the high cost of housing to the developers and has identified couple programs including, Programs 3.e and 3.l to address this issue. The programs include developing an electronic permitting system to increase efficiency in processing housing applications and hiring additional Planning and Housing Division staff to process applications as well as focusing on implementing the Housing Element programs. Additionally, in response to California law and the need to support more housing for the community, South Pasadena has been shifting toward more efficient permit review processes, reducing the number of hearing bodies involved in project approval and improving inter-departmental coordination to streamline the entitlement process.

Discretionary Design Review: Efforts to Streamline

Single- and all multi-family housing uses are permitted by right (P) in districts that allow residential uses. However, design review (discretionary) is required of all new structures and additions, with the exception of ADUs, emergency shelters, and single-room occupancy housing. City Planning staff reviews residential projects to confirm Code compliance in preparation to present them to the design review approval body. The City has three regulatory bodies with authority to review housing projects depending on the type and nature of a project: the Design Review Board (DRB), Cultural Heritage Commission (CHC), and Planning Commission (PC). Residential project applications with up to six units that are exempt from CEQA are heard by the DRB, and those with seven or more units (or not CEQA-exempt) require approval by the Planning Commission. Where the Zoning Code requires a conditional use permit for a use, the Planning Commission is the approving body. Projects may be appealed, and those that are appealed to the City Council receive priority scheduling. The required findings for design review located in SPMC Section 36.410.040.I are for the reviewing body to find that the design and layout of the proposed development:

1. Is consistent with the General Plan, any adopted design guidelines and any applicable design criteria for specialized areas (e.g., designated historic or other special districts, plan developments, or specific plans);

2. Will adequately accommodate the functions and activities proposed for the site, will not unreasonably interfere with the use and enjoyment of neighboring, existing, or future developments, and will not create adverse pedestrian or traffic hazards;

3. Is compatible with the existing character of the surrounding neighborhood and that all reasonable design efforts have been made to maintain the attractive, harmonious, and orderly development contemplated by this section and the General Plan; and

4. Would provide a desirable environment for its occupants and neighbors, and is aesthetically of good composition, materials, and texture that would remain aesthetically appealing with a reasonable level of maintenance and upkeep.

The sites with lower income RHNA assigned to them in Appendix A will all allow multifamily residential development without discretionary review once the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted. This will address constraints associated with discretionary review currently required in the city. As part of the zoning work called for in Program 3.n in Chapter 6.8, the City will evaluate whether any of the above findings is subjective and a constraint to development of additional multifamily housing in the City on the sites identified in this Housing Element. Revisions will be made to the City's zoning regulations to address these constraints

as part of implementation of Program 3.n. The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review hearing and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the project type. This makes it possible for housing projects to be approved at one public hearing unless the project is continued for revisions or appealed. The exception is for properties deemed historically or culturally significant, which require design review by the CHC followed by the Planning Commission. The intent is to expedite most housing applications through an easier permit process.

The processes listed in Table VI-41 generally run concurrently. Most residential projects do not require a Negative Declaration (ND/MND) or an EIR. Projects typically requiring a ND/MND or an EIR include a General Plan Amendment, Zone Change, and/or larger projects not qualified under CEQA exemptions. The City also requires the joint processing of related applications for a single project. As an example, a conditional use permit or planned development permit application is reviewed in conjunction with a tentative tract map, requested variances and design review. Such procedures save time, money, and effort for both the public and the developer. Applications for building permits are usually submitted within one year once a project is fully entitled. To the City's knowledge, no requests have been made to develop any site in the existing Housing Element sites inventory at lower densities than anticipated in the inventory.

The City is also preparing the Downtown Specific Plan to increase housing production and improve transparency in design requirements. The Downtown Specific Plan encourages quality housing development for a range of income levels in Downtown South Pasadena through the following actions:

- Develop and adopt a Form-Based Code for the Downtown area that emphasizes pedestrian orientation, integration of land uses, treatment of streetscapes as community living space, and offers a streamlined development review process. (A3.2a)

- In the Downtown Specific Plan area, reduce the minimum parking requirement for two-bedroom or larger units in multifamily residential buildings from 2 spaces per unit to 1.5 spaces per unit, and consider "unbundling," under which parking spaces must be sold or leased separately from units. (A4.8c)

- Review the time limits and other regulations for on-street parking supply in Downtown and streamline regulations to improve the ease of interpreting parking rules. (A4.8f)

- Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/work spaces by artists. (A8.2b)

To further streamline the permitting process, the City will adopt objective development and design standards (Program 3.b), with assistance from a SCAG REAP-funded program in which South Pasadena is participating. To align with the State's needs and goals for housing production, objective residential development and design standards will be updated to be simpler to understand and easier to implement, resulting in faster processing timelines. The objective development and design standards will include easy-to-read development and design regulations through measurable requirements, simple tables, and diagrams, and they'll require no personal or subjective judgement to determine if the standards have been met, allowing for a straightforward administrative process. This project was kicked off in March 2022, and public outreach was conducted from July 2022 to January 2023 to provide information about multi-unit and mixed-use objective standards and streamlined

permitting processes to accelerate housing production. The project will culminate with the City's adoption of objective development and design standards within 120 ~~day~~days of adoption of a compliant Housing Element.

Application Processing Times

The time required to process an application varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. The timeframes that are generally typical for the City's entitlement processes, based on normal conditions, are shown in Table VI-41, below. Depending on the complexity of the project and required entitlements, Planning aims to approve a single-family project within four to six weeks from the date that the application is deemed complete provided no variances, exceptions, or zone changes are needed. For multi-family projects, pursuant to the State Permit Streamlining Act, the City's processing timeframe is based on the CEQA determination for the proposed project and can range from 120 days for a project deemed to be exempt, up to 12 months for a project requiring preparation of an EIR.

Nevertheless, over the past three years, between 2019 and 2021, the department sustained an unusually high amount of staff turnover at all levels, which disrupted these timeframes and delayed several housing projects. This was exacerbated by the COVID-19 pandemic, which interrupted the work environment and the public hearing processes. Despite the pandemic, in 2020, the City prioritized addressing the application backlog and three important multi-family housing projects were approved in 2020-21, including the City's first project with affordable housing based on State density bonus law (prior to adoption of the inclusionary housing ordinance). The City also prioritized the adoption of Code amendments to support housing, including the inclusionary housing ordinance and a comprehensive update to the ADU ordinance. The ADU ordinance updates in particular have simplified review of ADUs, establishing clear, objective standards for staff-level approval. These applications represent a high percentage of recent Planning applications and processing time was greatly reduced in 2021.

To prioritize more efficient application review and approval, the Council approved an increase to the Community Development Department budget in 2021, adding new staff positions. The recognition of the relationship between staff enhancements and more efficient processing is expressed in this housing element through Program 3.l, which commits to increasing staff resources and creating a dedicated housing division within the Community Development Department. Additionally, application processing time will be reduced when the City acquires the electronic permitting system (Program 3.e).

Table VI-41
TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES

APPROVAL	TYPICAL PROCESSING TIME	APPROVAL BODY
Planning Clearance (Site Plan Review)	2 - 6 weeks	City Staff
Accessory Dwelling Units	30 - 60 days	City Staff
Administrative Use Permit	1 - 2 months	Community Development Director
Conditional Use Permit	4 - 6 months	Planning Commission
Planned Development Permit	6 - 12 months	Planning Commission
Variance	4 - 6 months	Planning Commission
Zone Change	6 - 12 months	City Council
General Plan Amendment	6 - 12 months	City Council
Design Review	4 - 6 months	Cultural Heritage Commission/ Design Review Board/Planning Commission
Tentative Tract Map	4 - 12 months	Planning Commission
Parcel Maps	4 - 6 months	Planning Commission
Negative Declaration	6 - 8 months	Planning Commission or City Council*
Environmental Impact Report	8 - 12 months	Planning Commission

Source: South Pasadena Community Development Department, 2022

* Depending on entitlement and significance of impact

City Staff Assistance in the Permit Process

City staff assists developers to provide information and guidance on the entitlement process in order to expedite approval procedures and reduce the likelihood of unnecessary timing constraints on development. A project often begins with an informal, courtesy meeting, at which the developer can present the concept to Community Development staff and get feedback and guidance for complying with requirements of the Code and the design review process. Once the developer submits an application, with the required components, such as a site plan, floor plans, elevations, landscape plan, and, in some cases a subdivision map, the Planning Division, Building and Safety Division and other agencies, such as Public Works and the Fire Department, will review for Code consistency and flag concerns in order to avert problems that might otherwise not be detected until building permit review later on.

After the project is entitled, the Building and Safety Division performs plan checks and issues building permits. Throughout construction, the building inspector inspects the project site to ensure compliance with requirements and to monitor progress. This process is typical and does not impose an undue time constraint on most developments.

Permits to Encourage Development of Affordable Residential Projects

The Zoning Code provides for flexibility in the application of Zoning Code standards through the planned development permit process for multifamily projects that include a certain percentage of the project as affordable housing. The purpose of the planned development permit is to allow consideration of innovation in site planning and other aspects of project design and more effective design responses to site features, uses on adjoining properties, and environmental impacts than the Zoning Code standards would produce without adjustment. Planned development permit approval may be requested for an affordable multifamily housing, mixed-use commercial, and multifamily residential development, or senior housing project and requires approval of a conditional-use permit. Planned development permit approval may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, such as floor area ratio, building height (but not beyond the ballot initiative maximum of 45 feet), setbacks, parking, and street layout.

Affordable housing projects may also qualify for the granting of a density bonus and incentives and/or concessions that can include deviations or waivers from certain development standards, as established in the Zoning Code for multifamily development. Program 2.e is proposed to update the City's zoning to comply with current state density bonus law. Other programs that will address the need to streamline the development process include Programs 2.a, 2.k, 2.l, 3.a, 3.e, and 3.l.

6.5.3 Environmental Constraints

While the City of South Pasadena is predominantly developed, there are vacant and underutilized parcels on which development can be accommodated. Many of these parcels, however, are impacted by environmental constraints and sensitivities.

Topography

The largest concentration of undeveloped land for new residential development is located in the City's hillside area referred to as the Southwest Monterey Hills. Development in this area is constrained due to steep slopes, substandard lots, unimproved roads, and geologic and seismic-related issues. Historically, development has varied in the degree and sensitivity to which it has accounted for these constraints. Some developments have sited housing units in ways to maintain the hillside's unique landform while others have used extensive grading to alter the natural landform. The extent to which development will be permitted on the City's hillsides in the future is of particular concern.

The remaining undeveloped or primarily undisturbed open space in the City, located primarily in the following areas, represents opportunities for conservation, habitat protection, and open space use:

- The canyons, hillsides, and steep topography in the Southwest Monterey Hills, and the primarily City-owned vacant, undeveloped lands in the southwest corner of the Southwest Monterey Hills;
- The Arroyo Seco and adjacent areas;
- Upper slopes in the Monterey Road/Pasadena Avenue/Kolle Avenue/Brunswick Avenue/Oak Hill Avenue residential areas;
- Raymond Hill Site

The following are more detailed discussions of the City's environmental constraints and hazards that affect, in varying degrees, existing and future residential developments.

Slope Stability

The Safety Element of the General Plan identifies landslide areas in the Repetto Hills just inside the City's western boundary. The Monterey Road Landslide area, in the southwest portion of the City, is a particular area of concern. Although small in geographic extent, the landslide area is extremely unstable in certain portions and is located in or near the majority of remaining undeveloped land in the City. Liquefaction of the soil is of secondary concern. The Los Angeles County General Plan Safety Element indicates that South Pasadena is at low risk for liquefaction.

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series

of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only known active faults of local significance actually located in South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along any of these faults has the potential to generate surface ruptures that would affect structures within the city.

Flooding

The City of South Pasadena is located within Zone X of the National Flood Insurance Rate Maps (FIRM), which designates areas of minimal (.2% Annual Chance) flooding. As there are no floodplain areas within the City, there are no pertinent flood hazards.

Fire Hazards

The California Department of Forestry and Fire Protection has identified all the land in adjacent Los Angeles along South Pasadena's western and southwestern boundaries as being a "very high fire hazard severity zone." Although the state did not include South Pasadena in this fire area, a fire starting in the neighboring Los Angeles neighborhoods of Garvanza, Highland Park, Montecito Heights, or Newtown Park, could spread into the Monterey Hills community of South Pasadena under certain prevailing wind conditions. In February 2020, the Council adopted Ordinance 2342, which established a "High Risk Fire Area… defined as those properties located South of Monterey Road, extending to the City border, and West of Meridian Avenue, extending to the City border." This represents approximately 25 percent of the land area in the city.

Climate change is anticipated to increase the frequency and severity of fire events across California, including in Los Angeles County. SB 99 (2019), passed in response to the destruction of Paradise, California, in the 2018 Camp Fire, requires that all local jurisdictions ensure that all residential developments in a hazard area have a minimum of two evacuation routes. The City is required by this law to ensure that residents of Monterey Hills can effectively evacuate in the event of an emergency given the community's proximity to a fire hazard severity zone. To reduce the threat of fire in the hillside areas, more restrictive building standards are applied to new residential developments, including accessory dwelling units (ADUs), requiring fire sprinklers and specific roofing materials. This requirement increases the cost of developing new residential structures but is warranted by the fire risk inherent in this area.

Open Space

Constraints to development include sensitive environmental resources. Zoning regulations are designed so that development in the hillside areas protects the "view-shed" both to and from the hillsides and retains as much remaining natural vegetation as possible. The City's Zoning Code encourages sensitive forms of development, which complement the natural and visual character of the City and its hillsides.

There are some open space areas that do not lend themselves to development. These areas have been left in their natural state and are maintained under private ownership. Such open space lands include the undeveloped portions of the hillsides, steeply sloping topography and canyons in the Southwest Monterey Hills, portions of the Altos de Monterey, and Raymond Hill.

The City owns 15.89 acres of unimproved land in the Altos de Monterey hillside residential tract, referred to as Lot 117. This area is considered an open-space resource to the neighborhood and is not intended for future development.

The sites identified in the Housing Element inventory can be developed with the number of units identified on each site even with environmental constraints taken into consideration.

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multifamily rental housing, emergency shelters, mobile homes, and transitional and supportive housing. The following is a discussion of the Zoning Code regulations that serve to encourage and facilitate a variety of housing types.

Multifamily Residential Districts

South Pasadena's current Zoning Code provides for a Residential Medium Density (RM) district allowing for development of 6 to 14 dwelling units per acre and a Residential High Density (RH) district allowing for development of multiple dwellings of 14 to 24 units per acre. Multifamily residential units are permitted in the RM and RH zoning districts and do not require a conditional use permit (CUP). Multifamily housing is also allowed in the Mission Street Specific Plan (MSSP) district. Programs in this Housing Element and changes proposed in other elements of the General Plan will allow multifamily housing in more areas of South Pasadena and at higher densities, including the proposed Mixed-Use District and proposed Downtown Specific Plan (see Programs 2.j, 2.k, and 3.a).

Mixed-Use Zoning Code Provisions

Mixed-use development projects are those that integrate retail and/or office commercial uses with residential uses on the same parcel. Mixed use is allowed in the Commercial General (CG) zoning district and the MSSP zoning district subject to approval of a CUP. The Zoning Code requires commercial and residential uses within a mixed-use project to be fully separated, with residential units limited to the rear portion of the first story, and/or on the second and higher stories. The maximum allowable density for the residential component of a mixed-use project in a CG zoning district is 24 dwelling units per acre and up to 48 dwelling units per acre in the MSSP zoning district. On Bonus Sites on which additional parking is provided, up to one dwelling unit for each 900 square feet of lot area is permitted. On all other sites, up to one dwelling unit for each 1,500 square feet is permitted.

The General Plan Update and Downtown Specific Plan will amplify the role of mixed-use development in South Pasadena. In order to facilitate implementation of the housing plan, Zoning Code amendments will be considered that would change the processes and standards for mixed-use projects, significantly increasing the land resources available for mixed-use development.

The Zoning Code allows for waivers to development standards for mixed-use commercial and residential uses that include an affordable housing component consistent with the inclusionary housing ordinance. Some modifications may be allowed through a planned development permit.

Mixed-Use Development Regulations in the CG Zoning District

When applying development regulations to mixed-use development projects in the CG zone, the RH zoning district requirements, as described in Table VI-35, Residential Site Development Standards by Zoning District, apply to the residential component and the CG zoning district requirements, as described in Table VI-42, Commercial, Mixed-Use, and Business Park District Development Standards," apply to the commercial component.

Mixed-Use Development Regulations in the MSSP Zoning District

Mixed-use development projects in the MSSP zoning district are subject to the regulations as specified for the subject parcel in the MSSP (see Table VI-42). Development capacity for a project site within the MSSP is determined by a number of factors. A maximum of a 0.8 floor area ratio (FAR) is allowed to derive the total square footage permitted for development, but if public parking spaces are provided as part of the project, the project would be eligible to receive a density bonus to increase the development capacity of the site up to 1.5 FAR. The total number of units allowed within a mixed-use project in the MSSP is derived by dividing the total allowable square feet of development, based on permitted FAR, by 763 square feet, which was the average size of a residential unit within the MSSP when the plan was prepared. Limitations on the total number of units that can be realistically developed in the MSSP include the citywide maximum height restriction of 45 feet, physical dimensions and configuration of the project site, and whether required parking is proposed to be surface or subsurface level.

Program 3.a calls for adoption of the Downtown Specific Plan (DTSP), which will update the zoning and regulations throughout the existing MSSP and into other areas of the Downtown. The DTSP proposes to allow 50 dwelling units to the acre on Mission Street and 60 dwelling units to the acre in the rest of the Specific Plan Area. Multifamily residential uses will be allowed without discretionary review in any location on a site. This will include projects with 100-percent residential uses.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are permitted as either attached or detached units in zoning districts that allow single-family and multifamily dwellings. Junior accessory dwelling units (JADUs) are also allowed in the City. The ADU regulations (SPMC Section 36.350.200) were last updated in June 2021 to comply with State law by allowing their construction in all residential locations, providing objective standards and clarifying the approval process. An illustrated, explanatory brochure explaining the ADU process was published and posted together with the new regulations to assist interested homeowners.

South Pasadena has an extensive historic preservation program, including many historic districts with single-family zoning. These districts are subject to State and local historic preservation laws as well as the ADU statutes. The City received a grant from the State Office of Historic Preservation to develop ADU standards and guidelines that would bridge the requirements of both with the purpose of encouraging ADUs with appropriate design requirements. The second phase of the ADU update, which provided objective standards and guidelines to allow ADUs on historic properties, was approved in December 2021. The City is committed to supporting the construction and legalization of ADUs, as described in Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k.

Manufactured Homes

Residential single-family detached housing makes up about half of the housing stock in the City and includes a small number of mobile homes. The City's Zoning Code considers a manufactured home that may or may not be on a permanent foundation to be a single-family dwelling and, as such, it is a permitted use in the Residential Estate (RE), Residential Single Family (RS), RM, and RH zoning districts subject to the same development regulations as established for conventional "stick built," single-family detached residential units. Because manufactured housing is permitted in all of the residential zoning districts, and the zoning regulations governing construction of manufactured

housing are the same as those established for conventionally constructed housing, suitable opportunities are provided in the residential zoning districts for development of this housing type.

Housing for Persons with Disabilities

Group homes or residential care facilities represent a viable housing type for persons living with a disability and for seniors, providing a supervised group home environment with personal services and assistance with daily activities on-site. The Zoning Code includes provisions for group homes for persons with disabilities and residential care facilities for the elderly. The Zoning Code (SPMC 36.700.020 - Definitions) defines a group home as follows:

> "A dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour non-medical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Includes: children's homes; orphanages; rehabilitation centers; self-help group homes."

SPMC 36.700.020 – Definitions defines a Residential Care Facility for the Elderly (RCFE) as follows:

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.
>
> 2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.
>
> 3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

Pursuant to State law, SPMC 36.220.030 (Table 2-2) - Residential Zoning District Land Uses and Permit Requirements permits residential care facilities of six or fewer residents in any residential district of South Pasadena subject to the same development regulations as are applied to residential uses of the same type in the same zone, as described in Table VI-35. Consistent with State law, the Zoning Code does not define family, does not establish a maximum concentration requirement for residential care facilities, and does not impose any special development standards for residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, which could constrain the provision of residential care facilities for the elderly or persons with disabilities.

The City's Zoning Code allows for residential care facilities for the elderly and residential care facilities of seven or more residents within the RM and RH zoning districts subject to the development standards described in Table VI-35 and approval of a CUP**.** In the case of residential care facilities providing assisted living for seven or more residents, the Zoning Code establishes special development standards for these facilities, as summarized below:

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.
- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

Because the Zoning Code permits residential care facilities of six or fewer residents in any residential district of the city and does not impose any special development standards for these residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, the Zoning Code does not impose any constraints to the provision of residential care facilities for the elderly or persons with disabilities. Program 5.b is proposed to remove the CUP requirement for residential care facilities of more than six residents.

SPMC 36.410.110 - Reasonable Accommodation provides for granting a reasonable accommodation by the Community Development Director for a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability an equal opportunity to the housing of their choice. The granting of a reasonable accommodation is subject to the following findings (SPMC 36.410.110.G):

> The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws and entitled to a reasonable accommodation;
>
> a. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;
>
> b. The reasonable accommodation will not impose an undue financial or administrative burden on the City;
>
> c. The requested accommodation will not result in a fundamental alteration in the nature of a City program or law, including, but not limited to, the General Plan, Zoning Code, design guidelines, and any specific plans; and
>
> d. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

To further address the housing needs of individuals with disabilities, this Housing Element includes a program objective to explore options for requiring that a percentage of all new multifamily residential projects in South Pasadena be universally accessible (see Program 4.e).

Emergency Shelters

The City's Zoning Code defines an emergency shelter as:

> "A residential facility, other than a residential care facility, operated by a provider that provides temporary accommodations to persons or families for a time period not to exceed six months per calendar year and which offers accommodations on a first-come first-served basis where the resident(s) must vacate each morning and have no guaranteed bed for the next night. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations to provide emergency or temporary shelter, and which may also provide meals, counseling and other services, as well as common areas for residents of the facility."

There are currently no emergency shelters within South Pasadena. Emergency shelters are permitted in the Business Park (BP) zoning district, through a ministerial process, subject to specific standards contained in SPMC Section 36.350.250, which was last revised in 2013. The standards govern the size and location of shelters; require on-site facilities, such as laundry, cooking, and bathroom facilities and provision of support services; set parking standards, security lighting requirements; and require a management plan for City approval prior to occupancy.

Sites within the BP zoning district are within walking distance to the Los Angeles Metropolitan Authority (MTA) Line L South Pasadena station with connections to retail areas and job centers along the route, making this an appropriate location for this land use. There are multiple sites in the BP zone that offer opportunities for development of emergency shelters with more than 12 acres of land on 19 parcels. The parcels range in size from 0.06 to 2.33 acres. In addition to this existing capacity in the BP district, the proposed General Plan update and subsequent Zoning Ordinance revision will designate the BP as the Ostrich Farm District, with a corresponding increase in residential capacity through higher density and development standards.

State law allows for Zoning Code regulations to govern the operations of an emergency shelter, including the establishment of a maximum number of beds in any one shelter provided the maximum adequately addresses the City's homeless population need. The standards contained in SPMC 36.350.250 are listed below:

A. Special design standards:

a) Location requirements. An emergency shelter shall not be located any closer than 300 feet to another emergency shelter or within 300 feet of a residential use, public park, or public school.

b) Maximum number of beds. The maximum number of beds for an emergency shelter shall be 12 beds plus a residential unit for a full time on-site manager. The total number of beds in operation at one time in the City shall not exceed 20 beds.

c) Maximum occupancy. Maximum occupancy at any one time shall be 12 residents plus a minimum of one on-site manager.

d) On-site facilities. Each emergency shelter shall provide central laundry and cooking facilities, a minimum of one toilet per six beds per gender, a minimum of one shower per six beds per gender, and private showers for family shelter facilities. Resident storage areas shall be provided. At least one of the following specific support services shall be provided:

i) Recreation room;
ii) Counseling center;
iii) Child care;
iv) Referral services;
v) Other similar supportive services geared to the homeless.

e) Off-street parking. One space per employee and one space per each four beds or one-half space per bedroom of a family unit with children plus up to five visitor spaces for service providers.

f) Lighting. Security lighting shall be provided. A plan for security lighting shall be submitted for review and approval by the Police Department and be installed and fully operational prior to occupancy of the facility.

g) Waiting areas. Intake areas and waiting areas shall be located to prevent queuing in the public right-of-way or a parking lot. These areas shall be screened from public view with either a six-foot high wall or landscaping reaching six feet in height.

B. Management and operations standards:

a) On-site security personnel and an on-site manager shall be present at the facility during all hours of operation.

b) Outdoor activities are limited to the hours of 8:00 a.m. to 9:00 p.m.

c) Resident check-in is permitted between the hours of 4:00 p.m. and 11:00 p.m. Residents are required to vacate the premises at 8:00 a.m. with no guaranteed bed for the next night.

d) Resident stays are limited to a maximum of six months per resident within a 12-month time period.

e) Loitering is prohibited.

f) A written management plan shall be submitted for review and approval by the Community Development Director prior to occupancy and shall address provisions for staff training, neighborhood outreach, security, screening of residents to ensure compatibility with services provided, training and treatment programs for residents, loitering control, and a staffing and services plan for assisting residents to obtain permanent shelter and income.

The City's existing standards for emergency shelters (SPMC 36.350.250) were consistent with State law when adopted in 2013; however, changes in State law (including AB 130, signed into law in September 2019) no longer allow local regulations to establish buffering standards between an emergency shelter and other land uses, restrict parking standards from requiring more than the number needed for a shelter's employees, and specify that the number of beds to be allowed in the city must be based on the most recent point-in-time count. As discussed earlier in Section 6.3.5, the 2020 LAHSA Homeless Count found 15 unsheltered individuals in South Pasadena and the 2021 count was cancelled due to the COVID-19 pandemic. The results of LAHSA's 2022 count, conducted between February 22nd and 24th, were not released at the time of this draft, but South Pasadena police, who participated, indicated that 28 individuals were counted within the City limits.

Accordingly, SPMC 36.350.250 must be revised to fully comply with State law (see Program 4.a). Revisions will include removal of current distancing requirement from other uses, revised parking requirements, a revised maximum number of beds to at least 30 to accommodate the 2022 point-in-time survey and in consideration of the cost and feasibility of providing this service, and any other changes to standards needed to comply with state law (see Program 4.a). The development standards and regulations applicable to all projects located within the BP zoning district and other nonresidential districts are described in Table VI-42.

South Pasadena maintains a Homeless Outreach Team, which operates a referral program to connect individuals living on South Pasadena's streets and open spaces to shelters in the City of Pasadena, which participates with the City of South Pasadena to provide services to these individuals. The Team provides transportation for individuals desiring to go to the shelter and monitors the location and conditions of individuals identified to be without housing in the city. Continuing commitment to provide this program is included as Program 2.f.

Table VI-42
COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040)

DEVELOPMENT FEATURE	REQUIREMENT BY ZONING DISTRICT			
	CO	CG	BP	MSSP
Minimum lot size	Minimum area and width for parcels proposed in new subdivisions.			
Area (square feet)	10,000 sf			N.A.
Width (feet)	50 ft			N.A.
Setbacks (feet)	Minimum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.			
Front	25 ft on Fremont St. between the 110 freeway and Monterey Rd., 20 ft required otherwise.	None required	25 ft	5 ft
Sides, each	15 ft if adjacent to an RS district; none required otherwise.			5 ft
Street side	None required		None required	None required
Rear	None, except if adjacent to an alley 5 ft, or if adjacent to a RS district 25 ft		None required	None required
Lot coverage	Maximum percentage of total lot area that may be covered by structures.			
	No maximum		50%	60%
Floor Area Ratio	N.A.	N.A.	N.A.	Bonus sites with extra public parking: -Mixed Use and Residential: 1.5 Other Development Sites: -Mixed Use: 0.8 -Residential: 0.5
Height limit (feet)	Maximum allowable height of structures. See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements.			
Maximum height	35 ft			35 ft
Landscaping	As required by Division 36.330 (Landscaping Standards)			As required by Section 8.6.3 (Outdoor Open Space in Residential or Mixed Use Projects) of the Mission Street Specific Plan
Parking	As required by Division 36.310 (Parking and Loading)			As required by Chapter 6.0 (Transportation and Parking) of the Mission Street Specific Plan
Signs	As required by Division 36.320 (Signs)			As required by Section 7.5.2 (Signs) of the Mission Street Specific Plan

Transitional and Supportive Housing

Transitional housing is defined by the State, and by the City's Zoning Code, as:

> "Rental housing for stays of at least six months operated under program requirements that call for the termination of assistance and recirculation of the housing unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months."

Transitional and supportive housing uses are permitted in all residential zoning districts, subject to the same design standards as other residential uses in the district. In compliance with State law, and in conjunction with the General Plan Update and Downtown Specific Plan, transitional housing will also be included as a permitted use in other zones that allow for mixed-use residential and commercial development (see Program 4.b). Currently, there are no transitional housing or supportive housing facilities in South Pasadena.

While transitional housing aims to facilitate the movement of unhoused individuals and families to permanent housing, supportive housing is distinguished by the provision of on-site or off-site services that assist the residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. This type of housing is defined as a group home in the City's Zoning Code. Program 4.b also addresses compliance with State law in regard to ensuring that supportive housing is permitted in a manner similar to other housing in all zones where housing is allowed.

In July 2019, the Governor signed AB 101, which allows Low Barrier Navigation Centers to be approved by right, without CEQA review required. Government Code Section 65660 defines "Low Barrier Navigation Center" as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry…"

As a form of transitional and supportive housing, this use is already permitted in residential zoning districts (SPMC 36.220.030, Table 2), and the definition defaults to the State law referenced above. However, the City has not yet incorporated a specific definition of Low Barrier Navigation Centers, which would clarify compliance with State law. Policy 4.4 and Program 4.b address the need to update the Code to include a definition of low-barrier navigation centers and expand to allow them within mixed-use zoning districts within one year.

Single-Room Occupancy

The City's Zoning Code defines Single-Room Occupancy (SRO) as:

> "A residential facility for homeless persons, other than a residential care facility, operated by a provider that offers housing consisting of single-room dwelling units that is the primary residence of its occupant or occupants for a period not to exceed six months per calendar year. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations to provide SRO housing. SRO residential units must contain either food preparation or sanitary facilities or may contain both."

SROs are allowed by right in the BP zoning district, subject to the specific use standards in SPMC Section 36.350.260. South Pasadena does not currently have any SRO developments.

An SRO unit is generally between 200 and 350 square feet in size. These units provide a valuable source of housing for lower-income individuals and can serve as an entry point into the housing market for people transitioning into permanent housing. Some of the Code standards required for SROs include that they may not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school and must be developed on a minimum lot size of 10,000 square feet with a maximum density of one unit per 1,600 square feet of gross floor area. The specific standards also include requirements for establishes setbacks, parking, common area open

space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Community Development Director prior to occupancy and operations.

Zoning Provisions to Encourage Affordable Housing

In addition to the areas of the City where higher-density housing is allowed or is proposed to be allowed without discretionary review, the City's Zoning Code includes permitting procedures and incentive programs to encourage the development of affordable housing by allowing for flexibility in the application of development regulations and standards and through the approval of density bonuses for projects containing an affordable housing component. These zoning provisions are discussed herein.

a. Planned Development Permit

The City's Zoning Code provides flexibility in the application of development standards for a project containing an affordable housing or senior housing component pursuant to the approval of a planned development permit (see Municipal Code Section 36.410.100). Planned development permit approval may be requested for an affordable housing, mixed-use, or senior housing project to modify or adjust any applicable development standard of the Zoning Code. Approval of a planned development permit may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, including, but not limited to, FAR, building height, setbacks, parking, and street layout. Planned development permits are approved by the Planning Commission at a public hearing and pursuant to findings summarized below.

1. The project must be consistent with the actions, goals, objectives, policies, and programs of the General Plan and any applicable specific plan, allowed within the applicable zoning district, and comply with all applicable provisions of the Zoning Code and adopted design guidelines other than those modified by the planned development permit, and be adequately served by public facilities, services, and utilities.

2. The approved modifications to the development standards of the Zoning Code are found to be necessary and appropriate to accommodate the superior design of the proposed project, its compatibility with adjacent land uses, and its successful mitigation of environmental impacts.

3. The location, size, planning concepts, design features, and operating characteristics of the project are and will be compatible with the character of the site, and the land uses and development intended for the surrounding neighborhood by the General Plan.

4. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the use.

5. The establishment, maintenance, or operation of the use would not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood of the proposed use, any neighborhood improvements, or the citywide welfare.

The Planning Commission may impose any conditions deemed reasonable and necessary to ensure that the project will comply with the findings. Standard conditions of approval applied by the Planning Commission as part of an approval for a planned development permit are summarized below.

1. Appropriate City building permits are required prior to construction.
2. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.
3. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.
4. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.
5. A demolition permit is required for any existing buildings to be demolished.
6. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.
7. Where required, CAL-OSHA permits must be obtained.
8. Compliance with all State of California disability access regulations for accessibility and adaptability is required.
9. Plan check for electrical, mechanical, plumbing, and sewer is required.
10. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.
11. A soils report is required.
12. A grading and drainage plan approved by the City is required prior to issuance of the building permit.
13. Structural and energy calculations are required to be provided.
14. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.
15. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.
16. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

Depending on workload, review and approval of a planned development permit by the Planning Commission can be completed within 6 to 12 months. The Housing Element includes Program 4.c to maintain the Zoning Code provision allowing approval of a planned development permit for projects proposing development of affordable housing to encourage its development.

b. Affordable Housing Incentives

The Council adopted SPMC Section 36.370 (Affordable Housing Incentives) in 2013 to incorporate State requirements to grant density bonuses and incentives and/or concessions for affordable housing by right. The "Affordable Housing Incentives" provisions of the Zoning Code allow for the granting of a density bonus to eligible projects upon approval by the Community Development Director and the granting of affordable housing incentives and/or concessions to eligible projects by the Planning Commission. State density bonus law has been updated since 2013 expanding the amount of bonus (up to 50 percent for many projects and up to 80 percent for 100-percent affordable projects), increasing the number of incentives and concessions the City must offer, and expanding the list of types of projects that are eligible for a State density bonus. Although the City implements state density bonus law as it is updated, the City has included Program 2.e in this Housing Element to update the Zoning Code to comply with current State density bonus law.

Some of the central components of the affordable housing incentives in SPMC 36.370 are a ministerial approval process for eligible projects; reduced parking requirements and allowing tandem parking or uncovered parking on the project site; a process for inclusion of a Child Care Facility and requirements to ensure unit quality. The location of the designated dwelling units within projects receiving a density bonus or incentives and/or concessions is at the discretion of the City with the goal to integrate the units into the overall project with designated dwelling units reasonably dispersed throughout the development, where feasible. Furthermore, the affordable units must contain on average the same number of bedrooms as the market-rate units, and must be compatible with the design or use of the remaining units in terms of appearance, materials, and finish quality. If a project is to be phased, the affordable units must be phased in the same proportion as the market-rate units, or phased in another sequence acceptable to the City. Alternatively, the City may authorize some or all of the designated dwelling units associated with one housing development to be produced and operated on an alternative development site.

As part of the approval of a density bonus and incentive and/or concession, the developer is required to record a deed restriction against the property that ensures that continued affordability of the designated units is maintained.

c. Inclusionary Housing Ordinance

In 2018, City Council directed staff to explore policies to proactively increase the production of affordable housing. In 2019, at the City Council's direction, the Community Development Department began outreach in the community, and heard strong support from the community for an inclusionary housing policy. After extensive outreach, and some delay due to the pandemic, on March 9, 2021, the Planning Commission recommended adoption of a draft inclusionary housing ordinance. The City adopted the inclusionary housing regulations (Ordinance 2355) ordinance on May 5, 2021.

This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. Those changes will be adopted at or near the same time as Housing Element adoption as will zoning updates to codify those changes outside of the Downtown.

The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics

and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).

Inclusionary Requirements

The inclusionary regulations require any project with three or more residential units proposed in South Pasadena to include at least 20 percent of the base number of units in the project as affordable to lower- or moderate-income households. Applicants may pay an in-lieu fee instead of providing units only for projects containing three or four residential units, for any ownership project, or for fractional units calculated as part of the inclusionary requirement. The in-lieu fee option is described further in the next section.

The inclusionary requirement would change as the number of units in a project increases. Only rental projects between 3 and 10 units may include moderate-income units as part of the inclusionary mix. Larger projects with rental units would need to include a mix of lower-income and very/extremely low income units, as detailed in the ordinance. Ownership (condominium) projects containing for-sale inclusionary units would provide them as moderate-income units.

Table VI-43 summarizes the implementation alternatives allowed by SPMC 36.375.050 – Inclusionary Unit Requirement for different types of residential projects.

Table VI-43
INCLUSIONARY HOUSING REQUIREMENT OPTIONS

	3-4 RENTAL UNITS	5-10 RENTAL UNITS	11+ RENTAL UNITS	FOR-SALE UNITS
On-site Option	20% of base # of units; affordable to extremely low, very low, low, or moderate income	20% of base # of units; Designate an affordable unit as extremely low, very low, lower, or moderate income, provided that if the project includes two affordable units, either: a. Both units shall be lower income; or b. At least one shall be a very-low income unit and the other unit may be very low, lower, or moderate.	20% of base # of units; Provide 50% of required affordable units as extremely low or very low and 50% as lower-income units. In case of an uneven number, one more unit shall be provided as very low.	20% of base # of units; Provide as moderate-income units
Off-site Option	N/A	YES	YES	YES
Rehabilitation/ Conversion of Existing Units Option	N/A	YES	YES	YES
Land Dedication Option	N/A	YES	YES	YES
In-Lieu Fee Option	YES	N/A	N/A	YES

Source: City of South Pasadena, 2021; SPMC 36.375.050

Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to

promote clarity regarding the City's expectations for quality and contextual design for all projects, providing more certainty to applicants, particularly those on a large enough scale to have a stronger effect on the surrounding area. All of the sites included in the sites inventory to address the lower-income RHNA are of sufficient size to derive strong benefit from taking advantage of the proposed design incentives in the inclusionary regulations. The incentives offered exceed guarantees available under State Density Bonus law. Incentives are offered for height, minimum unit size, and parking. Based on the recently adopted regulations, the City expects an increase in higher-density residential development with on-site affordable units. Program 2.i calls for implementation and monitoring of the Inclusionary Housing ordinance.

In-Lieu Fee Option

The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. The in-lieu fee study was completed and resulted in various fee options. On March 16, 2022, the fee options were taken to City Council for review and to provide direction. On March 18, 2022, the Planning Commission reviewed and provided comments on the study and the Council's direction from the March 16th City Council meeting. The Commission's comments will be incorporated into the staff report for Council's public hearing to adopt a fee resolution tentatively scheduled for May 18, 2022. The City Council shall establish the fee by resolution, then it will adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.

Alternatives to Building Inclusionary Units On-Site

There are a few alternatives to building the inclusionary units on-site for rental projects with five or more units. These include building the units on another site, donating land, or rehabilitating existing residential units and deed-restricting them as affordable housing. Use of these alternatives is subject to Planning Commission approval.

Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects as required by the ordinance.

The City has conducted a financial feasibility analysis of the inclusionary regulations including analysis of the ordinance with the adopted 20 percent threshold and an alternative 15 percent threshold. The analysis indicated that new market-rate projects are likely to be financially feasible while providing 20

percent of units at affordable rents or sale prices if the developer utilizes California's State Density Bonus law to increase the number of allowed market-rate units. However, without the use of the Density Bonus concession, it is not likely that market-rate projects would be financially feasible under the City's existing requirements. The City then conducted subsequent analysis to change the required number of affordable dwelling units to 15 percent of the base number of dwelling units. A range of for-sale and rental housing prototypes representative of likely new development in the City were reviewed to assess whether each prototype would be able to achieve standard development return metrics with the inclusion of required affordable units. Under a requirement to provide 15 percent of for-sale units at prices affordable to moderate-income households, townhome projects are likely to be financially feasible without any development incentives. In addition, under a requirement to provide 15 percent of rental units at rents affordable to low-income households, multifamily rental projects are likely to be financially feasible without any development incentives. Under a requirement to provide 15 percent of rental units at rents affordable to very-low income households, projects developed at 70 units per acre are likely to be financially feasible without any development incentives. Based on this analysis, the City is proposing to revise the regulations with a 15 percent threshold (See Program 2.m).

In addition to the City committing to revising the City's Inclusionary Ordinance (Program 2.m) the City held a Developer Forum on August 15, 2022 to obtain additional feedback on the City's Inclusionary Ordinance. Developers encouraged the City to consider increasing the unit threshold above three units so that developers doing smaller projects won't be constrained by the inclusionary fees. The City will evaluate the threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law as stated in Program 2.m). See Appendix B for the Developer Forum notes.

Since the inclusionary regulations were recently adopted, the City has not yet been able to collect data to analyze its effect. Program 2.i commits the City to reviewing the effectiveness of the inclusionary regulations starting in 2023 and revising if and when this is deemed necessary for greater effectiveness.

6.6.2 Land Resources

This section describes the resources available for the development, rehabilitation, and preservation of housing in the City of South Pasadena. This section includes an inventory of sites zoned for residential development that are suitable for future housing development in South Pasadena and an evaluation of the City's ability to provide adequate sites to address its identified share of future housing needs.

Availability of Sites for Housing

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. Opportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), and Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily

residential, which would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.

- Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; sites are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

All sites discussed in this section are shown on maps in Appendix A of this Housing Element.

Sites Inventory

Table VI-44 describes the vacant sites remaining in the City that can accommodate residential development. All these sites are suitable for development of moderate and above-moderate residential development. One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so it is included in Table VI-50, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).

In determining the realistic unit capacity for sites listed in Table VI-44 that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. Table VI-45 presents recent projects in medium and lower density areas of the City that support the 80 percent assumption. All of the projects exceeded 80% of allowed unit capacity. It should also be noted that 90 percent of the sites in Table VI-45 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption of SB 9, which allows duplex development on single-family parcels statewide.

A small number of the sites in this table are in nonresidential zones. The changes to allow greater density on many nonresidential sites and incentivize housing development via the City's inclusionary regulations will further encourage housing development on non-residentially zoned properties. The realistic development capacity for each site can be increased with approval of a density bonus as part of a development application. Zoning Code provisions applicable to the zoning district for each site, as described in the Constraints section, were assumed and no density bonuses or the inclusionary housing regulations were applied. This is for consistency with state guidance as stated in the HCD 2020 Housing Element Site Inventory Guidebook:

"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households.

Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Suitability of Non-Vacant Sites

As shown in Table VI-44, many of the sites suitable for residential development are non-vacant. Non-vacant sites provide additional constraints on development due to the fact that non-vacant sites have existing uses that would likely be disrupted with development of the site with residential uses.

Under the current zoning code, South Pasadena has received multiple development applications for residential development of non-vacant sites. A couple of recent examples are included as identified sites in Appendix A, including the Carrow's Site (Site 11 in Appendix A), which was approved by the Planning Commission on April 18, 2022, and the School District Site (Site 10 in Appendix A), which was approved by the Planning Commission on September 13, 2022. In addition to these sites, two additional mixed-use projects have been approved on sites with existing uses. The Mission Bell project, approved in 2020, consists of 36 residential units and approximately 7,400 square feet of commercial space. The Seven Patios, approved in 2021, consists of 57 residential units and approximately 6,100 square feet of commercial space. Development applications for these two projects were submitted prior to the City's adoption of its Inclusionary Housing Ordinance, and therefore do not include any affordable units so are not included in the list of identified sites in Appendix A.

In addition to these recent approvals of non-vacant sites under the City's existing zoning code and approval process, Programs 2.a, 2.e, and 2.m, 2.n, 3.b, 3.e, and 3.l are all intended to encourage redevelopment of non-vacant sites. In part, these programs will ease the development standards and ensure proposed projects are considered by the City in a more timely manner than projects have been considered in the past. With these changes, it is anticipated that the redevelopment of non-vacant sites will become more likely.

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Table VI-44
VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5311010012[3]~~	~~Medium Density Residential~~	~~RM~~	~~N/A~~	~~14~~	~~0.28~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~3~~	~~0~~	~~3~~
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5311010007[3]~~	~~Medium Density Residential~~	~~RM~~	~~N/A~~	~~14~~	~~0.31~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~3~~	~~0~~	~~3~~
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5311010010[3]~~	~~Medium Density Residential~~	~~RM~~	~~N/A~~	~~14~~	~~0.34~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~3~~	~~0~~	~~3~~
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5311010015[3]~~	~~Medium Density Residential~~	~~RM~~	~~N/A~~	~~14~~	~~0.40~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~4~~	~~0~~	~~4~~
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5311010008[3]~~	~~Medium Density Residential~~	~~RM~~	~~N/A~~	~~14~~	~~0.65~~	~~Non-Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~4~~	~~0~~	~~4~~
~~Monterey Rd. at Pasadena Ave.~~	~~91030~~	~~5312002007[2]~~	~~High Density Residential~~	~~RH~~	~~N/A~~	~~24~~	~~0.10~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~1~~	~~0~~	~~1~~
~~Monterey Rd. at Oak Hill Ave.~~	~~91030~~	~~5312002009[2]~~	~~High Density Residential~~	~~RH~~	~~N/A~~	~~24~~	~~0.13~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~2~~	~~0~~	~~2~~
~~Monterey Rd. at Oak Hill Ave.~~	~~91030~~	~~5312002025[2]~~	~~High Density Residential~~	~~RH~~	~~N/A~~	~~24~~	~~0.15~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~2~~	~~0~~	~~2~~
~~**Moderate**~~							~~**2.36**~~					~~0~~	~~22~~	~~0~~	~~22~~
End of Rollin St.	91030	5314026050	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
La Portada St. at Via del Rey	91030	5314025021	AM	RS	N/A	1 unit per parcel	0.75	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa St.	91030	5311009056	AM	RS	N/A	1 unit per parcel	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009057	AM	RS	N/A	1 unit per parcel	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009058	AM	RS	N/A	1 unit per parcel	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Cielo at Santa Teresa	91030	5311009055	AM	RS	N/A	1 unit per parcel	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015034[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015033[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010030[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010029[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave at Blair Ave.	91030	5311010028[3]	Estate & Very Low Density Residential	RS	N/A	3.5	2.37	Vacant	YES - Current	Privately Owned	Available	0	0	6	6
Bank St. at Meridian Ave.	91030	5314020007	Estate & Very Low Density Residential	RS	N/A	3.5	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032044	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308019034	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031001	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308023015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310022006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017021	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017020	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023008	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Brunswick Ave.	91030	5311015016	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023019	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022003	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308022042	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Short Way St. at Oak Hill Ave.	91030	5312031029	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave at Oak Crest Ave.	91030	5314010005	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026010	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308024017	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023007	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022002	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Mountain View Ave. at Alta Vista Ave.	91030	5314010024	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308021012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009032	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308032012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311008033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015006	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308024033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310034030	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Hill Dr.	91030	5308002070	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026011	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Warwick Ave.	91030	5311006013	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Alta Vista Ave.	91030	5314008014	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Blair Ave. at Saint Albans Ave.	91030	5311017058	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camden Ave. at Camden Parkway	91030	5321011013	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Saint Albans Ave.	91030	5311006900	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015005	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5314006020	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031041	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Monterey Rd.	91030	5311007019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Cambridge Pl. at Valley View Rd.	91030	5310018025	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Brunswick Ave. at Kolle Ave.	91030	5311006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031040	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5311014048	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Ave.	91030	5308031039	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Collis Ave.	91030	5312017025	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave. at Indiana Ave.	91030	5314007017	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Bank St.	91030	5314019023	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031042	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave. at Blair Ave.	91030	5311008039	Low Density Residential	RS	N/A	6	0.21	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Sol at Las Palmitas St.	91030	5308002072	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014042	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Warwick Pl. at South Ln.	91030	5311006028	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Rollin St. at Meridian Ave.	91030	5314017027	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	State-Owned	Available	0	0	2	2
Alta Vista Cir. at Indiana Ave.	91030	5314006005	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Ave. at Pinecrest Dr.	91030	5311006057	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024034	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014043	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Braewood Ct.	91030	5314016077	Low Density Residential	RS	N/A	6	0.28	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308020027	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Alta Vista Cir. at Alta Vista Ave.	91030	5314005045	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Pl. at Oak Hill Ln.	91030	5312020012	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024031	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005021	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005017	Low Density Residential	RS	N/A	6	0.35	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Oak Hill Terrace	91030	5311006055	Low Density Residential	RS	N/A	6	0.37	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308031053	Low Density Residential	RS	N/A	6	0.72	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Bank St. at Meridian Ave.	91030	5314018010	Low Density Residential	RS	N/A	6	0.73	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
~~Mission St. and Grand Ave.~~	~~91030~~	~~5313006038~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~N/A~~	~~36.7~~	~~0.17~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~0~~	~~4~~	~~4~~
~~Mission St. and Fremont Ave.~~	~~91030~~	~~5315008042~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~N/A~~	~~36~~	~~0.45~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~0~~	~~12~~	~~12~~
~~Garfield Ave. and Huntington Dr.~~	~~91030~~	~~5321015018~~	~~Medium Density Residential (Proposed General Plan Land Use is Mixed Use)~~	~~RM (Proposed Zoning is Mixed Use)~~	~~N/A~~	~~55~~	~~0.20~~	~~Vacant~~	~~YES - Current~~	~~Privately Owned~~	~~Available~~	~~0~~	~~5~~	~~5~~	~~10~~
ABOVE-MODERATE SUBTOTAL							~~18.61~~17.41					**0**	~~50~~	~~130~~109	~~135~~109
TOTAL							~~20.97~~17.41					**0**	~~270~~	~~130~~109	~~157~~109

Source: City of South Pasadena, 2021

Note 1: Available means the site has not been entitled for development

Note 2: These four parcels have the same owner and are for sale. The City has recently received developer interest in developing residential units on these parcels as one project.

Note 3: These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Note 4: There are no known environmental constraints.

Table VI-45
REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	BUILT DENSITY	PERCENT OF ALLOWED CAPACITY
1974 Huntington Drive	5321008016	.24	Under Construction	RM	Duplex	Market rate 3-unit ownership project	3	12.5 du/acre	>100%
1413 Lyndon	5319003004	.20	Completed in 2016	RM	Single-family home	Market rate 3-unit ownership project	3	10 du/acre	> 100%
191 Monterey Rd.	5311010022	.70	Completed in 2017	RM	Single-family home	Market rate 9-unit ownership project	9	12.9 du/acre	92%
1818 Peterson Ave.	5508025027	.09	Entitled in 2021	RS	Vacant	Market rate 1,231 sf Single-family dwelling with 495 sq. ft. JADU	2	11.1 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)
807 Rollins St.	5314017901	.23	Entitled in 2021	RS	Vacant	Market rate 3411 sf Single-family dwelling, (JADU-ready, entitled in April 2022)	1	4.3 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)

Source: City of South Pasadena, 2022

Accessory Dwelling Unit Potential

In the last five years, ADUs have become more broadly allowed under California law. The City's local zoning regulations have been updated regularly to reflect those changes to state law. Beginning in 2017, the City has seen steady increases year over year in permitted ADUs each year. Before 2017, no ADUs were permitted. Local interest in ADUs is significant. ADU building permit numbers from 2017 through the first half of 2022 are listed below.

- 2017 – 1 ADU received a building permit
- 2018 – 4 ADUs received building permits
- 2019 – 7 ADUs received building permits
- 2020 – 8 ADUs received building permits
- 2021 – 19 ADUs received building permits
- 2022 (through August 31) – 38 ADUs receiving building permits

The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City issued 9 building permits for ADUs in the second half of 2021 and 28 building permits for ADUs through December 31, 2021. (see Table VI-46). The City's projection for permit issuances starting at the beginning of 2022 through the end of the projection period is provided in Table VI-46. (See also Appendix E for more detailed analysis). The projection assumes that ADU permits will increase at a similar rate to the increase from 2017 through 2022, as shown above, through the first half of and in 2023 because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. This supports the conservative assumptions in Table VI-46 and the more vigorous assumptions in Table VI-47.

Table VI-46
ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING PERMITS	ADU BUILDING PERMITS
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29
2023	55	39
2024	55	39
2025	65	39
2026	68	39
2027	68	39
2028	68	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	470	320[1]

[1] In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts, see Appendix E for a more detailed analysis of ADU projections.

As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between January 1, 2022, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-~~51~~ 52 provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. A survey of studio and one-bedroom rentals available in South Pasadena in August 2022 was conducted online. The average price for this type of unit was a 1 bedroom for $2,500/month. The lowest rental price was $1,995. The other three listings were higher. However, these listings only include those ADU units that are being rented at market prices, and do not include ADU units that are being rented to friends and family through private placements, which have been shown to often be at below-market rents that would be affordable to lower-income households. These rental listings reflect a point-in-time and are considered supplemental to the SCAG affordability analysis which was based on a much larger data set. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-47. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-47
POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING APPLICATIONS	ADU BUILDING PERMITS ISSUED	NOTES
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of application for the remainder of 2022.
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits. Assumption of 10% increase in applications and 75% moving forward to building permits. Assumption of strady application rate, no increase.
2024	60	45	
2025	66	50	
2026	72	54	
2027	72	54	
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022 – October 15, 2029	**560**	**403**	

To provide additional context, this projection scenario forecasts that less than 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU.

Market Trends

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance updates and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.

Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-48 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior

Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.

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Table VI-48
REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-50 (AND SITE ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Buildout starting in Summer 2021 and concluding in Fall 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail)	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.45 FAR	Odd-shaped sites near transit: North side of Mission (, , 12) Site 14, combined with adjacent lots Other sites near rail transit: City Yard (8); Fremont/Mission (12), Arco (8) *These sites are similar in size and proximity to transit; identified for rezoning to produce more units than example project.*
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	Entitled in 2021	MSSP	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units on above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.48 FAR	School Site -11 (historic resource); Carrows site (11); Parking Lot sites -12, 13 (rectangular; several parcels combined) *These sites are similar in size to the Mission Bell project, with structures on a portion of the lot that could be incorporated into a larger project or demolished; identified for rezoning at higher densities to produce more units than example project.*
Eight Twenty 820 Mission St.	5315-017-094, 5315-017-082, 5315-017-067, 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses	38	20	109% of allowed FAR (Allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Parking Lot sites -12 and 13 (rectangular; several parcels combined) *Like the example project, these properties are owned by parties interested in consolidating to build a larger multi-family project (some are City-owned); identified for rezoning to produce more units than example project.*
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in Spring 2020	CO	Commercial retail with underutilized parking lot	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (Allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (16, 17, 20, 21, 22) Monterey Road Site (3) *These sites are similar in size and have owner interest in developing a residential project that would include on-site affordable housing and receive a density bonus. One site is in consideration for affordable housing overlay zone for higher density.*
Mission Meridian Village Meridian Ave and Mission St	5315021001, 5315021079, 5315021047	1.6	Built in 2005	MSSP	Lower density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes: three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 10) Vacant Site/Ostrich Farm (1) Tyco Site (4) School District Site (10) *These are larger sites, in mixed-use areas, with potential for a project with multiple structures including affordable housing per the IHO; identified for rezoning to produce more units than example project.*

Source: PlaceWorks and City of South Pasadena, 2022

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Regional Examples of Small Site Development

Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Strong potential was determined from a combination of property owner interest and common ownership. All small sites made up of more than one parcel have common ownership except Site 12 which has one parcel owned by the City and one parcel owned by a private owner. The changes in zoning that will affect market conditions and will encourage redevelopment with housing are called for in Program 3.n and will include adoption of the Downtown Specific Plan. Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-49 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. In addition, the City expects more projects to come forward once the zoning and General Plan changes are adopted. The City has also included Program 3.d to encourage and facilitate parcel assemblage and work with developers and property owners who are interested in lot consolidation.

Table VI-49
REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION

ADDRESS/ PROJECT NAME	JURISDICTION	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY
Stanford Pasadena, 150 S. Oak Knoll	Pasadena	0.23	preliminary entitled 2017	Rental	19	83
Stanford Pasadena, 139 S. Oak Knoll	Pasadena	0.20	preliminary entitled 2017	Rental	16	80
233 Hudson	Pasadena	0.37	entitled 2018	Condo, 5,729 SF of retail/office	42	114
Pico Eleven, 1112 Pico Blvd	Santa Monica	0.44	finished 2018	Condo	32	73
1819 Pico	Santa Monica	0.49	preliminary entitled 2020	Condo, 4,174 SF of retail/office	48	98
3223 Wilshire	Santa Monica	0.45	constructed 2020	Rental, 5,418 SF of retail/office	53	118
2225 Broadway	Santa Monica	0.22	constructed 2020	Rental, 2,751 SF of retail/office	15	68
1450 Cloverfield	Santa Monica	0.45	constructed 2020	Rental, 8,385 SF of retail/office	34	76

Source: PlaceWorks, 2021

Sites to Address the Lower-Income RHNA

To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-50). As with the one vacant site, all of these sites would either be affected by proposed changes to their General Plan Land Use designation or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites to address the lower-income RHNA that are in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-50. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished; and Programs 2.j and 2.k address the Affordable Housing Overlay.

In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-50 about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C. The City followed up again with owners in the table who hadn't responded to the earlier rounds of outreach both via letter and phone calls in late 2021 and early 2022, yielding multiple additional responses. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, including the inclusionary housing ordinance, and suggests the property owner consider affordable housing. In addition to sites owned by the City, staff has solicited interest from property owners of approximately 16 properties on the inventory, as noted in Appendix A. Some of these have pending applications for projects that include residential units (also noted in Appendix A). In other cases, property owners or their representatives have had meetings with City staff to plan for applications following the City's adoption of the General Plan, DTSP and zoning code amendments.

Because projects on all of the sites included in Table VI-50 are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 60 percent of the units were assumed to address the lower-income RHNA and 40 percent are assumed for moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus for projects on these sites supports the realistic capacity assumptions. Three of the sites included in Table VI-50 are proposed to receive the Affordable Housing Overlay (Sites 3, 6, and 7). Two of those sites are already designated and zoned for residential development (Sites 3 and 6).

Site 7, the Methodist Church Site is designated and zoned as Community Facilities. Part of the more than 6-acre site is already developed with non-residential community facility uses. Based on discussions with the owners about their interest in developing unused portions of the site for multifamily housing, the likelihood of development of undeveloped portions of the site with higher density residential has been established. In addition, all sites included in Table VI-48 are examples of multifamily projects developed on sites designated to allow non-residential development.

The zoning amendments with development standards to implement the application of the Affordable Housing Overlay to this site along with Sites 3 and 6 will ensure allowed heights and other development standards to accommodate feasible development of projects with at least 30 dwelling units per acre (see Programs 2.j and 2.k). The unit assumptions on three of those sites (3, 6, and 7) are lower than 95 percent of the maximum allowed units under the proposed density and are based on discussions with property owners about expected numbers of units they would propose on those sites. Additional analysis of densities that are feasible within the City height limits is provided in Section 6.5.2 under Regulations Impacting Housing Supply. Additional detail on why 95 percent is a realistic capacity for these sites is provided in Appendix F.

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Table VI-50
SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA [1]

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
3	181, 185 and 187 Monterey Rd.	91030	5311015035	0	0	8	8	Shortfall of Sites	0.34	Medium Density Residential	RM	Medium-Density Residential with AH Overlay	RM with AH Overlay	30	Non-Vacant
		91030	5311010001	0	0	0	0	Shortfall of Sites	0.33	Medium Density Residential	RM			30	Non-Vacant
		91030	5311010002	0	0	0	0	Shortfall of Sites	0.59	Medium Density Residential	RM			30	Non-Vacant
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012040	0	0	7	7	Shortfall of Sites	0.94	Estate & Very Low Density Residential	RE	Estate & Very Low Density Residential with AH Overlay	RE with AH Overlay	30	Vacant
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	30	0	0	30	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with AH Overlay	CF with AH Overlay	30	Non-Vacant
8	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	42	0	0	42	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant[3]
9	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
10	Mission St. and Fairview Ave.	91030	5315008047*	0	19	89	108	Shortfall of Sites	1.90	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
11	Mission St. and Fremont Ave.	91030	5315009051	5	0	45	50	Shortfall of Sites	0.81	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
12	El Centro St. and Mound Ave.	91030	5315003044*	13	6	2	21	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	7	2	2	11	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003903	10	0	0	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	70	Non-Vacant
		91030	5315003904	8	0	0	8	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	7	0	0	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	11	0	0	11	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant
~~14~~	~~Oxley St. and~~	~~91030~~	~~5315003033~~	~~6~~	~~2~~	~~2~~	~~10~~	~~Shortfall of Sites~~	~~0.18~~	~~General Commercial~~	~~CG~~		~~Mixed Use~~	~~55~~	~~Non-Vacant~~

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
		~~91030~~	~~5315003032~~	~~8~~	~~3~~	~~2~~	~~13~~	~~Shortfall of Sites~~	~~0.22~~	~~General Commercial~~	~~CG~~	~~Downtown Fair Oaks~~			~~Non-Vacant~~
~~15~~14	Fair Oaks Ave. and Grevelia St.	91030	5315001070	~~33~~46	~~15~~23	~~8~~23	~~56~~92	Shortfall of Sites	0.85	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	~~70~~110	Non-Vacant
~~16~~15	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	~~80~~110	~~30~~55	~~23~~55	~~133~~220	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	~~70~~110	Non-Vacant
~~17~~	~~Fair Oaks Ave. and Bank St.~~	~~91030~~	~~5319003029~~	~~30~~	~~14~~	~~6~~	~~50~~	~~Shortfall of Sites~~	~~0.89~~	~~General Commercial~~	~~CG~~	~~Downtown SP~~	~~Fair Oaks~~	~~60~~	~~Non-Vacant~~
	TOTAL			~~593~~592	~~191~~205	~~249~~286	~~1,033~~1,083		~~26.18~~24.89						

Source: City of South Pasadena, 2021

* Included in prior Housing Element sites inventory

[1] See Appendix A for any identified environmental constraints that will be mitigated prior to residential development occurring.

[2]See Appendix A for site-by-site description of how redevelopment is likely in the planning period for each of these sites.

3 Site 8 has an underground gasoline tank and filling station on the site that will be removed and the City will remediate any soil contamination found on the site prior to development for residential uses. See Appendix A Site 8 for further discussion.

Table VI-51
DOWNTOWN SPECIFIC PLAN REZONING CAPACITY ANALYSIS[1]

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5310019001	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310019002	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310019003	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019004	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019005	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019006	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5310019009	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5310019010	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5310019021	Medium Density Residential	RM	0.33	8	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5310020010	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310020011	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310020012	Medium Density Residential	RM	0.21	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033001	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033002	Medium Density Residential	RM	0.13	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5310033008	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5310033019	Medium Density Residential	RM	0.52	22	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5310033021	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5310033901	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5311001008	Ostrich Farm Mixed-Use	RM	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311001018	Ostrich Farm Mixed-Use	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5311001020	Ostrich Farm Mixed-Use	RM	0.56	1	70	19	10	10	39	5%	100%	100%	100%	100%	400%	100%	5%	0.975	0.488	0.488	1.950
5311001038	Ostrich Farm Mixed-Use	CG	0.72	1	70	25	12	12	49	5%	100%	100%	100%	100%	400%	100%	5%	1.225	0.613	0.613	2.450
5311001041	Ostrich Farm Mixed-Use	CG	0.59	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5311002047	Community Facilities	CF	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5311002050	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5311002051	High Density Residential	RH	0.30	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	20%	2.000	1.000	1.000	4.000
5311002056	Medium Density Residential	RM	0.35	2	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311002057	Medium Density Residential	RM	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311002059	High Density Residential	RH	1.86	0	70	65	33	33	131	5%	100%	100%	100%	100%	400%	100%	5%	3.275	1.638	1.638	6.550
5311002122	Medium Density Residential	RM	0.53	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5311002138	Ostrich Farm Mixed-Use	BP	0.75	1	70	26	13	13	52	5%	100%	50%	100%	100%	400%	100%	3%	0.650	0.325	0.325	1.300
5311002139	Ostrich Farm Mixed-Use	BP	1.06	1	70	37	18	18	73	5%	100%	50%	50%	100%	400%	100%	1%	0.456	0.228	0.228	0.913
5311002900	Medium Density Residential	RM	0.06	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311003026	High Density Residential	RH	0.02	0	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5311003027	High Density Residential	RH	0.37	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5311003028	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5311003029	High Density Residential	RH	0.03	0	45	1	0	0	1	5%	100%	100%	100%	100%	100%	100%	5%	0.025	0.013	0.013	0.050
5311003030	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311003031	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003032	High Density Residential	RH	0.02	0	45	1	0	0	1	5%	100%	100%	100%	100%	100%	100%	5%	0.025	0.013	0.013	0.050
5311003033	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5311003034	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311003035	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003036	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5311003037	High Density Residential	RH	0.49	0	70	17	9	9	35	5%	100%	100%	100%	100%	400%	100%	5%	0.875	0.438	0.438	1.750
5311003038	High Density Residential	RH	0.32	0	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311003039	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311003040	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311003043	Ostrich Farm Mixed-Use	BP	2.33	1	70	81	41	41	163	5%	50%	50%	50%	100%	400%	100%	3%	2.038	1.019	1.019	4.075
5311004011	Ostrich Farm Mixed-Use	BP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5311004012	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311004013	Ostrich Farm Mixed-Use	BP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5311004014	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5311004015	Ostrich Farm Mixed-Use	BP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311004018	High Density Residential	RH	0.51	0	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5311004019	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5311004020	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5311004023	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311004026	High Density Residential	RH	0.77	0	70	27	14	14	55	5%	100%	100%	100%	100%	400%	100%	5%	1.375	0.688	0.688	2.750
5311004027	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311004030	High Density Residential	RH	0.45	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5311004044	Ostrich Farm Mixed-Use	CG	0.36	1	70	12	6	6	24	5%	100%	100%	50%	100%	400%	100%	3%	0.300	0.150	0.150	0.600
5311010006	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311010007	Medium Density Residential	RM	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311010008	Medium Density Residential	RM	0.65	1	70	22	11	11	44	5%	100%	100%	100%	100%	400%	100%	5%	1.100	0.550	0.550	2.200
5311010009	Medium Density Residential	RM	0.26	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5311010010	Medium Density Residential	RM	0.34	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5311010011	Medium Density Residential	RM	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5311010012	Medium Density Residential	RM	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5311010015	Medium Density Residential	RM	0.40	1	70	13	7	7	27	5%	100%	100%	100%	100%	400%	100%	5%	0.675	0.338	0.338	1.350
5311010016	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5311010022	Medium Density Residential	RM	0.70	1	70	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5311010052	Medium Density Residential	RM	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5311012004	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	50%	100%	100%	100%	400%	100%	3%	0.150	0.075	0.075	0.300
5311012018	Medium Density Residential	RM	0.84	1	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5311012020	Medium Density Residential	RM	1.60	1	70	56	28	28	112	5%	100%	100%	100%	100%	400%	100%	5%	2.800	1.400	1.400	5.600
5311015028	Medium Density Residential	RM	0.76	1	70	26	13	13	52	5%	100%	100%	100%	100%	400%	100%	5%	1.300	0.650	0.650	2.600
5311015029	Medium Density Residential	RM	0.69	1	70	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5311015030	Medium Density Residential	RM	0.30	4	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5311015048	Medium Density Residential	RM	1.10	1	70	38	19	19	76	5%	100%	100%	100%	100%	400%	100%	5%	1.900	0.950	0.950	3.800
5312001903	High Density Residential	RH	0.58	0	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5312002002	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5312002003	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5312002004	High Density Residential	RH	0.13	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5312002005	High Density Residential	RH	0.03	0	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5312002006	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5312002007	High Density Residential	RH	0.10	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5312002008	High Density Residential	RH	0.04	0	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5312002009	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5312002023	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5312002025	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313003039	Medium Density Residential	RM	0.19	5	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313003040	Medium Density Residential	RM	0.26	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313003041	Medium Density Residential	RM	0.34	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313003042	Medium Density Residential	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313003045	Medium Density Residential	RM	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313004018	Medium Density Residential	RM	0.55	24	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5313004026	Downtown Specific Plan	CG	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004030	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004031	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313004032	Medium Density Residential	RM	0.21	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004033	Medium Density Residential	RM	0.20	8	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5313004034	Medium Density Residential	RM	0.20	8	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5313004035	Medium Density Residential	RM	0.63	26	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5313004036	Medium Density Residential	RM	0.59	10	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313004037	Medium Density Residential	RM	0.18	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004038	Medium Density Residential	RM	0.17	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004039	Medium Density Residential	RM	0.15	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004040	Medium Density Residential	RM	0.14	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004041	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004042	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004043	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004044	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313004045	Medium Density Residential	RM	0.17	5	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004046	Medium Density Residential	RM	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313004047	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313004048	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004049	Medium Density Residential	RM	0.18	6	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313004050	Medium Density Residential	RM	0.29	8	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313004051	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313004052	Medium Density Residential	RM	0.19	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004053	Medium Density Residential	RM	0.22	3	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313004054	Downtown Specific Plan	CG	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313004055	Downtown Specific Plan	CG	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5313005023	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5313005024	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005025	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005026	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005027	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005028	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005029	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5313005030	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5313005033	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5313005034	High Density Residential	RH	0.42	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5313005035	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005036	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5313005037	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005038	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005039	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005040	Medium Density Residential	RM	0.60	1	30	0	0	17	17	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.275	1.275
5313005041	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005042	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5313005054	High Density Residential	RH	0.43	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5313005059	High Density Residential	RH	0.50	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	150%	8%	0.863	0.431	0.431	1.725
5313005081	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	150%	8%	0.713	0.356	0.356	1.425
5313006024	Downtown Specific Plan	MSSP	0.44	1	70	15	7	7	29	5%	100%	100%	100%	100%	400%	150%	8%	1.088	0.544	0.544	2.175
5313006025	Downtown Specific Plan	MSSP	0.50	1	70	17	9	9	35	5%	100%	100%	100%	50%	400%	150%	4%	0.656	0.328	0.328	1.313
5313006038	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313006039	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313006040	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5313006042	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006043	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006044	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5313006052	High Density Residential	RH	0.49	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	150%	8%	0.863	0.431	0.431	1.725
5313006053	High Density Residential	RH	0.67	0	45	15	7	7	29	5%	100%	100%	100%	100%	100%	150%	8%	1.088	0.544	0.544	2.175

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5313006054	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5313007040	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007041	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007042	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007043	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007044	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007045	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007054	Downtown Specific Plan	MSSP	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313007057	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	50%	400%	150%	4%	0.375	0.188	0.188	0.750
5313007067	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5313007068	Downtown Specific Plan	MSSP	0.81	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5313008013	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313008014	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5313008015	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5313008016	Downtown Specific Plan	MSSP	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5313008026	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5313008027	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5313008028	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5313008029	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5313009008	Medium Density Residential	RM	0.14	4	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313009009	Medium Density Residential	RM	0.31	4	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313009010	Medium Density Residential	RM	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5313009011	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009012	Medium Density Residential	RM	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5313009013	Medium Density Residential	RM	0.13	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313009014	Medium Density Residential	RM	0.19	4	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009015	Medium Density Residential	RM	0.47	8	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313009016	Medium Density Residential	RM	0.02	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	100%	5%	0	0	0	0
5313009017	Medium Density Residential	RM	0.17	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313009018	Medium Density Residential	RM	0.52	20	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313009019	Medium Density Residential	RM	0.18	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009020	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	50%	100%	100%	100%	400%	100%	3%	0.150	0.075	0.075	0.300
5313009021	Medium Density Residential	RM	0.20	4	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313009022	Medium Density Residential	RM	0.35	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313009023	Medium Density Residential	RM	0.17	3	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009024	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009026	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009027	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009028	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009029	Medium Density Residential	RM	0.18	2	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313009030	Medium Density Residential	RM	0.17	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313009031	Medium Density Residential	RM	0.23	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009032	Medium Density Residential	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313009034	Medium Density Residential	RM	0.76	1	70	26	13	13	52	5%	100%	100%	100%	100%	400%	100%	5%	1.300	0.650	0.650	2.600
5313010021	High Density Residential	RH	0.85	0	70	30	15	15	60	5%	100%	100%	100%	100%	400%	100%	5%	1.500	0.750	0.750	3.000
5313010047	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	20%	2.000	1.000	1.000	4.000
5313010048	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313010049	High Density Residential	RH	0.14	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	20%	1.100	0.550	0.550	2.200
5313010050	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5313010051	High Density Residential	RH	0.36	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5313010052	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313010053	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313010054	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5313010055	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010056	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313010057	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010058	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313010059	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313010060	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313010061	High Density Residential	RH	0.14	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313010062	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313010063	High Density Residential	RH	0.37	0	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5313010064	High Density Residential	RH	0.33	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313010065	High Density Residential	RH	0.65	0	70	23	11	11	45	5%	100%	100%	100%	100%	400%	100%	5%	1.125	0.563	0.563	2.250
5313010068	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313011001	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	100%	5%	0.675	0.338	0.338	1.350
5313011004	High Density Residential	RH	0.47	0	70	17	8	8	33	5%	100%	100%	100%	100%	400%	100%	5%	0.825	0.413	0.413	1.650

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313011006	Ostrich Farm Mixed-Use	BP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5313011008	Ostrich Farm Mixed-Use	BP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313011011	Ostrich Farm Mixed-Use	BP	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313011014	Ostrich Farm Mixed-Use	BP	0.60	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	100%	5%	1.000	0.500	0.500	2.000
5313011016	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313012001	Medium Density Residential	RM	0.18	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012002	Medium Density Residential	RM	0.16	2	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313012003	Medium Density Residential	RM	0.40	4	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313012004	Medium Density Residential	RM	0.39	9	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313012005	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012006	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012007	Medium Density Residential	CG	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012008	Transitional Mixed-Use	CG	0.23	3	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313012009	Transitional Mixed-Use	CG	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5313012010	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012011	Medium Density Residential	RM	0.25	2	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5313012012	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5313012013	Medium Density Residential	RM	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5313012014	Medium Density Residential	RM	0.10	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5313012015	Medium Density Residential	RM	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313012016	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313012017	Medium Density Residential	RM	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012018	Medium Density Residential	RM	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012019	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012020	Medium Density Residential	RM	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5313012021	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313017009	High Density Residential	RH	0.08	0	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5313017010	High Density Residential	RH	0.60	0	70	21	11	11	43	5%	100%	100%	100%	100%	400%	100%	5%	1.075	0.538	0.538	2.150
5313017011	High Density Residential	RH	0.34	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5313017013	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017014	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313017017	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313017019	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5313017020	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017021	High Density Residential	RH	0.16	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017022	High Density Residential	RH	0.43	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	100%	5%	0.775	0.388	0.388	1.550
5313017023	High Density Residential	RH	0.43	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	100%	5%	0.775	0.388	0.388	1.550
5313017024	High Density Residential	RH	0.47	0	70	17	8	8	33	5%	100%	100%	100%	100%	400%	100%	5%	0.825	0.413	0.413	1.650
5313017025	High Density Residential	RH	0.45	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	100%	5%	0.800	0.400	0.400	1.600
5313017026	High Density Residential	RH	0.15	0	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5313017027	High Density Residential	RH	0.11	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5313017028	High Density Residential	RH	0.39	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5313017031	High Density Residential	RH	0.26	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5313017038	High Density Residential	RH	0.82	0	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5313017063	High Density Residential	RH	0.30	0	70	10	5	5	20	5%	100%	100%	50%	100%	400%	100%	3%	0.250	0.125	0.125	0.500
5313017067	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5313017802	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5313017902	High Density Residential	RH	0.11	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5314003039	Medium Density Residential	RM	3.02	1	30	0	0	90	90	5%	100%	100%	100%	100%	100%	150%	8%	0	0	6.750	6.750
5315001035	Transitional Mixed-Use	CO	0.19	4	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001036	Transitional Mixed-Use	CO	0.19	3	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315001037	Transitional Mixed-Use	CO	0.23	8	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315001038	Transitional Mixed-Use	CO	0.23	3	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315001042	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315001043	Transitional Mixed-Use	CO	0.17	7	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315001045	Transitional Mixed-Use	CO	0.25	8	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001047	Transitional Mixed-Use	CO	0.24	10	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315001048	Transitional Mixed-Use	CO	0.24	6	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315001072	Downtown Specific Plan	CO	2.62	0	110	144	72	72	288	5%	100%	50%	100%	100%	400%	150%	4%	5.400	2.700	2.700	10.800
5315001073	Transitional Mixed-Use	CO	0.24	1	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315002013	Transitional Mixed-Use	CO	0.24	9	45	1	0	0	1	5%	100%	100%	100%	100%	100%	150%	8%	0.038	0.019	0.019	0.075
5315002014	Transitional Mixed-Use	CO	0.24	6	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315002019	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315002021	Transitional Mixed-Use	CO	0.23	4	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315002023	Transitional Mixed-Use	CO	0.15	3	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315002024	Transitional Mixed-Use	CO	0.08	2	45	1	0	0	1	5%	100%	100%	100%	100%	100%	150%	8%	0.038	0.019	0.019	0.075
5315002030	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	100%	100%	50%	400%	150%	4%	0.525	0.263	0.263	1.050
5315002034	Downtown Specific Plan	CG	0.24	0	110	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5315002035	Downtown Specific Plan	CG	0.29	0	110	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400

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5315002036	Downtown Specific Plan	CG	0.32	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315002037	Downtown Specific Plan	CG	0.03	0	110	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315002038	Downtown Specific Plan	CG	0.13	0	110	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5315002039	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315002040	Downtown Specific Plan	CG	0.32	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315002041	Downtown Specific Plan	CG	0.12	0	110	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315002049	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315002055	Downtown Specific Plan	CG	1.00	0	110	55	27	27	109	5%	100%	100%	100%	100%	400%	150%	8%	4.088	2.044	2.044	8.175
5315002061	Downtown Specific Plan	RM	0.23	0	110	13	6	6	25	5%	100%	100%	100%	100%	400%	150%	8%	0.938	0.469	0.469	1.875
5315002062	Downtown Specific Plan	RM	0.23	0	110	13	6	6	25	5%	100%	100%	100%	100%	400%	150%	8%	0.938	0.469	0.469	1.875
5315002063	Downtown Specific Plan	RM	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315002064	Downtown Specific Plan	RM	0.15	0	110	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315002065	Downtown Specific Plan	RM	0.11	0	110	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315002074	Downtown Specific Plan	CG	0.37	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315002901	Downtown Specific Plan	CG	0.47	0	110	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5315002902	Downtown Specific Plan	CF	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315002905	Downtown Specific Plan	CF	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315002907	Downtown Specific Plan	CF	0.00	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5315002911	Downtown Specific Plan	CF	0.97	1	70	34	17	17	68	5%	100%	100%	100%	100%	400%	150%	8%	2.550	1.275	1.275	5.100
5315002912	Downtown Specific Plan	CF	0.24	1	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5315003023	Downtown Specific Plan	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315003025	Downtown Specific Plan	CG	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003026	Downtown Specific Plan	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315003028	Downtown Specific Plan	CG	0.48	1	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5315003029	Downtown Specific Plan	CG	0.04	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315003030	Downtown Specific Plan	CG	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003031	Downtown Specific Plan	CF	1.78	1	70	62	31	31	124	5%	100%	100%	100%	100%	400%	150%	8%	4.650	2.325	2.325	9.300
5315003032	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315003033	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315003034	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315003039	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003040	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5315003041	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003042	Downtown Specific Plan	CG	0.20	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315003043	Downtown Specific Plan	CG	0.34	0	110	19	9	9	37	5%	50%	100%	100%	100%	400%	150%	4%	0.694	0.347	0.347	1.388
5315003044	Downtown Specific Plan	CG	0.37	0	110	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5315003046	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003047	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315003048	Downtown Specific Plan	CG	0.13	0	110	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5315003049	Downtown Specific Plan	CG	0.08	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5315003050	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315003054	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003055	Downtown Specific Plan	CG	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315003056	Downtown Specific Plan	CG	0.09	0	110	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315003057	Downtown Specific Plan	CG	0.37	0	110	21	10	10	41	5%	100%	100%	100%	100%	400%	150%	8%	1.538	0.769	0.769	3.075
5315003058	Downtown Specific Plan	CG	0.49	0	110	27	14	14	55	5%	100%	50%	100%	100%	400%	150%	4%	1.031	0.516	0.516	2.063
5315003059	Downtown Specific Plan	CG	0.50	1	70	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5315003065	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	50%	100%	100%	400%	150%	4%	0.525	0.263	0.263	1.050
5315003083	Downtown Specific Plan	CG	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315003803	Downtown Specific Plan	CG	0.42	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315003901	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315004027	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	100%	5%	0.175	0.088	0.088	0.350
5315004028	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004029	Transitional Mixed-Use	CO	0.18	12	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004030	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004031	Transitional Mixed-Use	CO	0.18	4	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315004032	Transitional Mixed-Use	CO	0.18	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315004034	Transitional Mixed-Use	CO	0.18	5	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315004035	Transitional Mixed-Use	CO	0.18	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315004037	Transitional Mixed-Use	CO	0.18	12	45	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004038	Medium Density Residential	RM	0.19	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004039	Medium Density Residential	RM	0.18	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004041	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004042	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315004043	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004044	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004045	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315004046	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315004047	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315004066	Downtown Specific Plan	CG	0.36	0	110	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5315004083	Downtown Specific Plan	CG	1.06	0	110	58	29	29	116	5%	100%	100%	100%	100%	400%	150%	8%	4.350	2.175	2.175	8.700
5315004084	Downtown Specific Plan	CG	1.88	0	110	103	52	52	207	5%	100%	100%	100%	100%	400%	150%	8%	7.763	3.881	3.881	15.525
5315004085	Downtown Specific Plan	CG	0.66	0	110	36	18	18	72	5%	100%	100%	100%	100%	400%	150%	8%	2.700	1.350	1.350	5.400

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315004087	Medium Density Residential	RM	0.36	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5315005062	Transitional Mixed-Use	CO	0.16	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315005063	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315005065	Transitional Mixed-Use	CO	0.16	5	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315005066	Transitional Mixed-Use	CO	0.16	2	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315006014	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	50%	100%	100%	100%	400%	150%	4%	0.394	0.197	0.197	0.788
5315006017	Downtown Specific Plan	MSSP	0.51	1	70	17	9	9	35	5%	50%	100%	100%	100%	400%	150%	4%	0.656	0.328	0.328	1.313
5315007030	Downtown Specific Plan	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315007055	Downtown Specific Plan	RM	0.91	1	70	31	16	16	63	5%	100%	100%	100%	100%	400%	150%	8%	2.363	1.181	1.181	4.725
5315007900	Downtown Specific Plan	CF	0.79	1	70	27	14	14	55	5%	100%	100%	100%	100%	400%	150%	8%	2.063	1.031	1.031	4.125
5315008023	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	50%	50%	100%	100%	400%	150%	2%	0.047	0.023	0.023	0.094
5315008025	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	50%	100%	100%	100%	400%	150%	4%	0.019	0.009	0.009	0.038
5315008032	Downtown Specific Plan	MSSP	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315008033	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008034	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008035	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008036	Downtown Specific Plan	MSSP	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5315008037	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315008038	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008039	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008040	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315008041	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008042	Downtown Specific Plan	MSSP	0.45	1	70	15	8	8	31	5%	100%	100%	100%	50%	400%	150%	4%	0.581	0.291	0.291	1.163
5315008043	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315008044	Downtown Specific Plan	MSSP	0.67	1	70	23	12	12	47	5%	100%	100%	100%	100%	400%	150%	8%	1.763	0.881	0.881	3.525
5315008045	Downtown Specific Plan	MSSP	0.53	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	150%	8%	1.350	0.675	0.675	2.700
5315008046	Downtown Specific Plan	MSSP	0.80	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5315009022	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315009023	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315009024	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315009025	Downtown Specific Plan	MSSP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315009026	Downtown Specific Plan	MSSP	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315009027	Downtown Specific Plan	MSSP	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315009028	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315009029	Downtown Specific Plan	MSSP	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315009030	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315009031	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009032	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315009033	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009034	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009035	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315009036	Downtown Specific Plan	MSSP	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009037	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009038	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315009039	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315009046	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315009047	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315009050	Downtown Specific Plan	MSSP	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315010019	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315010020	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315010021	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010022	Medium Density Residential	RM	0.19	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315010023	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010025	Medium Density Residential	RM	0.23	3	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010026	Transitional Mixed-Use	CO	0.19	2	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010028	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010029	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010030	Transitional Mixed-Use	CO	0.17	5	45	1	1	1	3	5%	100%	100%	100%	100%	100%	150%	8%	0.113	0.056	0.056	0.225
5315010031	Transitional Mixed-Use	CO	0.21	3	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315010032	Medium Density Residential	RM	0.23	2	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315010033	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315010035	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010036	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010037	Medium Density Residential	RM	0.16	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010038	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315010039	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010040	Medium Density Residential	RM	0.27	7	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315010041	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315010043	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011027	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315011028	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315011030	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315011031	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011033	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011034	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011035	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011037	Medium Density Residential	RM	0.03	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315011038	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315011039	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315011044	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011045	Transitional Mixed-Use	CO	0.17	1	45	3	2	2	7	5%	100%	100%	100%	100%	100%	150%	8%	0.263	0.131	0.131	0.525
5315011052	Medium Density Residential	RM	0.64	1	30	0	0	18	18	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.350	1.350
5315011067	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315011068	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011903	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315011904	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012016	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012017	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012019	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012020	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315012022	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012023	High Density Residential	RH	0.08	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	150%	8%	0.150	0.075	0.075	0.300
5315012024	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315012025	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315012028	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012029	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012030	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012031	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

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5315012032	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012033	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012034	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315012035	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315012038	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315012048	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012049	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315012050	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315012903	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315012904	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	150%	8%	0.488	0.244	0.244	0.975
5315013019	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315013020	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013021	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013022	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013023	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315013024	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.075	0.075
5315013025	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013026	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013027	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013028	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013029	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013030	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013033	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013034	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013035	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013037	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013038	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013039	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013040	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013041	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315013042	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315013043	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315013046	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315013903	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315013904	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315013906	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315013907	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315014021	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014022	Downtown Specific Plan	MSSP	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014023	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014024	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315014025	Downtown Specific Plan	MSSP	0.04	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315014027	Downtown Specific Plan	MSSP	0.06	1	70	2	1	1	4	5%	50%	100%	100%	100%	400%	150%	4%	0.075	0.038	0.038	0.150
5315014028	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315014029	Downtown Specific Plan	MSSP	0.18	1	70	6	3	3	12	5%	50%	50%	100%	100%	400%	150%	2%	0.113	0.056	0.056	0.225
5315014035	Downtown Specific Plan	MSSP	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315014039	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014040	Downtown Specific Plan	MSSP	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5315014041	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014042	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315014043	Downtown Specific Plan	MSSP	0.15	1	70	5	2	2	9	5%	50%	100%	100%	100%	400%	150%	4%	0.169	0.084	0.084	0.338
5315014049	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	50%	100%	100%	100%	400%	150%	4%	0.019	0.009	0.009	0.038
5315014051	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	100%	50%	50%	100%	400%	150%	2%	0.197	0.098	0.098	0.394
5315015015	Downtown Specific Plan	MSSP	0.13	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315015017	Downtown Specific Plan	MSSP	0.23	1	70	8	4	4	16	5%	50%	100%	100%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5315015047	Downtown Specific Plan	MSSP	0.37	1	70	13	6	6	25	5%	50%	100%	50%	100%	400%	150%	2%	0.234	0.117	0.117	0.469
5315016001	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016002	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016003	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	150%	8%	0.338	0.169	0.169	0.675
5315016004	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016005	High Density Residential	RH	0.34	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	150%	8%	0.600	0.300	0.300	1.200
5315016006	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	150%	8%	0.413	0.206	0.206	0.825
5315016010	High Density Residential	RH	0.28	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315016019	High Density Residential	RH	0.37	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	150%	8%	0.600	0.300	0.300	1.200
5315016022	High Density Residential	RH	0.72	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	150%	8%	1.200	0.600	0.600	2.400
5315016023	High Density Residential	RH	0.64	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	150%	8%	1.050	0.525	0.525	2.100

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5315016024	High Density Residential	RH	0.32	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	150%	8%	0.563	0.281	0.281	1.125
5315016025	High Density Residential	RH	0.42	0	45	10	5	5	20	5%	100%	100%	100%	100%	100%	150%	8%	0.750	0.375	0.375	1.500
5315016026	High Density Residential	RH	0.12	0	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315016027	High Density Residential	RH	0.11	0	45	3	1	1	5	5%	100%	100%	100%	100%	100%	150%	8%	0.188	0.094	0.094	0.375
5315016028	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5315016029	High Density Residential	RH	0.83	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	150%	8%	1.388	0.694	0.694	2.775
5315016031	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016032	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016033	High Density Residential	RH	0.69	0	45	15	8	8	31	5%	100%	100%	100%	100%	100%	150%	8%	1.163	0.581	0.581	2.325
5315016035	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5315016047	High Density Residential	RH	0.28	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5315016900	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	150%	8%	0.638	0.319	0.319	1.275
5315017001	Downtown Specific Plan	MSSP	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315017002	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017003	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017004	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017007	Downtown Specific Plan	MSSP	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315017025	Downtown Specific Plan	MSSP	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5315017026	Downtown Specific Plan	MSSP	0.99	1	70	34	17	17	68	5%	100%	100%	100%	100%	400%	150%	8%	2.550	1.275	1.275	5.100
5315017027	Downtown Specific Plan	MSSP	0.46	1	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5315017028	Downtown Specific Plan	MSSP	0.63	26	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315017029	Downtown Specific Plan	MSSP	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5315017031	Downtown Specific Plan	MSSP	0.56	19	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315017033	Downtown Specific Plan	MSSP	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	150%	8%	0.038	0.019	0.019	0.075
5315017034	Downtown Specific Plan	MSSP	0.10	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5315017035	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5315017036	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017037	Downtown Specific Plan	MSSP	0.25	6	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5315017039	Downtown Specific Plan	MSSP	0.24	12	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5315017040	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5315017043	Downtown Specific Plan	MSSP	0.20	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5315017044	Downtown Specific Plan	MSSP	0.47	16	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017045	Downtown Specific Plan	MSSP	0.44	1	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5315017047	Downtown Specific Plan	MSSP	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315017064	Downtown Specific Plan	MSSP	0.29	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315017088	Downtown Specific Plan	MSSP	0.26	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315017099	Downtown Specific Plan	MSSP	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5315017100	Downtown Specific Plan	MSSP	0.11	1	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525

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5315017101	Downtown Specific Plan	MSSP	0.91	1	70	31	16	16	63	5%	100%	100%	50%	100%	400%	150%	4%	1.181	0.591	0.591	2.363
5315018060	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315018061	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315018062	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018063	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5315018064	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5315018065	Medium Density Residential	RM	0.26	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.525	0.525
5315018066	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315018067	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5315018068	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018070	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018071	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315018072	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315018073	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315018074	Medium Density Residential	RM	0.05	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5315019026	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019027	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019028	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019029	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019030	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019031	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019033	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019034	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019035	Medium Density Residential	RM	0.05	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315019036	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315019037	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5315019038	Medium Density Residential	RM	0.05	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075

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5315019039	Medium Density Residential	RM	0.05	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5315019040	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5315019041	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019042	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019043	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019044	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019045	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019046	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315019047	Downtown Specific Plan	MSSP	0.25	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5315019048	Downtown Specific Plan	MSSP	1.25	1	70	43	22	22	87	5%	100%	100%	100%	100%	400%	150%	8%	3.263	1.631	1.631	6.525
5315019049	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5315020004	Downtown Specific Plan	MSSP	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5315020006	Downtown Specific Plan	MSSP	0.14	1	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5315020008	Downtown Specific Plan	MSSP	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315020009	Downtown Specific Plan	MSSP	0.27	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315020010	Downtown Specific Plan	MSSP	0.27	1	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5315020013	Downtown Specific Plan	MSSP	0.28	1	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5315020014	Downtown Specific Plan	MSSP	1.14	1	70	40	20	20	80	5%	50%	100%	100%	100%	400%	150%	4%	1.500	0.750	0.750	3.000
5315020016	Downtown Specific Plan	MSSP	0.31	1	70	10	5	5	20	5%	50%	100%	100%	100%	400%	150%	4%	0.375	0.188	0.188	0.750
5315020017	Downtown Specific Plan	MSSP	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5315020903	Downtown Specific Plan	MSSP	0.09	1	70	3	1	1	5	5%	50%	100%	100%	100%	400%	150%	4%	0.094	0.047	0.047	0.188
5315021008	Downtown Specific Plan	MSSP	0.57	1	70	19	10	10	39	5%	100%	100%	50%	100%	400%	150%	4%	0.731	0.366	0.366	1.463
5315021031	Downtown Specific Plan	MSSP	0.45	1	70	15	8	8	31	5%	100%	100%	50%	100%	400%	150%	4%	0.581	0.291	0.291	1.163
5315021051	Downtown Specific Plan	MSSP	0.65	1	70	22	11	11	44	5%	100%	100%	50%	100%	400%	150%	4%	0.825	0.413	0.413	1.650
5317019001	Medium Density Residential	RM	0.23	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5317019002	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5317019003	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019004	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019005	Medium Density Residential	RM	0.17	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5317019008	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5317019009	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5317019010	Medium Density Residential	RM	0.08	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075

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5317019011	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5317019012	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5317019013	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5317019014	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5317020015	High Density Residential	RH	0.30	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317020016	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317020017	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317020018	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317020019	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317020020	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317020022	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020023	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020024	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317020025	High Density Residential	RH	0.70	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	100%	5%	0.800	0.400	0.400	1.600
5317020026	High Density Residential	RH	0.84	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	100%	5%	0.925	0.463	0.463	1.850
5317020028	High Density Residential	RH	0.56	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5317020029	High Density Residential	RH	0.53	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317020030	High Density Residential	RH	0.54	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317020031	Downtown Specific Plan	CG	4.44	1	70	155	77	77	309	5%	100%	100%	100%	100%	400%	100%	5%	7.725	3.863	3.863	15.450
5317020032	Downtown Specific Plan	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5317020047	High Density Residential	RH	0.63	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	100%	5%	0.700	0.350	0.350	1.400
5317021001	High Density Residential	RH	0.40	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5317021002	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021003	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021004	High Density Residential	RH	0.20	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317021007	High Density Residential	RH	0.47	0	45	11	5	5	21	5%	100%	100%	100%	100%	100%	100%	5%	0.525	0.263	0.263	1.050
5317021014	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021018	High Density Residential	RH	0.76	0	45	17	9	9	35	5%	100%	100%	100%	100%	100%	100%	5%	0.875	0.438	0.438	1.750
5317021019	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021020	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021023	High Density Residential	RH	0.94	0	45	21	11	11	43	5%	100%	100%	100%	100%	100%	100%	5%	1.075	0.538	0.538	2.150
5317021025	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021026	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317021027	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021028	High Density Residential	RH	0.33	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317021029	High Density Residential	RH	0.40	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5317021030	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021031	High Density Residential	RH	0.33	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317021032	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317021033	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021034	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317021036	High Density Residential	RH	0.61	0	45	14	7	7	28	5%	100%	100%	100%	100%	100%	100%	5%	0.700	0.350	0.350	1.400
5317021037	High Density Residential	RH	1.11	0	45	25	13	13	51	5%	100%	100%	100%	100%	100%	100%	5%	1.275	0.638	0.638	2.550
5317021038	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022001	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317022004	High Density Residential	RH	0.15	0	45	3	2	2	7	5%	100%	100%	50%	100%	100%	100%	3%	0.088	0.044	0.044	0.175
5317022006	High Density Residential	RH	0.96	0	45	22	11	11	44	5%	100%	100%	100%	100%	100%	100%	5%	1.100	0.550	0.550	2.200
5317022007	High Density Residential	RH	0.32	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317022008	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022009	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317022010	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317022011	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5317022012	High Density Residential	RH	0.66	0	45	15	7	7	29	5%	100%	100%	100%	100%	100%	100%	5%	0.725	0.363	0.363	1.450
5317023001	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	50%	100%	100%	100%	100%	100%	3%	0.163	0.081	0.081	0.325
5317023002	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317023003	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317023004	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317023005	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317023006	High Density Residential	RH	0.54	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	100%	5%	0.600	0.300	0.300	1.200
5317023009	High Density Residential	RH	0.69	0	45	15	8	8	31	5%	100%	100%	100%	100%	100%	100%	5%	0.775	0.388	0.388	1.550
5317023010	High Density Residential	RH	0.85	0	45	19	10	10	39	5%	100%	100%	100%	100%	100%	100%	5%	0.975	0.488	0.488	1.950
5317024001	High Density Residential	RH	0.07	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	100%	5%	0.100	0.050	0.050	0.200
5317024002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317024003	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024004	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024005	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317024006	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317024007	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317025001	High Density Residential	RH	0.33	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5317025003	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317025004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317025005	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317025006	High Density Residential	RH	0.22	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317025901	High Density Residential	RH	0.31	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650

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5317026001	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317026002	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317026003	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027001	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027003	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027005	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027006	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027007	High Density Residential	RH	0.20	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027008	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317027009	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317027010	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028001	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5317028002	High Density Residential	RH	0.18	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028003	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5317028004	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5317028005	High Density Residential	RH	0.29	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028006	High Density Residential	RH	0.31	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317028007	High Density Residential	RH	0.29	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028008	High Density Residential	RH	0.31	0	45	7	4	4	15	5%	100%	100%	100%	100%	100%	100%	5%	0.375	0.188	0.188	0.750
5317028015	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600
5317028016	High Density Residential	RH	2.01	0	45	45	23	23	91	5%	100%	100%	100%	100%	100%	100%	5%	2.275	1.138	1.138	4.550
5317028270	Medium Density Residential	RM	2.73	1	30	0	0	81	81	5%	100%	100%	100%	100%	100%	100%	5%	0	0	4.050	4.050
5318001001	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318001002	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318001003	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318001004	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318001005	Medium Density Residential	RM	0.21	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318001011	Medium Density Residential	RH	0.97	42	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318002018	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	50%	100%	100%	100%	100%	100%	3%	0.150	0.075	0.075	0.300
5318002020	High Density Residential	RH	1.80	0	45	40	20	20	80	5%	100%	100%	100%	100%	100%	100%	5%	2.000	1.000	1.000	4.000
5318002028	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318003001	High Density Residential	RH	0.29	0	45	7	3	3	13	5%	100%	100%	100%	100%	100%	100%	5%	0.325	0.163	0.163	0.650
5318003002	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	100%	5%	0.300	0.150	0.150	0.600

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5318003004	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318003005	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318003006	High Density Residential	RH	0.48	0	45	11	5	5	21	5%	100%	100%	100%	100%	100%	100%	5%	0.525	0.263	0.263	1.050
5318003007	High Density Residential	RH	0.49	0	45	11	6	6	23	5%	100%	100%	100%	100%	100%	100%	5%	0.575	0.288	0.288	1.150
5318003008	High Density Residential	RH	0.88	0	45	20	10	10	40	5%	100%	100%	100%	100%	100%	100%	5%	1.000	0.500	0.500	2.000
5318003009	High Density Residential	RH	0.82	0	45	19	9	9	37	5%	100%	100%	100%	100%	100%	100%	5%	0.925	0.463	0.463	1.850
5318003011	High Density Residential	RH	0.38	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5318003801	High Density Residential	RH	0.08	0	45	2	1	1	4	5%	100%	100%	100%	100%	100%	100%	5%	0.100	0.050	0.050	0.200
5318004012	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004015	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004016	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004017	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318004018	High Density Residential	RH	0.34	0	45	8	4	4	16	5%	100%	100%	100%	100%	100%	100%	5%	0.400	0.200	0.200	0.800
5318004019	Downtown Specific Plan	CG	0.50	0	110	28	14	14	56	5%	100%	100%	100%	100%	400%	150%	8%	2.100	1.050	1.050	4.200
5318004020	Downtown Specific Plan	CG	0.21	0	110	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5318004021	Downtown Specific Plan	CG	0.31	0	110	17	9	9	35	5%	100%	100%	100%	100%	400%	150%	8%	1.313	0.656	0.656	2.625
5318004022	Downtown Specific Plan	CG	0.35	0	110	19	10	10	39	5%	100%	100%	100%	50%	400%	150%	4%	0.731	0.366	0.366	1.463
5318004023	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	100%	5%	0.475	0.238	0.238	0.950
5318004024	Downtown Specific Plan	CG	2.00	0	110	110	55	55	220	5%	100%	100%	100%	100%	400%	100%	5%	5.500	2.750	2.750	11.000
5318005001	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005002	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005007	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005008	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005009	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5318005010	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005011	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005012	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005013	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005014	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005015	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005016	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005017	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005018	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005019	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005020	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005021	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005022	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005023	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5318005024	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005025	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005026	High Density Residential	RH	0.20	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005027	High Density Residential	RH	0.73	0	45	16	8	8	32	5%	100%	100%	100%	100%	100%	100%	5%	0.800	0.400	0.400	1.600
5318005030	High Density Residential	RH	0.24	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005031	High Density Residential	RH	0.22	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318005034	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005035	High Density Residential	RH	0.57	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5318005036	High Density Residential	RH	0.23	0	45	5	3	3	11	5%	100%	100%	100%	100%	100%	100%	5%	0.275	0.138	0.138	0.550
5318005038	High Density Residential	RH	0.19	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318005072	High Density Residential	RH	0.56	0	45	13	6	6	25	5%	100%	100%	100%	100%	100%	100%	5%	0.625	0.313	0.313	1.250
5318005088	High Density Residential	RH	0.38	0	45	9	4	4	17	5%	100%	100%	100%	100%	100%	100%	5%	0.425	0.213	0.213	0.850
5318006016	High Density Residential	RH	0.21	0	45	5	2	2	9	5%	100%	100%	100%	100%	100%	100%	5%	0.225	0.113	0.113	0.450
5318006017	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	100%	5%	0.200	0.100	0.100	0.400
5318013025	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013026	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013027	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013028	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013029	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013030	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013031	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318013032	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013033	Medium Density Residential	RM	0.25	13	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318013034	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5318013035	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013036	Medium Density Residential	RM	0.18	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013048	Medium Density Residential	RM	0.10	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318013049	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013050	Medium Density Residential	RM	0.10	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013051	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013052	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100

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5318013053	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318013054	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318013055	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318014001	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014002	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5318014003	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5318014008	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014009	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	50%	100%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5318014011	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318014012	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014013	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014014	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014016	Downtown Specific Plan	RM	0.08	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5318014018	Downtown Specific Plan	CG	0.15	0	110	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5318014019	Downtown Specific Plan	RM	0.07	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318014020	Downtown Specific Plan	CG	0.25	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5318014022	Medium Density Residential	RM	0.29	3	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5318014023	Medium Density Residential	RM	0.23	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014026	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014027	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014028	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014029	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014030	Medium Density Residential	RM	0.15	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014031	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014032	Medium Density Residential	RM	0.18	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318014033	Medium Density Residential	RM	0.30	7	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318014034	Medium Density Residential	RM	0.24	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318014035	Medium Density Residential	RM	0.28	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.350	0.350
5318014042	Medium Density Residential	RM	1.16	1	30	0	0	34	34	5%	100%	100%	100%	100%	100%	100%	5%	0	0	1.700	1.700
5318014086	Medium Density Residential	RM	0.32	1	30	0	0	9	9	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.450	0.450

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5318014094	Medium Density Residential	RM	0.28	2	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5318014095	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318014096	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015001	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5318015002	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015003	Downtown Specific Plan	CG	0.09	0	110	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5318015004	Downtown Specific Plan	CG	0.27	0	110	15	7	7	29	5%	100%	100%	100%	100%	400%	150%	8%	1.088	0.544	0.544	2.175
5318015005	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5318015006	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5318015007	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5318015008	Downtown Specific Plan	CG	0.19	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5318015009	Downtown Specific Plan	CG	0.18	0	110	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5318015010	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015011	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015013	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015017	Downtown Specific Plan	CG	0.62	0	110	34	17	17	68	5%	100%	100%	100%	100%	400%	100%	5%	1.700	0.850	0.850	3.400
5318015018	Medium Density Residential	RM	0.30	4	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318015019	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015020	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015023	Medium Density Residential	RM	0.24	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5318015024	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015025	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015026	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015027	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015028	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015029	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015030	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5318015031	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015032	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015033	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5318015034	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5318015035	Medium Density Residential	RM	0.11	2	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5318015036	Downtown Specific Plan	CG	0.85	0	110	47	23	23	93	5%	100%	100%	100%	100%	400%	150%	8%	3.488	1.744	1.744	6.975
5318015037	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318015038	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016019	Downtown Specific Plan	CG	0.26	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	100%	5%	0.700	0.350	0.350	1.400
5318016021	Downtown Specific Plan	CG	0.01	0	110	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5318016022	Downtown Specific Plan	CG	0.01	0	110	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5318016023	Downtown Specific Plan	CG	0.43	0	110	24	12	12	48	5%	100%	100%	100%	100%	400%	100%	5%	1.200	0.600	0.600	2.400
5318016024	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5318016025	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5318016026	Downtown Specific Plan	CG	0.17	0	110	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5318016027	Downtown Specific Plan	CG	0.35	0	110	19	10	10	39	5%	100%	100%	100%	100%	400%	150%	8%	1.463	0.731	0.731	2.925
5318016028	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016029	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016030	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016031	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016032	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016033	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016034	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016035	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016036	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016037	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5318016038	Downtown Specific Plan	CG	0.08	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318016039	Downtown Specific Plan	CG	0.08	0	110	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5318018001	Medium Density Residential	RM	0.36	8	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319002004	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319002005	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002006	Medium Density Residential	RM	0.21	2	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002008	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319002017	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002018	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300

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5319002019	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319002020	Medium Density Residential	RM	0.15	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002021	Medium Density Residential	RM	0.23	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319002026	Medium Density Residential	RM	0.14	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002027	Medium Density Residential	RM	0.14	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319002028	Medium Density Residential	RM	0.18	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002032	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319002033	Medium Density Residential	RM	0.17	5	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319003001	Medium Density Residential	RM	0.24	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319003002	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003003	Medium Density Residential	RM	0.22	3	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319003005	Medium Density Residential	RM	0.22	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319003006	Medium Density Residential	RM	0.19	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003015	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319003018	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319003019	Medium Density Residential	RM	0.22	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319003020	Medium Density Residential	RM	0.22	6	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319003022	Medium Density Residential	RM	0.12	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003023	Medium Density Residential	RM	0.15	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319003030	Medium Density Residential	RM	0.19	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319003032	Downtown Specific Plan	CG	0.89	0	110	49	24	24	97	5%	100%	100%	100%	100%	400%	150%	8%	3.638	1.819	1.819	7.275
5319003045	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.225	0.225
5319004001	Medium Density Residential	RM	0.18	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004003	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004004	Medium Density Residential	RM	0.15	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319004005	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004006	Medium Density Residential	RM	0.21	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004007	Medium Density Residential	RM	0.40	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0

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5319004008	Medium Density Residential	RM	0.20	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004009	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319004010	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004011	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004014	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319004016	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004017	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004019	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319004020	Transitional Mixed-Use	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319004021	Transitional Mixed-Use	RH	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319004022	Transitional Mixed-Use	RH	0.19	5	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319004023	Medium Density Residential	RM	0.13	3	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319004024	Medium Density Residential	RM	0.19	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319004025	Medium Density Residential	RM	0.23	7	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319004035	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319004036	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319004037	Transitional Mixed-Use	RH	0.12	2	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5319005001	Medium Density Residential	RM	0.29	8	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319005008	Medium Density Residential	RM	0.20	3	30	0	0	3	3	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.113	0.113
5319005009	Medium Density Residential	RM	0.30	8	30	0	0	1	1	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.038	0.038
5319005010	Medium Density Residential	RM	0.30	4	30	0	0	5	5	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.188	0.188
5319005015	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319005017	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319005018	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319005019	Medium Density Residential	RM	0.24	6	30	0	0	1	1	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0.038	0.038
5319005021	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319005022	High Density Residential	RH	0.32	0	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5319005023	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5319005024	High Density Residential	RH	0.26	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319005025	High Density Residential	RH	0.12	0	70	4	2	2	8	5%	50%	100%	100%	100%	400%	150%	4%	0.150	0.075	0.075	0.300
5319005027	Medium Density Residential	RM	0.21	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300

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5319006005	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319006025	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319006027	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5319006034	High Density Residential	RH	0.44	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5319007001	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5319007043	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319007048	High Density Residential	RH	0.75	0	70	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5319008001	Mixed-Use Centers	CG	0.24	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319008002	Mixed-Use Centers	CG	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319008005	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008006	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008007	Mixed-Use Centers	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319008008	Mixed-Use Centers	CG	0.29	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319008009	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319008018	High Density Residential	RH	0.50	0	70	18	9	9	36	5%	100%	100%	100%	100%	400%	150%	8%	1.350	0.675	0.675	2.700
5319008039	Mixed-Use Centers	CG	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319009003	Mixed-Use Centers	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319009004	Mixed-Use Centers	CG	0.20	1	70	7	3	3	13	5%	100%	50%	100%	100%	400%	150%	4%	0.244	0.122	0.122	0.488
5319009005	Mixed-Use Centers	CG	0.20	1	70	7	3	3	13	5%	100%	50%	100%	100%	400%	150%	4%	0.244	0.122	0.122	0.488
5319009013	Mixed-Use Centers	CG	0.46	12	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319009014	Mixed-Use Centers	CG	0.42	14	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319009015	Mixed-Use Centers	CG	0.21	4	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319009016	Mixed-Use Centers	CG	0.21	4	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319009033	Mixed-Use Centers	CG	0.28	1	70	9	5	5	19	5%	100%	50%	100%	100%	400%	150%	4%	0.356	0.178	0.178	0.713
5319009036	Mixed-Use Centers	CG	0.69	1	70	24	12	12	48	5%	100%	50%	100%	100%	400%	150%	4%	0.900	0.450	0.450	1.800
5319009037	Mixed-Use Centers	CG	1.23	1	70	42	21	21	84	5%	100%	100%	100%	100%	400%	150%	8%	3.150	1.575	1.575	6.300
5319017011	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319017013	Medium Density Residential	RM	0.26	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319017014	Medium Density Residential	RM	0.26	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319017018	Medium Density Residential	RM	0.25	1	30	0	0	7	7	5%	100%	100%	50%	100%	100%	150%	4%	0	0	0.263	0.263
5319018001	High Density Residential	RH	0.33	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319018002	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319018004	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018005	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018006	High Density Residential	RH	0.27	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018011	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319018012	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018013	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018015	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018016	High Density Residential	RH	0.14	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319018017	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319018018	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319018019	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319018020	High Density Residential	RH	0.56	0	70	19	10	10	39	5%	100%	100%	100%	100%	400%	150%	8%	1.463	0.731	0.731	2.925
5319018022	High Density Residential	RH	0.27	0	70	9	5	5	19	5%	100%	100%	100%	100%	400%	150%	8%	0.713	0.356	0.356	1.425
5319018029	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319019001	Mixed-Use Centers	CG	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	150%	8%	0.413	0.206	0.206	0.825
5319019002	Mixed-Use Centers	CG	0.08	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319019005	Mixed-Use Centers	CG	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	150%	8%	0.150	0.075	0.075	0.300
5319019007	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019008	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019009	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019013	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019014	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019015	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019016	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019019	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019021	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019024	Mixed-Use Centers	CG	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5319019025	Mixed-Use Centers	CG	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5319019027	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319019040	High Density Residential	RH	0.46	0	70	16	8	8	32	5%	100%	100%	100%	100%	400%	150%	8%	1.200	0.600	0.600	2.400
5319019056	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319019061	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	50%	100%	400%	150%	4%	0.281	0.141	0.141	0.563
5319019064	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5319020003	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020004	Medium Density Residential	RM	0.21	5	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319020005	Medium Density Residential	RM	0.21	8	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020006	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020007	Medium Density Residential	RM	0.21	12	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020008	Medium Density Residential	RM	0.53	8	30	0	0	8	8	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.600	0.600
5319020011	Mixed-Use Centers	CG	0.21	1	70	7	3	3	13	5%	100%	100%	50%	100%	400%	150%	4%	0.244	0.122	0.122	0.488

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5319020012	Medium Density Residential	RM	0.39	12	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319020013	Medium Density Residential	RM	0.39	6	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5319020016	Medium Density Residential	RM	0.13	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319020017	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020018	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319020019	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319020025	Medium Density Residential	RM	0.33	14	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020026	Mixed-Use Centers	CG	0.37	1	70	12	6	6	24	5%	100%	100%	50%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5319020046	Medium Density Residential	RM	0.42	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319020056	Medium Density Residential	RM	0.38	16	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319020061	Medium Density Residential	RM	0.44	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319021001	Medium Density Residential	RM	0.15	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021002	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021003	Medium Density Residential	RM	0.12	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021004	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319021005	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319021006	Medium Density Residential	RM	0.32	2	30	0	0	8	8	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.600	0.600
5319021007	Medium Density Residential	RM	0.28	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319021008	Medium Density Residential	RM	0.26	10	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021011	Medium Density Residential	RM	0.39	17	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021012	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021013	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319021014	Medium Density Residential	RM	0.39	17	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319021025	Medium Density Residential	RM	0.39	1	30	0	0	11	11	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.825	0.825
5319023001	Medium Density Residential	RM	0.37	6	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319023004	Medium Density Residential	RM	0.43	8	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319023006	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319023007	Medium Density Residential	RM	0.26	6	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150

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5319023008	Medium Density Residential	RM	0.21	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023026	Medium Density Residential	RM	0.43	18	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023027	Medium Density Residential	RM	0.57	25	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319023043	Medium Density Residential	RM	0.42	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.900	0.900
5319027011	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319027013	Medium Density Residential	RM	0.38	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5319027016	Medium Density Residential	RM	0.11	4	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319027017	Medium Density Residential	RM	0.06	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319027021	Medium Density Residential	RM	0.29	10	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319027022	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319027907	Medium Density Residential	RM	0.33	10	30	0	0	0	0	5%	50%	100%	100%	100%	100%	150%	4%	0	0	0	0
5319028012	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319028024	Medium Density Residential	RM	0.38	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.750	0.750
5319032012	Medium Density Residential	RM	0.52	1	30	0	0	15	15	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.125	1.125
5319032014	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319032015	Medium Density Residential	RM	0.18	4	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319032017	Medium Density Residential	RM	0.56	1	30	0	0	16	16	5%	100%	100%	100%	100%	100%	150%	8%	0	0	1.200	1.200
5319033001	Medium Density Residential	RM	0.24	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319033002	Medium Density Residential	RM	0.12	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319033006	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319033016	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319033017	Medium Density Residential	RM	0.25	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319033018	Medium Density Residential	RM	0.25	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033019	Medium Density Residential	RM	0.43	7	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319033024	Medium Density Residential	RM	0.47	13	30	0	0	1	1	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.075	0.075
5319033025	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033026	Medium Density Residential	RM	0.16	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319033027	Medium Density Residential	RM	0.24	4	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319034006	High Density Residential	RH	0.25	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319034007	High Density Residential	RH	0.26	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319035001	Transitional Mixed-Use	CO	0.58	1	70	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5319035002	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5319035003	High Density Residential	RH	0.35	0	70	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5319035005	High Density Residential	RH	0.27	0	45	6	3	3	12	5%	100%	100%	100%	100%	100%	150%	8%	0.450	0.225	0.225	0.900
5319035006	Transitional Mixed-Use	CO	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319035012	High Density Residential	RH	0.26	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5319035013	High Density Residential	RH	0.19	0	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5319035014	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319035015	High Density Residential	RH	0.03	0	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5319035016	Transitional Mixed-Use	CO	0.17	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5319035036	High Density Residential	RH	0.41	0	45	9	5	5	19	5%	100%	100%	100%	100%	100%	150%	8%	0.713	0.356	0.356	1.425
5319035045	High Density Residential	RH	0.55	0	45	12	6	6	24	5%	100%	100%	100%	100%	100%	150%	8%	0.900	0.450	0.450	1.800
5319036016	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036017	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036018	High Density Residential	RH	0.19	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036019	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319036021	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319037001	High Density Residential	RH	0.58	0	70	20	10	10	40	5%	100%	100%	100%	100%	400%	150%	8%	1.500	0.750	0.750	3.000
5319037002	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319037003	High Density Residential	RH	0.24	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5319037004	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037005	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037006	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037007	High Density Residential	RH	0.21	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5319037008	Medium Density Residential	RM	0.41	8	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319037009	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037010	Medium Density Residential	RM	0.35	11	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319037011	Medium Density Residential	RM	0.37	2	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037012	Medium Density Residential	RM	0.16	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5319037013	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319037014	Medium Density Residential	RM	0.17	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.225	0.225
5319037015	Medium Density Residential	RM	0.22	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.450	0.450
5319038001	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5319038008	High Density Residential	RH	0.18	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5319038009	Medium Density Residential	RM	0.11	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5319038010	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319038011	Medium Density Residential	RM	0.14	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5319038012	Medium Density Residential	RM	0.20	7	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5319038013	Medium Density Residential	RM	0.20	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5319038014	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.375	0.375
5319038017	Medium Density Residential	RM	0.41	1	30	0	0	11	11	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.825	0.825
5319038018	High Density Residential	RH	0.44	0	70	15	8	8	31	5%	100%	100%	100%	100%	400%	150%	8%	1.163	0.581	0.581	2.325
5319038019	Medium Density Residential	RM	0.60	26	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5319038020	High Density Residential	RH	0.74	0	70	26	13	13	52	5%	100%	100%	100%	100%	400%	150%	8%	1.950	0.975	0.975	3.900
5319038022	High Density Residential	RH	0.24	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5319038028	High Density Residential	RH	0.22	0	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5320001004	Downtown Specific Plan	CG	0.12	0	110	7	3	3	13	5%	100%	100%	100%	50%	400%	150%	4%	0.244	0.122	0.122	0.488
5320001012	Medium Density Residential	RM	0.18	2	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5320001014	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5320001015	Medium Density Residential	RM	0.19	2	30	0	0	4	4	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.300	0.300
5320001016	Medium Density Residential	RM	0.19	6	30	0	0	0	0	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0	0
5320001021	Downtown Specific Plan	CG	0.36	0	110	20	10	10	40	5%	100%	100%	100%	50%	400%	150%	4%	0.750	0.375	0.375	1.500
5320001024	Downtown Specific Plan	CG	0.68	0	110	37	19	19	75	5%	100%	100%	100%	50%	400%	150%	4%	1.406	0.703	0.703	2.813
5320002008	Medium Density Residential	RM	0.21	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5320002010	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5320002022	Medium Density Residential	RM	0.23	2	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5320003001	Downtown Specific Plan	CG	0.39	0	110	22	11	11	44	5%	100%	100%	100%	100%	400%	150%	8%	1.650	0.825	0.825	3.300
5320003003	Downtown Specific Plan	CG	0.20	0	110	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320003005	Downtown Specific Plan	CG	0.21	0	110	12	6	6	24	5%	100%	100%	100%	50%	400%	150%	4%	0.450	0.225	0.225	0.900
5320003006	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5320003007	Downtown Specific Plan	CG	0.25	0	110	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320003008	Downtown Specific Plan	CG	0.22	0	110	12	6	6	24	5%	100%	100%	100%	100%	400%	150%	8%	0.900	0.450	0.450	1.800
5320003011	Medium Density Residential	RM	0.15	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320003015	Medium Density Residential	RM	0.20	4	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320005023	Transitional Mixed-Use	CG	0.81	1	70	28	14	14	56	5%	50%	100%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5320005903	Transitional Mixed-Use	CG	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320005904	Transitional Mixed-Use	CG	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320005905	Transitional Mixed-Use	CG	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	150%	8%	0.488	0.244	0.244	0.975
5320006901	Community Facilities	CF	4.06	0	70	142	71	71	284	5%	100%	100%	100%	100%	400%	150%	8%	10.650	5.325	5.325	21.300
5320007019	High Density Residential	RH	0.13	0	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320007020	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320007021	High Density Residential	RH	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320007022	High Density Residential	RH	0.81	0	70	29	14	14	57	5%	100%	100%	100%	100%	400%	150%	8%	2.138	1.069	1.069	4.275
5320008024	High Density Residential	RH	0.80	0	70	28	14	14	56	5%	100%	100%	100%	100%	400%	150%	8%	2.100	1.050	1.050	4.200
5320008025	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320008026	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009004	High Density Residential	RH	0.17	0	45	4	2	2	8	5%	100%	100%	100%	100%	100%	150%	8%	0.300	0.150	0.150	0.600
5320009005	High Density Residential	RH	0.54	0	70	19	9	9	37	5%	100%	100%	100%	100%	400%	150%	8%	1.388	0.694	0.694	2.775
5320009006	High Density Residential	RH	0.20	0	70	7	4	4	15	5%	100%	100%	100%	100%	400%	150%	8%	0.563	0.281	0.281	1.125
5320009008	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009010	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009015	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009017	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009022	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320009024	High Density Residential	RH	0.17	0	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320009025	High Density Residential	CG	0.33	0	70	12	6	6	24	5%	100%	50%	100%	100%	400%	150%	4%	0.450	0.225	0.225	0.900
5320009028	High Density Residential	RH	0.40	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320009031	Mixed-Use Centers	CG	0.81	1	70	28	14	14	56	5%	100%	50%	100%	100%	400%	150%	4%	1.050	0.525	0.525	2.100
5320010001	High Density Residential	RH	0.38	0	70	13	7	7	27	5%	100%	100%	100%	100%	400%	150%	8%	1.013	0.506	0.506	2.025
5320010002	High Density Residential	RH	0.25	0	70	9	4	4	17	5%	100%	100%	100%	100%	400%	150%	8%	0.638	0.319	0.319	1.275
5320010003	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320010005	High Density Residential	RH	0.28	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320011001	High Density Residential	RH	0.29	0	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320011002	High Density Residential	RH	0.13	0	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320011003	High Density Residential	RH	0.41	0	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320011004	High Density Residential	RH	0.23	0	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320017015	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320018001	Medium Density Residential	RM	0.25	8	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320018003	Medium Density Residential	RM	0.28	11	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320018004	Medium Density Residential	RM	0.36	8	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320018006	Medium Density Residential	RM	0.16	6	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375

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5320018007	Medium Density Residential	RM	0.02	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5320018014	Medium Density Residential	RM	0.01	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	150%	8%	0	0	0	0
5320018024	Medium Density Residential	RM	0.05	1	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320018026	Medium Density Residential	RM	0.24	1	70	8	4	4	16	5%	100%	100%	50%	100%	400%	150%	4%	0.300	0.150	0.150	0.600
5320020001	Medium Density Residential	RM	0.43	8	70	11	6	6	23	5%	100%	100%	100%	100%	400%	150%	8%	0.863	0.431	0.431	1.725
5320020003	Medium Density Residential	RM	0.17	7	70	3	1	1	5	5%	100%	100%	100%	100%	400%	150%	8%	0.188	0.094	0.094	0.375
5320020004	Medium Density Residential	RM	0.17	4	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320020005	Medium Density Residential	RM	0.17	3	30	0	0	2	2	5%	100%	100%	100%	100%	100%	150%	8%	0	0	0.150	0.150
5320020006	Medium Density Residential	RM	0.30	5	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320021003	Medium Density Residential	RM	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320021004	Medium Density Residential	RM	0.21	5	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320021007	Medium Density Residential	RM	0.40	12	70	8	4	4	16	5%	100%	100%	100%	100%	400%	150%	8%	0.600	0.300	0.300	1.200
5320021009	Medium Density Residential	RM	0.40	1	70	14	7	7	28	5%	100%	100%	100%	100%	400%	150%	8%	1.050	0.525	0.525	2.100
5320021014	Medium Density Residential	RM	0.28	11	70	4	2	2	8	5%	100%	100%	100%	100%	400%	150%	8%	0.300	0.150	0.150	0.600
5320021020	Medium Density Residential	RM	0.14	4	70	3	2	2	7	5%	100%	100%	100%	100%	400%	150%	8%	0.263	0.131	0.131	0.525
5320021021	Medium Density Residential	RM	0.22	6	70	5	2	2	9	5%	100%	100%	100%	100%	400%	150%	8%	0.338	0.169	0.169	0.675
5320021023	Medium Density Residential	RM	0.38	14	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320021024	Medium Density Residential	RM	0.20	12	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320021025	Medium Density Residential	RM	0.20	12	70	1	1	1	3	5%	100%	100%	100%	100%	400%	150%	8%	0.113	0.056	0.056	0.225
5320031011	Mixed-Use Centers	CG	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050
5320031012	Medium Density Residential	RM	0.33	2	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320031013	Medium Density Residential	RM	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320031014	Medium Density Residential	RM	0.33	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	150%	8%	0.788	0.394	0.394	1.575
5320031015	Medium Density Residential	RM	0.33	10	70	6	3	3	12	5%	100%	100%	100%	100%	400%	150%	8%	0.450	0.225	0.225	0.900
5320031022	Transitional Mixed-Use	CG	0.30	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	150%	8%	0.750	0.375	0.375	1.500
5320032003	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5320032039	Community Facilities	CF	2.47	0	70	87	43	43	173	5%	100%	100%	100%	100%	400%	150%	8%	6.488	3.244	3.244	12.975
5321007013	Medium Density Residential	RM	0.27	4	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5321007014	Transitional Mixed-Use	CG	0.32	1	70	11	5	5	21	5%	100%	100%	100%	100%	400%	100%	5%	0.525	0.263	0.263	1.050

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321007018	Medium Density Residential	RM	0.84	1	70	29	14	14	57	5%	100%	100%	100%	100%	400%	100%	5%	1.425	0.713	0.713	2.850
5321008016	Medium Density Residential	RM	0.24	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321008017	Medium Density Residential	RM	0.26	6	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321008049	Medium Density Residential	RM	0.52	1	70	18	9	9	36	5%	100%	100%	100%	100%	400%	100%	5%	0.900	0.450	0.450	1.800
5321011006	Medium Density Residential	RM	0.34	6	70	9	5	5	19	5%	100%	100%	100%	100%	400%	100%	5%	0.475	0.238	0.238	0.950
5321011007	Medium Density Residential	RM	0.22	5	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321011008	Medium Density Residential	RM	0.49	12	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5321012008	Medium Density Residential	RM	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5321012017	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321012018	Medium Density Residential	RM	0.27	8	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321013001	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013002	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013003	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013004	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013005	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013006	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013007	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321013008	Community Facilities	CF	0.72	0	70	25	13	13	51	5%	100%	100%	100%	100%	400%	100%	5%	1.275	0.638	0.638	2.550
5321013009	Medium Density Residential	RM	0.22	2	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321013010	Medium Density Residential	RM	0.08	0	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5321014001	Medium Density Residential	RM	0.01	1	70	0	0	0	0	5%	100%	100%	100%	100%	400%	100%	5%	0	0	0	0
5321014002	Medium Density Residential	RM	0.14	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5321014003	Medium Density Residential	RM	0.14	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014004	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014005	Medium Density Residential	RM	0.14	2	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014006	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014007	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321014012	Medium Density Residential	RM	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321014017	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321014018	Medium Density Residential	RM	0.09	1	70	3	1	1	5	5%	100%	100%	100%	100%	400%	100%	5%	0.125	0.063	0.063	0.250
5321015004	Medium Density Residential	CG	0.13	5	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321015005	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015006	Medium Density Residential	RM	0.13	3	70	3	2	2	7	5%	100%	100%	100%	100%	400%	100%	5%	0.175	0.088	0.088	0.350
5321015007	Medium Density Residential	RM	0.23	4	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015008	Medium Density Residential	RM	0.12	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015009	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321015010	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015011	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015012	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321015013	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015014	Medium Density Residential	RM	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321015015	Transitional Mixed-Use	RM	0.20	2	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015016	Mixed-Use Centers	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321015017	Mixed-Use Centers	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015018	Mixed-Use Centers	RM	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321015020	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	50%	100%	400%	100%	3%	0.288	0.144	0.144	0.575
5321015021	Medium Density Residential	CG	0.20	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321017002	Transitional Mixed-Use	CG	0.32	8	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750
5321017003	Medium Density Residential	RM	0.27	8	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321017004	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321017006	Medium Density Residential	RM	0.13	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017008	Medium Density Residential	RM	0.16	3	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017009	Medium Density Residential	RM	0.37	10	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321017010	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321017011	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321017012	Transitional Mixed-Use	CG	0.14	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321017013	Medium Density Residential	RM	0.22	1	70	7	4	4	15	5%	100%	100%	100%	100%	400%	100%	5%	0.375	0.188	0.188	0.750

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						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321017900	Medium Density Residential	RM	0.03	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018001	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018002	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018003	Medium Density Residential	RM	0.15	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321018004	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018005	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018006	Medium Density Residential	RM	0.39	10	70	9	4	4	17	5%	100%	100%	100%	100%	400%	100%	5%	0.425	0.213	0.213	0.850
5321018007	Medium Density Residential	RM	0.16	1	70	5	2	2	9	5%	100%	100%	100%	100%	400%	100%	5%	0.225	0.113	0.113	0.450
5321018008	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018009	Medium Density Residential	RM	0.16	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018010	Medium Density Residential	RM	0.17	1	70	5	3	3	11	5%	100%	100%	100%	100%	400%	100%	5%	0.275	0.138	0.138	0.550
5321018011	Medium Density Residential	RM	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321018012	Medium Density Residential	RM	0.07	1	70	2	1	1	4	5%	100%	100%	100%	100%	400%	100%	5%	0.100	0.050	0.050	0.200
5321018013	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018014	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018015	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018016	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018017	Medium Density Residential	RM	0.04	1	70	1	0	0	1	5%	100%	100%	100%	100%	400%	100%	5%	0.025	0.013	0.013	0.050
5321018020	Medium Density Residential	RM	0.11	1	70	4	2	2	8	5%	100%	100%	100%	100%	400%	100%	5%	0.200	0.100	0.100	0.400
5321018025	Medium Density Residential	RM	0.06	2	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5321018026	Medium Density Residential	RM	0.06	2	70	1	1	1	3	5%	100%	100%	100%	100%	400%	100%	5%	0.075	0.038	0.038	0.150
5321019003	Mixed-Use Centers	CG	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019004	Mixed-Use Centers	CG	0.38	1	70	13	6	6	25	5%	100%	100%	100%	100%	400%	100%	5%	0.625	0.313	0.313	1.250
5321019009	Mixed-Use Centers	CG	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019012	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019013	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019014	Medium Density Residential	RM	0.17	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019015	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321019016	Medium Density Residential	RM	0.18	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019017	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019018	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019019	Medium Density Residential	RM	0.19	1	70	6	3	3	12	5%	100%	100%	100%	100%	400%	100%	5%	0.300	0.150	0.150	0.600
5321019020	Medium Density Residential	RM	0.21	1	70	7	3	3	13	5%	100%	100%	100%	100%	400%	100%	5%	0.325	0.163	0.163	0.650
5321019021	Medium Density Residential	RM	0.23	1	70	8	4	4	16	5%	100%	100%	100%	100%	400%	100%	5%	0.400	0.200	0.200	0.800
5321019022	Mixed-Use Centers	CG	2.92	1	70	102	51	51	204	5%	100%	100%	100%	100%	400%	100%	5%	5.100	2.550	2.550	10.200
5321019023	Mixed-Use Centers	CG	0.35	1	70	12	6	6	24	5%	100%	100%	100%	100%	400%	100%	5%	0.600	0.300	0.300	1.200
5321038016	Mixed-Use Centers	CG	0.31	1	70	10	5	5	20	5%	100%	100%	100%	100%	400%	100%	5%	0.500	0.250	0.250	1.000
5321038017	Mixed-Use Centers	CG	0.33	1	70	11	6	6	23	5%	100%	100%	100%	100%	400%	100%	5%	0.575	0.288	0.288	1.150
5324012901	Medium Density Residential	RM	0.04	1	30	0	0	0	0	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0	0
5324018003	Medium Density Residential	RM	0.23	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5324018004	Medium Density Residential	RM	0.25	1	30	0	0	6	6	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.300	0.300
5324018012	Medium Density Residential	RM	0.20	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324018013	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018014	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018016	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324018017	Medium Density Residential	RM	0.44	1	30	0	0	12	12	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.600	0.600
5324018018	Medium Density Residential	RM	0.29	1	30	0	0	8	8	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.400	0.400
5324019009	Medium Density Residential	RM	0.07	1	30	0	0	1	1	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.050	0.050
5324019010	Medium Density Residential	RM	0.09	1	30	0	0	2	2	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.100	0.100
5324019011	Medium Density Residential	RM	0.16	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019012	Medium Density Residential	RM	0.17	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019013	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019014	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324019015	Medium Density Residential	RM	0.19	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250
5324019016	Medium Density Residential	RM	0.15	1	30	0	0	3	3	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.150	0.150
5324019017	Medium Density Residential	RM	0.18	1	30	0	0	4	4	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.200	0.200
5324019018	Medium Density Residential	RM	0.21	1	30	0	0	5	5	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.250	0.250

APN	Current General Plan Land Use	Current Zoning	Parcel Size (Acres)	Existing Units	Maximum Density	Maximum Additional Development Capacity				Development Capacity Adjustments								Anticipated Development Capacity			
						Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Historic	Commercial Utilization	Buildings Constructed since 2000	Environmental Constraints	Density ≥ 50du/ac	Within 1/2 Mile of Major Transit Stop	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5324019019	Medium Density Residential	RM	0.36	1	30	0	0	10	10	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.500	0.500
5324019023	Medium Density Residential	RM	0.59	1	30	0	0	17	17	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.850	0.850
5324019024	Medium Density Residential	RM	0.51	1	30	0	0	14	14	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.700	0.700
5324019025	Medium Density Residential	RM	0.25	1	30	0	0	7	7	5%	100%	100%	100%	100%	100%	100%	5%	0	0	0.350	0.350
5324019029	Medium Density Residential	RM	3.53	1	30	0	0	105	105	5%	100%	100%	100%	100%	100%	100%	5%	0	0	5.250	5.250
5324019078	Medium Density Residential	RM	2.71	1	30	0	0	80	80	5%	100%	100%	100%	100%	100%	100%	5%	0	0	4.000	4.000
			371.32	2,244		8,905	4,463	6,224	19,592									533	266	379	1,178

~~ADDRESS/ INTERSECTION~~	~~ZIP CODE~~	~~APN~~	~~LOWER-INCOME UNITS~~	~~MODERATE-INCOME UNITS~~	~~ABOVE MODERATE-INCOME UNITS~~	~~REALISTIC TOTAL CAPACITY (UNITS)[3]~~	~~PARCEL SIZE (ACRES)~~	~~CURRENT GENERAL PLAN LAND USE~~	~~CURRENT ZONING~~	~~PROPOSED GENERAL PLAN DESIGNATION~~	~~PROPOSED ZONING~~	~~MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)~~	~~EXISTING USES~~	~~CONSTRAINTS~~
~~Downtown Specific Plan~~	~~91030~~	~~5313006041~~	~~1~~	~~0~~	~~0~~	~~1~~	~~0.07~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5313006043~~	~~1~~	~~1~~	~~0~~	~~2~~	~~0.18~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5313006044~~	~~1~~	~~0~~	~~1~~	~~2~~	~~0.18~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5313007042~~	~~1~~	~~1~~	~~0~~	~~2~~	~~0.15~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Parking Lots (Commercial Use Properties)~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5313007054~~	~~1~~	~~1~~	~~0~~	~~2~~	~~0.16~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Srve Shps:Radio, TV, Refrig, Prnt Shp~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5313007067~~	~~1~~	~~1~~	~~1~~	~~3~~	~~0.31~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Office Buildings~~	~~Existing commercial office~~
~~Downtown Specific Plan~~	~~91030~~	~~5313008026~~	~~1~~	~~0~~	~~1~~	~~2~~	~~0.17~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Residential - Two Units~~	~~Existing multi-family residential~~
~~Downtown Specific Plan~~	~~91030~~	~~5313008027~~	~~1~~	~~0~~	~~0~~	~~1~~	~~0.12~~	~~Mission Street Specific Plan~~	~~MSSP~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Office Buildings~~	~~Existing commercial office~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003022~~	~~2~~	~~1~~	~~1~~	~~4~~	~~0.37~~	~~Community Facilities~~	~~CF~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Institutional - Churches~~	~~Existing church~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003025~~	~~1~~	~~0~~	~~1~~	~~2~~	~~0.17~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Mission Street Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing multi-unit commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003039~~	~~1~~	~~0~~	~~1~~	~~2~~	~~0.20~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Banks Savings & Loan~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003040~~	~~1~~	~~1~~	~~0~~	~~2~~	~~0.22~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003042~~	~~1~~	~~0~~	~~1~~	~~2~~	~~0.20~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003046~~	~~1~~	~~0~~	~~0~~	~~1~~	~~0.07~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003048~~	~~1~~	~~0~~	~~0~~	~~1~~	~~0.13~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Restaurants, Cocktail Lounges~~	~~Existing commercial retail~~
~~Downtown Specific Plan~~	~~91030~~	~~5315003056~~	~~0~~	~~0~~	~~1~~	~~1~~	~~0.09~~	~~General Commercial~~	~~CG~~	~~Downtown Specific Plan~~	~~Fair Oaks Avenue Zone~~	~~70~~	~~Commercial - Stores~~	~~Existing commercial retail~~

ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)[3]	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	EXISTING USES	CONSTRAINTS
Downtown Specific Plan	91030	5315007055	22	0	0	22	0.91	Medium Density Residential	RM	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315008023	0	0	1	1	0.09	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315008024	3	1	1	5	0.49	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315008032	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing commercial retail
Downtown Specific Plan	91030	5315008035	1	1	0	2	0.24	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing auto service station with potential for soil contamination
Downtown Specific Plan	91030	5315008043	1	0	1	2	0.18	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing commercial office
Downtown Specific Plan	91030	5315008045	3	1	1	5	0.53	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing multi-unit commercial retail
Downtown Specific Plan	91030	5315009026	1	0	0	1	0.08	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing commercial retail
Downtown Specific Plan	91030	5315009030	1	0	0	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315009032	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315009046	0	1	0	1	0.09	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315009047	1	0	0	1	0.09	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315014022	0	1	0	1	0.13	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Two Units	Existing multi-family residential Within the North of Mission Historic District
Downtown Specific Plan	91030	5315014027	0	1	0	1	0.06	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315014035	1	1	0	2	0.20	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing commercial retail
Downtown Specific Plan	91030	5315014042	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing office
Downtown Specific Plan	91030	5315015015	1	0	0	1	0.13	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315017034	0	1	0	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017040	1	0	0	1	0.14	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315017047	3	3	2	8	0.24	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315019047	1	1	1	3	0.25	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315021001	1	0	0	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail Within the Mission West Historic District

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Downtown Specific Plan	91030	5318004020	1	1	0	2	0.21	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Restaurants, Cocktail Lounges	Existing quick-serve restaurant
Downtown Specific Plan	91030	5318014001	1	0	1	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5318014095	1	1	0	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5318014096	1	0	1	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5318015003	0	0	1	1	0.09	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Srvc Shps:Radio, TV, Refrig, Pat Shp	Existing commercial retail
Downtown Specific Plan	91030	5318015004	1	1	1	3	0.27	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5318015006	1	0	1	2	0.21	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Banks Savings & Loan	Existing bank
Downtown Specific Plan	91030	5313006040	0	0	1	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Two Units	Existing multi-family residential
Downtown Specific Plan	91030	5313007057	1	1	1	3	0.31	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Auto, Recreation EQPT, Construction EQPT, Sales & Service	Existing auto service station, likely environmental remediation necessary
Downtown Specific Plan	91030	5313007068	5	2	1	8	0.81	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing multi-unit commercial retail
Downtown Specific Plan	91030	5313008014	0	0	1	1	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5313008016	1	0	1	2	0.22	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315002030	2	1	1	4	0.42	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Service Stations	Existing gas station, likely environmental remediation necessary
Downtown Specific Plan	91030	5315002034	4	0	0	4	0.24	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315002035	1	1	1	3	0.29	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315002036	1	1	1	3	0.32	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315002039	1	1	0	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315002041	1	0	0	1	0.12	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003029	0	0	1	1	0.04	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315003031	9	4	5	18	1.78	Community Facilities	CF	Downtown Specific Plan	Mission Street Zone	70	Institutional - Churches	Existing church
Downtown Specific Plan	91030	5315003059	3	1	1	5	0.50	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial – Office Buildings	Existing office
Downtown Specific Plan	91030	5315006014	1	1	1	3	0.32	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial – Restaurants, Cocktail Lounges	Existing restaurant Within the Mission West Historic District
Downtown Specific Plan	91030	5315006015	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315006017	3	1	1	5	0.51	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Heavy Manufacturing	Existing office Within the Mission West Historic District

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Downtown Specific Plan	91030	5315008033	1	0	1	2	0.24	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Srvc Shps:Radio, TV, Refrig, Pnt Shp	Existing multi-tenant retail commercial -
Downtown Specific Plan	91030	5315008039	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315008041	1	0	1	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315008046	5	2	1	8	0.80	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential Within the Mission West Historic District
Downtown Specific Plan	91030	5315009023	1	0	0	1	0.05	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315009035	1	1	1	3	0.31	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315009036	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Two Units	Existing multi-family residential
Downtown Specific Plan	91030	5315009037	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing multi-tenant retail commercial -
Downtown Specific Plan	91030	5315014029	1	0	1	2	0.18	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315014041	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Two Units	Existing multi-family residential
Downtown Specific Plan	91030	5315014043	1	1	0	2	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315014049	1	0	0	1	0.04	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315017004	0	1	0	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017007	1	1	1	3	0.28	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315017029	1	1	1	3	0.32	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017039	1	1	0	2	0.24	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315020004	1	1	1	3	0.30	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315020006	0	0	1	1	0.14	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315020013	1	1	1	3	0.28	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315021051	24	0	0	24	0.65	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5318014018	1	0	1	2	0.15	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Residential - Four Units (Any Combination)	Existing multi-family residential
Downtown Specific Plan	91030	5318015002	1	1	0	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Professional Buildings	Existing office
Downtown Specific Plan	91030	5318015005	1	0	1	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	None known
Downtown Specific Plan	91030	5318016021	0	0	1	1	0.01	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5318016022	1	0	0	1	0.01	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail

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Downtown Specific Plan	91030	5318016024	1	1	0	2	0.17	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5318016025	1	0	1	2	0.17	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5318016026	1	0	1	2	0.17	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5320001024	4	2	1	7	0.68	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Service Stations	Existing gas station with car servicing station; expected environmental remidation is required
Downtown Specific Plan	91030	5320001004	0	0	1	1	0.12	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Restaurants, Cocktail Lounges	Existing quick-serve restaurant
Downtown Specific Plan	91030	5313006039	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Professional Buildings	Existing office
Downtown Specific Plan	91030	5313007040	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Mineral Processing	Existing vacant office building
Downtown Specific Plan	91030	5313008015	1	1	0	2	0.24	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5313006024	2	1	1	4	0.44	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5313006042	1	0	1	2	0.18	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5313008013	1	0	0	1	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315001072	13	6	6	25	2.62	Professional Office	CO	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315002040	1	1	1	3	0.32	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Restaurants, Cocktail Lounges	Existing restaurant
Downtown Specific Plan	91030	5315002055	6	2	2	10	1.00	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Shopping Centers (Neighborhood, community)	Existing multi-unit commercial retail
Downtown Specific Plan	91030	5315002074	2	1	1	4	0.37	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003026	1	0	0	1	0.15	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003030	1	1	0	2	0.16	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Residential - Three Units (Any Combination)	Existing multi-family residential
Downtown Specific Plan	91030	5315003034	1	1	0	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003054	1	0	0	1	0.07	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003055	0	1	0	1	0.07	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003058	3	1	1	5	0.49	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Banks Savings & Loan	Existing multi-unit commercial retail
Downtown Specific Plan	91030	5315009027	1	0	0	1	0.03	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315009028	1	0	0	1	0.05	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Commercial	Existing single-family residential
Downtown Specific Plan	91030	5315009031	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Warehousing, Distribution, Storage	Existing auto service station, likely environmental remediation necessary
Downtown Specific Plan	91030	5315009033	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Four Units (Any Combination)	Existing multi-family residential
Downtown Specific Plan	91030	5315009034	1	0	1	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Three Units (Any Combination)	Existing multi-family residential

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Downtown Specific Plan	91030	5315009039	1	1	0	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315014021	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential Within the North of Mission Historic District
Downtown Specific Plan	91030	5315017001	1	0	0	1	0.12	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017002	0	1	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017025	1	0	1	2	0.21	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Three Units (Any Combination)	Existing multi-family residential
Downtown Specific Plan	91030	5315017027	3	1	1	5	0.46	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Institutional - Hospitals	Existing assisted living facility
Downtown Specific Plan	91030	5315017036	1	1	1	3	0.25	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017037	1	0	1	2	0.25	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315020010	2	0	1	3	0.27	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315002038	0	0	1	1	0.13	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315002049	1	0	1	2	0.22	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003023	1	0	0	1	0.07	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003028	3	1	1	5	0.48	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315003041	1	1	0	2	0.20	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003043	1	1	1	3	0.34	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Recreational - Theaters	Existing historic movie theater
Downtown Specific Plan	91030	5315003047	1	0	0	1	0.09	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003057	2	1	1	4	0.37	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Banks Savings & Loan	Existing bank
Downtown Specific Plan	91030	5315007030	1	1	0	2	0.16	Medium Density Residential	RM	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315008036	1	1	1	3	0.33	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing light manufaturing
Downtown Specific Plan	91030	5315008038	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315008040	0	1	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315008044	4	2	1	7	0.67	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315009022	1	0	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Auto, Recreation EQPT, Construction EQPT, Sales & Service	Existing auto service station, likely environmental remediation necessary
Downtown Specific Plan	91030	5315009025	0	0	1	1	0.08	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315009029	0	0	1	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315009050	1	1	1	3	0.33	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail

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Downtown Specific Plan	91030	5315014023	0	0	1	1	0.14	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Two Units	Existing multi-family residential Within the North of Mission Historic District
Downtown Specific Plan	91030	5315014024	1	0	0	1	0.12	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Auto, Recreation EQPT, Construction EQPT, Sales & Service	Existing office
Downtown Specific Plan	91030	5315014028	0	0	1	1	0.12	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing multi-unit commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315014039	0	1	0	1	0.11	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Existing office
Downtown Specific Plan	91030	5315014040	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315015017	1	1	0	2	0.23	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office Within the Mission West Historic District
Downtown Specific Plan	91030	5315017003	0	0	1	1	0.10	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017026	6	2	2	10	0.99	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Institutional - Hospitals	Existing medical building
Downtown Specific Plan	91030	5315017028	4	1	1	6	0.63	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315017031	4	1	1	6	0.56	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315017033	0	0	1	1	0.04	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017043	1	0	1	2	0.20	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315017044	3	1	1	5	0.47	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Five or more apartments	Existing multi-family residential
Downtown Specific Plan	91030	5315017045	2	1	1	4	0.44	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315019048	7	3	3	13	1.25	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5315020016	1	1	1	3	0.31	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing commercial retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315021008	27	0	0	27	0.57	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315021031	20	0	0	20	0.45	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5313007041	1	0	1	2	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing vacant office building
Downtown Specific Plan	91030	5313007043	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5313007044	1	1	0	2	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5315003050	1	1	0	2	0.17	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5313007045	1	0	1	2	0.15	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail parking
Downtown Specific Plan	91030	5313008028	1	0	0	1	0.14	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking

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Downtown Specific Plan	91030	5315008034	1	1	0	2	0.17	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5315009038	1	0	1	2	0.18	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5318014008	1	0	1	2	0.18	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5318016038	1	0	0	1	0.08	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5315017035	1	0	0	1	0.09	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315003049	1	0	0	1	0.08	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing vacant retail
Downtown Specific Plan	91030	5315008037	1	1	0	2	0.25	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5315014047	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking Within the Mission West Historic District
Downtown Specific Plan	91030	5315020906	0	0	1	1	0.07	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Government - Government Parcel	Existing museum Within the Mission West Historic District
Downtown Specific Plan	91030	5315014051	1	1	1	3	0.32	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315015047	2	1	1	4	0.37	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Stores	Existing retail Within the Mission West Historic District
Downtown Specific Plan	91030	5315003065	2	1	1	4	0.42	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing multi-unit mixed-use retail and office
Downtown Specific Plan	91030	5315017072	9	4	4	17	1.74	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Mixed-Use	Existing mixed-use retail and residential
Downtown Specific Plan	91030	5315017099	1	0	1	2	0.16	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing commercial office
Downtown Specific Plan	91030	5313008029	0	1	0	1	0.03	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential side yard
Downtown Specific Plan	91030	5315002912	1	1	0	2	0.24	Community Facilities	CF	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5315008025	1	0	0	1	0.04	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking Within the Mission West Historic District
Downtown Specific Plan	91030	5315003803	2	1	1	4	0.42	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Vancant existing industrial
Downtown Specific Plan	91030	5315002901	3	1	1	5	0.47	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing municipal parking
Downtown Specific Plan	91030	5315002037	1	0	0	1	0.03	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5315009024	0	1	0	1	0.03	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Store Combination	Existing retail
Downtown Specific Plan	91030	5315020017	2	1	1	4	0.40	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Industrial - Lgt Manf.Sm. EQPT. Manuf Sm.Shps Instr.Manuf. Prnt Plnts	Vancant industrial
Downtown Specific Plan	91030	5315003083	1	0	0	1	0.08	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5318004021	1	1	1	3	0.31	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5318014003	1	0	1	2	0.19	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail

ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)[2]	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	EXISTING USES	CONSTRAINTS
Downtown Specific Plan	91030	5318015001	1	1	0	2	0.19	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Store Combination	Existing multi-unit retail
Downtown Specific Plan	91030	5318015036	5	2	2	9	0.85	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5318016023	2	1	1	4	0.43	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Recreational - Clubs., Lodge Halls, Fraternal Organizations	Existing Masonic Temple
Downtown Specific Plan	91030	5318004022	1	1	1	3	0.35	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Service Stations	Existing auto service station with potential for soil contamination.
Downtown Specific Plan	91030	5318004024	11	5	4	20	2.00	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Supermarkets	Existing grocery store
Downtown Specific Plan	91030	5318014009	1	0	1	2	0.21	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5318016027	1	1	1	3	0.35	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Office Buildings	Existing office
Downtown Specific Plan	91030	5318016019	1	1	1	3	0.26	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5320001021	2	1	1	4	0.36	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Auto, Recreation EQPT, Construction EQPT, Sales & Service	Existing auto service station with potential for soil contamination.
Downtown Specific Plan	91030	5318014002	0	0	1	1	0.09	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Stores	Existing retail
Downtown Specific Plan	91030	5318014020	2	0	1	3	0.25	General Commercial	CG	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5318016039	1	0	0	1	0.08	General Commercial	CG	Downtown Specific Plan	Fair Oaks Avenue Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
Downtown Specific Plan	91030	5318014019	1	0	0	1	0.07	Medium Density Residential	RM	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5318014016	1	0	0	1	0.08	Medium Density Residential	RM	Downtown Specific Plan	Mission Street Zone	70	Residential - Single	Existing single-family residential
Downtown Specific Plan	91030	5315014025	1	0	0	1	0.04	Mission Street Specific Plan	MSSP	Downtown Specific Plan	Mission Street Zone	70	Commercial - Parking Lots (Commercial Use Properties)	Existing retail parking
			378	127	137	642	54.95							

[1] There are no known environmental constraints identified on these sites, any environmental constraints identified in the future will be mitigated prior to residential development occurring

[2] Realistic capacity is based on the likelihood that with the adoption of the DTSP 20 percent of these sites will develop with residential ,the income level breakdown assumed 10 percent of units will be built for lower-income households and the remaining 10% was split between moderate and above moderate-income households.

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~~Downtown Specific Plan Rezoning~~Additional Capacity ~~Analysis~~ Through Rezoning

As discussed throughout the Housing Element, the City is in the process of drafting the DTSP and making other zone changes to accommodate additional residential capacity throughout the city. The City~~, and~~ is required to adopt the new Specific Plan and other zone changes as part of Programs 3.a, 3.b and 3.n. Table VI-51, above, lists the parcels located within the Downtown Specific Plan, as well as the High Density and Medium Density Residential zones, ~~area~~ which are not otherwise included in the site specific analysis as part of Table VI-50.

As part of the required rezoning, the City will increase the zoning capacity of Medium Density residential zones to 30 du/ac and of High Density residential zones to 45 du/ac. This increased capacity is sufficient to induce redevelopment of some portion of both of these zones at a high enough density to ensure the provision of housing affordable to lower income households.

Within the Downtown Specific Plan, ~~I~~it is anticipated that ~~the Downtown Specific Plan will include~~there will be two zones~~:~~, the Mission Street Zone and the Fair Oaks Avenue Zone, the Huntington Avenue Zone, and the Ostrich Farm Zone.

Within the Mission Street Zone, it is anticipated that the maximum Floor Area Ratio will be ~~2~~7.0, with an additional intensity bonus of up to a FAR of ~~2~~7.5 available through community benefit incentives. The maximum building height for this zone is anticipated to be ~~35~~ 84 feet and seven stories, once the citywide height limit is repealed or replaced in this area.

Within the Fair Oaks Avenue Zone, it is anticipated that the maximum Floor Area Ratio will be ~~2~~10.0, with an additional intensity bonus of up to a FAR of ~~2.5~~11 available through community benefit incentives. The maximum building height for this zone is anticipated to be ~~45~~ 110 feet and 10 stories, once the citywide height limit is repealed or replaced in this area.

In addition, the area around Huntington Avenue and the Ostrich Farm will also be made into mixed-use zones either through inclusion into the Downtown Specific Plan or through a mixed-use overlay. The development standards in these mixed-use areas will mirror the standards of the Mission Street zone withing the DTSP.

The City understands not all of these sites will redevelop in the planning ~~period so is including a larger set of parcels with the 20% likelihood of redevelopment applied. Realistic capacity is based on the likelihood that with the adoption of the DTSP 20 percent of these sites will develop with residential units. The income level breakdown assumed 10 percent of the units will be built for lower-income households and the remaining 10 percent was allocated to moderate- and above moderate-income households~~. It is anticipated that each parcel has a base likelihood to be redeveloped of 5%, with that likelihood being adjusted based on specific factors related to each parcel listed below.

- **Historic or Historic District:** Site that are historic or located in a historic district are anticipated to be half as likely to be developed than non-historic sites. Properties that are historic or are located in a historic district are required to be reviewed by the City's Cultural Heritage Commission and are required to fulfill certain requirements as described in Section 6.5.2, *Governmental Constraints*, of the Housing Element. Because of these added constraints, historic properties are given a 50% development capacity adjustment.

- **Commercial Lot Utilization:** Many of the sites in the Downtown Specific Plan are currently being used as commercial properties. However, there are a wide range of intensity of uses within the area, with the existing uses being more economically viable the greater the intensity of use. Therefore, existing commercial uses at an intensity with a Floor Area Ratio of 2.0 or greater has been given a 50% development capacity adjustment.

- **Recent Construction:** The vast majority of buildings within the Downtown Specific Plan Area are older than 20 years. It is anticipated that buildings constructed within the past 20 years are less likely to be redeveloped during the planning period. Buildings built within the past 20 years have been given a 50% development capacity adjustment.

- **Environmental Constraints:** While the environmental condition of each site is not known, it is possible to anticipate that some sites will have environmental constraints that will require remediation based on the site's current or historic uses. Sites with known current and historic uses that are likely to require environmental remediation, such as gas stations and automotive service uses, have been given a 50% development capacity adjustment.

- **Proximity to Transit:** The Downtown Specific Plan area is well served by transit. Sites that are located within ½ mile of a Major Transit Stop, as defined by Public Resource Code Section 21064.3, have been given a 150% development capacity adjustment. Projects on these sites will not be required to provide on-site parking once Program 3.b is implemented.

- **Density ≥ 50 du/ac**: It is anticipated that sites with a higher allowed intensity will be more likely to be redeveloped due to the higher potential return on investment by the property owners and developers of these sites. Therefore, sites with a residential zoning capacity of 50 du/ac or more are given a 400% development capacity adjustment.

Availability of Infrastructure

Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Assessment being prepared for the Housing Element and the Environmental Impact Report being prepared for the General Plan and Downtown Specific Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.

Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-52. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-52
COMPARISON OF SITE CAPACITY AND RHNA

INCOME GROUP	TOTAL RHNA	UNITS APPROVED SINCE 6/30/21	ADUS WITH APPROVED BUILDING PERMITS SINCE 6/30/21	PROJECTED ACCESSORY DWELLING UNITS	UNITS ON VACANT AND NON-VACANT SITES WITH SUITABLE ZONING (TABLE VI-44)	UNITS ON VACANT SITES NEEDING ZONING CHANGES (SITE 1 TABLE IV-50)	UNITS ON NON-VACANT SITES NEEDING ZONING CHANGES (TABLE IV-44 AND 50)	UNITS ~~ON ADDITIONAL DOWNTOWN PARCELS~~DUE TO REZONING (TABLE VI-51)	TOTAL CAPACITY	SURPLUS RHNA	SURPLUS RHNA PERCENT
Extremely Low	757	0	1	45	0	70	~~523~~522	~~378~~533	~~1,178~~1,332	~~23~~177	15%
Very Low		0	1	27							
Low	398	0	3	130							
Moderate	334	0	1	6	~~27~~0	0	~~218~~205	~~127~~266	~~379~~478	~~45~~144	43%
Above Moderate	578	9	22	89	~~153~~109	0	~~380~~286	~~137~~379	~~790~~894	~~212~~316	55%
TOTAL	**2,067**	**9**	**29**	**297**	~~180~~109	**70**	~~1,121~~1,083	~~642~~1,178	~~2,347~~2,775	~~280~~708	34%

Note: The income levels assigned to the ADUs approved since June 30, 2021 are based on the SCAG ADU affordability analysis.

6.6.3 Financial Resources

A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-53 describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to the City on a competitive basis for a variety of housing and community development activities. City competes for funds through the State's application process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Federal Emergency Shelter Grants	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	New Construction Rehabilitation Homeless Assistance Public Services
Home Investment Partnership Program (HOME)	Grants available to the City on a competitive basis for a variety of housing activities. City competes for funds through the State's application process.	Homebuyer Assistance Rehabilitation New Construction Rental Assistance
Housing Choice Voucher Program (Section 8)	Assistance program that provides direct funding for rental subsidies for very low-income families.	Rental Assistance
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	New Construction
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	Rehabilitation
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.	Homeless Assistance New Construction
Housing Opportunities for Persons with AIDS (HOPWA)	The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.	Rental assistance
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	Homebuyer assistance Rehabilitation New construction Rental assistance
2. State Programs		
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and non-entitlement jurisdictions, and competitive grants to non-entitlement jurisdictions.	Predevelopment Development Acquisition Rehabilitation Preservation Matching Funds Homelessness Assistance Accessibility Modifications Homeownership Assistance Fiscal Incentives

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Local Early Action Planning (LEAP) Grants	The Local Action Planning Grants (LEAP), provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that: Accelerate housing production Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.	Housing element updates Updates to zoning, plans or procedures to increase/accelerate housing production Pre-approved architectural and site plans Establishing State-defined Pro-housing policies See complete list in program materials
SB 2 Technical Assistance Grants	Financial and technical assistance to local governments to update planning documents and zoning ordinances to streamline housing production, including but not limited to general plans, community plans, specific plans, implementation of sustainable communities strategies, and local coastal programs.	Technical assistance Planning document updates
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	Homebuyer Assistance
Building Equity and Growth in Neighborhoods (BEGIN)	A state-funded program administered by HCD which provides low- and moderate-income households up to $30,000 for a down payment.	Homebuyer Assistance
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	Homebuyer Assistance Rehabilitation
Single Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	Homebuyer Assistance
Housing and Disability Advocacy Program (HDAP)	Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.	Rental assistance
No Place Like Home	Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.	New construction
Mental Health Services Act (MHSA)	Funding through MHSA of 2004 available to counties to spend toward mental health services.	New construction Special needs programs
Homeless Emergency Aid Program (HEAP)	A block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California.	Identified homelessness needs Capital improvements related to homelessness Rental assistance
California Emergency Solutions and Housing (CESH)	Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.	Homelessness service system administration New construction Rental assistance
Low-Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	New Construction
3. Private Resources/Financing Programs/Regional Programs		
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multifamily rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition

Table VI-53
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Federal National Mortgage Association (Fannie Mae)	Fixed-rate mortgages issued by private mortgage insurers. Mortgages which fund the purchase and rehabilitation of a home. Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance Rehabilitation
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. City provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	Homebuyer Assistance
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	New Construction Homebuyer Assistance Rehabilitation Housing Supportive Services
San Gabriel Valley Regional Housing Trust	A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects.	New Construction

6.6.4 Opportunities for Energy Conservation

Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.

Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use, which translates to a reduction in energy use. In 2020, the Council adopted a Climate Action Plan (CAP) as a long-range planning document that guides the City towards a target of carbon neutrality by 2045, which aligns with the State's overall climate goals. The Housing Plan also includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.

As part of the City's commitment to protecting the environment and building resiliency, South Pasadena chose to utilize Clean Power Alliance as the City's residential electricity provider in February 2019, and commercial electricity provider in May 2019. The City selected 100% Green Power as the default option for residential customers, which provides 100% renewable energy through South

California Edison's (SCE) electrical infrastructure. In 2021, 95% of residents subscribed to the 100% Green Power option.

The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-54
COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED

INCOME LEVEL	RHNA ALLOCATION	UNITS PERMITTED 2013-2020	REMAINING ALLOCATION
Very Low	17	1	16
Low	10	3	7
Moderate	11	1	10
Above Moderate	25	113	-
Total	**63**	**118**	**33**

Source: City of South Pasadena Annual Progress Reports, HCD, 2021

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

    - Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.
- Seniors:
    - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.
- Unhoused Persons:
    - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.

- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
- The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.

Table VI-55 describes the City's progress in implementing the 2014-2021 Housing Element programs.

Table VI-55
2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Energy Efficiency Program This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program. **Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.	The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements. For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in more enforcement of housing maintenance and support for displaced tenants. The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.	Amend and continue with current energy-related program.
Planning Assistance and Permit Processing The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.	The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight Year Objective: Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period.		
Housing Development Program This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications. **Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate-income housing units during the 2014-2021 planning period.	No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full-service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.	Amend substantially to reflect current City efforts and continue.
CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners. **Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.	The City continues to provide information about CalHome and conducts outreach through its contracted housing rights and tenant protection agency. They serve as the main source of this type of information and support for South Pasadena residents.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Section 8 Rental Assistance The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons. **Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.	Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/ The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program. HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.	Continue.
Housing Acquisition and Rehabilitation A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing. **Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).	Amend to address accomplishments and continue.
Density Bonus for Affordable Housing The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households.	The Senior Housing project at 625 Fair Oaks was approved in 2020 and received a 35-percent density bonus. It will have 86 units with 13 units reserved for low-income households. The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction with adoption of an inclusionary housing ordinance, the City	Amend to address updates to state law and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist with development of 21 lower income units and 5 moderate income units.	incorporated streamlined approval for waivers in conjunction with the density bonus for projects that include on-site inclusionary housing. City staff regularly provides assistance to applicants considering proposing projects using the density bonus.	
Homeless Services The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena. **Eight-year Objective**: The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.	The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region. In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents. Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Senior Housing The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors. **Eight-year Objective**: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing apartment buildings as affordable senior housing whenever possible.	The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.	Continue.
Vacant Sites The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels. **Eight-year Objective:** Continue to maintain an inventory of vacant and underdeveloped sites for development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate-income housing units.	No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.	Amend and continue.
Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. **Eight-year Objective:** Continue to promote the development of housing units above ground floor commercial uses on vacant properties located	The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market-rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs is also located in a mixed-use district. A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been included in the draft programs section to further facilitate housing in the mixed-use areas.	Amend and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.		
Residential Second Units The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts. **Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.	The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2021 addressed issues that had added complexity to ADU approval in order to further facilitate ADU production. Although the 5th Cycle objective for residential second units was low, ADUs have become a much more significant component of the housing strategy over the past eight years. In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. Following the City's adoption of a new ADU ordinance in mid-2021, the number of building permits for ADUs increased substantially to 32 building permits in 2021. At the close of this housing element period, a second Code revision (Phase 2 for historic properties) was adopted in order to better facilitate ADUs on those properties, which is expected to further increase the applications and issuance of building permits for ADUs.	Amend and continue.
Land Use Controls 1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit. **Eight-year Objective:** The City will adopt an amendment to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use	Objective 1: Ordinance 2253 amended the Zoning Code to remove the conditional-use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. Objective 2: The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum	Objective 1. Delete. Objective 2. Amend and continue. Objective 3. Amend to reflect accomplishments and continue. Objective 4. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months. 2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300 foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population. **Eight Year Objective**: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds. 3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. **Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. 4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area, establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for	number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P-permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law. Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements. Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.	Objective 5. Amend to address completed portions of the program and continue. Objective 6. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
review by the Director of Planning and Building prior to occupancy and operations. **Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types. 5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements. **Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. 6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations. **Eight-year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code. 7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.		

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.		
Provision of Technical Assistance to Developers of Affordable Housing The City's Planning & Building Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. **Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process. The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications are submitted with all requirements to streamline the approval process. The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding. ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Fair Housing Program The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs. **Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing for persons with disabilities, on a case by case basis, in order to promote equal access to housing.	The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation. The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know-your-rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.	Amend and continue.
Promote Energy Conservation The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents. **Eight-year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building design guidelines and development standards, including the use of solar	Policies are being developed as part of the General Plan Update, currently underway.	Combine with Energy-Efficiency Program and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates, and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.		

6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES

This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.

6.8.1 Goals, Policies, and Programs

The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:

- Conserving the existing supply of affordable housing;
- Assisting in the provision of housing;
- Providing adequate sites to achieve a variety and diversity of housing;
- Removing governmental constraints as necessary; and
- Promoting equal housing opportunity.

The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. Furthermore, South Pasadena's housing plan includes a sixth goal aimed at ensuring housing stability and affordability for renters, who make up more than half of South Pasadena's population. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: Community Development Department, Public Works Department

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b – Convert Caltrans Homes to Affordable Housing

The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties.

The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB 381 that respond to the cost constraints of particular properties.

SB 381 allows the City to sell identified historic homes at fair market value, but requires that the City use the proceeds from the sale to provide three affordable units for each home sold at fair market value. Additionally, if the City purchases non-historic surplus properties from Caltrans, SB 381 provides the City the option to sell the properties to moderate or lower income households, or rent the properties to lower income households.

Additionally, the City may consider the construction of additional units, either as ADUs or Missing Middle housing, on certain parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional

buffer if constructed.~~The California Department of Transportation (Caltrans) is obligated by State law to offer unoccupied Caltrans-owned surplus residential properties located in South Pasadena for sale to the City. The City has expressed interest to Caltrans in purchasing these twenty (20) unoccupied surplus properties through this State program, which contain twenty-two (22) housing units. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on these surplus properties ensuring that they are made available to moderate or lower income households. Through this Program, if economically feasible, the City will preserve and rehabilitate these properties as affordable housing, and make them available to moderate and lower income households.~~

Eight-year Objective: Acquire and c~~C~~onvert ~~20~~ unoccupied, Caltrans-owned properties~~,~~ that are not sold at fair market value ~~containing 22 housing units,~~ to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Maximize the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.

Funding Source: General Fund; HRE; public (federal, state, regional) grants, ~~or~~ loans, and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)

Responsible Agency: Caltrans; Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State ;target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions in the Southwest Monterey Hills neighborhood and other neighborhoods with the oldest housing stock identified in the 2022 survey (Table VI-26), or as subsequently identified, to reduce displacement risk of tenants living in currently substandard housing.

The City will continue to monitor opportunities and pursue funds annually, as available, through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies.

~~The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy, that will~~To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge. ~~The City will post availability of this funding program on city's website by January 2023, with annual updates; and will develop a marketing strategy plan by July 2023 to educate homeowners and property owners of the availability of these funds for rehabilitation, which may include posts in local newspapers, on City social media, and in newsletters annually; sending mailers at least every other year to areas with older housing stock; annual inserts in electric and gas bills, and distribution of flyers at neighborhood street fairs, farmer's markets and similar community social events.~~

Eight-year Objective: Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.

Funding Source: HOME, ~~SB 2~~ PHLA, program fees collected by covered rental property owners, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. ~~Develop~~ Propose Rental Housing ~~Occupancy~~ Inspection Program to City Council by October 2024. ~~and Policy in fiscal year 2022/2023. Develop a marketing strategy, to be implemented at least annually, by July 2023.~~

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that the City has not been tracking any affordable housing units with deed-restrictions and/or subsidized funding. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually, or by request, with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino to bring the CalEnviroScreen percentile score below the 70th percentile impaired drinking water. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel particulate matter exposure which is concentrated in the northern portion of South Pasadena north of Mission Street, and groundwater contamination which is isolated in the southeastern portion of the City south of Mission Street and east of Meridian Avenue

to reduce the impact of these in areas with the highest scores to below the CalEnviroScreen 50th percentile.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate in identified areas to bring the CalEnviroScreen percentile impaired drinking water score below the 70th percentile; and groundwater and diesel particulate matter scores in identified areas below the 50th percentile.

Funding Source: General Fund

Responsible Agency: ~~Community Development Department,~~ Public Works Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the City's contracted housing rights and tenant protection agency.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses,

incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Expand housing mobility opportunities by encouraging construction of ~~1,000~~ affordable units ~~(lower-income RHNA allocation is 1,155), with at least 300 of these~~ in higher-income residential areas~~ with lower proportions of overpayment~~, as well as on sites with developer interest including higher density residential, mixed-use sites within the Downtown~~-~~ Specific Plan and other mixed-use areas, and non-residential sites with redevelopment potential on underutilized commercial properties. Accomplish this by facilitating ~~timely~~ expedited review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

Program 2.b – Affordable Housing Production

The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.

Eight-year Objective: Fund and build 400 affordable units, at least 200 on sites with the highest access to resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and 200 affordable units on residentially zoned sites in higher-income neighborhoods to facilitate housing mobility in mixed-income neighborhoods, and limit potential for concentrating affordable housing in areas identified with higher rates of renter households and incidence of poverty.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the City's contracted housing rights and tenant protection agency.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households in the areas with higher rates of homeowner overpayment and poverty and neighborhoods with a high proportion of renter households to facilitate housing mobility for a minimum of 50 low-income and 50 very low-income households to receive assistance during the 2021-2029 planning period. The status of availability of funding will be posted on the City's website and updated as funding becomes available.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; City's contracted housing rights and tenant protection agency

Timeframe: Ongoing as NOFAs are released for CalHome; City's contracted housing rights and tenant protection agency will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract with a housing rights and tenant protection agency to provide a biannual educational workshop, beginning in 2023, for rental property landlords, property managers, and other rental housing providers on the benefits of making their units available to HCV holders. Prioritize outreach efforts to property owners and landlords with multifamily and single family rental units in higher-income residential neighborhoods to reduce existing concentrations of HCV renter households in the Fremont Avenue/Huntington Avenue/Meridian Avenue and Mission Street neighborhoods and maximize housing mobility opportunities in higher income neighborhoods, with the objective of at least 40 housing providers committing to pricing one or more of their units to be eligible to accept HCV holders.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing.

Program 2.f - Offer Services to People without Housing

The City will continue its participation in the regional mobile outreach program administered by San Gabriel Valley Council of Governments (SGVCOG). As part of this program, an outreach team spends three hours per week in South Pasadena to provide referrals and support to unhoused individuals. In addition, the South Pasadena Police Department will continue to perform its own outreach to unhoused individuals in South Pasadena, referring them to 211 for resources and services and providing its remaining emergency motel vouchers that were purchased with the City's formerly allocated Measure H funds.~~emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.~~

SGV CARE

The City of South Pasadena is participating in San Gabriel Valley Crisis Assistance Response and Engagement Program (SGV CARE) with Arcadia and San Marino. Launched in August 2022 by the SGVCOG and Los Angeles Centers for Alcohol and Drug Abuse (L.A. CADA), SGV CARE is the first multi-city regional effort to provide alternative mobile responses to 9-1-1 calls for people experiencing mental or behavioral health emergencies, including those who are unhoused. The SGV

CARE response team is composed of a Licensed Clinical Social Worker, an Emergency Medical Technician, and a Substance Use Disorder Counselor, and it commits to a 30-minute maximum response time to non-violent, non-medical emergency service calls with a focus on serving a variety of needs related to mental and behavioral health and/or homelessness. The pilot phase of this program, also known as the Homeless, Mental Health and Crisis Response Pilot Program, entails a co-response with law enforcement and expires May 31, 2023.

SGV CARE's approach alleviates the burden on law enforcement, while ensuring that communities members experiencing a mental or behavioral health crisis and/or homelessness receive safe and effective crisis intervention and de-escalation services; emotional support and counseling; mental health assessments; safety planning with referrals to local resources; and, if needed, transportation to a treatment facility or service provider. In SGV CARE's first quarter of operation, the average response was 10 minutes, and 64% of those served were unhoused individuals.

Recognizing that crises do not end after a response call, a critical component of SGV CARE is following up with each client and connecting them to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. L.A. CADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it is well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances.

With the technical assistance of the Harvard Kennedy School Government Performance Lab, staff from SGV CARE cohort cities, SGVCOG, and L.A. CADA have been collecting and evaluating data and participating in regular implementation meetings to develop key performance metrics and improve the continued operation of SGV CARE beyond May 2023. The pilot program is fully funded by the Los Angeles County Board of Supervisors' Measure H funds, and the permanent SGV CARE program has thus far secured $850,000 in funding from State Senator Portatino's office and $1.5 million in federal funding.

SVG CARE is an integral part of the City's adopted 2021-2026 Strategic Plan and commitment to affordable housing and helping persons of all income levels with housing options. The 2021-2026 Strategic Plan approved by Council on May 18, 2022 includes six key goals, including Goal 5: Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs. Additionally, item 5e, Homeless Initiatives, identifies several tasks including the City to continue working with the SGVCOG on region-wide solutions; participate in mental health/crisis intervention program (mobile crisis response program); and expand working relationships with community partners such as Union Station Homeless Services to help the unhoused.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department, Community Development Department

Timeframe: Coordinate a meeting with neighboring jurisdictions by ~~February~~ December 2023 to identify strategies and translate materials on homeless services to Spanish by ~~May 2023~~March 2024.

~~The~~ SGV CARE pilot program was launched in July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Permanent SGV CARE program to begin June 2023.

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.

Funding Source: General Fund, ~~(for staff resources) and~~ grants, and developer public funding sources

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special -Needs Housing

City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, State No Place Like Home Funds (administered by LACDA), and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December ~~2022~~2023; Train staff to process reasonable accommodations by December ~~2022~~2023; Seek funding opportunities beginning in ~~2022~~ 2023 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act within 120 days after the adoption of the Housing Element.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. Due to economic conditions, the Council has directed an amendment to revise the requirement (See Program 2m). The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. The City will encourage projects that meet this threshold to locate within higher-income neighborhoods and neighborhoods with lower proportions of rental households to facilitate income integration and housing mobility opportunities for lower-income and renter households, and reduce further concentration of affordable units in identified areas of lower-incomes, higher diversity index scores, and larger proportions of renter households. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units. Additionally, the City shall review the effectiveness of the Inclusionary Housing regulations and if revisions are deemed necessary, they will be made when such needs are identified. The review will include consultation with the local development community and shall utilize constraints on development as criteria, including housing costs and timing, and will ensure revisions do not act as a constraint on development.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: No later than June 30, 2025, review effectiveness of the Inclusionary Housing ordinance at producing affordable housing units and its impacts on the viability of housing production. Make adjustments as necessary to the Inclusionary Housing Ordinance based on the review findings no later than December 31, 2025.

Program 2.j – General Plan Affordable Housing Overlay

The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites, outside of the Downtown and Mixed-Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility and income-integration opportunities to high resourced areas.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.

Program 2.k – Affordable Housing Overlay Zone

The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Facilitate develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility and income-integration opportunities to high resourced areas.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning to include overlay by October 15, 2024.

Program 2.1 – Facilitate Affordable Housing on City-Owned Property.

The City will utilize identified City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. The City will sell such parcels to developers building affordable housing or otherwise ensure the development of housing on such sites. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the City will initiate the Surplus Lands Act (SLA) process to pursue affordable housing projects in the city. The City will require an affordability covenant recorded against the land stipulating a specified percent of the total units developed will be affordable to lower-income households, in accordance with State law. The City will comply with State law to implement the SLA process as follows:

- The City will declare land "surplus" in accordance with the definition listed in Government Code, Section 54221, subdivision (b)(1).
- The City will prepare and issue a Notice of Availability (NOA) to the required parties and provide 60 days to receive responses from interested parties.
- The City will negotiate in good faith with any respondents for at least 90 days, prioritizing affordable housing uses in the order provided in Government Code section 54227.
- The City will send the proposed disposition to the State for review.
- The City will address any State findings, as needed.
- Upon final State approval, the City will execute a sale or lease of the land and record an affordability covenant.

The first RFP will be issued by March 31,2024, in order to begin construction within two years and complete within the housing element cycle period. Three other RFPs on three additional inventory sites will be issued by 2026, with the goal of the City disposing of all identified and applicable surplus sites. Projects under this program will be expedited in compliance with the SB 35 streamlined ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives, as applicable.

The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are listed below in addition to the sites discussed in the next paragraph:

- Site ~~9~~8: Public works yard site
- Site ~~14~~13: City-Owned Parking Lot site (City owns three of the four parcels)

There are no existing uses on these sites that impede additional development and there are no known conditions that preclude development in the planning period. The City is already coordinating with the owner of the other parcel on Site ~~14~~13. Site ~~9~~ 8 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site ~~13~~ 12 in

Table VI-50 and will coordinate with the owner of the other parcel on Site ~~13~~ 12 to encourage development of housing on that site.

Additionally, the City will commit to monitoring the continued progress of developing the city-owned sites every other year and will identify alternative sites within 6 months if necessary if sites will not be developed during the planning period.

Eight-year Objective: Sale of all City-owned surplus properties identified appropriate for housing. Issuance of RFPs on four projects and issuance of building permits for at least two projects, for a total of at least 40 ELI, VLI and LI units, 18 moderate income units, and 11 above moderate income units.

Funding Source: General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Create City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP ~~in~~ by 2024 and remaining three RFPs in 2026. Building Permit issuance for first project by 2025; two additional building permits issued by 2029.

Bi-annually, review progress towards developing city-owned sites and identify alternative sites within 6 months if sites will not be developed within the planning period.

Program 2.m – Update Inclusionary Housing Regulations.

In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20% of base units to 15% of base units. Additionally, an exemption to the Ordinance will be added for projects with less than 10 units. Other provisions of the ordinance will also be reviewed, in consultation with the local development community, in the revision process including but not limited to ~~the 10-unit threshold,~~ in-lieu fees, cost of a comparable unit and how the inclusionary regulations relate to state density bonus law and other City development standards.

~~(See also~~As part of Program 2.i.~~)~~, the effectiveness of the Inclusionary Housing Ordinance will be reviewed in 2025 and additional changes will be made to the Ordinance if it is determined that it is an impediment to housing development.

Eight-year Objective: Approve 137 inclusionary units during the planning period (15% inclusionary requirements on the moderate- and above moderate RHNA allocation of 912 units).

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Adopt updates to the Inclusionary Housing Ordinance within 120 days of Housing Element adoption.

Program 2.n – Citywide Height Limit Ballot Initiative

Consistent with requirements under state law concerning cities placing measures on the ballot, t~~T~~he City will seek through voter approval in a local election, the repeal of the current height limit of 45

feet as to at least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit. If the height limit is replaced, ~~and if replaced by a new height limit,~~ the new limit will be no less than ~~60~~ 84 feet to achieve the densities identified in the DTSP.~~and/or six stories (whichever is greater). The City will analyze which areas of the city should be included in the proposed ballot measure.~~ In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.

Eight-year Objective: Facilitate proposed densities ~~above 50 dwelling units/acre~~ on residential sites in the Housing Element where the height limit may be an impediment to development.

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Place measure on ballot by December 31, 2024.~~.~~ Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code. If the ballot measure is ~~-~~not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre.

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. ~~The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac.~~ Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least ~~20~~15-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." ~~Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.~~Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the expansion of mixed-use areas along the City's arterial corridors either through inclusion within the DTSP or through a zoning overlay district. Allowable densities withing these mixed-use areas will be 70 du/ac, expect for the Fair Oaks zone within the DTSP, which will be 110 du/ac. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.

Eight-year Objective: Rezone sufficient sites to ~~address 947 units (31.6 acres) in the lower-income RHNA categories~~ accommodate the City's RHNA targets.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.~~Latest date to complete General Plan amendments and rezoning: October 15, 2022~~

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

As part of the rezoning and adoption of the DTSP done as part of Program 3.a, the City will create development standards that encourage the development of high-density residential uses. It is anticipated that the base density of the DTSP zones will be either 70 or 110 du/ac, depending on the zone.

Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards:

- Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building.
- Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone.~~up to 2.5 to 1~~
- Minimum unit size: 450 square feet.
- Required parking:
    - No required parking for parcels within ½ mile of a high quality transit stop;
    - One space per studio or one-bedroom unit;
    - 1.5 spaces per two-bedroom or larger unit;
    - Development incentive of 0.5 spaces for deed restricted affordable housing units.
- Private open space: 50 square feet minimum for Liner and Flex Building typologies.

These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. . Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code accordingly.

Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include:

- Reduced private open space requirements;
- Reduced public open space requirements;
- Reduced parking requirements;
- Expedited processing.

The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate.

The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan with adoption within 120 days of adoption of this Housing Element. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing. Specific actions proposed to facilitate mixed use development in the Downtown Specific Plan include the items listed below. The strategy or incentive number in the proposed plan is shown in parentheses.

- Engage the development community and property owners to promote the redevelopment of single-use and single-story retail centers on Fair Oaks Avenue into mixed-use projects with shared parking. (A2.6a)

- Engage the development community and property owners to promote infill development on underutilized sites. Vacant and small underutilized sites contribute little to the City's tax base and diminish the character and feel of the City. These are prime opportunities for redevelopment and new growth that conforms to the City's urban design standards and context, and bolsters the City's tax base. The City can encourage development on these sites by engaging with property owners and developers to facilitate transactions and development activity. Such actions can include:

    - It is critical to engage with private owners of larger opportunity sites, particularly those who have expressed an interest in redevelopment. Such sites offer an excellent opportunity to begin transforming Fair Oaks Avenue into a veritable mixed-use corridor. Early "proof of concept" projects will demonstrate feasibility, and will likely convince others to follow suit.

    - Work with the South Pasadena Unified School District (SPUSD) to create refined development standards for the School District site on Mission Street that are aligned with both community desires noted in the General Plan and Downtown Specific Plan, School District needs, as well as market opportunities. (A2.6c)

- Remove on-site parking requirements near transit in accordance with State law to leverage transit access and to incentivize mixed-use development. (A2.7c)

- Locate residential and employment growth in mixed-use buildings. (A2.8b)

- Adopt flexible regulations that can respond to market changes in emerging industries and attract contextual development. (A3.6a)

- ~~Leverage the Metro L Line Station for walkable mixed-use development opportunities on nearby catalytic sites to provide variety of affordable housing types, local employment, community benefits, and application of extensive Transportation Demand Management (TDM) measures. (A3.6b)~~

- ~~Provide a mix of land uses within new infill projects. (A5.1a)~~

~~In addition, the City is currently preparing objective development and design standards to streamline review of residential projects throughout the city, including in the Mixed Use areas.~~

Eight-year Objective: Target production of 400 lower-income housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website ~~by June 2023~~ to include revised process for streamlined processing of planned development permits for mixed-use and Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by ~~June~~ November 2023. Update handout materials by ~~June~~ November 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually ~~-~~(see Program 2.a.) Analyze and consider a fee reduction or waiver at the mid-point review if necessary.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring ~~their~~ its ADU ordinance into compliance with State law.

The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.

As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners:

- Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets~~,~~;
- ~~have~~Make brochures available at community center and libraries, and at "ADU Community Open House"~~.~~;
- ~~-~~Create short promotional videos or flyers and brochures (digital and print) by January 2024~~.~~;
- Distribute at least annually though social media promotions, direct mailings to property owners; with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k).

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Online application process with staff intake for quality control
- Maintain and amend materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce the number of steps and shorten timeframes, and
- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and

383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and include ADU Amnesty information and incentives. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the

City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.

Eight-year Objective: Identify sufficient land for rezoning, or other strategies, to accommodate the unmet lower-income RHNA that was projected to be met by ADUs.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs including rezoning are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Provide assistance to homeowners to convert 50 identified existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach. Identify neighborhoods with relatively high proportions of unpermitted ADUs by July 2024 to target outreach. Determine incentives for legalizing ADUs with deed-restricting

commitment by January 2024. Update brochures with legalization process information and incentives in concert with ADU Ordinance update timeframe.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program ~~and amend fees~~ by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.
- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs

[1] Chapple, Garcia, et al. *Reaching California's ADU Potential: Progress to Date and the Need for ADU Finance*, 18.

as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.

- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the development process of 297 ADUs through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.

Funding Source: General Fund, grant funding

Responsible Agency: Community Development Department

Timeframe: Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.1 – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: ~~City has already advertised new Planning positions and aims to be fully staffed by June 2022. Include the housing division in the~~ The Housing Division was included in the 2022-2023 budget and ~~add~~ new staff ~~by December 2022~~ was hired by November 2022. Planning unit is operating with 5 FTE and recruiting for one additional person.

Program 3.m – Implement SB 9 and SB 10

The City intends to promote the housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resources. This will include the development of

streamlined processes for SB9 and an SB10 implementation program with pre-approved building typologies.

Specifically, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts.

The baseline density for this program will be 15 du/acre in the RE and RS zones. Staff shall present a specific proposal to the City Council for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. The missing middle housing program proposal will include:

- Zoning Code Text Amendment to establish a Missing Middle housing program.
- Appropriate development standards to facilitate program density including but not limited to: identifying lot size requirements, reducing setbacks, increasing FAR and evaluating minimum unit size requirements.
- A simple waiver system to ensure development standards do not preclude the density of 15 du/acre.
- An exhibit or definition to clearly demarcate the area that is subject to the ordinance.

By December 2027, the City will analyze whether it is on track to meet the eight-year objective for the Missing Middle housing program. If, at that point, the City is not on track to meet the eight-year objective, it will increase the allowable maximum density for this program. ~~These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption to expedite housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resource opportunities.~~

~~The City took action by urgency ordinance to establish objective standards in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022~~fall 2023~~. The City will also adopt a user-friendly and objective administrative process in compliance with SB 9 within the context of other City development requirements. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual progress report to HCD.~~

~~The City commits to implementing the provisions of SB 10 that may be applied in order to address segregated living patterns and create balanced living patterns that affirmatively further fair housing.. Additionally, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones along high-quality transit corridors and/or transit stops, except for in high fire hazard areas. Missing Middle housing types contemplated for this program may include duplexes, triplexes, four-plexes, and cottage courts. At the time of program development and Ordinance adoption, the community, Planning Commission and City Council will determine the scope of the program. Eligible property owners within these designated areas will be able to opt into this program.~~

Eight-year Objective: Facilitate the development of at least 50 units with the SB10 Missing Middle housing program over the reporting period.~~Administration of SB 9 ordinance is ongoing; specific administrative process and guidelines for SB 9 to be developed; explore potential zoning code amendments pursuant to SB 10 and adopt feasible amendments~~implement Missing Middle housing ~~types – including duplexes, triplexes, four-plexes, and cottage courts – along high-quality transit corridors and/or transit stops, except for in high fire hazard areas~~.

Funding Source: General Fund; SCAG REAP 2.0 Grant

Responsible Agency: Community Development Department

Timeframe: The City will work with a technical consultant to develop objective design standards or building typologies related to this program and prepare and present the necessary implementation policy and zoning amendments to effectuate the program within 24 months of the adoption of the Housing Element.

By December 2027, analyze Missing Middle housing program and make modifications as necessary. ~~SB 9 implementation began in December 2021, and a revised permanent ordinance and materials will be prepared within 120 days after the adoption of this Housing Element; Development Standards for "Missing Middle" housing will be prepared within 120 days after the adoption of this Housing Element.SB 10 analysis and implementation by December 2024~~

Program 3.n – Zoning Changes

This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review. In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.

Eight-year Objective: Update zoning to facilitate the needed housing units.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning will occur within 120 days after adoption of a compliant Housing Element.

Program 3.o – No Net Loss

The City will evaluate the sites inventory identifying the zoning, size, and number of vacant and underutilized parcels suitable for residential development for each income category. If the sites inventory indicates a shortage of available sites to accommodate the remaining RHNA for an income category, the City shall rezone sufficient sites with appropriate densities to accommodate its remaining RHNA for each income category.

Eight-year Objective: n/a

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: No later than December 31, 2024 and December 31, 2026, the City shall evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites.

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))

Eight-year Objective: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law in regard to parking and distance between shelters and to establish a higher, economically feasible maximum number of beds permitted in any one emergency shelter and accommodate the increased homeless population documented in the 2022 Point in Time count.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code within 120 days after adoption of the Housing Element.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals for a minimum of 207 accessible units over the 2021 – 2029 planning period.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member in areas with access to transit, commercial services, and amenities to improve mobility opportunities.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design. Within the Downtown Specific Plan and mixed-use zones, target development of 300 new homes incorporating universal design.

Responsible Agency: Community Development Department

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives with completion by July 2025; ongoing application and enforcement of accessibility requirements; ongoing education efforts and information added to ADA requirements on City website.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete ~~in 2022~~by June 2024.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the City's contracted housing rights and tenant protection agency to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the City's contracted housing rights and tenant protection agency at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide ~~Fair~~ fair ~~Housing~~ housing education, outreach, mediation, and referral services through the Housing Division ~~City Manager's office~~ and a contracted ~~housing rights and tenant protection agency~~ fair housing and landlord-tenant legal organization and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. Distribute informational materials to community organizations and neighborhood gathering spots in areas with higher rates of protected groups, particularly in the South Pasadena Southwest neighborhoods with higher rates of disabled persons; the South Pasadena North/Garfield Park areas with a higher proportion of seniors with disabilities and renter populations; and the South Pasadena Southeast neighborhoods with higher rates of poverty, renter households and lower incomes. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year Objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022 by providing assistance or referrals to 40 residents, or as needed; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with the City's contracted housing rights and tenant protection agency staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Funding Source: General fund, State, and federal funds

Responsible Agency: ~~City Manager's Office;~~ Community Development Department, federal and State agencies

Timeframe: Ongoing; Meet annually with the City's contracted fair housing and landlord-tenant legal organization~~housing rights and tenant protection agency~~, beginning in 2023, to assess patterns of fair housing issues, and plan and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM,

and RH. These types of facilities are still subject to State licensing requirements, when a state license is a requirement for the residential care facility.

Eight-year Objective: Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: First zoning text amendment within 120 days after adoption of a compliant housing element. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide

In the 1940's, covenants that restricted the sale of property to ~~Whites or Caucasians~~white people only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Eight-year Objective: Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.

Responsible Agency: Community Development Department; Los Angeles County Recorder

Funding Source: General Fund; grants if offered through a State or County program

Timeframe: Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December ~~2022~~2023; encouragement of removal from private properties: ongoing.

GOAL 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters

South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

Program 6.a – Rent Registry

Staff will research, develop, and propose to City Council a local rent registry program. A rent registry program would require owners of certain, to-be-determined, rental property types (those with a minimum number of units, for instance) to register their units and pay a per-unit registration fee on an annual basis. Staff envision the rent registry serving initially as a database that the City would use to collect and track rental data on units, including affordable units, and to disseminate information to property owners about tenant protections. However, the utility of the rent registry could be expanded over time to incorporate additional monitoring, compliance, and enforcement activities as new programs are established and linked to it. Staff will draw from thorough analysis to develop the details of the program, which will be subject to the approval of City Council.

Eight-year Objective: City will have a comprehensive online database of all affordable and market-rate rental housing units in South Pasadena subject to the registration requirement with a user interface and fee payment system for rental property owners. The registry will be updated annually and serve as a streamlined platform for Community Development staff to track the City's rental housing inventory and provide information to rental housing property owners. City will decide whether to link this registry to the administration of other activities and programs.

Funding Source: General fund (staff time for development and administration); registration fees from property owners

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Propose policy to City Council by February 2024. Complete development of rent registry by 2025. Begin implementation of rent registry by 2026.

Program 6.b – Right to Return Policy

Local and regional housing and tenants' groups have raised concerns about the displacement of tenants in South Pasadena, and across Los Angeles County, due to renovation work initiated by the landlord. To address these concerns, staff will research, develop, and propose to City Council a policy that establishes a tenant's legal right to return to a property at a comparable rent after eviction and/or relocation due to substantial remodel or other just cause reasons. The details of such a policy will be informed by rigorous research of local examples, community input, and careful legal analysis.

Eight-year Objective: In qualifying circumstances, all tenants who are temporarily displaced from their units due to construction work and wish to return upon completion will be able to do so under the law. Thus, this policy will stem permanent the permanent displacement of renters from South Pasadena due to just cause no-fault evictions and/or relocation for certain reasons.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council as part of a broader tenant protections ordinance by December 2023.

Program 6.c – Relocation Assistance

In 2019 and 2021, in response to the COVID-19 pandemic, City Council passed two urgency just cause ordinances that require the landlord to pay relocation assistance to the tenant when evicting the tenant for a just cause no-fault reason. Beyond South Pasadena, cities across Los Angeles County have their own relocation assistance requirements for just cause evictions, which commonly require the landlord to pay at least 2.5 times the Fair Market Rent or current rent in addition to an allowance for moving expenses. Some cities, like Los Angeles and Pasadena, also have requirements for the landlord to pay temporary relocation assistance to a tenant when certain types of work require the tenant to temporarily vacate the unit. Staff will review the urgency just cause ordinances, perform more thorough research and analysis, and draft and propose to City Council a new permanent ordinance with permanent and temporary relocation assistance requirements for just cause no-fault evictions and temporary relocation for certain reasons.

Eight-year Objective: South Pasadena renters will have local tenant protections that reduce the financial burden placed on tenants when they are (temporarily or permanently) displaced from their homes for legally permitted reason and instead place financial obligations onto the property owners.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program); property owners

Timeframe: Propose policy to City Council by December 2023.

Program 6.d – Rent Stabilization

Staff will research, develop, and propose to City Council a rent stabilization policy to protect South Pasadena's renters of certain properties from excessive rent increases that undermine housing affordability and stability. A local rent stabilization program would establish a lower cap on rent increases than that set in the Tenant Protection Act pursuant to AB 1482 to the extent permitted by the Costa-Hawkins Rental Housing Act, which prohibits cities from applying rent stabilization to certain properties, including single-family homes, condos, and properties built after 1995.

Eight-year Objective: Reduce high rent burdens and forced moves among South Pasadena's renters due to excess rent increases and, in turn, increase their financial security and housing stability.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council by December 2023.

6.8.2 Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-56.

Table VI-56
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED[1]	REHABILITATED[1]
Extremely Low/Very Low Income	757	7	8
Low Income	398	24	8
Moderate Income	334	4	9
Above Moderate	578	6	10
Total	2,067	41	35

1. Note that no housing units have been identified as at risk of conversion to market rate in South Pasadena within 10 years of the beginning of the 6th-cycle planning period, however there are preservation and rehabilitation needs in the community, therefore units have been included in both columns. The number of units is based the quantified objectives in Program 1.c, 2.c, and 2.d.

Appendix A:
Sites Exhibits

Maps and Exhibits - 2021-2029 Housing Element

- Citywide Maps of Sites in the Land Inventory
- Overview Maps of Sites to Address the Lower-Income RHNA or with Pending or Approved Applications
- Detailed Exhibits for Sites to Address the Lower-Income RHNA or with Pending or Approved Applications
- Additional Sites Map within the Downtown Specific Plan Boundary

Figure A-1.a. Citywide Sites Inventory Map (1)

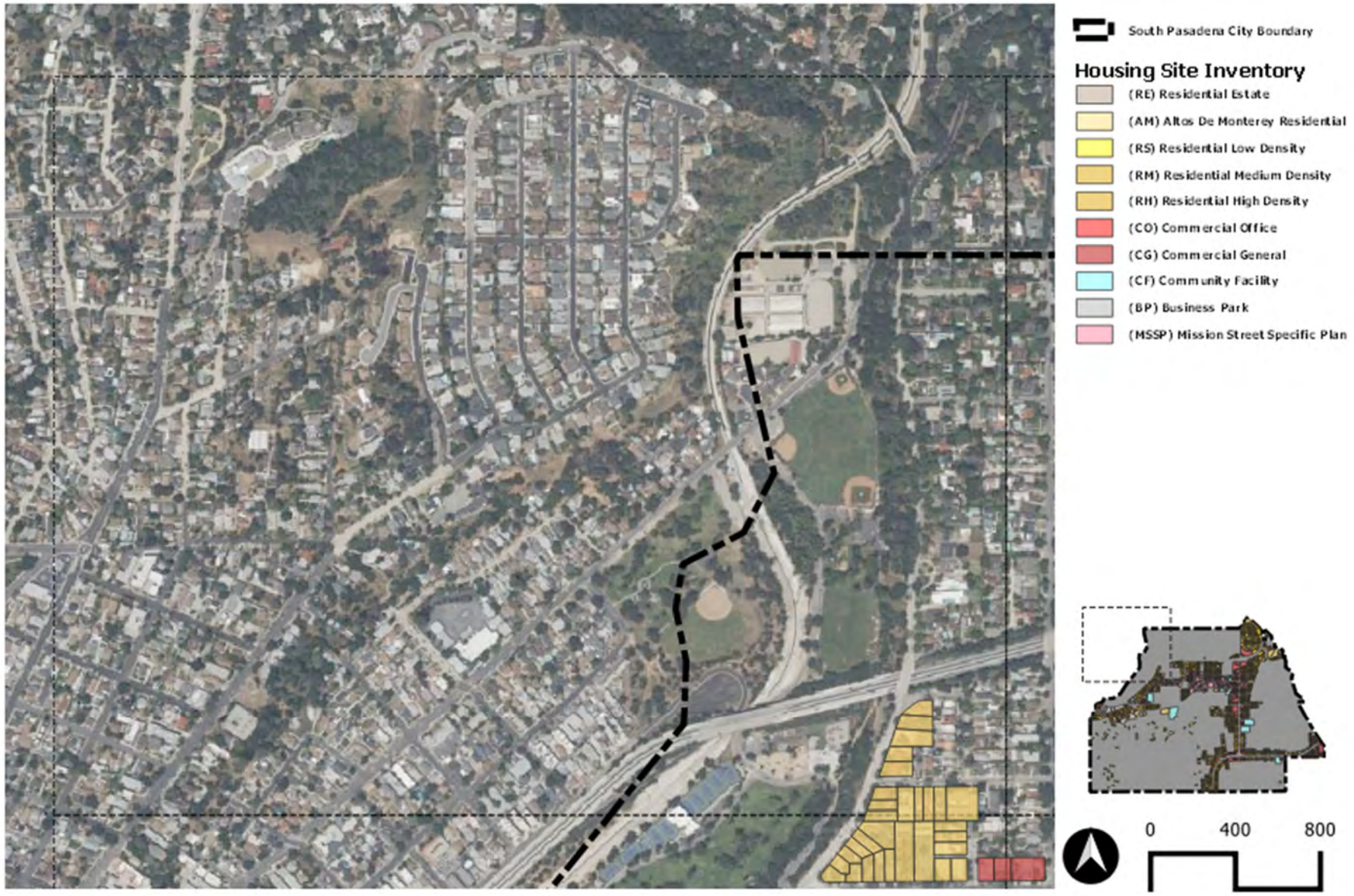


Figure A-1.b. Citywide Sites Inventory Map (2)

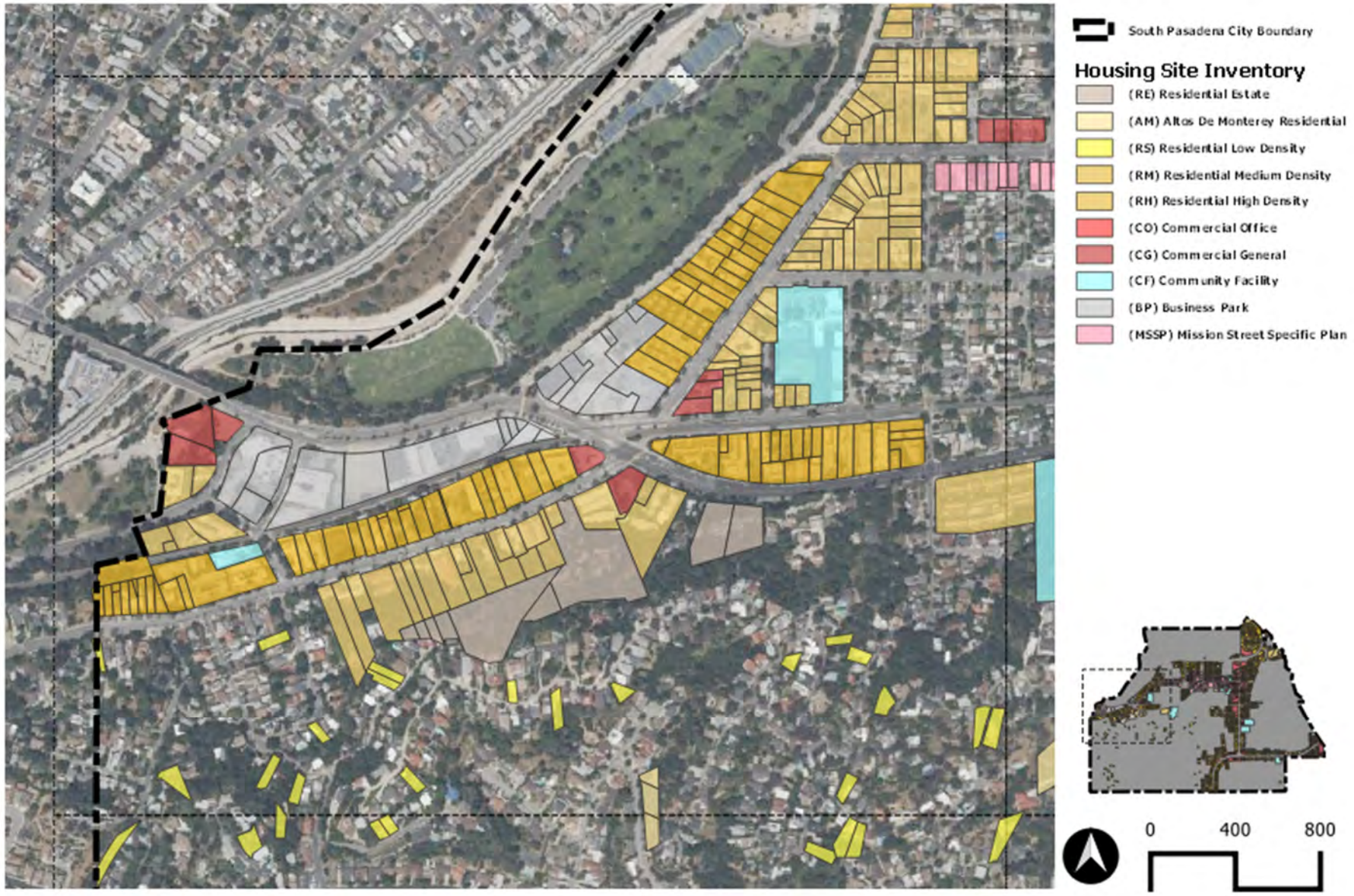


Figure A-1.c. Citywide Sites Inventory Map (3)

Figure A-1 d Citywide Sites Inventory Map (4)

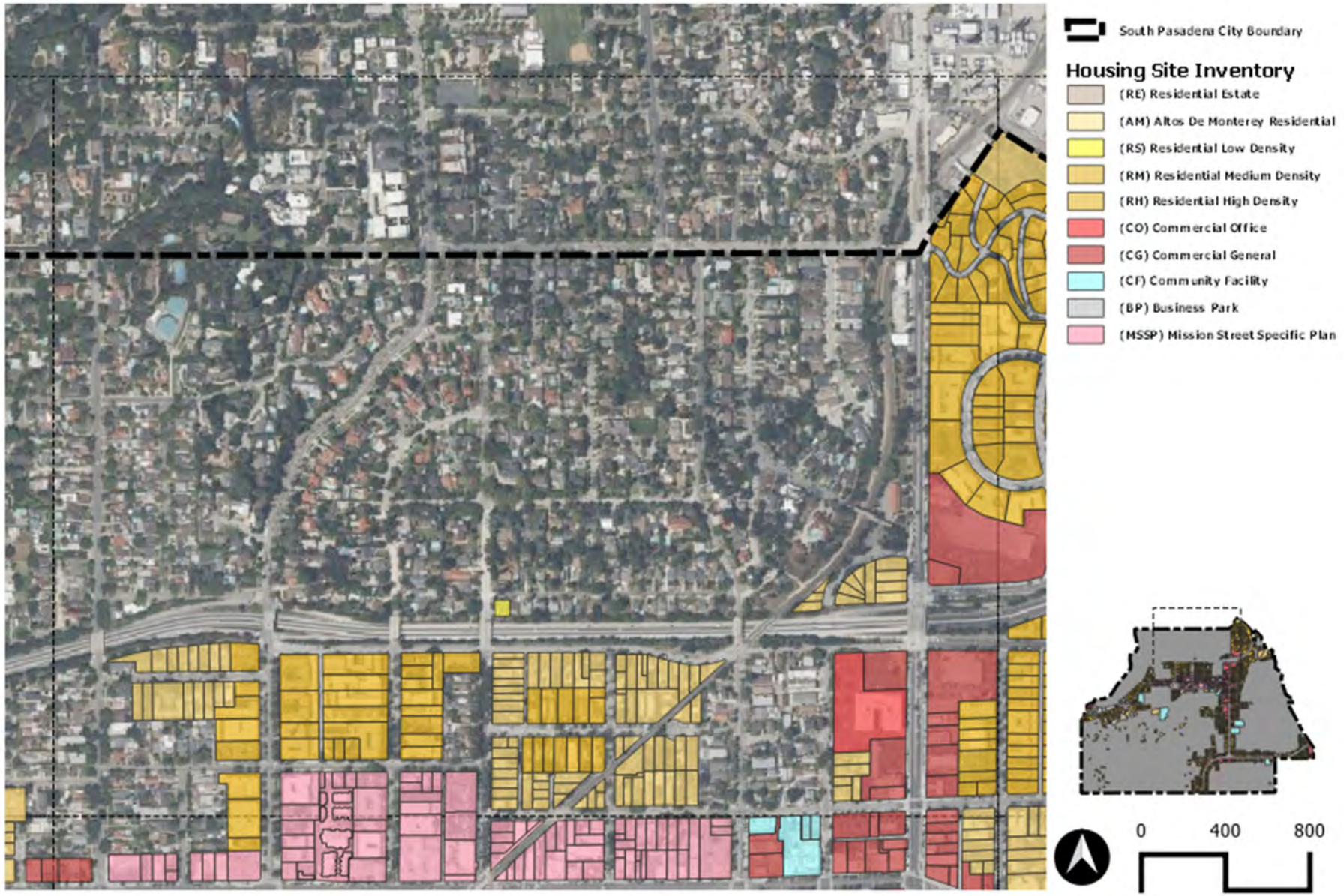


Figure A-1.e. Citywide Sites Inventory Map (5)

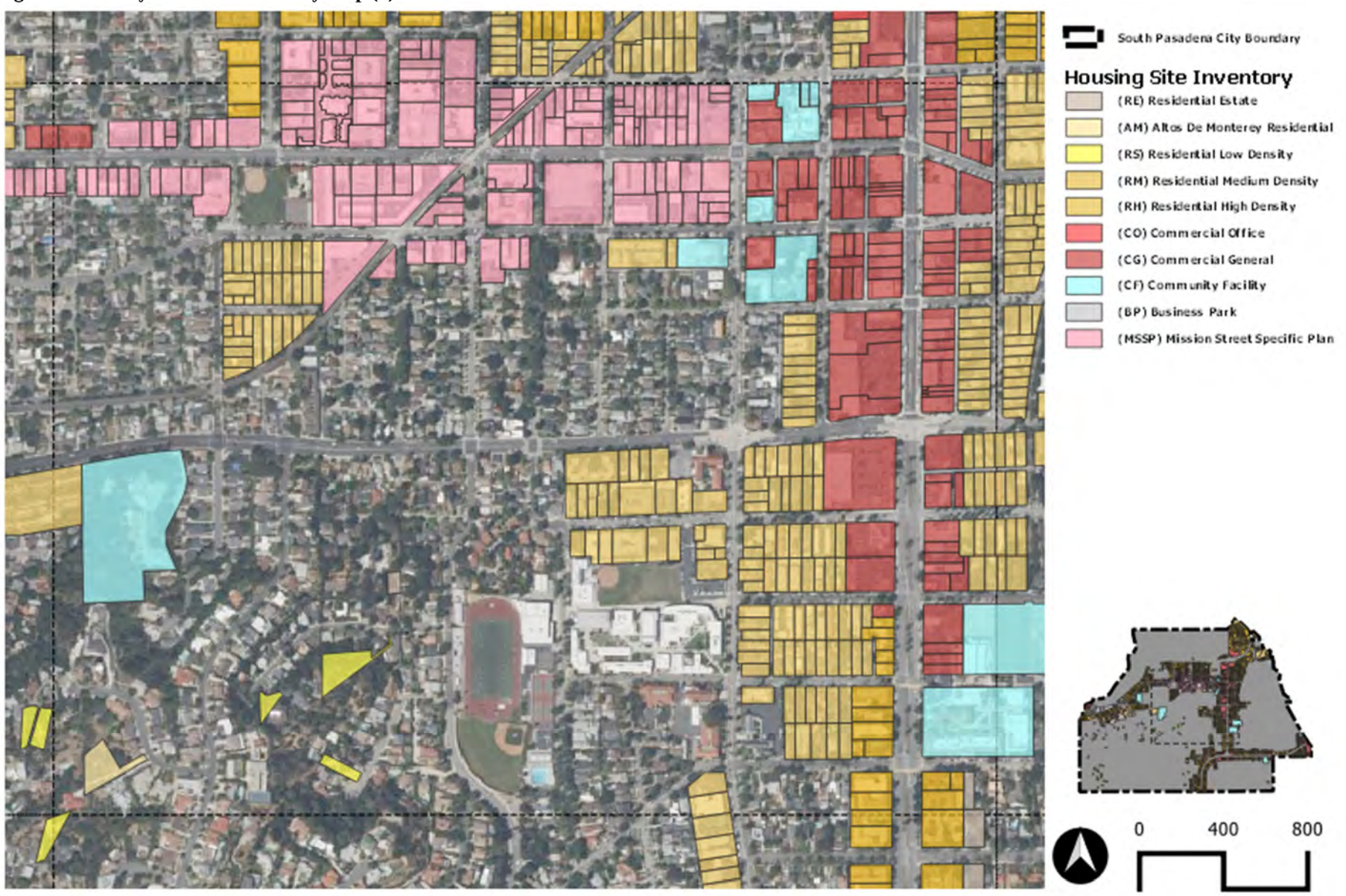


Figure A-1.f. Citywide Sites Inventory Map (6)

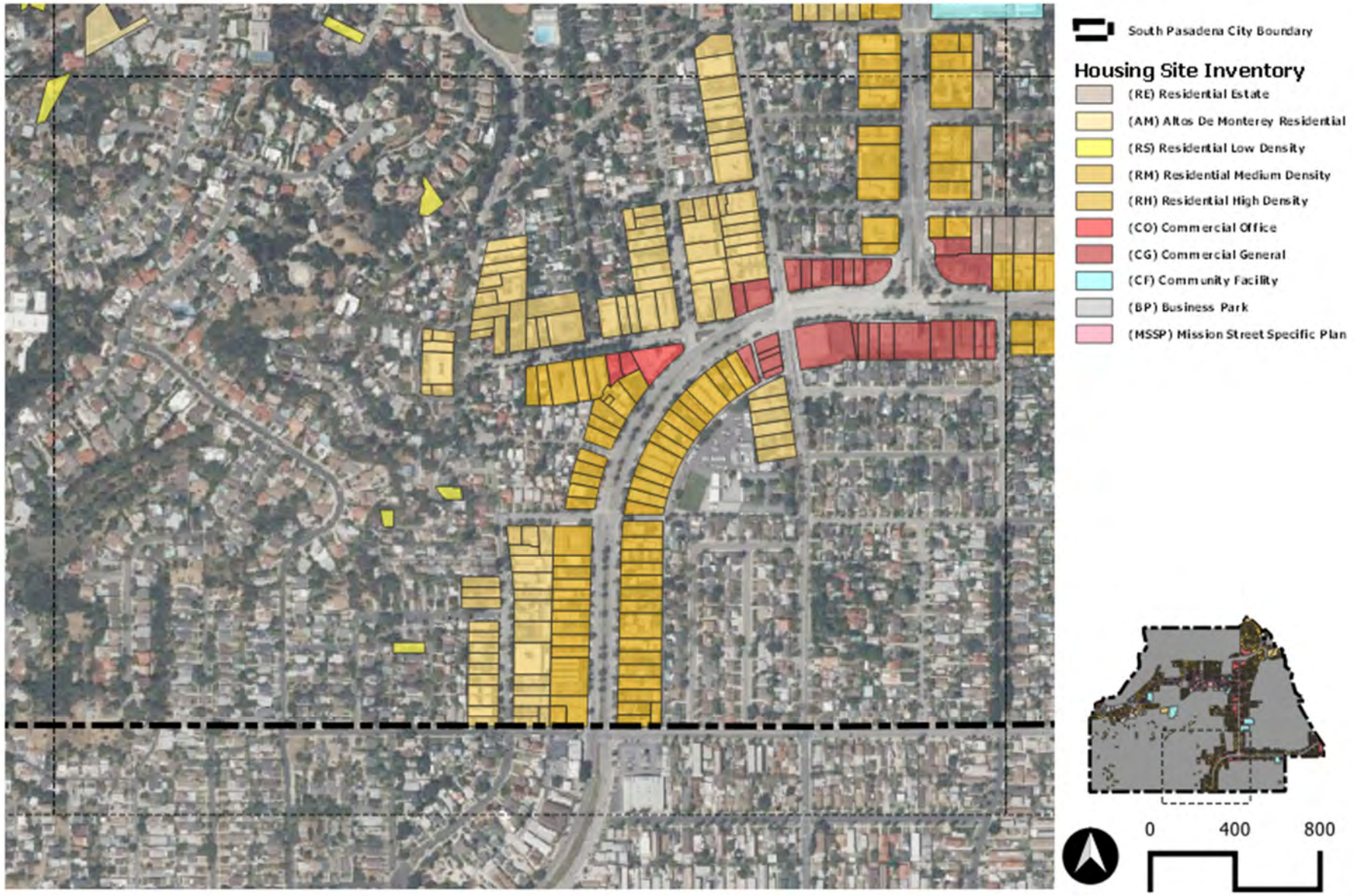


Figure A-1.g. Citywide Sites Inventory Map (7)

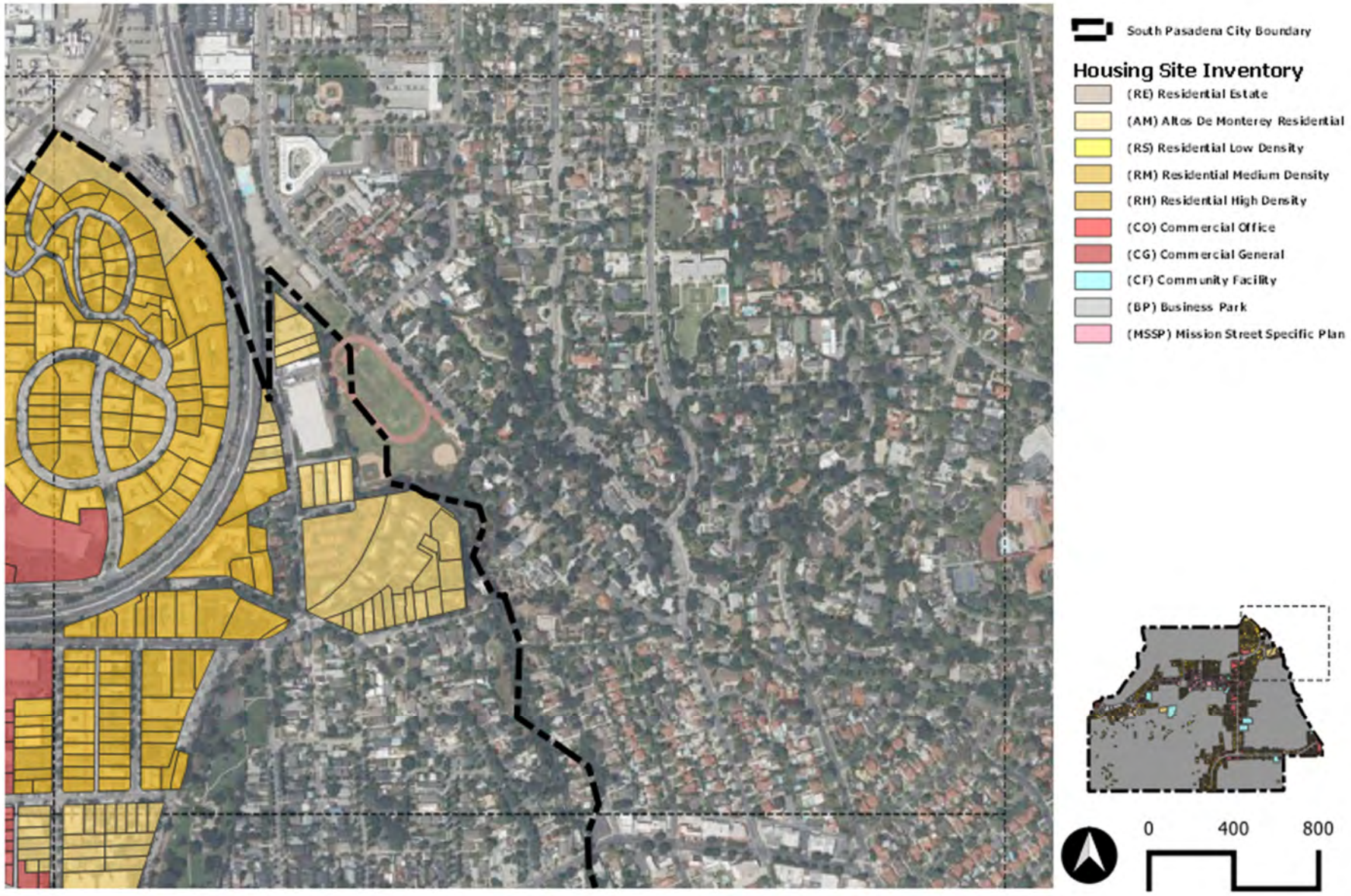


Figure A-1.h. Citywide Sites Inventory Map (8)

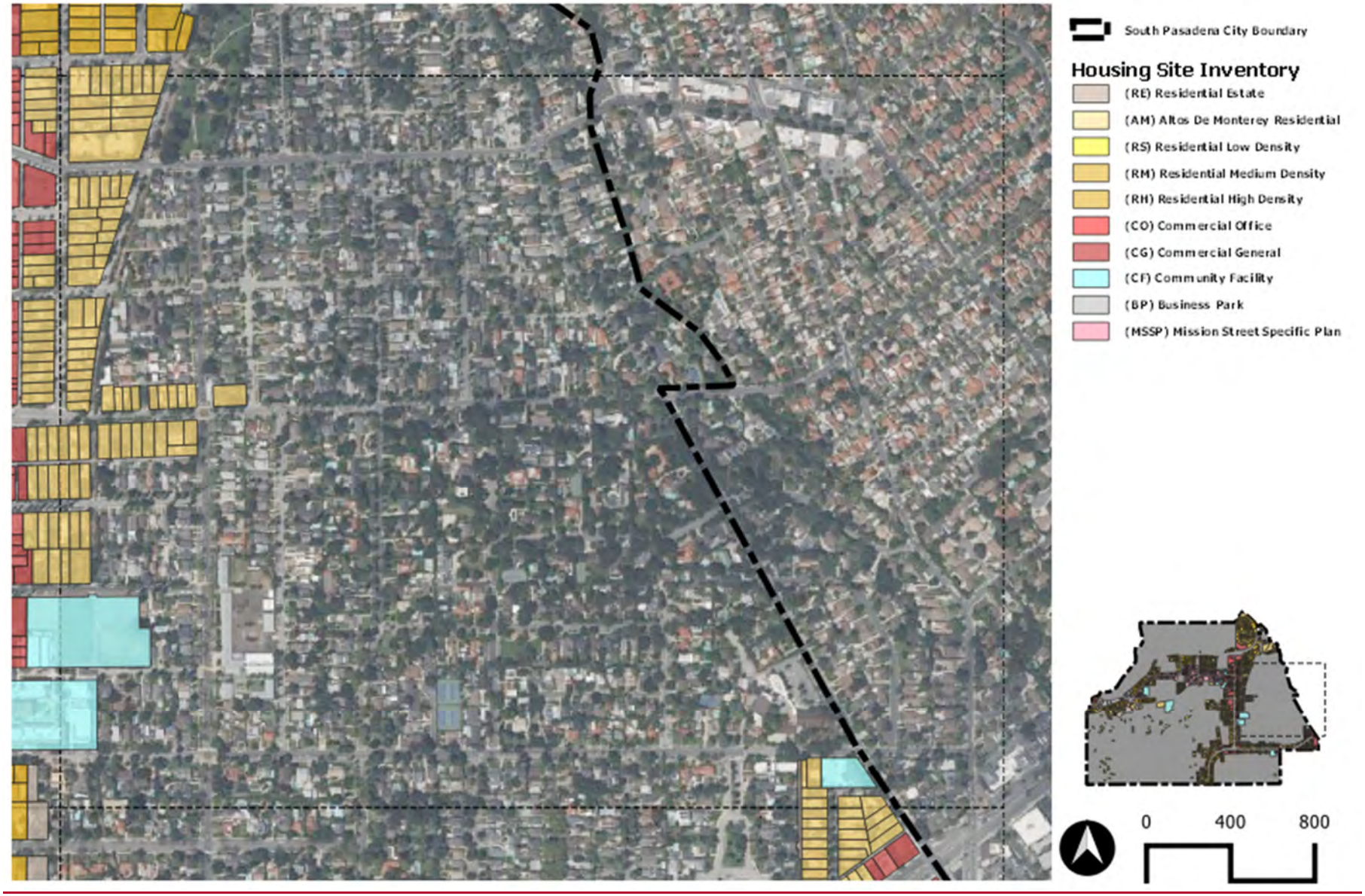


Figure A-1.i. Citywide Sites Inventory Map (9)

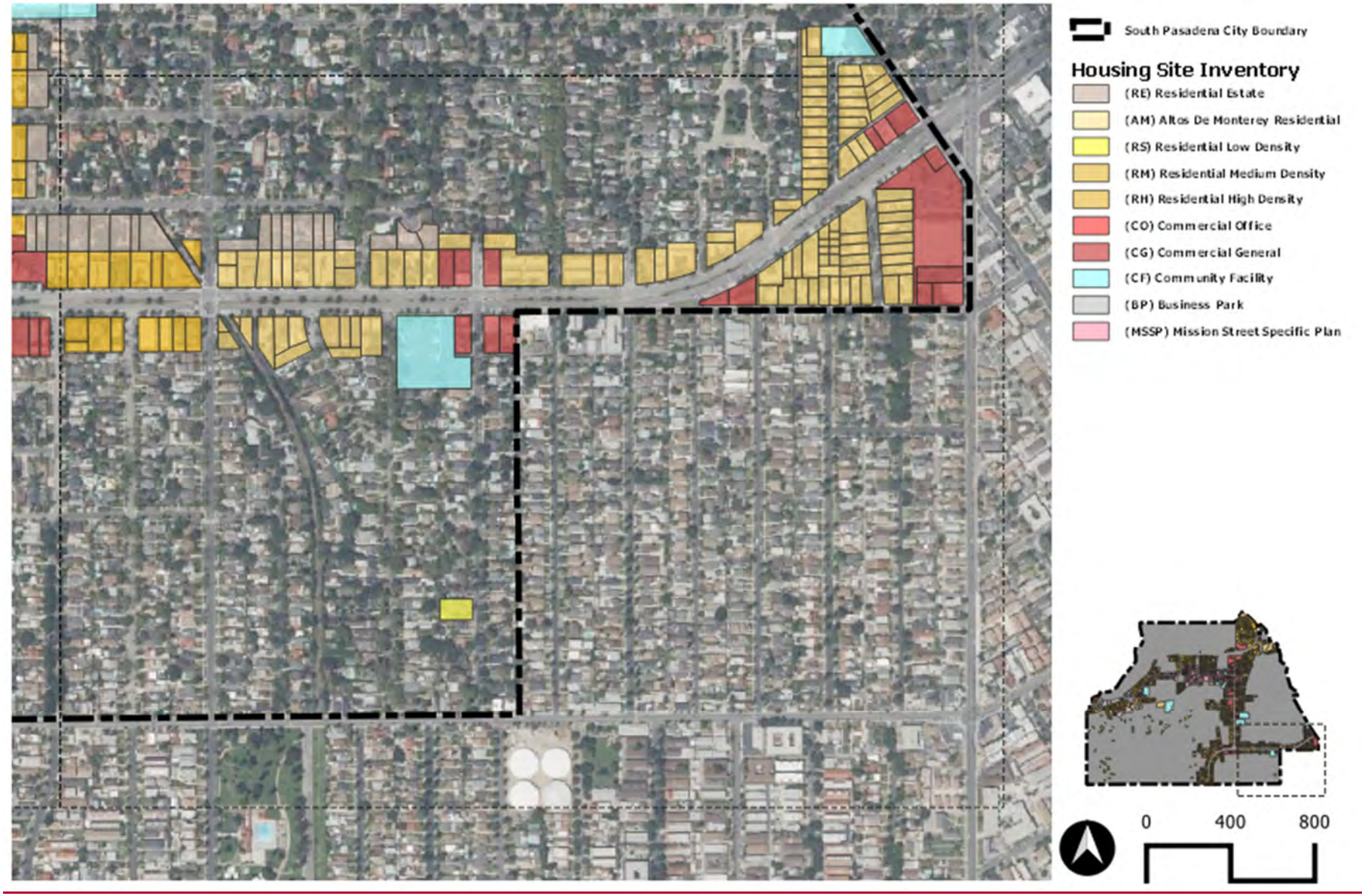


Figure A-2.a Maps of Sites to Address the Lower-Income RHNA Inventory (1) or with Pending or Approved Applications

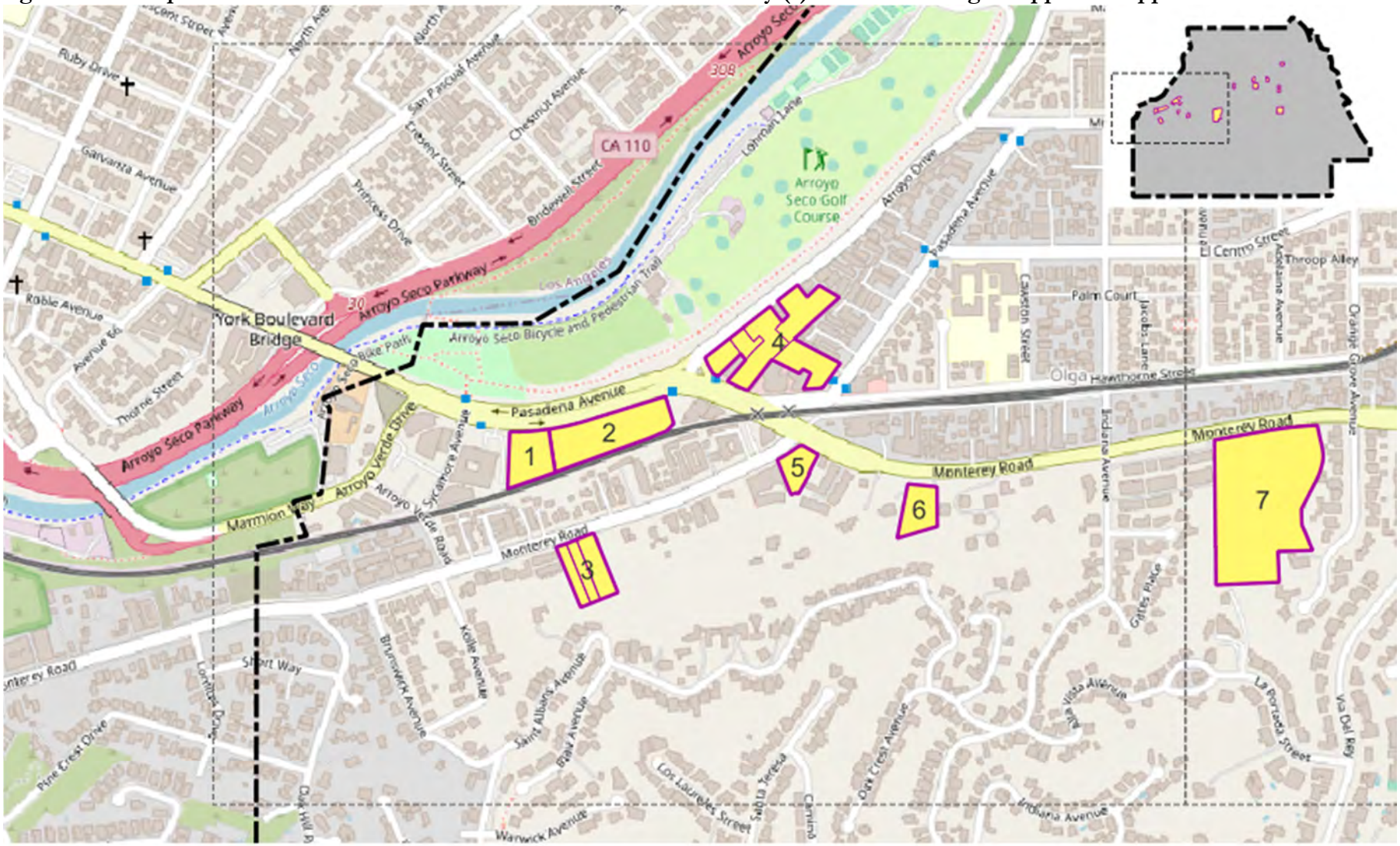


Figure A-2.b Maps of Sites to Address the Lower-Income RHNA Inventory (2) or with Pending or Approved Applications

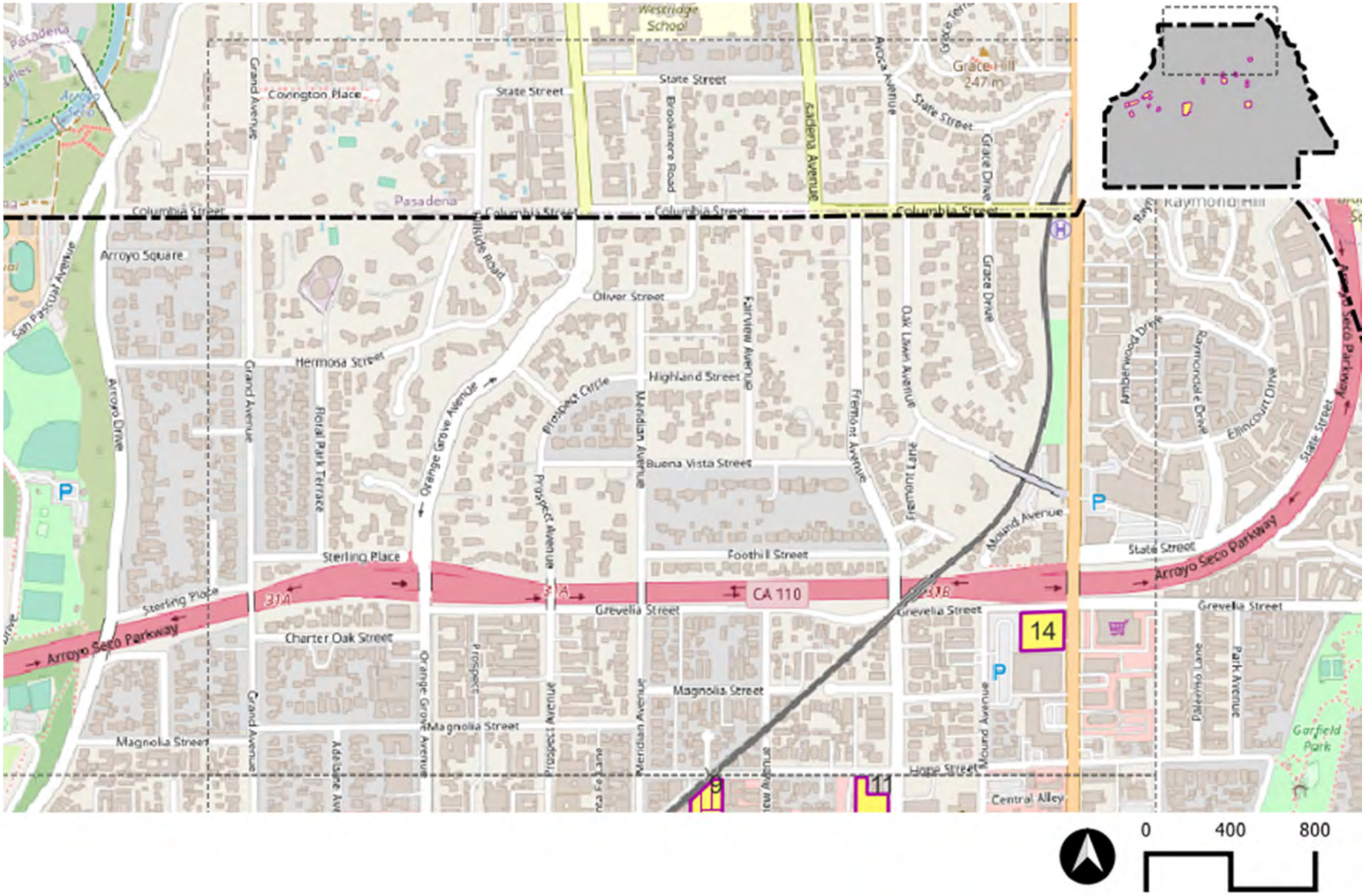


Figure A-2.c Maps of Sites to Address the Lower-Income RHNA Inventory (3) or with Pending or Approved Applications

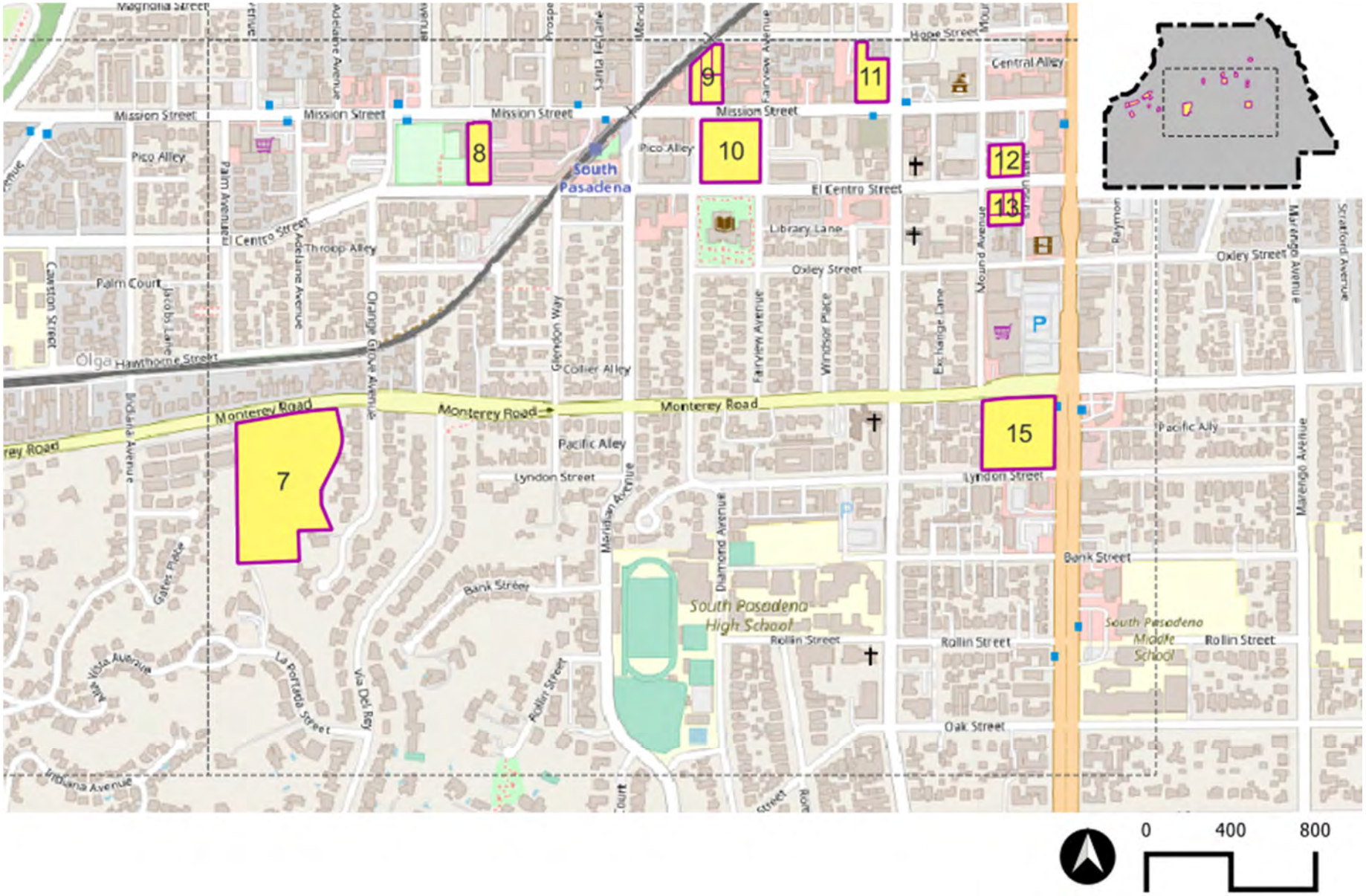


Figure A-3.a Map of Additional Sites ~~within the Downtown Specific Plan Boundary~~to Accommodate Lower Income RHNA

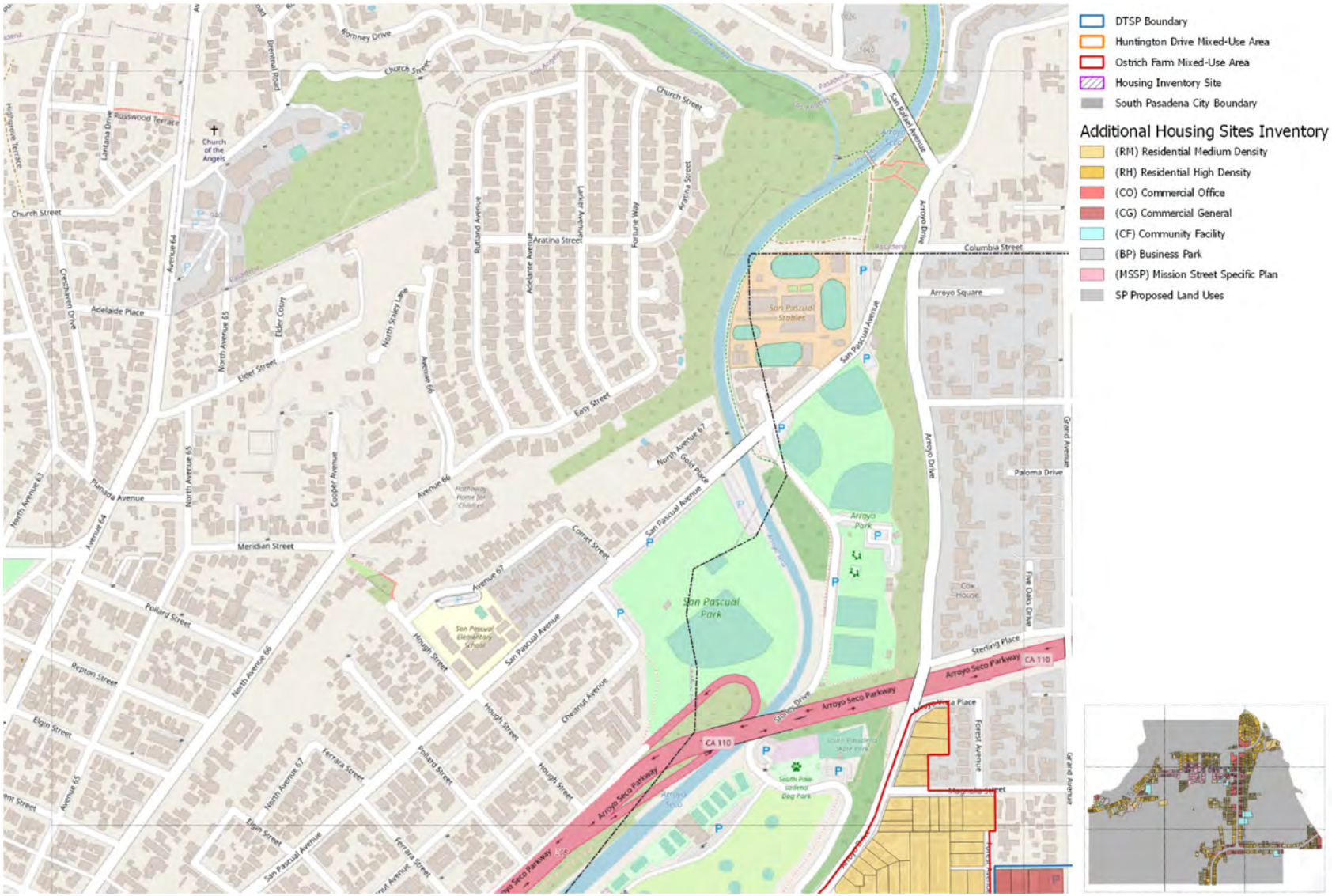


Figure A-3.b Map of Additional Sites to Accommodate Lower Income RHNA

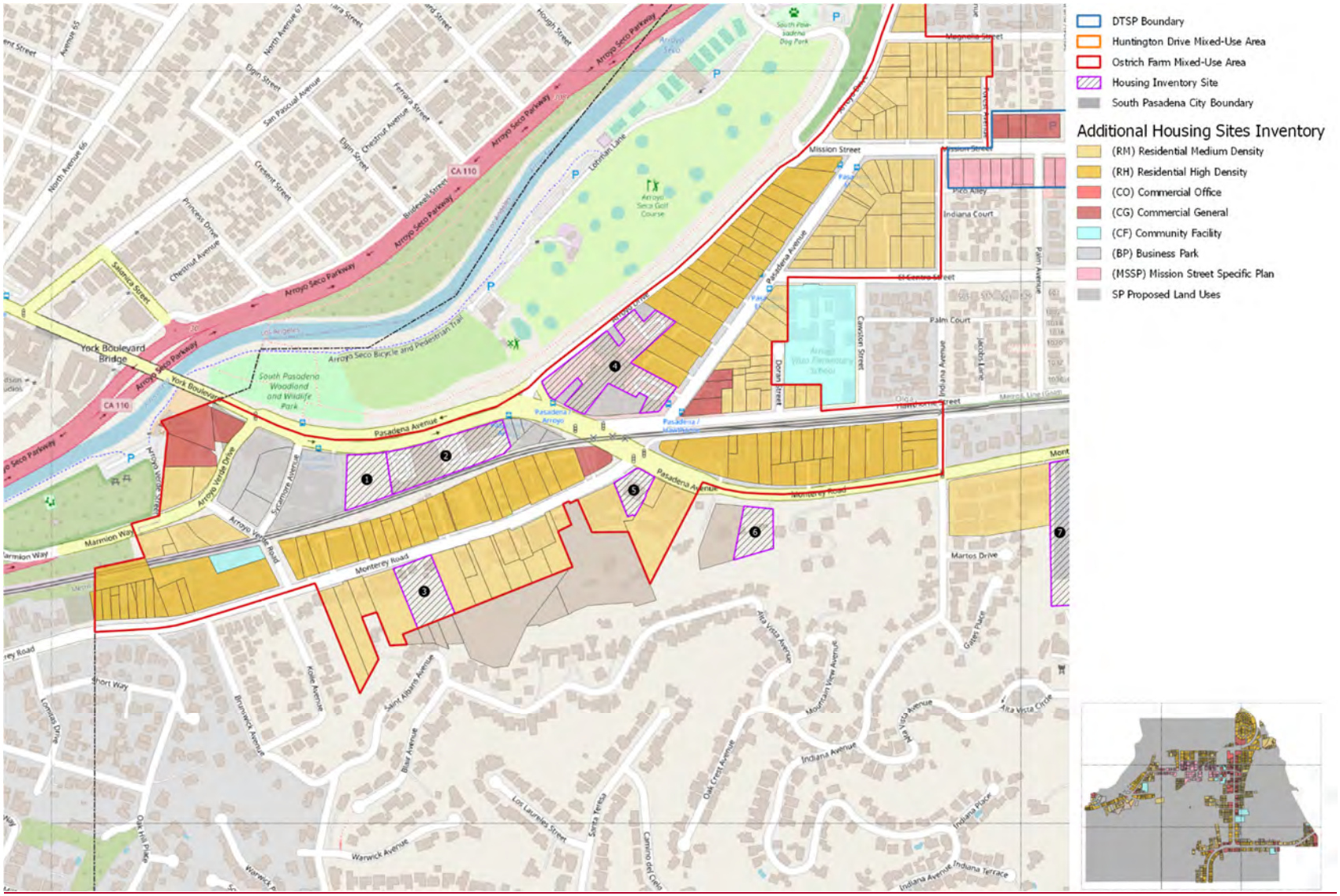


Figure A-3.c Map of Additional Sites to Accommodate Lower Income RHNA

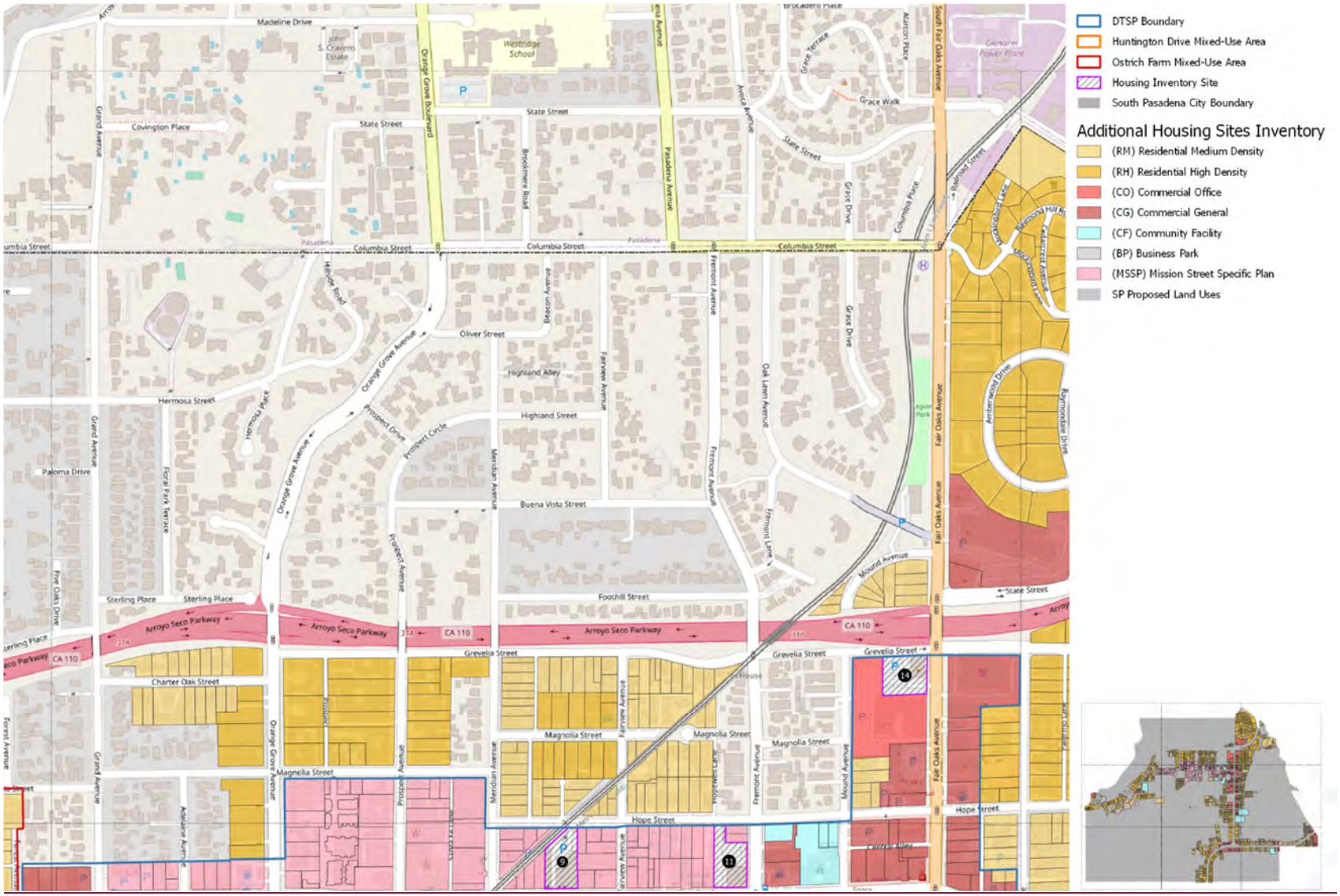


Figure A-3.d Map of Additional Sites to Accommodate Lower Income RHNA

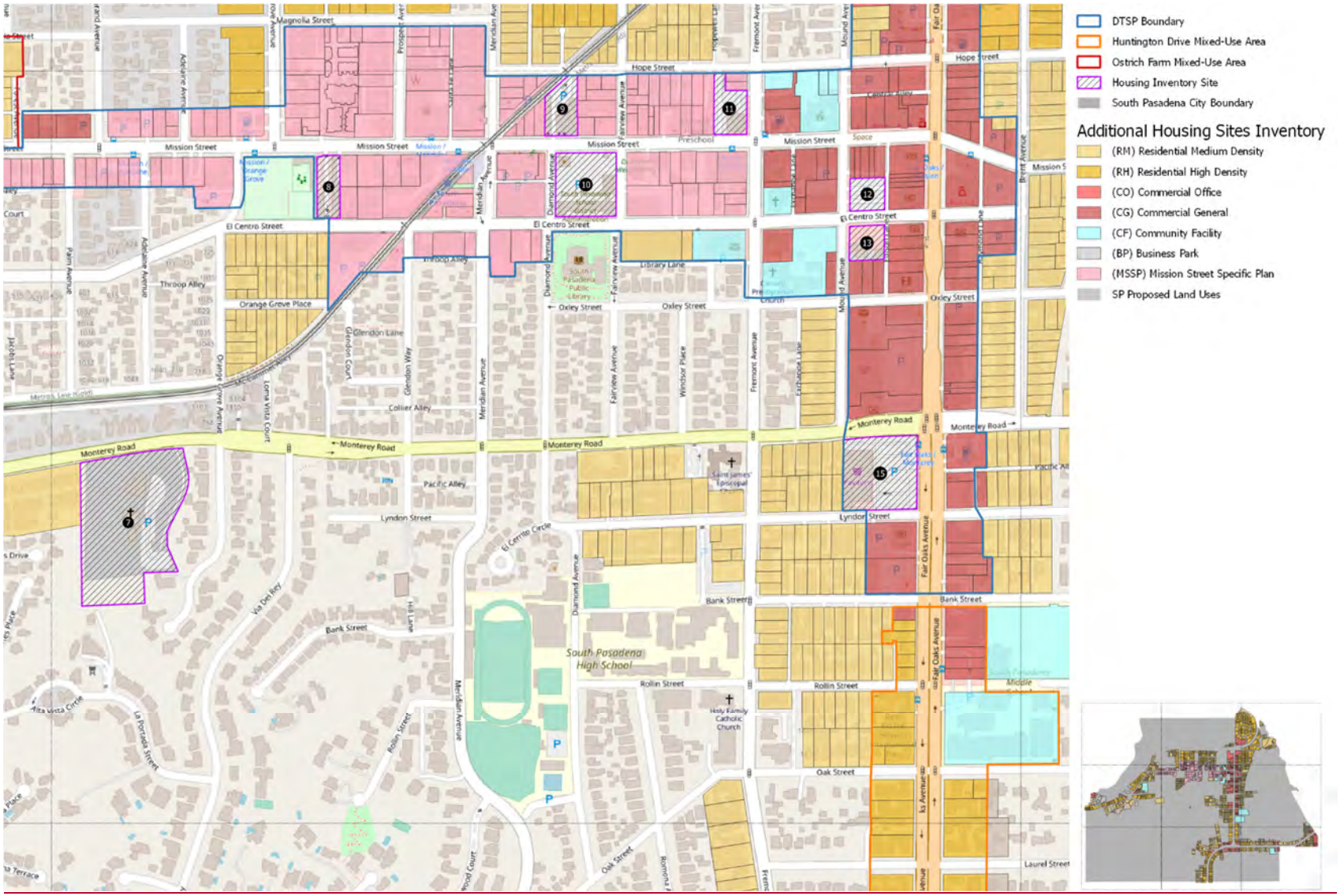


Figure A-3.e Map of Additional Sites to Accommodate Lower Income RHNA

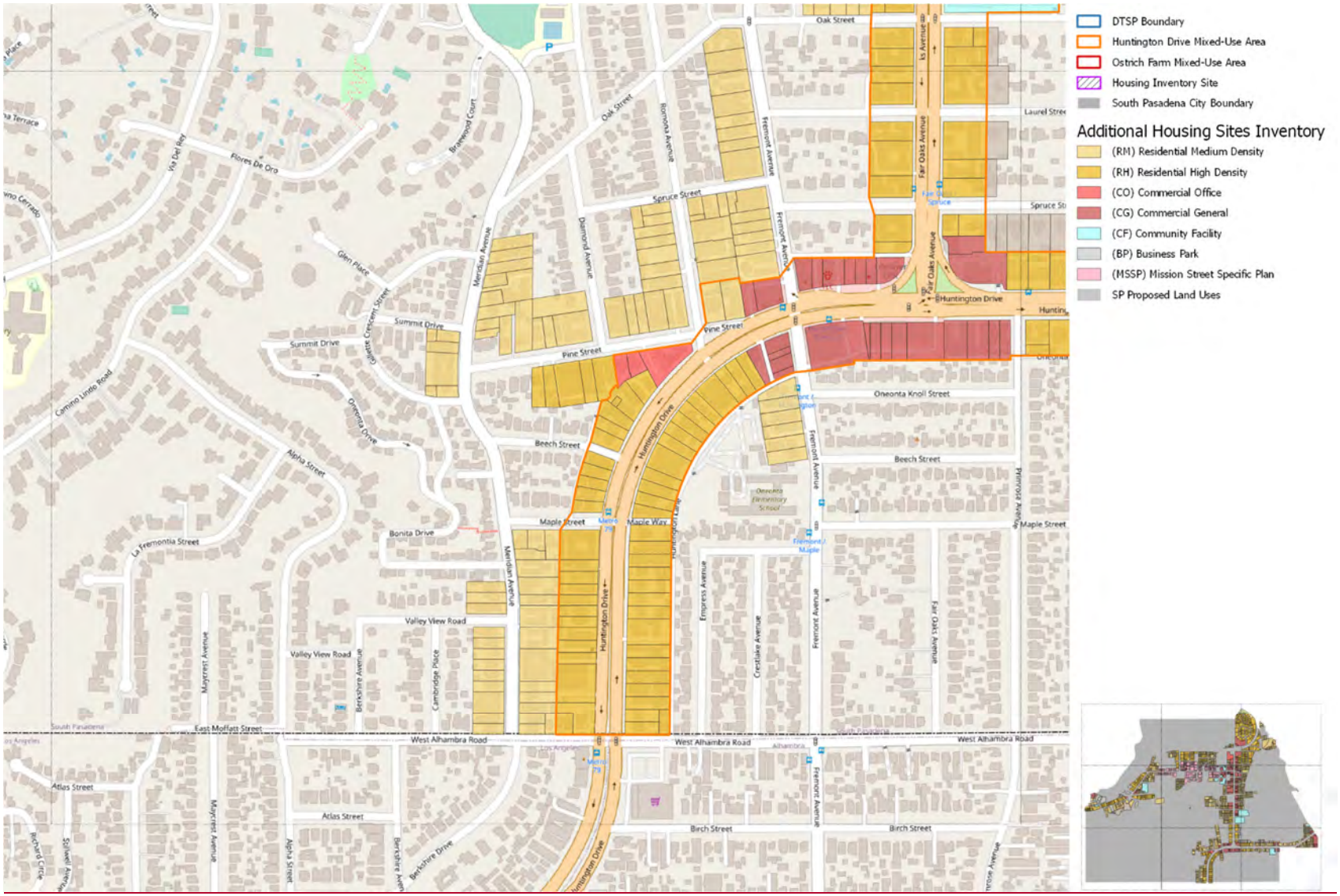


Figure A-3.f Map of Additional Sites to Accommodate Lower Income RHNA

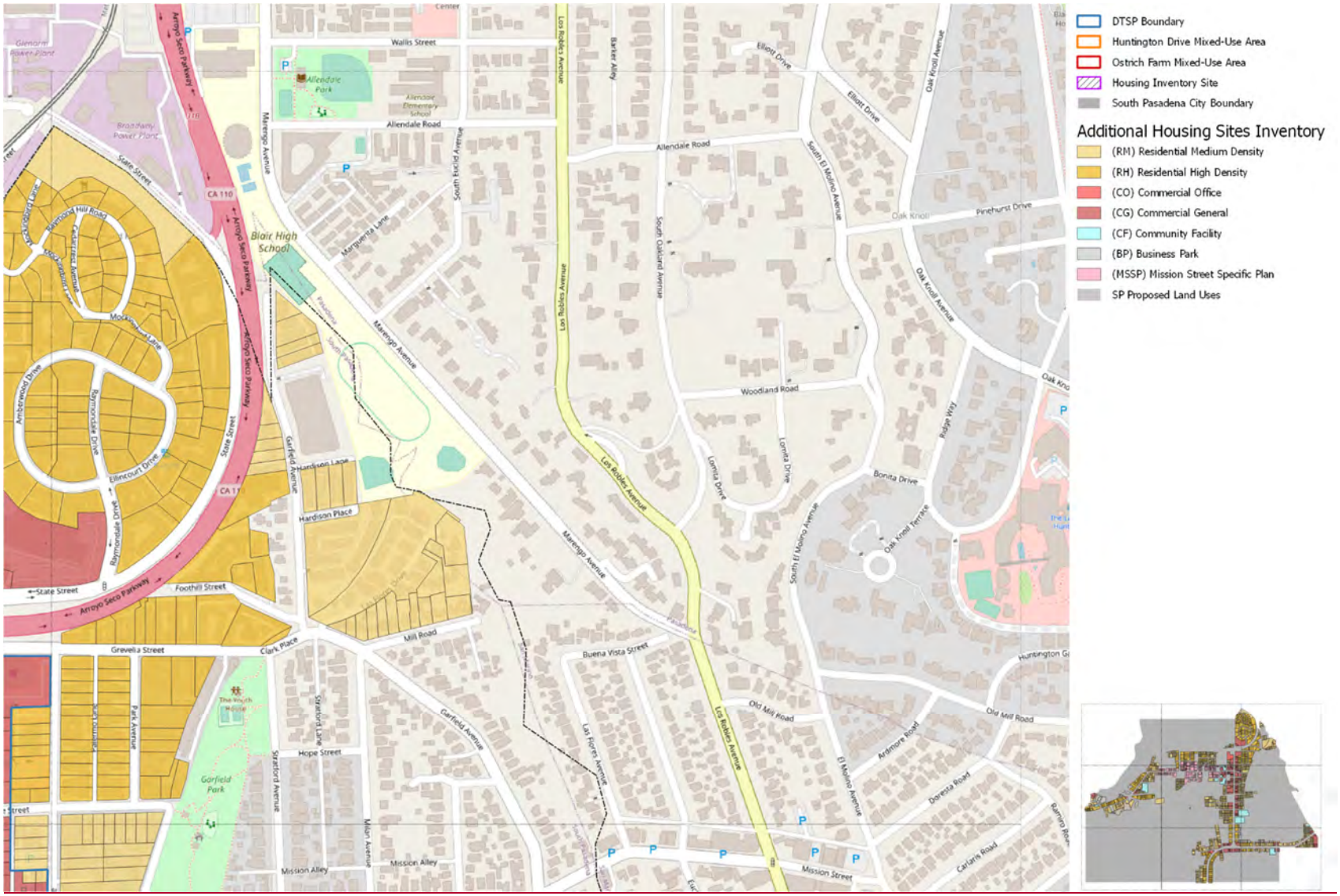


Figure A-3.g Map of Additional Sites to Accommodate Lower Income RHNA

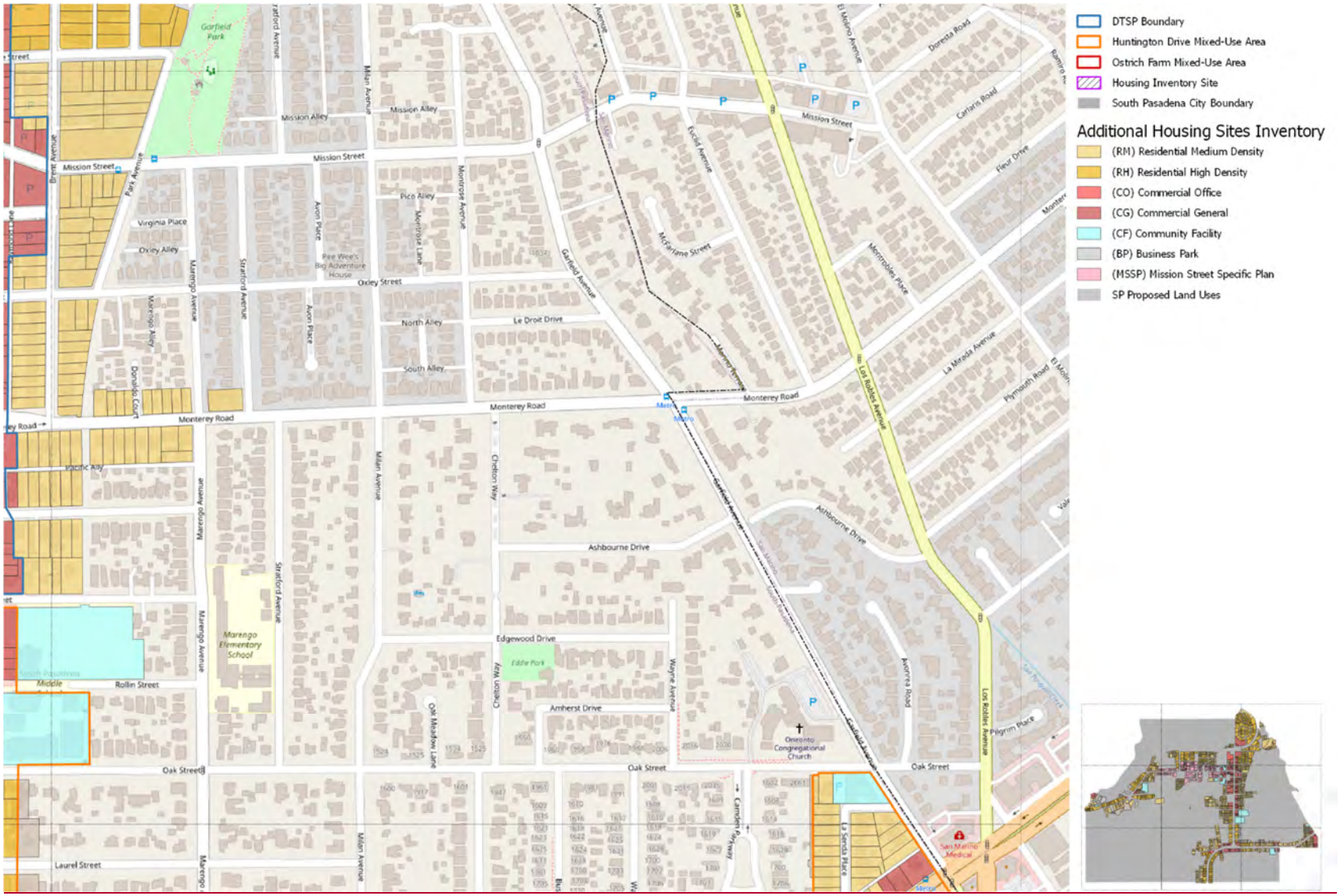
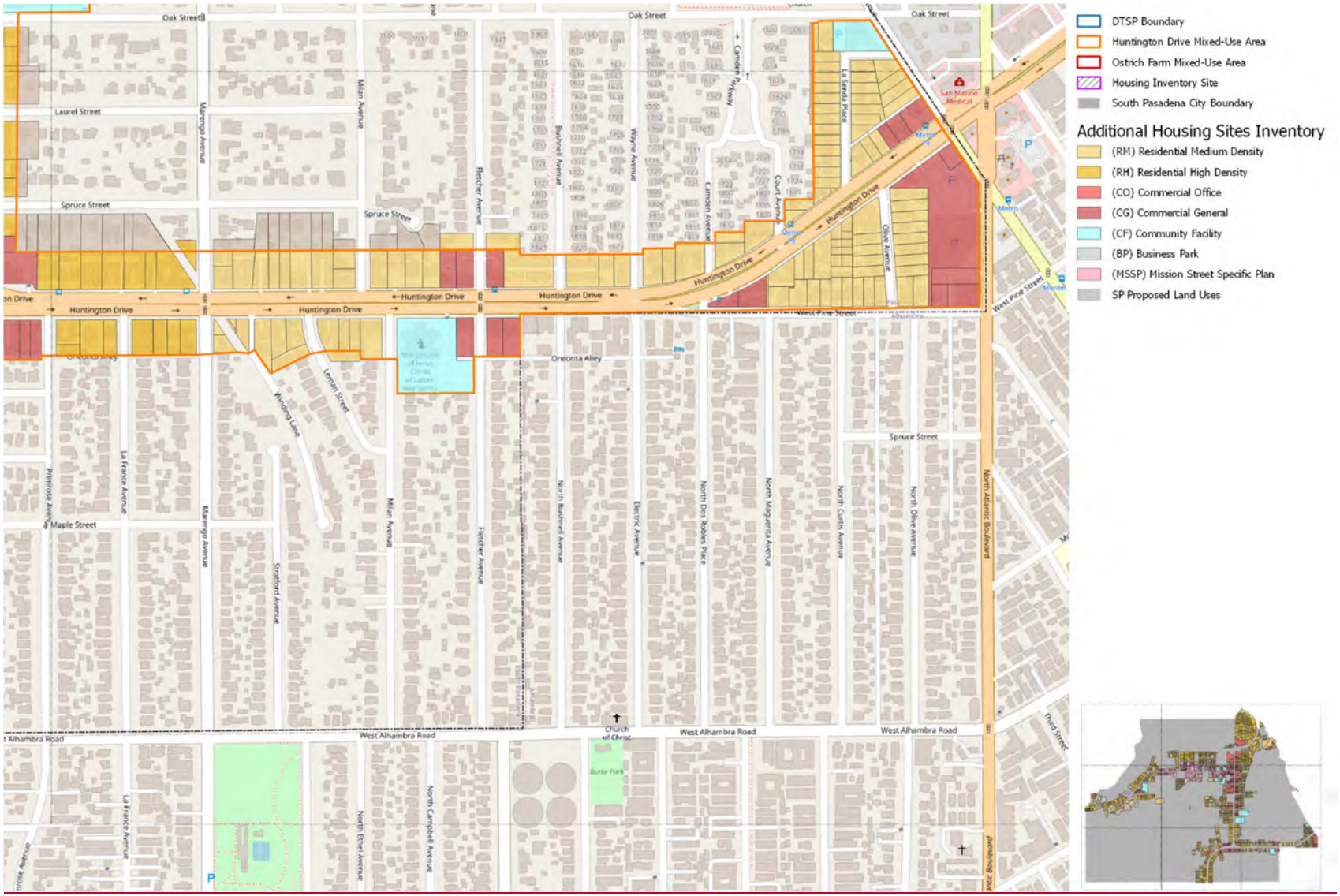


Figure A-3.h Map of Additional Sites to Accommodate Lower Income RHNA


DTSP Boundary
Huntington Drive Mixed-Use Area
Ostrich Farm Mixed-Use Area
Housing Inventory Site
South Pasadena City Boundary
Additional Housing Sites Inventory
(RM) Residential Medium Density
(RH) Residential High Density
(CO) Commercial Office
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
SP Proposed Land Uses
Oak Street
Laurel Street
Spruce Street
Huntington Drive
West Pine Street
Oneonta Alley
Maple Street
West Alhambra Road
Church of Christ
Burke Park
Marengo Avenue
Milan Avenue
Fletcher Avenue
Bushnell Avenue
Wayne Avenue
Camden Avenue
Court Avenue
La Senda Place
Olive Avenue
Winding Lane
Leman Street
Primrose Avenue
La France Avenue
Stratford Avenue
North Bushnell Avenue
Electric Avenue
North Dos Robles Place
North Maguerita Avenue
North Curtis Avenue
North Olive Avenue
North Atlantic Boulevard
North Ethel Avenue
North Campbell Avenue
Third Street
San Marino Medical

SITES TO ADDRESS THE LOWER-INCOME RHNA OR WITH PENDING OR APPROVED APPLICATIONS

1. Vacant Site

This site is vacant.

Parcel Number	5311003096
Site Size (acre)	1.05 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use with Housing Opportunity Site
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	70 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes - Verbal communication between City staff and property owner representative; Property owner representatives requested meeting with City (7/28/21 and 8/9/21 meetings to discuss potential housing proposal).
Environmental Constraints	No known environmental constraints.

2. Business and Research Park parking lot site

Existing use is as a business park with offices and large surface parking areas. The site is underutilized given the large parking lot and proposed density. Bullseye Glass and Judson Studios (southwestern-most buildings) are relatively new tenants.

Parcel Number	5311004010
Site Size (acre)	2.23 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	~~60~~ 70 du/ac.
Realistic/Net Units	50 lower-, 20 moderate-, 13 abovemoderate-income units= 83 total units
Property Owner or Developer Interest in Residential Development?	Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed.Property owner was supportive of rezoning for potential for multi-family residential development in the planning period. Developer interest in site.
Environmental Constraints	No known environmental constraints.

3. Monterey Road site

Underutilized parcels each with one single-family home on it. All three parcels have the same owner. Owner is interested in the development of housing and has submitted an application for a total of 8 market-rate units on the three parcels.

Parcel Numbers	5311015035, 5311010001, 5311010002
Site Size (acre)	5311015035 – 0.34 acres, 5311010001 - 0.33 acres, 5311010002 – 0.59 acres = 1.26 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM with Affordable Housing Overlay
Proposed General Plan Land Use	Medium-Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	8 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes, both Property Owner and Developer Interest. Property owner has submitted an application for residential development.
Environmental Constraints	Rear portion of the site is significantly sloped.

4. Tyco site

Existing uses include parking lots and underutilized industrial buildings. All parcels have the same owner. Owner is interested in consolidating the parcels and developing a few hundred units of high-density housing on the site.

Parcel Numbers	5313011007, 5313011009, 5313011010, 5313011012, 5313011013
Site Size (acre)	5313011007 – 0.89 acres, 5313011009 – 0.34 acres, 5313011010 – 0.24 acres, 5313011012 – 1.00 acres, 5313011013 – 0.80 acres =3.26 acres total
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	130 lower-, 57 moderate-, 30 above moderate-income units = 217 total units
Property Owner or Developer Interest in Residential Development?	Yes. Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed. Owner/Developer interested in building over 300 units during the planning period.
Environmental Constraints	No known environmental constraints.

5. Liquor store site

Existing use is liquor store. Underutilized site with surface parking and proposed density. The structure is 50-60 years old. There have been no planning/building permits applied for or issued for this site over the past ten years, indicating that there have been no major investments in the structure.

Currently, improvements on the site include an approximately 5,500 square foot retail building, and approximately 10,000 square feet of parking that includes 17 parking spaces. As shown below, the site can accommodate 31 housing units. The proposed Ostrich Farm Mixed-Use zoning will allow for up to 8,500 square feet of retail development in additional to the residential development shown. It is anticipated that redevelopment of the site to residential mixed-use will significantly increase the site's value over the existing use.

A question about this site was presented to developers during the City's developer forum, where the participants identified this site as "moderately likely" to be redeveloped. The judgement of the likelihood of redevelopment was made in comparison to other sites presented to the developer forum, all of which were in the Downtown Specific Plan area, and based on the shape of the site.

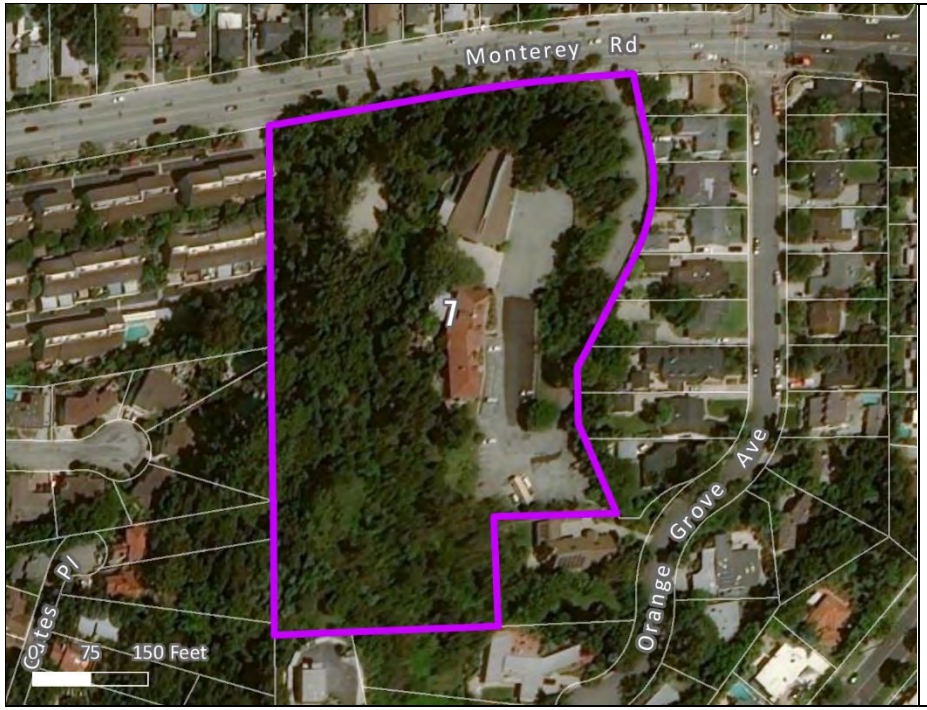
Parcel Number	5311012019
Site Size (acre)	0.55 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	19 lower-, 8 moderate-, 4 above moderate-income units = 31 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner. No expressed interest from any developers.
Environmental Constraints	No known environmental constraints.

6. Arroyo Vista Inn site

Existing use is a bed & breakfast inn. Owners are interested in affordable housing development on the portions of the site close to Monterey Road, retaining the existing buildings. Close to transit and amenities. The site was recently subdivided into three parcels. The housing potential is on the right-hand parcel and only on the street-facing third of the parcel. The owner has submitted an application for residential units on this parcel.

Parcel Number	5311012040
Site Size (acre)	5311012040 – 0.94 acres
Current General Plan Land Use	Estate & Very Low Density Residential
Current Zoning	RE
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RL with Affordable Housing Overlay
Proposed General Plan Land Use	Very Low Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	7 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes. Letter and Meetings with Property Owners for Housing Development during the planning period
Environmental Constraints	Rear portion of the site is significantly sloped.

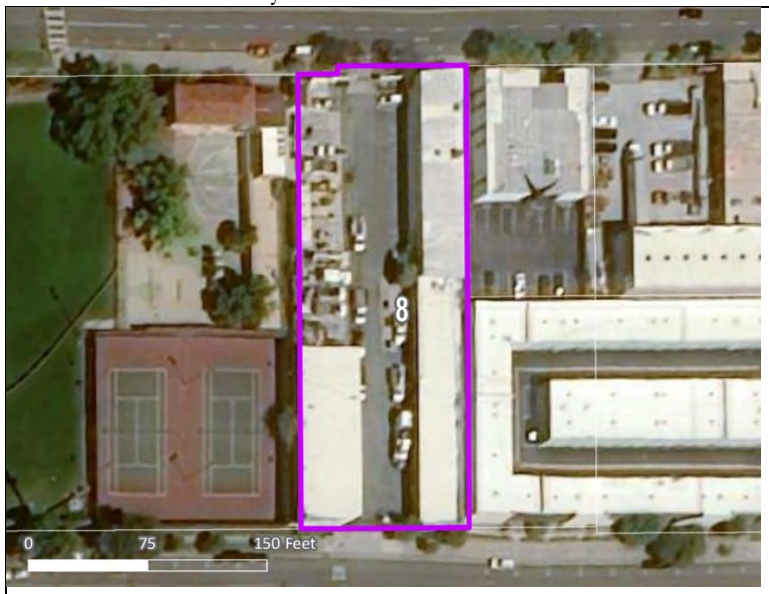
7. Methodist Church site



Existing use is church buildings, parking lot, and open space/undeveloped area. The church that owns the property has been studying different scenarios for developing the site further to incorporate housing, including affordable housing units. The existing church building and historic community room building and parking lot would be retained along with some areas of slopes, but other areas of the site are underutilized and could easily accommodate housing development. Without these constraints, the site could accommodate 100 units. However, based on the constraints of the site, including the topography, historic resources, and intention of the property owner, it is anticipated that the site will reasonably accommodate 30 lower income units.

Parcel Number	5314003083
Site Size (acre)	6.65 acres
Current General Plan Land Use	Community Facilities
Current Zoning	CF
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	CF with Affordable Housing Overlay
Proposed General Plan Land Use	Civic with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	30 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes. Meetings with property representatives and architects in response to their interest in developing 30 housing units during the planning period.
Environmental Constraints	Site has significant topography and the property owner intends to keep the existing uses.

8. Public works yard site



~~Existing use is the City public works yard.~~ This property is owned by the City. Existing use is the City public works yard, with three distinct uses on site: offices, material storage, and vehicular storage. The City commits to relocating these uses during the planning period. The office uses will relocate to City Hall, the material storage uses will relocate and be combined with existing material storage located adjacent to the South Pasadena Dog Park on Stoney Drive, and the Public Works Department will purchase or lease a secured warehouse building for vehicular storage in South Pasadena or a neighboring community.

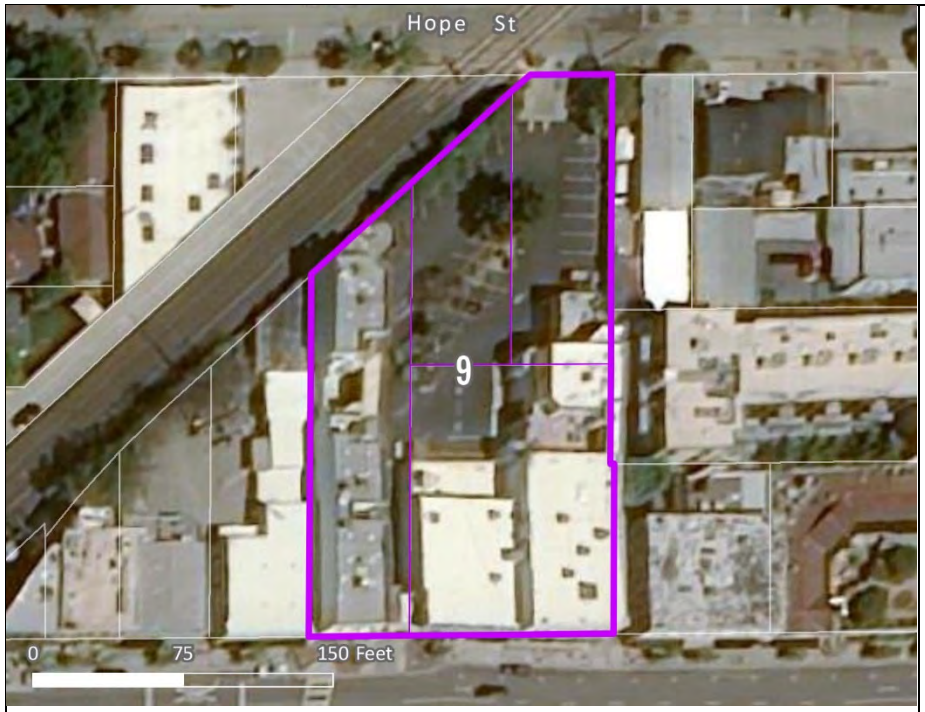
This site is centrally located near transit and services. ~~The current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the public works yard, in order to vacate the property for an affordable housing project.~~ Once vacated, the City will make this site available for a 100% affordable housing development. This property is included in Program 2.l for developing City-owned sites with affordable housing.

The site inlcudes ~~There is~~ an underground gasoline tank and filling station on site that will be removed prior to redevelopment of the site. As part of the redevelopment, an environmental site assessment will be conducted to determine if any environmental remediation is required. However, there is currently no indication that remediation will be required. The underground gas tank is inspected regularly and no leaks have been detected. Any necessary remediation identified in the environmental site assessment will be conducted by the City prior to redevelopment of the site. It is not anticipated that the testing or remidation of the site, if required, will present significant constraint on redevelopment of the site, as this type of testing and remediation is common on many previously developed parcels. Site with soil contamination are generally remediated through the excavation and export of contaminated soil during the grading process.

Parcel Number	5315020901
Site Size (acre)	0.71 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	Maximum density 70 du/ac. Minimum density 60 du/ac.
Realistic/Net Units	42 lower- -income units = 42 total units

Property Owner or Developer Interest in Residential Development?	Yes, City-owned and replacement yard options identified.
Environmental Constraints	The site contains an existing gasoline filling station and underground storage tank. Potental soil contamination may impact timeframe and cost of redevelopment.

9. Meridian site



Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services. The property owner's plan to redevelop will be made more feasible by the proposed programs in this housing element, the DTSP, and height increases based on the density bonus and/or changes to the height maximum initiative.

Parcel Numbers	5315014030, 5315014032, 5315014033, 5315014044
Site Size (acre)	5315014030 – 0.23 acres, 5315014032 – 0.16 acres, 5315014033 – 0.13 acres, 5315014044 – 0.31 acres= 0.83 acres total
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street (adjacent to the track)
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.

Realistic/Net Units	34 lower-, 15 moderate-, 8 above moderate-income units = 57 total units
Property Owner or Developer Interest in Residential Development?	Yes. Meeting and site visit with owner representative and City staff
Environmental Constraints	No known environmental constraints.

10. School District site

The property contains a historic school district building, but the majority of the property is a surface parking lot. This site is identified in the current adopted South Pasadena Housing Element. In 2021, the South Pasadena Unified School District sold the property to a developer. The current property owner has proposed a mixed-use project that includes retail, 89 market rate residential units, 19 moderate-income residential units, and adaptive reuse of the historic school administration building for commercial uses. The developer submitted the project in September 2021 and it received final approval from the Planning Commission on September 13, 2022. The units assigned to this site are based on the approved application. This site is centrally located near transit, schools and services.

Parcel Number	5315008047
Site Size (acre)	1.90 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	19 moderate-income and 89 above moderate-income units = 108 total units
Property Owner or Developer Interest in Residential Development?	Yes, application received and approved.
Environmental Constraints	No known environmental constraints.

11. Carrow's site

Existing use is Carrow's restaurant with surface parking. An application for a mixed-use project, utilizing the State Density Bonus, with 50 units (5 affordable units) and 3,769 square feet of commercial area was submitted on February 8, 2021 and approved by Planning Commission on April 18, 2022. The application was submitted prior to the effective date of the inclusionary housing ordinance, and as such was not subject to its provisions.

Parcel Number	5315009051
Site Size (acre)	0.81 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	5 lower- and 45 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Yes. Application under review; unit count based on current application
Environmental Constraints	No known environmental constraints.

12. El Centro St. and Edison Ln. Site

Existing use is a moderately used parking lot. The west parcel of the two parcels is owned by the City. Parking would be underground if the site is developed for housing. When developed, the project would need to provide at least 3 commercial spaces for the bank east of this site. The entire site is identified in the current adopted South Pasadena Housing Element. This site is centrally located near transit and services.

Parcel Numbers	5315003044, 5315003901
Site Size (acre)	5315003044 – 0.37 acres and 5315003901 – 0.19 acres= 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed-Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	20 lower-, 8 moderate-, 4 above moderate-income units = 32 total units
Property Owner or Developer Interest in Residential Development?	The smaller, west parcel is City-owned. Although no response was received from the property owner of the east parcel, the City will continue efforts to consolidate the parcels to develop a housing project.
Environmental Constraints	No known environmental constraints.

13. City-Owned Parking Lot site

Existing use on the three northern parcels is a parking lot and a small theatre building. The City has a short-term lease in place with the theater becaue the goal is to develop a 100% affordalbe housing development on this site. The lease was amended in 2022 so that it is a month-to-month lease that expires on March 31, 2024. These lease amendments were made to allow the City to redevelop the site into residential uses. Those three parcels are owned by the City. There has been recurring interest from developers over the years for senior affordable housing development. The fourth parcel at the south end of the site could be consolidated with the other three parcels to develop as one site. There is one single-family residence on the existing site. It is not occupied by a lower-income household. The owners are interested in their property redeveloping together with the City-owned parcels as multifamily affordable units. The City plans to issue an RFP for development of housing on this site.

Parcel Numbers	5315003903, 5315003904, 5315003902, 5315003035
Site Size (acre)	5315003903 – 0.18 acres, 5315003904 – 0.12 acres , 5315003902 – 0.12 acres, 5315003035 – 0.19 acres = 0.61 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	1 parcel Vacant, 2 parcels Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	36 lower- -income units = 36 total units
Property Owner or Developer Interest in Residential Development?	Yes, Three parcels are city-owned and the owners of the fourth parcel are interested in their parcels being consolidated with the city parcels and all four parcels redeveloping together for multifamily residential development during the planning period.
Environmental Constraints	No known environmental constraints.

~~14. Oxley site~~

~~These are two adjacent parcels with the same owner. The owner has confirmed to the City that they are interested in redeveloping their parcels for multi-family housing. Currently, each parcel has one single-family home on it. They are not currently occupied by lower-income households.~~

~~Parcel Numbers~~	~~5315003033, 5315003032~~
~~Site Size (acre)~~	~~5315003033 – 0.18 acres, 5315003032 – 0.22 acres = 0.42 acres total~~
~~Current General Plan Land Use~~	~~General Commercial~~
~~Current Zoning~~	~~CG~~
~~Rezoning or Change to Land Use Required?~~	~~Yes~~
~~Proposed Zoning~~	~~Mixed Use~~
~~Proposed General Plan Land Use~~	~~Downtown Fair Oaks~~
~~Vacant or Non-Vacant~~	~~Non-Vacant~~
~~Density or Proposed Density (units per acre)~~	~~60 du/ac.~~
~~Realistic/Net Units~~	~~14 lower , 5 moderate , 4 above moderate income units = 23 total units~~
~~Property Owner or Developer Interest in Residential Development?~~	~~Yes, property owner is interested in redevelopment with multifamily residential during the planning period.~~
~~Environmental Constraints~~	~~No known environmental constraints.~~

~~15.~~14. Shaker's site

Existing use is a small restaurant, Shaker's, with substantial surface parking. This is a strong site for redevelopment for housing, and could incorporate the existing or a replacement restaurant and possibly other ground floor commercial uses. Staff has held multiple meetings with the property owner and property owner's representative, who are very interested in developing the site with a high-density housing/mixed-use project. Redevelopment of the site will require a Historic Resources Evaluation (HRE) report for demolition. This site is centrally located near transit and services.

Parcel Number	5315001070
Site Size (acre)	0.85 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	~~70~~ 110 du/ac.
Realistic/Net Units	~~33~~ 46 lower-, ~~15~~ 23 moderate-, ~~8~~ 23 above moderate-income units = ~~56~~ 92 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner representatives have met several times with City staff.
Environmental Constraints	No known environmental constraints.

~~16.~~15. Pavilions parking lot site

Existing use is a supermarket (Pavilions) with a large surface parking lot with the commercial use set back from the street. Although ~~currently undergoing a~~recently remodeled to update the store, the owner has informed the City that they are also developing a proposal to redevelop the property with underground parking, a new market and high density housing on upper levels at the maximum that would be allowed by City zoning, and would include affordable housing units. The ~~current~~ recent renovations are minor in nature and would not preclude redevelopment of the site. The project would be similar to others that the owner has implemented in other locations throughout the state.

Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that would include the grocery store use as well as housing. This site is centrally located near transit and services and schools.

In a February 2022 meeting with Community Development staff, the property owners provided a proposed mixed-use project description with high density residential, at the highest capacity allowed by Code using density and height bonuses, and a new market of similar size to the existing. Their continuing interest in a project of this scale was confirmed in a December 2022 letter and was reitterated at the February 1, 2023 City Council meeting during public comments.

Parcel Number	5319002034
Site Size (acre)	2.67 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	~~70~~ 110 du/ac.
Realistic/Net Units	~~80~~ 110 lower-, ~~30~~ 55 moderate-, ~~23~~ 55 above moderate-income units = ~~133~~ 220 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff in higher density housing redevelopment during the planning period.
Environmental Constraints	No known environmental constraints.

~~17. Retail and restaurant buildings and parking lot site~~

~~Existing use is a retail center that includes a resturant located along a portion of the street frontage, a two-story building in rear, and surface parking in the center of the site and along the remainder of the street frontage. There is potential for redevelopment of the site based on recent project trends and active economic reinvestment in area. This site is centrally located near transit and services. There are existing leases on the site with varying termination dates during the planning period. Approximately one quarter of the rear building is vacant. All of the leases include early termination clauses. The property owner has expressed interest in redevelopment of the site to City staff.~~

~~Parcel Number~~	~~5319003029~~
~~Site Size (acre)~~	~~0.89 acres~~
~~Current General Plan Land Use~~	~~General Commercial~~
~~Current Zoning~~	~~CG~~
~~Rezoning or Change to Land Use Required?~~	~~Yes~~
~~Proposed Zoning~~	~~Fair Oaks~~
~~Proposed General Plan Land Use~~	~~Downtown Fair Oaks~~
~~Vacant or Non-Vacant~~	~~Non-Vacant~~
~~Density or Proposed Density (units per acre)~~	~~60 du/ac.~~
~~Realistic/Net Units~~	~~30 lower , 14 moderate , 6 above moderate income units = 50 total units~~
~~Property Owner or Developer Interest in Residential Development?~~	~~Property owner interest expressed to City staff.~~
~~Environmental Constraints~~	~~No known environmental constraints.~~

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Appendix B: Public Participation Summary

Appendix B: Summary of Public Participation

Release of Public Review Draft Housing Element

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. Below is a summary of all outreach since initiation of the Housing Element update, all written comments on the Housing Element received by the City, and how comments on the draft were addressed in this revised draft Housing Element. The summaries of outreach and community input are organized by type of outreach or meeting.

Public Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform.

Workshops 1 and 2

The City held two online public workshops with the general public to solicit feedback from City residents on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. The same workshop was held on the two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about Housing Elements. That survey was available before, during, and after the workshops. In addition, the City set up an email address to receive input ahead of the workshops and throughout the Housing Element Update and encouraged participants to submit comments and questions via email.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with an overview of the 6th-cycle Housing Element Update process, with a question-and-answer period in the middle. The second part of the workshop presentation focused on the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. Interaction was conducted via chat and email to minimize inappropriate content or behavior or instances of Zoom "bombing" by uninvited guests. Participants were directed to share their questions either through Zoom's chat feature or to email their questions to the City. The City staff selected questions among those received and answered some of them during the meeting as time allowed. They indicated that all questions would be answered in a frequently asked questions (FAQ) document that they drafted after the meeting's end and was then posted on the City's website.

Public Workshop, May 30, 2020 (Workshop 1)

There were approximately 30 participants at this workshop. Due to technical difficulties with the chat feature for some participants, after the end of the presentation more questions were answered by City staff and the consultant team.

The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: https://www.southpasadenaca.gov/home/showdocument?id=21084

- Participants asked about the RHNA process and how the number was determined for South Pasadena.
- Participants asked about the potential for golf courses, school district lands, and other sites with existing uses to be re-purposed for meeting the City's RHNA.
- Participants asked about Accessory Dwelling Units (ADUs) and their potential for rental units for low-income housing as well as the potential implications of the legalization of AirBnB in the City.
- Participants asked about the impacts of potentially increasing maximum density and height limits to increase housing supply.

Public Workshop, June 2, 2020 (Workshop 2)

There were approximately 30 participants at this workshop. The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: ***https://www.southpasadenaca.gov/home/showdocument?id=24141***

- Participants asked about CalTrans-owned properties and how those might be used for new housing.
- Participants asked about the potential lowering of the City's RHNA resulting from the current economic slowdown and future elimination of Metro bus stops in the City.
- Participants asked about the consequences and penalties for a non-compliant housing element.
- Participants asked about the methodology for determining RHNA and how SCAG had arrived at the City's RHNA numbers.
- Participants asked about the City's future ADU guidelines.

Workshops 3 and 4

The City held two online public workshops with the general public to solicit feedback from City residents on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m. The same workshop was held on two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about what should be discussed at the workshops. That survey was available before and during the workshops and was closed after the workshops. In addition, the City continued to accept emails to receive input ahead of the workshops.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with a brief overview of the 6th Cycle Housing Element Update process and the strategies under consideration to address the City's RHNA. Meeting participants were then separated into virtual breakout rooms to discuss questions about RHNA strategies. The groups were small, at around five people, and each had staff or consultant facilitators. Polling questions were asked of participants soon after the beginning of the workshop, after the presentation right before the breakout groups, and then the same questions were asked again just after the breakout group segment to gauge whether opinions changed based on the breakout group discussions. The polling questions were:

First poll after slide 4 – second team meeting rolls slide

- Did you participate in the Housing Element Workshops 1 or 2?
- If not, have you watched presentations the City has posted on their website about the Housing Element?

Second poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

Third poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

The discussion questions for the breakout groups were:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena, either because of the size, style, mix of uses, features, degree of affordability, etc.?

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

The workshops concluded after the breakout room discussion.

Public Workshop, September 23, 2020 (Workshop 3)

There were approximately 12 participants at this workshop. The participants represented members of City commissions, City Council members, housing advocates, community members, those who work in South Pasadena, and both renters and homeowners. The results of the two substantive poll questions for Workshop 3 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 20%
  - Upzoning single-family areas – 30%
  - Increasing density without increasing height – 0%
  - **Increasing height and density – 50%**

Poll after breakout groups and report-backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 11%
  - Upzoning single-family areas – 22%
  - Increasing density without increasing height – 11%
  - **Increasing height and density – 56%**

There were two breakout groups at Workshop 3. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
   - Sees a lot of obstacles for housing and would like the City to think outside of the box
   - Knows many of the legislators that wrote the laws, wants to make sure the City makes decisions that would provide the best housing
   - Wants to make sure the City avoids liability with HCD and advocacy groups
   - Wants to hear what fellow residents thought about the different proposals and what is important for the future
   - Would like to see broad community support coming together to get behind this element.
   - Wants to make sure housing is built for everyone in the San Gabriel Valley
   - Wants to make sure RHNA gets distributed to affirmatively affirm fair housing and avoids concentrations of poverty
   - Would like to see increased density and sustainable landscapes
   - Concerned about big RHNA increase that the City has to absorb. Important to preserve small town character and single-family neighborhoods as we add housing
   - A lot of people want to live here, want to make it possible for a variety of people to live here. Likes idea of increased height limits and greater densities

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- Higher-density/height can provide more affordable/lower-income housing without looking like Downtown Los Angeles
- Two-thirds of ADUs can be deemed affordable
- Believes the City needs to upzone and increase densities and will need more ideas for low-income housing
- Should go beyond the targeted zoning for the six areas mentioned
- City will run into issues with the no-net-loss rule
- Does not believe HCD will give the City the minimum number of ADUs that is calculated
- Least favorite is upzoning single-family housing
- Would like to see more analysis that increased density/height is needed. Believes the City will face some difficulty with providing sufficient proof for specific parcels
- Frustrated with the City's ability to provide low-income housing since there is no redevelopment or assistance from the State, believes the only tool available is inclusionary housing
- It's hard to imagine the proposal for upzoning single-family would be accepted by most residents, interested in what kind of implications will happen from the Housing Element in different portions of the City
- ADUs could be problematic as long-term housing, especially for families. Shouldn't be the primary solution
- Higher densities could allow a blending of housing affordable to lower- and higher-income brackets
- Not opposed to ADUs, concerned with affordability levels
- Concerned about reliance on ADUs
- More potential for ADUs as a solution than other options
- ADUs are a wonderful idea. City should allow ADUs to be legalized/acknowledged without penalty
- Asked about Caltrans properties. City let the questioner know that they have not heard back from Caltrans regarding a potential partnership. City is interested in working with Caltrans to rehabilitate the Caltrans properties. Can't easily count those towards to RHNA because they are not new units.
- Desires choices for all affordability levels
- Increase in height and density sounds nice. Interested in understanding more about how to distribute height and density so as not to limit affordability options to confined areas
- Concerned about waiving or lowering parking requirements and traffic from ADUs
- Be careful with parking issues
- Important to consider reasons behind voter-imposed height limit
- Preserve small-town character

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

    - To reduce GHG emissions, housing should be concentrated around High-Quality Transit Area (Gold Line Station)

- Should be as close to the Gold Line Station as possible, should eliminate parking requirements in those locations
- Along transit corridors (Huntington/Fair Oaks/Gold Line)
- Near the Gold Line is preferred; however, it is a historic district
- Vons center is a prime location
- Definitely near transit, there will be some capacity issues with the historic character, commercial corridors
- At least half of participants agreed housing should be dispersed through many areas of the City

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Monrovia/Azusa examples, options are diverse in terms of affordability
    - Smaller buildings on Raymond Street (south of Colorado) at Fair Oaks/Mission, need good design guidelines
    - Encinitas, higher-density project example (May 20th presentation to City Council)
    - Hiring great architects, variety of designs that are respectful of the context
    - The mix of densities by the middle school. There is a tradition of a mix of densities in South Pasadena.
    - Historic Ostrich Farm building in South Pasadena
    - President Apartments at 669 South Union in Los Angeles. It is a six-floor apartment building with 105 units.
    - We have a good mix all over town. Multifamily units are well integrated. Fit with diversity of architectural styles appropriate for each neighborhood
    - Mission Meridian in South Pasadena. It is a traditional mix with landscaping, setbacks, and quality materials. It did a good job of reflecting the historic character while also providing relatively dense housing and a range of bedrooms.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - As close to the Gold Line as possible, parking reformed
    - Proactive code enforcement, rental housing
    - Inclusionary Housing Policy
    - Sustainability
    - Affordability was mentioned by several people
    - Inclusive of income groups/families
    - Ability to be here in the long haul
    - More permanent supportive housing
    - Population-specific housing
    - Encourage long-term tenants and homeowners, mix of kinds of housing and affordability

- Community, sustainability, and infrastructure adapting to climate change

The following question was brought up during the breakout groups:

- Has South Pasadena explored tax increment financing in lieu of disassembly of redevelopment?

Public Workshop, September 26, 2020 (Workshop 4)

There were approximately 15 participants at this workshop. The participants represented members of City commissions, housing advocates, community members, students, those who work in South Pasadena, and included renters and homeowners. The results of the two substantive poll questions for Workshop 4 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 15%
  - Upzoning single-family areas – 31%
  - Increasing density without increasing height – 15%
  - **Increasing height and density – 38%**

Poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 0%
  - **Upzoning single-family areas – 43%**
  - Increasing density without increasing height – 14%
  - **Increasing height and density – 43%**

There were three breakout groups at Workshop 4. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
   - Has followed the state laws and wants to make sure the City builds good looking beneficial housing
   - Not against raising the height in certain area (Ostrich Farms)
   - Housing should relate to the existing character and add value to the City
   - Believes affordable housing should be done first
   - Wants to hear what the community wants in terms of meeting our RHNA goals
   - Wants development of Caltrans properties according to the character of the community
   - Interested in seeing more housing in the area, different types of housing suitable for families
   - Would like a housing element that will sustain growth that the City can accommodate reasonably
   - Concerned about impacts on schools
   - Favors some minor height improvements in key areas

- Need more flexibility for low-income housing design
- Inclusionary housing regulations
- Affordable housing
- Address density and height within zoning (increase)
- Wants priority city process to follow HCD guidelines
- Prioritize geographic equitable distribution of units
- Prioritize housing dispersed equitably not just in concentrated areas.

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- No. The City would have to work with an outside partner (regional). There is no incentive for developers to provide affordable housing.
- None of the above, none of the options presented were good. Need to build more and increase density. Concerns about traffic around Ralphs and Vons sites.
- Most residents favor height and density modifications in certain areas but not all over town. City-owned property on Mound/El Centro could be a good candidate for low-income mixed-use housing, three to four stories.
- Look at adaptive re-use/micro-apartments. Need to work with the state to get credit for these types of developments.
- Upzone throughout the City (single-family areas). Would provide more opportunities. Focus on specific parcels for more density and height.
- A few people said all of the above.
- Reduce parking.
- Increase density without increasing the height, and work with developers to not create boxy projects. Can do a lot with density without height, allow up to five stories perhaps? City doesn't allow smaller product because of density.
- Adaptive re-use is counted by HCD for RHNA.
- 80 percent development assumption is not likely.
- Eliminating parking minimums in the Mission/Meridian zone.
- Downtown does not need more parking to claim more affordable units.
- The more we look at density, upzoning single-family lots, and increasing height will make a difference for planning for versus the actual building of housing. Should keep in mind.
- Inclusionary zoning. Could achieve a large amount through inclusionary housing.
- A few people liked the height and density increase strategy and had these additional comments:
    - One worried about ballot measure actually passing.
    - Likes the Andalucia precedent project.
    - Concern about sites at the periphery, need transit-oriented development.
- Upzoning single-family would be good for disbursement of housing in City. So, favor single-family upzoning but may be a stretch.
- Closer to transit (rail).

- A few people were skeptical about aggressive ADU numbers. Some had additional comments:
    - Doesn't understand how that works for renters.
    - Hard to monitor.

3. Are there certain areas of the City where increasing housing strategies should be concentrated?

- Throughout the City but look for specific areas around transit, commercial areas, neighborhood amenities.
- Concentrate around transit stop, walkable places, Downtown, Fair Oaks, Mission District. Opportunity by Ostrich Farm can be created.
- Mound/Oxley is close to amenities and would encourage walkability/public transit.
- Huntington Drive has pockets that could accommodate increased density, paratransit would be needed to support development in other areas.
- All of the above - Downtown, Mission west of the subway stop, Mission should allow four stories.
- Mission west does not want to mess with the historic downtown. There is not a lot of transit ridership. Has been a decrease in ridership.
- If throughout City, not blanket, culture may not support it.
- City/PlaceWorks has done a good job of identifying areas but there are some additional/other areas: Huntington Drive is underutilized (four cities connect). Currently, medical offices and low rise that is underutilized. Also look at Ostrich Farm, Mission, and Fair Oaks.
- First priority is near Gold Line station. Incalculable asset that we are not realizing potential of.
- Meridian mixed-use is good. Exciting possibility for mixed-use and density in that corridor.
- Disbursement throughout City but with contextually different housing types. More near transit and services (Gold Line). Well served everywhere already, so can add housing anywhere.
- Prefer to see more housing near transit hubs (Mission/Fair Oaks and metro station).
- Near transit and where practical; consider vacant lots.
- Downtown could accommodate a lot; Fair Oaks has a lot of opportunity for mixed-use; should be spread to some of the existing multifamily areas - triplex/four-plex.
- Shouldn't only be in 3-5 targeted areas of the city. Look at single-family residential neighborhoods also. Allow higher densities on first two-three properties off main corridors.

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

- Different style in different places, Mission should look like it was built 150 years ago.
- Different styles are appropriate, design review process is important, micro-apartments is something that should be considered in some areas, should not limit ourselves to a specific style/type.

- Townhomes at Hope and Meridian is a good example, design standards that are not automobile oriented, cars are moved to the back, less curb-cuts, design and size should prioritize three bedrooms or more to accommodate families.
- Mission/Meridian townhomes, variety of styles, bungalow to Spanish, does not want generic developments, need to have a sense of place, or reflects the historic character.
- Needs to represent South Pasadena, Adobe style, historic examples, character needs to be similar to the unique neighborhoods.
- Respect the historic fabric of the neighborhood block, be flexible given the context of the neighborhood, save the front historic design and modifications are located in the back, concerned about affordable housing
- Generally, multifamily - Look at occupants, tenants (end users) as they transition over lifespan. Professionals, families, seniors; look at different users. Density/massing/open space/courtyards great but also can limit development so we need to look closer as implications of those constraints. It can be too restrictive. Need to dive into more and see specific examples.
- Dense, walkable courtyard multifamily buildings already exist in South Pasadena. See Bank Street (10 units of housing in communal setting possible because without onerous parking requirements). Would love to see that happen again. Currently, the City parking requirements do not allow such projects to be built. Would like to see requirements change to bring back those types of projects and diversity of housing types.
- Sierra Vista Apartments on Esperanza Avenue (low-income senior, 1-2 bed), example of dense affordable complex with beautiful exterior - Yosemite lodge style. Blends well with single-family and multifamily on block. It is only 45 units, so maybe higher density to get more units.
- Likes Andalucia example, doesn't like Aliso example.
- Mission Meridian.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

- Design standards are set in stone, we can make sure it looks good.
- That infrastructure/community services are able to support the new housing units.
- Specifically, how we address affordable housing. One concern of ADU plan is that her work as an architect has shown that ADUs are just additional single-family for real estate but does not meet the goal of affordable units. Not just adding units, but how can we assure they are affordable units? Multifamily development also needed to meet minimum they need to make their projects pencil out. Make it more viable and provide more assurance. Don't skim the surface. Financing for developing affordable units is needed, mentioned Pasadena as an example. Can City partner with bank or banks for affordable housing?
- Housing Element sets values to production. Wants to see recognition of race-based exclusionary practices. Contemporary recognition and repair of redlining and other racist practices. Altos de Monterey in the 1960s was the only place to allow non-white residents. Would like to see acknowledgement of past and commit to real policies that are equitable.
- In addition to being affordable, have permanent supportive housing.
- Reduce parking requirements near transit stops.

- Tenant protections.

The following questions were brought up during the breakout groups:

- Do all units count the same toward the RHNA requirement? For example, is a one-bedroom apartment treated the same as a three-bedroom dwelling?
- Could 710/Caltrans money be used for more transit?
- RHNA appeal, what are our chances to lower our numbers?

Workshop 5

Public Workshop, October 21, 2021 (Workshop 5)

The City held a hybrid public workshops after release of the public draft Housing Element on Thursday, October 21, at 6:30 pm. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the workshop was to provide an overview of the 2021-2029 Public Review Draft Housing Element. After the presentation, the public was invited to ask questions and share comments. The meeting had approximately 12 participants, including two in-person and others on Zoom. Four participants spoke. The following summarizes these questions, comments and staff responses:

- The first question asked for clarification about AB 1398 regarding the possibility for getting the Housing Element approved by HCD by the February 11th deadline in order to avoid the mandatory timeframe for rezoning. The City clarified that before AB 1398 was approved, the February 11th deadline was for the adoption of the Housing Element by the City Council. However, with the change in law, adopting the Housing Element by the February 11th date is no longer a requirement to stay on the 8-year housing cycle. The law says in order to avoid a deadline to complete the rezoning within one year of October 15, 2021, the City would need to have adopted their Housing Element and submitted the adopted Housing Element to HCD for a 90-day review and receive certification at the end of that review before February 11, 2022. That new timeline is not feasible because the City is at the initial point of submitting the Draft Housing Element for the first 60-day review by HCD and will not have enough time to adopt and submit the final to HCD by February 11, 2022. Consequently, the City will adopt after February 11, 2022 and be required to complete the rezoning before October 15, 2022.
- The next question asked was in reference to whether Junior Accessory Dwelling Units (ADUs) were included as part of the site inventory in order to meet the City's RHNA. The City answered that both ADUs and JDUs will be counted.
- The third question asked how the City plans to incorporate the 6th, 7th and 8th (future) Regional Housing Need Allocations (RHNA) if the General Plan update is a 25-year plan with the follow-up question about the City's approach for meeting the RHNA from the 1st - 5th Housing Element updates. The City answered that through the 8-year timeframes for updating the Housing Element, the City will attempt to show that the City has the capacity to build the units during the projection period while keeping in mind that the City's capacity to develop these units is in line with the longer-term General Plan. The Housing Element is on a different timeframe from the General Plan and will be updated again in 2030. Furthermore, staff clarified that the Program Environmental Impact Report (PEIR) will be covering the Housing Element, General Plan Update and Downtown Specific Plan (DTSP). Thus, the City will use the General Plan and the PEIR as guide when analyzing appropriate sites for the next housing element update. To answer the follow-up question, staff explained that the City was able to address capacity for the 63 RHNA units in the 5th Housing Element with existing zoning.

- The next question was in regard to the sites inventory. A property owner wanted to confirm that his property was included in the sites inventory as he is interested in developing housing. PlaceWorks confirmed and directed the speaker to find the site in the document. The property was identified as Site #4 and is shown in Table VI-46 and Appendix A. The speaker also wanted to know where the City was in terms of timeline for revising the General Plan. City staff answered that there is a draft of the General Plan Update from 2019, but that it had been put on hold during much of the Housing Element Update preparation in order to integrate consistent programs and policies that align with the Housing Element. Staff stated that the revised draft of the General Plan will be released for public review shortly.

The last comment was about the importance of the City undertaking companion capacity planning for infrastructure including schools, water, wastewater, parking, etc. The commenter noted that the community has been requesting this type of analysis for two years. He would be more comfortable with the plan for housing presented in the draft if that infrastructure analysis was completed.

Workshop 6

Developer Forum August 15, 2022 (Workshop 6)

There were 8 community members, including two Planning Commissioners in attendance at the City's Developer Forum on August 15, 2022. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics related to development in the City and received the following responses.

Questions #1: Please provide input on development standards, processes, and procedures

- A local developer recently had issues with the open space standards and the landscaping requirements for multi-family/high density projects. They felt these requirements could constrain a project and the City should consider reducing the amount of open space/landscaping requirements and allow for roof top landscaping. Program 3.n Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer that had done several hillside developments in 2017 was required to remove trees to do the project. This required several trips to the Natural Resources Committee which delayed the project. There were requests to build the units around the trees and bring back to the Committee which added more time and cost to the project. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- Another participant spoke about the entitlement process and specific issues with parking requirements. They found it was difficult to meet the density bonus requirement for parking reductions and stated that based on her experience South Pasadena has enough public parking available to meet local demands and the City should consider parking reductions. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review. The City is also considering a single parking requirement in the downtown that could reflect the transit-oriented nature and to require bike parking. **Program 3.b** - Mixed-Use Developments and Adaptive Re-Use Specific actions proposed to facilitate mixed use development in the Downtown Specific Plan include engaging the development community and property owners to promote shared parking and consider reducing on-site parking requirements on shopping streets to leverage transit access and to incentivize potential office and multi-family residential mixed-use development.

- This participant also said that the current height limit of 45 ft is very challenging and was aware that it could get waived with a state density bonus, but the process takes too long. They recommended that the height limit be increased to 55 or 65 feet in specific areas along Mission Street, Fair Oaks, Huntington Dr., and Monterey Road. **Program 2.n** Citywide Height Limit Ballot Initiative will require the City to place a measure on the ballot in a local election to increase allowed heights above the current citywide limit of 45 feet.
- Another participant suggested the open space/landscaping requirements need to be more flexible because when you have to provide open court yards and private open space you have to increase the height of projects because of requirements. They felt that the Open Space requirements (within downtown area) need more flexibility. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer suggested that the entitlement process he experienced allowed him to work with a planner in between Planning Commission reviews to help move the project along. He encouraged making that an option for the future.
- There was on suggestion that the City should implement an electronic permit system. **Program 3.e** required the City to develop an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.
- One comments from a developer was that the City doesn't have enough planner to handle the volume of projects that are coming in for application and the City should consider bringing on additional contract planners to assist with project application reviews. The Community Development Department also recognizes the concern shared by the developers and has staffed up to deal with the project demands and are now more able to take on the new case load.

Question #2: Input on Inclusionary Housing Ordinance

- A develop who has built housing in South Pasadena said that in his experience the inclusionary housing threshold of three units is too low of a requirement. He wanted to do a 4-unit project but it was too costly with the inclusionary housing requirement. The three-unit requirement encourages developers to do bigger units so they don't have to pay the inclusionary housing fee. **Program 2.m** the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints including the unit threshold, the In-lieu fees and cost of a comparable unit and how the inclusionary regulations relate to state Density Bonus law.

Question # 3: Input on likelihood of development of sites in key areas

- All attendees participated in a polling regarding the likelihood of development. The five shared sites were rated by most as either somewhat likely or highly likely to develop. The two most likely to develop were the Pavillions site and Shakers sites.
- Proposed Ostrich Farm Site 5 (Liquor Store)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
- Proposed Downtown Specific Plan Site 10 (Near Mission Meridian)

  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
  - Comments on site: The diagonal edges on Site 10 is problematic for parking. The odd shape makes it hard to design the parking layout and fit in the required number of spaces. Recommendation was to reduce the parking requirement.

- Proposed Downtown Specific Plan Site 14 (City-Owned Parking Lot and Single-Family Residence)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
- Proposed Downtown Specific Plan Site 16 (Shaker's site)
  - Voted highly likely to be developed for mixed-use or residential only develop by the developer panel.
  - Comments: Allowing for higher height limit would be helpful on this site since it's near transit (near the Freeway).
- Proposed Downtown Specific Plan Site 21 (Pavillions)
  - Voted highly likely to be developed with mixed-use or residential-only develop by the developer panel.

Workshop 7 & 8

Community Outreach at SP Farmers' Market, August 18, 2022 (Workshop 7)

On Thursday, August 18, 2022, the Community Development Department set up a booth in the South Pasadena Farmers' Market from 4:00 to 8:00 pm to discuss the Housing Element. The late afternoon/evening market attracts hundreds of residents and many local employees and is a casual atmosphere for sharing ideas. Over the four-hour duration of the Market, Community Development staff discussed various aspects of the housing element with visitors to the booth, including: the sites inventory; ADUs; the regional housing crisis; the need for rezoning and mixed-use development and where it would be located; and reconsideration of the voter-approved height maximum through a new ballot initiative within the next two years. Those who stopped by expressed appreciation for the opportunity to talk to City staff about the issues.

Specific comments from community members that stopped by the booth included:

- Support for taking time for the community outreach on the height limit ballot measure
- Support for more housing and getting away from the exclusionary past of the City.
- Property owners in support of the housing overlay that will allow more housing on their property
- Support for modular ADUs and for pre-approved standard plans that residents could utilize (in line with Program 3.f in the draft HE)
- Opposition to any height limit cap revision and to more density
- Support for more height for residential only
- Support for allowing higher and denser development in Downtown near the L Line station, provided the architecture and design meet City standards.

Community Forum and Informational Workshop, August 20, 2022 (Workshop 8)

The City held a hybrid public workshop on Saturday, August 20, 2022, from 10:00 to 11:30 am. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the forum was to provide a brief overview of the Housing Element process; provide an update to the community on the status of addressing HCD's comments to the second draft of the Housing Element; and to solicit feedback from the community on the draft document and proposed programs. After a brief overview of the housing element process, the presentation focused on the bigger issues that needed to be addressed in the Housing Element, including the site analysis, development constraints including the height limitations, and Affirmatively Furthering Fair Housing.

After the presentation, the public was invited to ask questions and share comments. The meeting had approximately sixteen participants, including nine in-person and seven on Zoom. Thirteen participants spoke. The following summarizes these questions, comments and staff responses:

- Resident asked if there was a density that HCD would assume that anything over a certain density would be affordable.
  - City staff responded that there is a minimum density that sites need to be able to meet in order for the site to be suitable for affordable housing.

- Resident, who self-identified as former city planning director, stated that the existing General Plan maximum density of 24 du/ac is "ridiculously low." The maximum density could be raised to 36 du/ac without increasing the city-wide height limit. Supports removing the height limit in the proposed Downtown Specific Plan area.
  - City staff thanked the former planning director for his comments.

- Since sites less than half an acre aren't suitable for affordable housing, and a lot of the identified sites have been removed, it's not clear which sites the City is proposing to increase the density on to make up for the shortfall in units.
  - City staff explained that the City is taking two simultaneous paths to meet the City's housing needs. One path is to identify specific sites that the City expects will be redeveloped into housing during the planning cycle. The second path is to increase the allowable density in a large area of the city, focused on the proposed Downtown Specific Plan area, where some percentage of the sites throughout the entire area will be redeveloped without identifying which specific sites those will be.

- Could the City provide an overview of the terms of the stipulated judgement resolving the existing housing element lawsuit against the city?
  - The City Attorney provided an overview of the terms of the judgement: the City must submit a revised draft of the Housing Element to HCD no later than September 15, 2022; the City must initiate a ballot initiative to remove or revise the City's height limit, and if it fails do a mid-cycle review and update of the Housing Element to meet the City's housing needs under the existing height limit; until the Housing Element is adopted, the City will not object to Housing Accountability Act projects that are proposed; and a requirement to prepare more detail regarding the applicability of the identified sites in the site inventory.

- Where in the hierarchy of land use laws does the voter approved height limit fall?

  - City staff responded that a voter approved initiative supersedes both the General Plan and Zoning Ordinance of the city, and that if they conflict the voter approved initiative prevails. However, if the voter approved initiative is in conflict with State law, then the State law supersedes the voter approved initiative. Since South Pasadena's height limit does not directly contradict State law, and because there are alternative ways for the City to meet its requirements under State law that do not require the repeal of the height limit, it's the opinion of the City that State law cannot supersede the City's height limit.

- ADUs have been very popular in South Pasadena, what assumptions does HCD make regarding the affordability of ADUs.
  - City staff responded that the City must base its projection of the permitting of future ADUs on the number of ADUs permitted in past years, and that the City has to document rent on ADUs to take credit for the affordability of those new units in its annual report to HCD.

- Concerned about increasing the height in the downtown area, can the City look at increasing the density of areas outside of the downtown area instead of increasing the height. Also concerned about mixing condos and multi-unit developments in the single-family residential areas.
  - City staff responded that raising the density and height in the downtown area would allow for the necessary growth while preserving most of the city's existing neighborhoods. There is a choice the City and community needs to make about where these new units are going to go, and the direction most members of the community have provided is to increase the density in the downtown area since it's close to transit and walkable.

- What is the proposed new height limit?
  - City staff responded that currently there is not a specific height that the City is aiming for, but instead that the height needs to be tall enough to allow for the density anticipated by the Housing Element given the other development constraints imposed by the City's zoning. Furthermore, this is a question that the community will need to help answer, and is part of why the City is holding this community meeting and will be holding future community meetings on the topic.

- Can the City take credit for the affordability of ADUs that have been built previously, or only those built during the planning period?
  - City staff responded that the City can only take credit for the affordability of ADUs built during the planning period.

- On the General Plan and Mission Street Specific Plan committee during the 1990s, the goal was to downzone the city to reduce the projected population from over 60,000 as proposed in the previous General Plan from the 1960s to something more "reasonable." The City should be working to fight its RHNA allocation because accommodating that many new units will ruin the city as a small town. With the proposed changes, the added traffic will make the main thoroughfares of the city impassable.
  - City staff responded that the goal is to provide the community options for how to accommodate the city's housing needs.

- The City needs to do more public outreach, including making hard copies of the Housing Element and other planning documents available in hard copy at the public library, and to include visual aids in the documents that illustrate the different densities that are being proposed.

  - City staff responded that the City is doing outreach, such as this meeting, and that visual aids are included in the Housing Element to illustrate the proposed densities. Hard copies of the drafts have been available at City Hall and the Library, and as future drafts are released, they will also be made available in hard copy at these locations.

- Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing?
  - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

- What are the medium- and high-density residential densities in the draft General Plan?
  - City staff responded that the draft General Plan has not been finalized yet, but that it is expected that a public review draft will be available by the end of September.

- What are some creative solutions and options for meeting the housing needs other than building new units, such as converting existing family-owned apartments to low-income units?
  - City staff responded that the City cannot count existing units to meet its RHNA needs. Most of the time, existing family-owned apartments are the least expensive housing options in a community, so by converting those into deed-restricted Affordable Housing, it eliminates naturally occurring affordable housing and does not create any additional housing opportunities for the community.

- Concerned about the sustainability of the continuation of building new homes.
  - City staff responded that the solutions to our climate crisis and the solutions to our housing crisis are the same: building more housing near transit and building walkable, transit served communities.

- City has an ordinance that puts a constraint on demolishing buildings that are more than 45 years old.
  - The City does have a historic preservation ordinance that may require structures 45 years or older not identified as a cultural resource to obtain a Certificate of Appropriateness for demolition or alteration from the Cultural Heritage Commission (CHC). However, it is important to note that these projects taken to the CHC for demolition have not been denied since the ordinance was adopted. Therefore, the ordinance does not appear to be a constraint.

- What are the consequences of the City being out of compliance of the Housing Element Law?
  - The City Attorney responded that a lawsuit can be brought against the City where a judge could remove the City's land use authority and/or impose fines. The City was sued, and has a stipulated judgement that requires the city to take certain actions, described above, but does not remove the City's land use authority or impose punitive fines on the City. Additionally, the State Attorney General can sue the City and impose fines on the City, but since South Pasadena is working towards completing its Housing Element it is not expected that the Attorney General will sue the City and instead will focus on cities that are not working towards adopting a compliant housing element.

- Have we looked at other cities that have certified housing elements to see how they meet their housing needs?
  - City staff responded that the City is looking at the certified housing elements, but that many cities have significantly different conditions that make it easier to achieve a compliant housing element.

Workshop 9

Community Outreach at the Social Services and Social Justice Forum

A ninth workshop was held on November 9, 2022 in conjunction with the City's First Annual Social Services and Social Justice Forum. City staff and the City's Housing Element consultant were on hand to discuss the Housing Element with members of the public and service agencies present for the Social Justice Forum

Surveys

The City conducted public outreach via two online community surveys. Each of the surveys was launched prior to public workshops for the Housing Element Update.

Survey 1 – May - September 2020

The first survey was made available on the City's website in May 2020 and was open until September 2020 to allow for a long time period for input to be provided due to the impacts of the COVID-19 pandemic. The link to the survey was also sent to everyone who registered for Workshops 1 and 2. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to find out a little bit about their perspective on housing issues. A total of 33 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about housing and the General Plan Housing Element. This survey should take about 2 minutes.

1. *Are you:*
   a. *Renter in South Pasadena*
   b. *Property owner in South Pasadena*
   c. *Other*

2. *Have you heard of the Housing Element of the General Plan?*
   YES or NO
3. *Have you heard of the regional housing needs assessment or RHNA numbers?*
   YES or NO
4. *Please rank the following issues in order of importance to you.*
   a. *Production of additional housing stock*
   b. *Preservation of existing housing stock*
   c. *Creation of economically sustainable neighborhoods*
   d. *Providing a diverse cost range of housing opportunities*
5. *Has housing affordability impacted you or your family personally?*
   YES or NO
6. *Have you participated in the City's General Plan Update process?*
   YES or NO

The following summarizes the responses to the survey:

1. Are you a renter, property owner, or other?

   Approximately 60 percent of respondents were property owners, 35 percent were renters, and 3 percent chose other.

2. Have you heard of the Housing Element of the General Plan?

   Three quarters of respondents had heard of the Housing Element, one quarter had not.

3. Have you heard of the regional housing needs assessment or RHNA numbers?

   Approximately 80 percent of respondents had heard of RHNA, 20 percent had not.

4. Please rank the following issues in order of importance to you?

   Respondents ranked the four options in the following order from highest to lowest priority:

   - Providing a diverse cost range of housing opportunities
   - Creation of economically sustainable neighborhoods
   - Preservation of existing housing stock
   - Production of additional housing stock

   It should be noted however that most respondents chose all four options as priorities.

5. Has housing affordability impacted you or your family personally?

   Approximately 55 percent of respondents had been impacted personally in terms of housing affordability, approximately 45 percent had not been impacted.

6. Have you participated in the City's General Plan Update process?

   Approximately 58 percent of respondents had previously participated in the General Plan Update process, approximately 25 percent had not.

Appendix B

Survey 2 – September - October 2020

The second survey was made available on the City's website in September 2020 and was open until October 2020. The link to the survey was also sent to everyone who registered for Workshops 3 and 4. The main purpose of the survey was to identify the housing strategies people would like to learn about and discuss at Workshops 3 and 4. A total of 17 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about how the City of South Pasadena can achieve its Regional Housing Needs Assessment (RHNA) allocation for the 2021 Housing Element Update. This survey should take about 2 minutes.

During the workshops on September 23rd and 26th, 2020 we plan to discuss the following topics that are options for the City to address its RHNA allocation:

- *Effort to Appeal the City's RHNA number*
- *Options to Address the RHNA and Receive a Certified Housing Element*
    a. *Programs and strategies for an aggressive program to produce more affordable Accessory Dwelling Units (ADUs) in South Pasadena*
    b. *Options for zoning changes to increase density (number of housing units allowed on a property)*
        i. *Allowing more ADUs to be built on a single-family property*
        ii. *Allowing multifamily housing buildings to be built in single-family neighborhoods*
        iii. *Allowing housing to be built in areas that do not currently allow residential development*
        iv. *Increasing building heights and densities to allow more housing units to be built in mixed-use areas in town and/or just on specific sites*

1. *Have you participated in the City's previous Housing Element workshops?*
2. *Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?*
3. *Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target? Choose as many as you agree with.*
    a. *Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units*
    b. *Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development*
    c. *Increased density in specific areas of the City*
    d. *Increased height in specific areas of the City*
    e. *Increased density and height in specific areas of the City*
    f. *Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood*
    g. *Other*
4. *What other topics/options would you like to see discussed at these or future workshops?*
5. *What questions do you have about the RHNA or 2021 Housing Element Update?*

The following summarizes the responses to the survey:

1. Have you participated in the City's previous Housing Element workshops?

   41 percent of respondents said yes, 59 percent said no.

2. Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?

   35 percent said yes, 41 percent said no. Three people chose other and wrote in a response. The write-ins included two people who said the appeal won't work, another said don't spend any money on the RHNA appeal, and another said they don't know enough to choose yes or no.

3. Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target?

   The number of votes each strategy received is shown below from the strategies that received the largest number of votes to those that received the least votes.

   - Increased density in specific areas of the City – 9 votes
   - Increased density and height in specific areas of the City – 9 votes
   - Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development – 8 votes
   - Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood – 7 votes
   - Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units – 6 votes
   - Increased height in specific areas of the City – 6 votes

   Several write-in strategies were also proposed:

   - Convert any retail and business buildings that become vacant to residential
   - Widescale upzoning of single-family neighborhoods
   - Reuse empty commercial buildings for affordable housing
   - Increased height and density throughout the City.

4. What other topics/options would you like to see discussed at these or future workshops?

   - I would like to know what ways you guys are planning to fit the 2,062 housing units if the height limit is not changed.
   - Use of non-profit developers versus regular developers.
   - The aggressive ADU idea is an attempt to shirk the city's responsibility to build more housing. It will likely not succeed - as the state will not accept it. ADUs have been legal in South Pasadena for 3 years and there has been almost nothing built. There is little the city can do to get more "aggressive" - let alone reach the type of numbers being talked about. The City needs to allow real densities of greater than 30 units to an acre in your multifamily areas. The multifamily I've seen built has such low densities that it encourages only luxury 1,900 square foot condos.

- There is a lot of fear of change in South Pasadena. Can we help people visualize South Pasadena in a future that satisfies RHNA requirements? That might help focus energy on the choice between the options.
- Streamlined permitting process. Progressive ways to address the missing middle housing types.
- I hope to see the elimination of parking requirements to facilitate unit production and a serious discussion about inclusionary zoning.
- Adaptive reuse of commercial buildings for affordable housing.
- At the first Zoom Housing Meeting, numerous sites were presented as potential areas for development. But much of this data was based on a single conversation with the owner of the property who "said they were open to considering development." I found that rather loosey goosey. There were too many "ifs" in that scenario.
- South Pasadena, along with other towns, is bleeding commercial space. What are the options for converting some of these into work/living lofts?
- Finally, all of the development that has been greenlit in the city only offers 13 "affordable units." All development must focus on affordability or we can never come close to meeting the numbers. We know that developers don't make money on building affordable housing, so who will the city partner with to make that happen?
- What about the additional infrastructure that will be needed to support 20 percent more units and a 20 percent increase in population?
- We just came out of a 7-year drought. Where will the extra water supplies come from?
- Multiple studies in the last decade, including at Mission Meridian, have proven that transit based housing is an urban myth. It does not reduce traffic. If this plan goes forward, how will South Pasadena achieve its green Climate Action Plan goals in the coming 10 to 20 years?
- Regarding specific locations within the City to be up zoned – PlaceWorks' previous presentation at the Planning Commission did not address Huntington Drive or any area south of it.
- Even in a city as small as South Pasadena, effects of any changes will be distributed unevenly, which will produce uneven follow-on effects. I live near the Metro station and near the proposed Seven Patios project, which will create a significant traffic impact, especially on Farmer's Market days. How do any of the proposed options take into account the related structural changes that they will create?

5. What questions do you have about the RHNA or 2021 Housing Element Update?

- In what ways are you planning for the moderate and above moderate housing if you don't get the 1,000 ADUs?? What is the current zoning capacity of South Pasadena assuming the 50 units/acre for the Draft DTSP??
- In what ways is the City of South Pasadena critically thinking about progressive development, instead of just appealing the RHNA numbers?
- More information on inclusionary requirements, ADU considerations for RHNA counts, and Caltrans housing considerations for RHNA counts.
- I have some questions as to the accuracy of the predictions since they were determined pre-Covid. There are now more people moving out of the California than moving into the state.

- The increased density adjacent to the Gold Line Station under the pretense that all of these people will take the train to work in Pasadena/Downtown L.A. is a false flag. No one at the Mission Meridian Transit Village takes the Gold Line to commute. The ridership on the trains has steadily declined for three years. The few people I know who used the train to commute to Downtown Los Angeles are now driving as a precaution during Covid-19. The condos at the Mission Meridian Transit Village sold for upwards of $1.1 million in 2005. To be honest, it's highly unlikely that anyone who has paid that amount of money for a home is commuting by train. This was reported in the Los Angeles Times in 2007 and still holds true today. My council member used to ride his bike to take the train, but even he has quit doing that. He affirms that residents living at Mission Meridian are not commuting by train.
- Explain why South Pasadena never responded to the AFFH or LPFS surveys sent out by SCAG in 2018 and due back no later than April 2019. Our city's allocation now includes excess allocation from other cities who responded to the survey and saw their initial allocations reduced.
- When are you going to admit you want our city to look like Glendale, Pasadena, and Alhambra?
- Do we need to vote on these changes to the General Plan or will it be decided by the City? For instance, height increase was considered for the November Ballot, but up zoning wasn't. Who makes the decisions?
- Can we zone for/build more housing to exceed the target?
- What are resources I can consult to learn more about the RHNA process, specifically to understand how South Pasadena's RHNA number compares to that of other communities?

Hearings

City staff and their consultant, PlaceWorks, presented at multiple public hearings at different points in the update process prior to release of the public draft Housing Element.

July 21, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on July 21, 2020. The presentation covered the City's RHNA allocation, sites analysis and options for addressing the identified RHNA shortfall, options for inclusionary housing policy and ADU regulations, and potential options for increased density and height to accommodate additional housing. Information on potential changes to allowed density and height on specific sites was studied and presented. The following questions and input were received from the Planning Commission:

- Provide additional explanation of what moderate and above moderate RHNA means
- Has staff considered studying the Pavilions site?
- One consideration is changing what is allowed in single-family areas versus increasing the height limit in other areas
- Has staff looked at the stables site?
- Should think about a road diet on Monterey Road
- Consider street parking in the ADU regulations
- Could pre-approved ADUs include pre-fabricated units? It seems like they would be more affordable

- Are there precedents and incentives for converting market rate units to affordable units?
- What about the Caltrans properties?
- What about condo version to market rate then to affordable housing?
- Showing partial site redevelopment of Vons and Ralphs sites as the baseline condition with full redevelopment with density and height increases is misleading. If this is the approach needs to be supported more.
- Amount of parking provided for the precedent projects versus what would be required under South Pasadena's regulations?
- Wondering about the illustrative examples show versus the sites/areas a ballot measure to increase height would actually apply to
- Has City had conversations with the owners of all of these sites?
- Can regulations regarding height and zoning be adjusted after the Housing Element is adopted?
- Do Density Bonus units count towards the RHNA?
- Seems weird to have a ballot measure to increase height before the Housing Element.
- Will the RHNA change?
- Seems like the City would be forced to build more small units
- Makes sense to have less parking at the Gold Line Storage sites. Connect with the Downtown Specific Plan and General Plan and do that with all the 5 sites.
- Transit access to each of the 5 sites needs to be looked at
    - Ralphs site should be good, there are multiple bus lines
    - Ostrich farm site – not sure if there is sufficient transit access
- Increased density can add economic benefit/energize the area, just one edge might not make sense
- Premature for a height ballot initiative, the tail is wagging the dog
- Should fight the RHNA
- State Density Bonus – allows increased height
- South Pasadena isn't alone in facing a large RHNA increase
- The Council and the Mayor Pro Tem have personally written to and spoken with SCAG and state legislators and they aren't getting any traction on changing the RHNA
    - Alhambra – 6,000 + unit RHNA
    - San Marina – 398 unit RHNA
    - Beverly Hills – 3,096 unit RHNA
- The area a height increase applied to could be less site specific – a wider area
- More study is needed ahead of a ballot measure on height, leaning towards not recommending
- Supportive of strategic increased heights but thinks we aren't there yet, not enough time to make a decision to have a ballot measure ahead of the deadline for the general election. Not supportive of sending to City Council for November ballot
- Supportive of need to reconsider height limits
- Housing need is critical

- The consideration of height increase needs to be more thoroughly vetted, can't support at this time

Three recorded voicemail comments were received:

- First voicemail comment - SPRIG
  - Need an alternative that accommodates the RHNA within the 45-foot height limit
  - They gathered 67 signatures – don't want height increase
- Second voicemail comment
  - No height increase
  - Concerns about water, sewer, and electricity
- Third voicemail comment
  - Opposed to height-limit increase
  - Confirmed they had also submitted written comment

August 5, 2020

City staff and PlaceWorks presented to the City Council at their meeting on August 5, 2020. The presentation focused on the consideration by the Planning Commission at their July 21st meeting of recommending to the City Council to place a ballot measure to propose allowing increased height on the November ballot. Staff reported that the Planning Commission did not recommend moving forward with the ballot measure at this time. Staff also presented regarding a potential RHNA appeal by the City.

August 11, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on August 11, 2020. New analysis and information was presented about specific sites studied for potential height and density increases, following up on the presentation at the July 21st meeting. Updates included information on transit accessibility of candidate sites, parking ratios for precedent examples, and the addition of one site for consideration for potential height and density increases.

The following questions and input were received from the Planning Commission.

- Regarding Ostrich Farm Area:
  - Why not include parcels to the east of the vacant site?
  - Ostrich Farm area is appropriate, without needing to be as surgical as elsewhere
  - Need to look at how to make Ostrich Farm more of a complete neighborhood
  - Can it connect to Highland Park?

- Regarding Meridian Property:
  - Be careful to recognize historic district
  - Be careful not to overwhelm surrounding historic structures with additional height
  - Agree with sensitivity towards Meridian site
- Comments regarding sites in general:
  - Vons, Ralphs, and Ostrich Farm are good opportunities
  - Generally, site locations seem pretty smart
  - Concern about putting a lot of units in far corner of the city
  - Traffic and parking should be a top consideration
  - Traffic and parking analysis need to go hand in hand with these sites
  - Look at what State density bonus law means when considering additional heights
  - We need to build more housing
  - Presentation materials are going to be key pieces when communicating to residents
  - How much time do we have to make zoning changes outlined in Housing Element?
  - Does a height increase need to be in place at adoption of Housing Element?
  - What is required to prove redevelopment potential of a non-vacant site?
  - Question regarding ADU production target; answered that City will have to include aggressive programs
  - What does it mean if we don't raise heights? (need to explain to the public)
  - Is there a way to raise heights without going to the voters?
  - Can City get credit for units built in excess over prior Housing Element cycle?

September 8, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on September 8, 2020. The focus of the presentation was ADUs and options for supporting that housing type in the City as part of the Housing Element and ongoing City programming. Staff was specifically seeking input on update to the City's ADU zoning regulations and consideration of policies and programs to include in the draft Housing Element.

One recorded voicemail comment was received:

- City talked about ADU projection methodology at the July 21st Planning Commission meeting. Doesn't see that in the presentation this time.

The following questions and input were received from the Planning Commission:

- Will objective design standards be part of the near-term ADU ordinance update?
- Are the projected ADU numbers changing?
- Some ADU updates should be made now and maybe some later – before or after Housing Element adoption. The items to do later would be the more aggressive measures.
- Address parking problem related to ADUs
- Okay with duplex, deed-restriction ADU idea
- All were supportive of amnesty program.
  - One commissioner asked: Why does it need to be limited to non-historic properties?

- Yes, City should streamline planning and building review process
- Yes, supportive of homeowner assistance – guide to ADU development process
- Supports fee reductions for affordable ADUs
- Okay with ADU monitoring, but some concerns about staff time resources
- Okay with education and promotion around ADUs. Supportive of proactive/targeted outreach to certain neighborhoods and areas with larger lots
- Supportive of allowing two detached ADUs as long as there is enough room on the parcel for open space
- Concerned about streamlining impacts on staff workload. Should have as many standard ADU building types as possible. One-stop shop is a good idea.
- If City allowed two detached ADUs on a parcel could they require parking?
- Should include pre-fab ADU units – important for education program
- Should include costs and sources for loans in education and promotion program
    - City of Pasadena is offering two types of loans to encourage ADUs
- Careful who gets included on the list of resources (builders, etc.). Don't want to unfairly support or not support someone.
- Could tie education and promotion to streamlined approval
    - Homeowners could provide case study materials about the process, costs, how it went for them
- Could have objective criteria for which builders/others get included on the resources list

December 15, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on December 15, 2020. The presentation focused on additional design and economic analysis PlaceWorks prepared for certain sites to understand what types of housing projects would be feasible and acceptable on those sites and how changes to the City's General Plan and zoning related to density would relate to what is allowed under State Density Bonus law. The additional focused most on the Vons site.

January 26, 2021

City staff and PlaceWorks presented to the Planning Commission at their meeting on January 26, 2021. The meeting focused on the proposed Inclusionary Housing Regulations. Supporting information was presented regarding analysis of height and density on certain sites, following up on earlier meetings, in particular, the December 15, 2020, meeting.

May 26, 2021

City staff and PlaceWorks presented an update on the Housing Element process to the Planning Commission at their meeting on May 26, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the Planning Commission:

- Was the City concerned by HCD's preliminary review of some of the Housing Element sections?
- Asked about thresholds for sites analysis.
- Asked about the overlay described in Table VI-4 and details of the proposed zoning column.

- Mentioned public comment from Josh Albrektson from the previous Planning Commission meeting, not to forget it.
- What happened at the EIR scoping meeting?
- Thinks the City is being too optimistic about the analysis of the sites. Should remove small and steep single-family sites. In general, overly optimistic in all categories including ADUs, vacant and non-vacant sites.
- Multiple commissioners agreed yes, density increases are needed.
- Should ask other cities for ideas of how to meet the RHNA, need some magical solutions.
- Do City-owned sites included in the Housing Element have to be surplus?
- Does not want to include the ballfield or stables as Housing Element sites.
- Can the affordable housing production program be strengthened?
- Generally concur with strategies that were in the preliminary draft programs submitted to HCD.
- Would like another chance to review sites at the time of the public draft.
- Could there be some sort of "pre-permit program" for ADUs as a way to gauge interest in ADUs?
- Would it be possible for the planning commissioners to do a driving tour some of the sites?
- Interested in the church sites strategy.
- Likes the idea of redoing the City Hall site.
- Could the parcels by war memorial building on Fair Oaks possibly be added to the inventory?
- Can existing units be rehabilitated and counted towards the RHNA?
- Multiple commissioners said yes to the affordable housing overlay.
- Don't rule out all historic sites.
- Should increase densities in Ostrich Farm and Downtown.
- Should put increasing the citywide height limit back on the table and continue the community conversation.
- Will minimum densities be put into place?
- Raising height limits on certain properties should be considered.
- Multiple commissioners felt the sites to receive the affordable housing overlay will be competing with state density bonus in terms of incentivizing actual development. The overlay should be calibrated to produce results.
- In favor of affordable housing overlay but not as spot zoning.
- Feels the City doesn't have enough staff capacity to implement all of the proposed Housing Element programs. There is a long wait time for processing applications for ADUs. Need dedicated housing staff.
- Maybe strategy for projecting ADUs can be to project numbers annually – make more specific – year 2, year 3, etc.
- Can the parcel assemblage program work in conjunction with overlay zoning?
- They have done lot consolidation on hillside sites. There was an example of this from the previous Planning Commission meeting.
- Should spend time justifying the ADU projection number.

- Have demolitions of affordable units been an issue in South Pasadena?
- What the EIR is evaluating is a moving target, can't really finish the analysis yet.
- Please post the PowerPoint for this meeting.
- Need to get the word out to the public that the comment period is coming.
- History and context information in the Housing Element will be very helpful.
- There should be more aggressive publicity about the ADU amnesty program.
- Supportive housing for those with disabilities is needed.

October 12, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on October 12, 2021. The meeting focused on the release of the 2021-2029 public review Draft General Plan Housing Element. Public comments included:

- 95% realistic capacity because of density bonus?
- No analysis of inclusionary housing regulations?
- ADU projection numbers are too high

The following summarizes the input and questions from the Planning Commission:

- Which programs are state mandates, which are continuing from previous Housing Element? Please present this at the Oct 21st community workshop.
- Asked for clarification on state requirements regarding Senate Bill 9
- Asked for more context for regarding the level of input sought from the community at this point in the process.
- Need to explain RHNA and why the number is high.
- The Planning Commission requested an informational update at their Nov 9th meeting, including HCD comments if possible.

November 9, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on November 9, 2021. Four members of the public commented. These comments included:

- The City should have a requirement to hire local skilled workforce – both for reducing environmental/AQ/VMT impacts and for local jobs. The City of Hayward recently put this type of policy/requirement in place.
- Is the City applying for any state funding programs mentioned in the Housing Element programs?
- The ADU projection numbers are wildly optimistic.

The following summarizes the input and questions from the Planning Commission:

- Projected ADUs are only 20% of City's RHNA
- Is more than 50% of lower income RHNA being accommodated on non-vacant sites?

- Are there regional or nearby examples of projects - could any of that analysis or examples be strengthened/added to?
- The majority of the Planning Commission expressed concerns over the public's potential reaction to the rezoning and density changes included in the Draft, as well as the potential confusion about what the City is doing.
- Suggested strengthening the information in the water quality section of the Assessment of Fair Housing
- Asked for clarification about ADU track record information in the draft
- Could a program be added to close the gap between planning approvals and building permits?
- Could a program be added to work with prospective ADU applicants – ombudsman/mentor/technical assistance?
- Staffing and staff retention are critical to implementing the Housing Element programs
- Understand based on analysis presented earlier in the Housing Element project that the densities/units assumed in the HE will lead to bulkier buildings with smaller units if there is no density bonus/height increase for the project
- For rezoning, would be helpful to know what percent of the City will require rezoning?
- Agrees with public comment re: local skilled workforce and VMT reduction. Would be good for South Pasadena to have a local workforce requirement.
- Suggested more public outreach, with an emphasis on going to the people, and enhancing the site maps.
- What about the Caltrans housing?
- Some cities are fighting the RHNA
- Many of the regulations from the state in the Housing Element are impossible to meet
- Are many SCAG jurisdictions going to be in compliance?
- Sites maps could be better, add a legend/key. Note whether a site is vacant or non-vacant.
- Thinks the City has been doing a good job of getting the word out to the public about the project

November 17, 2021

City staff presented to the City Council on the public draft Housing Element at their meeting on November 17, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the City Council:

- Does the Monterey Road site (Site #3 in Appendix A) have an approved project?
- Ostrich Farm sites – what input has been received from property owners.
- Asked about the Carrow's site.
- Can the densities proposed in the draft fit within the 45 foot height limit?
- When will the aggressive ADU amnesty program happen?
- Is the City considering objective design standards to implement SB 9?
- Could SB 10 apply to only one parcel?
- Impressed with staff and the outreach that has been done to property owners. Thinks they've gone a long way toward addressing any controversy in the community.

- Amazing that there was no public comment at this meeting.
- The RHNA formula was unfair to South Pasadena.
- The Executive Director of Move LA was concerned about the RHNA approach related to High Quality Transit Corridors (HQTCs). Communities don't want HQTCs identified in the future because they will receive higher RHNA numbers because of them.
- Staff and consultants – good job addressing this complex topic.

May 10, 2022

City staff presented to the Planning Commission on the 2nd Public Review Draft and discussed the revisions made to the new draft (in person/virtual hybrid format).

July 20, 2022

City staff presented to the City Council on the HCD review letter for the 2nd Draft Housing Element.

July 26, 2022

City staff presented at the Planning Commission on the HCD review letter for the 2nd Draft Housing Element.

November 9, 2022

The City's Housing Element consultant presented at a Joint City Council and Planning Commission. The presentation included an overview of the California Department of Housing and Community Development's response letter regarding the Third Draft Housing Element, discussed anticipated responses to address the comments in the letter, and received feedback from the community, Planning Commission, and City Council on the comments and proposed responses.

February 1, 2023

The City's Housing Element consultant provided a summary of HCD's review letter regarding the 4th Draft Housing Element to the City Council and presented options for addressing remaining comments, including missing middle housing, identification of additional city-owned sites for lower income homes, increased zoning capacity along arterial corridors, and tenant protections.

February 9, 2023

This meeting was intended to be a community meeting focused on the Housing Element, but a majority of the City Council wanted to attended so was noticed as a City Council meeting. The meeting was conducted as a workshop to further discuss revisions to the Housing Element and collect resident feedback.

February 15, 2023

City staff and the City's Housing Element consultant presented refined ideas for addressing remaining comments based on feedback received from the Council and community over the preceding two meetings. Staff rreceived direction from City Council and Planning Commission on how to revise the Housing Element.

Written Public Comments

Received Prior to Public Draft

The City received the following written public comments prior to the release of the Public Draft Housing Element.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 9, 2020) expressed concern over staff report indication that City does not currently allow ADUs within the Mission Street Specific Plan area. Mr. Gelfand noted that such a policy is unlawful, citing State code, GC 65852.2.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 13, 2020) expressed satisfaction with the recent Planning Commission meeting where the City Attorney confirmed that the City is required to allow ADUs in the Mission Street Specific Plan's Districts that allow residential uses. Mr. Gelfand stated that during a Planning Commission meeting, staff suggested the definition of 'public transit', under the state ADU law, is limited to major transit stops. Mr. Gelfand states that this is not true and provided a citation for ADU state law, Gov Code 65852.2(j)(10). Mr. Gelfand states that the City does not have a parking problem, it has a "driving problem". Mr. Gelfand believes that reducing parking will actually alleviate traffic. Mr. Gelfand states that parking is meaningless in consideration of citywide. high access to transit. Mr. Gelfand states that the City's proposal to count 1,000 ADU units toward its RHNA allocation is preposterous; however, the City's plan to incentivize ADU development is taken seriously. They feel it will result in a modest increase in ADU production.

Leonora Camner, Executive Director of Abundant Housing LA, and Anthony Dedousis, Director of Policy and Research of Abundant Housing LA, regarding Preliminary Sites Analysis from the July 21, 2020 Planning Commission Agenda Report (September 4, 2020). Ms. Camner and Mr. Dedousis identified major issues in the Preliminary Sites Analysis, including:

1. The report appears to treat new housing capacity (i.e. the potential for new housing) as equivalent to realistic housing production (i.e. actual new housing). This is incorrect; they are not the same thing.

2. The report contains extremely optimistic forecasts of future ADU production which are extremely unlikely to be achieved even with aggressive policies, based on recent development trends.

3. The Preliminary Sites Analysis for lower-income housing is unlikely to meet California's standards for affirmatively further fair housing.

4. By accommodating insufficient housing growth to meet the RHNA targets at each income level, the Preliminary Sites Analysis is likely to fall afoul of the No Net Loss requirement.

They conclude their letter noting that Abundant Housing LA (AHLA) published a detailed memo, "Requirements and Best Practices for Housing Element Updates: The Site Inventory", explaining the key legal requirements and AHLA's recommended best practices for housing element updates. They offer availability to discuss our concerns further, and offer recommendations for additional policies to incorporate into South Pasadena's Housing Element Update.

Dr. Josh Albrektson (via email to HCD, February 25, 2021) informed HCD that they would receive a letter from Abundant Housing LA, YIMBY Law, and others regarding South Pasadena's current Housing Elements plans. Dr. Albrektson claims the City is not following any of the rules in the HCD's

June 10th memo. Dr. Albrektson states the City is going to HCD for a review soon, so Dr. Albrektson wanted to give HCD some local knowledge. Dr. Albrektson states that the City is passing an ADU ordinance that will make it harder to build ADUs. Dr. Albrektson states that in the fire zone, they will require all ADUs to be within 150 ft of the front property line, have sprinklers, and for all garage and structure conversions the parking lot must be replaced.

Dr Josh Albrektson (March 8, 2021) provides a list of six issues he identified as "illegal" in the preliminary draft Housing Element sections, referencing a Housing Element Memo he states the City does not comply with. Theses issues are:

1. Claiming a projection of 1,000 ADUs in the Housing Element.

2. Objective design standards versus subjective design guidelines for ADUs and what really qualifies as an objective standard.

3. It is illegal to backdate an ordinance or apply it to projects that have completed a pre-application checklist. This comment related to the City's inclusionary housing ordinance and the definition of "deemed complete."

4. Inclusionary units and density bonus cannot be used to count for RHNA units in the Housing Element. The analysis MUST use the base zoning.

5. The inclusionary housing ordinance will cause a significant drop in realistic development capacity.

6. AB 1505, regarding rental inclusionary housing, commenter provided a link to an HCD 2019 memo about this law.

Dr. Albrektson concludes with stating that South Pasadena will not produce a compliant Housing Element due to not following HCD's guidelines. Dr. Albrektson states that there are more reasons other than what he listed for which he predicts HCD will reject the City's draft element.

Abundant Housing LA (March 10, 2021) references a past 2020 letter the organization sent to the Mayor and identifies five concerns, some of which are carried forward from the 2020 letter, about the City's preliminary draft Housing Element sections. The five major concerns are:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its map of best candidate sites appears to include many sites where redevelopment is extremely unlikely.

2. Planning continues to make overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies.

3. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

4. Planning indicates that the proposed Inclusionary Housing Ordinance will help the City achieve its lower-income RHNA targets without a clear assurance that this ordinance will be accompanied by adequate zoning densities.

5. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

The organization provides recommendations for each identified concern for the City to consider.

Dr. Josh Albrektson (via email to HCD, April 12, 2021) introduced himself and summarized past public comments he has provided to the City about the Housing Element. Dr Albrektson indicates when he believed the City's actions were in conflict with State housing law and/or other guidance from HCD. The time frame of his comments range from July 2020 to April 2021.

Dr. Josh Albrektson (via email to HCD, April 13, 2021) presenting items he would like HCD to tell South Pasadena regarding its preliminary draft Housing Element sections. The list of points is below:

1. ADU estimates must be realistic.

2. A 10% Low and 10% VLI inclusionary housing requirement is a significant governmental constraint to housing and that must be accounted for in the realistic development capacity calculations.

3. Realistic development calculations must include factors like topography [and existing uses meaning that]...realistic development potential for these sites ...should be much less than 50%.

4. All sites included must be realistic. Sites that are currently leasing or have no owner affirmation or city sites that require replacements cannot be included in the sites inventory.

5. All sites included in vacant land list must actually be realistically able to be developed.

6. All sites must include a realistic number of possible affordable units.

7. Provided link to own sites inventory sheet

Dr. Albrektson provides additional information in the email that generally appeared to support his initial points above and offered some new ideas, listed below:

- Development limitations, including the City's height limits and inclusionary housing ordinance are impeding development.
- Market trends indicate multifamily development interest is low
- The City offers "representative project" examples that are dated (from 2005/2017) and would not comply with current laws and are therefore not representative.
- Using inclusionary units and state density bonus is not a substitute for appropriate zoning and is specifically outlawed. What this will actually do is make it so that almost all buildings can no longer be financially viable and nothing will get built in South Pasadena.

Andrew Jarnagin (April 28, 2021) describes what he identifies are three key issues with the City's 5th Cycle Housing Element that should be addressed in the 6th Cycle. These three issues are:

1. Encourage transit-oriented development in the downtown area

2. Remove barriers to affordable housing

3. Provide data to support policy and projections

Mr. Jarnagin offered additional comments for the City's Planning and Building Department. Mr. Jarnagin concludes with questions for the City related to its capacity to support meeting RHNA targets.

Dylan Casey, Executive Director of California Renters Legal Advocacy and Education Fund, (May 5, 2021) commented on the City's ADU ordinance. Mr. Casey states that the ordinance as currently proposed presents numerous conflicts with state ADU standards. Mr. Casey claims that if the Council fails to amend the ordinance to resolve these conflicts, South Pasadena would lose the ability to apply any development standards to ADU permits, and be forced to apply only the state minimum standards. Mr. Casey states that the proposed ordinance is in violation of Gov. Code Section 65852.2, as it would be more restrictive than is permitted under state law. Mr. Casey believes that the City should embrace ADU development and consider its benefits.

Anthony Dedousis, Director of Policy and Research at Abundant Housing LA, (via email to HCD, May 5, 2021), referenced two past letters (September 2020 and March 2021) submitted to City Planning. Mr. Dedousis notes that they have not received a response from City staff and City councilmembers.

Dr. Josh Albrektson (via email to HCD, May 20, 2021) sent information about inclusionary housing ordinance affordability levels recently passed by four different cities to provide a comparison demonstrating that South Pasadena's should be lower. The comparison cities were Pomona, Alhambra, Pasadena, and San Francisco.

Andrew Jarnagin (July 26, 2021) notes that he attended the May 26th, 2021 South Pasadena Planning Commission meeting and reported that HCD's review of the preliminary draft Housing Element sections was discussed in a positive light, which oversimplified the significant changes expected of the Housing Element in order to be in compliance. Mr. Jarnagin provided comments about HCD's informal review of the City's ADU projection and sites inventory. Mr. Jarnagin states that the South Pasadena community should be prepared for a non-compliant Housing Element from HCD. He believes that elected officials and residents must be presented realistic options for RHNA numbers to assess different approaches and determine policies that best align with local desires.

The Steering Committee Members of Our Future LA (September 14, 2021) provided feedback broken down into six focus areas. The focus areas are listed below along with the major topics within each focus area:

1. Protections – tenant protections including just cause eviction protections and enforcement, rent stabilization, tenants' right to counsel, strengthen permanent tenant education, and tenant anti-harassment protections.

2. Preservation – prioritize rezoning in high resource neighborhoods, don't include rent stabilized units in the sites inventory, implement no net loss laws, institute local programs and funding sources to preserve existing affordable housing.

3. Prioritization of Affordable Housing – value capture, create affordable housing on public land, 100% affordable housing overlays including for areas zoned R1.

4. Site Capacity Assessment – likelihood uses will discontinue, realistic capacity, report on progress towards 5th cycle RHNA, include a 15-30% buffer of sites.

5. Affirmatively Furthering Fair Housing – increase concentration of lower income households in areas where concentrations are currently low, reduce concentrations of lower income households in areas of noise or pollution, reduce noise and pollution, invest in historically disinvested areas including place-based strategies, analyze patterns of segregation and discrimination, prioritize site identification in high opportunity census tracts, identify funding and programs to ensure affordable units are built, solicit input on the housing element from all socioeconomic groups.

6. Forecasts of ADU Development – should use safe harbor methodology, provide for mid-cycle adjustments, use city-specific data to forecast affordability.

Our Future LA requested the opportunity to meet with the City to address their concerns in greater detail.

Comments Received on Public Draft

Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them

due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.

- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
    c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
3. Accessory Dwelling Units
    a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
    b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
4. Zoning
    a. Allow residential to be built in areas that are zoned for commercial use.
    b. Allow flexibility in inclusionary zoning.
5. Better entitlement process and reducing barriers to development
    a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
    b. Reduce parking standards and eliminate parking minimums.
    c. Cap fees on all new housing.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.

Anne Bagasao/John Srebalus (May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds

of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

GENERAL COMMENTS

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program

will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses

to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws

and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

--

Davis White he/him

yimbylaw.org

(415) 298-0788

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing

Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs

portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page

13) https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

10A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

" The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025.

Timeline: For the last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

8. The pre-application is eliminated, effective immediately.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

12. Removal of CUP for all projects under 50 units.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

17. The FAR requirements as stated in SB 478 are implemented immediately.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

19. Private open space required for all projects changed to 75 sq ft per unit

20. Common Open Space required cut in half for all projects.

21. Removal of all requirements for how the private open space is accessed from the apartment.

22. Removal of all dimension requirements for the common open space.

23. Elimination of all open space requirements of elevation

24. Removal of all uncovered area requirements

25. Open Space, either common or private, can be on the roof of the building.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

27. Removal of all commercial parking requirements within the downtown specific zone.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

29. Single family parking requirements lowered to one spot.

30. Signage made by the city for all public parking lots. This should be done by 2025.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

34. Removal of the Public Art Fee

35. Water connection and Sewer connection should be at cost.

36. Removal of all fees for ADUs.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Comments Received during the 7-day Review Period (September 15, 2022)

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

Governor Newsom signed AB 1466 in September 2021 which mandates that racially restrictive covenants contained in any real estate deeds be removed.

https://www.clta.org/news/581830/Governor-Newsom-Signs-Bill-Requiring-Redaction-of-Unlawful-Restrictive-Covenants.htm#.YlhKDflKY2I.gmail

Find out when (the date) this action is to be completed.

Also see
https://www.kcra.com/article/newsom-signs-bill-remove-racist-language-housing-deeds/37790221#

A more detailed narrative is given in the KPBS article
https://www.kpbs.org/news/local/2021/11/18/keep-remove-racially-restrictive-covenant-attached-yourhome

A significant quote in that articles appears:

> When faced with racism, Dew said his grandparents didn't dwell on it or share it openly with their kids because they had to survive and find ways to thrive, "to be stronger than what society makes of you."

> He understands why his elders felt that way, but he also knows that when we avoid the hard truths of history, they are often erased.

as well as here

"You see it a lot in NIMBYism," said Nancy Kwak, a University of California, San Diego historian. "People are pushing back against changes that would make a neighborhood more accessible, so a really simple example is more affordable housing."

Kwak says when San Diegans talk about property values and things like "I earned this house" or "this is something that I deserve," she hears the same logic that was used in the past to defend segregation.

Although such statements aren't overtly racist, many homeowners' perceived right to control who can and can't live near them helps maintain the inequities embedded in the current housing system, say Kwak and others.

"Make no mistakes about it, yes the covenants are gone, but the zoning took its place and it's been wildly effective," said Ricardo Flores, executive director of LISC San Diego, a local nonprofit committed to affordable housing in the region.

With more than half of San Diego's residential areas zoned for single-family homes, Flores wants to see higher density housing built in these areas.

"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."

As well as this pivotal language that brings us back to the argument about "affordable housing" initiatives:

> The same mindset that gave rise to racial covenants a century ago was on display during the 2020 presidential election when former President Donald Trump made "protecting the suburbs" for white people a key plank in his campaign.
>
> Speaking to a crowd of supporters in Midland, Texas in July 2020, Trump drove the message home.
>
> "People fight all their lives to get into the suburbs and have a beautiful home," he said. "There will be no more affordable housing forced into the suburbs."
>
> A month later, he and Ben Carson, then Secretary of the U.S. Department of Housing and Urban Development, penned an op-ed in the Wall Street Journal entitled, "We'll Protect America's Suburbs."
>
> The tagline read: "We reject the ultraliberal view that the federal bureaucracy should dictate where and how people live."

<u>The hidden history of racism in San Diego deeds</u>

Buried in the deeds of homes and subdivisions across San Diego County are racially restrictive covenants that serve as stark reminders of the region's racist past.

Without mentioning race, Trump clearly painted a picture of an imagined white-suburb under attack from "outside" forces that would change the neighborhood and perhaps even the value of one's home.

Across the country and in San Diego suburbs have become increasingly diverse, but in this case, many viewed the use of the word "suburb" as a euphemism for "white."

While racism is just one of a number of reasons why California remains mired in an affordable housing crisis, experts argue it's important that the history of housing discrimination remain front-and-center in our present-day debates.

Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."

2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. Permit Streamlining Act provision requiring completeness determination within 30 days

2. Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has

more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

> "The first three objectives of the Land Use Plan were stated as:
>
> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

> *" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We*

are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership.

However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

Tenant Protections,Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities.

Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

Maintaining Affordable Housing Inventory

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved

this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Elizabeth Anne Bagasao (September 14, 2022)

SPTU would like to add that the Third Draft Housing Element does not go far enough to support and assist low income and moderate income residents who live in South Pasadena today. The City has an opportunity to do more for these residents especially tenants with the Housing Element. Please take the opportunity to protect existing tenants and keep this individuals and families stable in our community.

Sincerely ,

Anne Bagasao
Sent from my iPhone

Comment: Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

- **How addressed:** The City's Inclusionary Housing Ordinance is mandatory for projects of a certain size, unlike the option to take advantage of state density bonus law. In addition, certain incentives are provided under the Inclusionary Housing Ordinance if applicants comply with objective design standards.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

- **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

- **How addressed:** Additional information about the Inclusionary in-lieu fee study that the City has been conducting has been included in this draft in Section 6.4. Program 2.i in Section 6.8 commits the City monitoring the effectiveness of the Inclusionary Housing Ordinance annually and revising the ordinance if needed to improve its effectiveness at producing affordable housing units.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

- **How addressed:** ADU building permit approvals in the City continue to increase and permit processing times have decreased. No revisions have been made in response to this comment.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
    - **How addressed:** This type of program is required by the state for inclusion in the Housing Element. If any deed-restricted affordable housing is created during the planning period, the City will implement this program related to those units.
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
    - **How addressed:** Revisions have been made to Program 2.a to provide more certain timing for program actions.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
    - **How addressed:** Comment noted.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
    - **How addressed:** According to LACDA, there were 10 vouchers in use in South Pasadena in 2021. Revisions were made to Program 2.d to increase outreach to encourage use of vouchers in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
    - **How addressed:** Most of the sites included in the Housing Element that are proposed to received the Affordable Housing Overlay only allow lower densities currently. No revisions have been made in response to this comment.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
    - **How addressed:** Program 2.l has been substantially revised since the last draft of the Housing Element.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
    - **How addressed:** An additional incentive has been added to Program 3.d along with more detail about program timing and implementation.

- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
    - **How addressed:** The City processing time for ADUs has decreased in recent months. The applications received and building permits approved for ADUs has continued to increase substantially during 2021 and early 2022.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
    - **How addressed:** Comment noted.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
    - **How addressed:** Comment noted. The City has already made progress implementing Program 3.l which is noted via revisions to the program in this draft.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
    - **How addressed:** The City took action by urgency ordinance to establish objective standards for SB 9 in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. Revisions have been made to Program 3.m with this updated information.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.
    - **How addressed:** No revisions have been made in response to this comment.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

- **How addressed:** Refer to earlier response related to the Inclusionary Housing Ordinance.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the

scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

- **How addressed:** See earlier responses.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

- **How addressed**: The City Hall site has been removed from the sites inventory in this draft.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.
    - **How addressed:** The City has continued to reach out to property owners about interest in development of sites in the inventory. Additional information has been added to Appendix A as applicable.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.
    - **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.
    - **How addressed:** See earlier responses regarding ADU production.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.
    - **How addressed:** Revisions have been made to Section 6.6 and Appendix E, however the City continues to rely on the SCAG affordability analysis as it is the best data available.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

- **How addressed:** See earlier response regarding monitoring of the effectiveness of the Inclusionary Housing Ordinance.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.
    - **How addressed:** Section 6.4 Fair Housing Assessment has been substantially revised since the last draft to address comments received and to address a new state law AB 1304 that went into effect since the previous draft was released.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

- **How addressed:** No revisions have been made in response to this comment.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
        - **How addressed:** Historic exclusionary practices occurred throughout South Pasadena. Rezoning to address housing needs will address all income categories and will take place in areas of the City that are high resource.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
        - **How addressed:** No revisions have been made in response to this comment. However, revisions have been made to Programs 1.c to address the need for tenant protection in addition to Program 1.d which was already included in the draft Housing Element.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
        - **How addressed:** The City's Inclusionary Housing Ordinance was adopted in 2021. Part of its intent is to create more homeownership opportunities for lower income residents or those who would like to become residents of South Pasadena who have historically been excluded. In addition, Program 5.c has been added to this draft to support inclusion and to remove racially restrictive covenants from property deeds citywide.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback

requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.

- **How addressed:** Zoning work called for in Program 3.a addresses this comment. Revisions have been made to that program and to Section 6.4 to address constraints associated with existing development standards.

b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
   - **How addressed:** The City is committed to complying with state no net loss statute and has included as many suitable sites as possible that can be analyzed to be adequate. The number of sites included in this draft exceeds the City's RHNA. Residential development will be allowed on a substantially larger number of sites once the General Plan, DTSP and associated zoning changes are complete.

c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
   - **How addressed:** Housing regulations statewide and locally in South Pasadena have changed significantly in the last two years including related to ADUs and with the adoption of the Inclusionary Housing Ordinance. Basing likelihood of development for the 6th cycle on the 5th cycle housing unit development doesn't make sense in light of these changes.

3. Accessory Dwelling Units
   a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
      - **How addressed:** Programs 3.g and 3.h address this comment.
   b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
      - **How addressed:** Programs 3.g, 3.i, and 3.k address this comment.
4. Zoning
   a. Allow residential to be built in areas that are zoned for commercial use.
      - **How addressed:** Sites currently zoned for commercial use are proposed to receive the Affordable Housing Overlay or to have their base General Plan land use and zoning changed in order to address the City's RHNA.
   b. Allow flexibility in inclusionary zoning.
      - **How addressed:** The City's Inclusionary Housing Ordinance allows a variety of options depending on the project type and whether an applicant chooses to comply with the objective design standards in the ordinance.
5. Better entitlement process and reducing barriers to development
   a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
      - **How addressed:** The sites rezoned to address the lower-income RHNA as called for in Program 3.a of this Housing Element will allow projects with 20 percent affordable units ministerially. Other projects are eligible for ministerial review under state law.
   b. Reduce parking standards and eliminate parking minimums.
      - **How addressed:** Program 3.a calls for the city to evaluate parking requirements as part of the DTSP and zoning amendments to implement the Housing Element.
   c. Cap fees on all new housing.
      - **How addressed:** No revisions have been made in response to this comment.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.
    - **How addressed:** No revisions have been made in response to this comment.

Anne Bagasao/John Srebalus ((May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

- **How addressed**: The City held the following meetings to gain additional input on the draft Housing Element. #1 Public Workshop on October 21, 2021. #2 Developer Forum on August 15, 2022. #3 Community Outreach at South Pasadena Farmer Market on August 18, 2022. #4 Community Forum and Informational Workshop on August 20, 2020. Comments received at this meeting have been included in Appendix B.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

- **How addressed:** The normal operation of the City was significantly affected by the COVID19 pandemic, resulting in the closure of City offices, as well as financial challenges for the City. This created new situations with which the City had to contend with, and at the same time address the housing element preparation in a challenging new work environment. We apologize for any impact that posed on SPTU and other participants. The immediacy of the health issues became a priority, but the State did not authorize any extensions of the housing element timeframe, and a small staff struggled to attend to both efforts. As the City pivoted to virtual meetings and events, outreach efforts persisted. The web page contains an opt-in mailing list link, and both respondents have taken advantage of that opportunity and have been receiving emails from housingelement@ on a regular basis informing about related events, meeting or milestones. City staff has always been open to suggestions for participation but is not aware of any offer to provide information from the respondents.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

- **How addressed:** The comment appears to reference issues that occurred two years ago, with significant communications, outreach meetings, public meetings, and plan amendments since. Both respondents are included in the email list that regularly receives information. As the CDD employees referenced in this comment (Joanna Hankamer and Margaret Lin) are no longer at the City, current staff is not aware of the 9/30/2020 email and how it was followed up at that time. We disagree that ensuring that SPTU was at every meeting is without excuse or the responsibility of the City. As respondents were included on the mailing list and staff had communications with SPTU, significant efforts were made along the way to include the commentor.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

- **How addressed**: The City held 7 public workshop, a developer forum and conducted an online community survey in addition to regular updates at the Planning Commission and City Council to keep the community engaged and updated on the Housing Element update process.

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

- **How addressed**: The commentor appears to clarify that 10% of the members at the Fall workshop were members of Abundant LA. This cannot be verified, and is not a group affiliated with the City. When a meeting is open to the general community, the City cannot control its participation. All are invited to attend. Ultimately the proposed housing element policies are developed based on a number of factors, including State law, HCD guidance, planning principles

and public comment. The housing element team did its best to use the input received from all, whether in large or small numbers.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

- **How addressed:** Consultation with individuals outside of public fora is not prohibited and remains a valuable way to understand community concerns. Current staff is unaware of this meeting and its contents. The parties the commentor references have continued to provide comments during the evolution of the housing element drafts, and remain engaged in public dialogue.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

- **How addressed:** All agendas for public meetings were posted in compliance with the Brown Act. The dates and times stated would comply with the Brown Act. As Ms. Hankamer is no longer with the City, we have no further information about this event.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

- **How addressed:** The City attempted to keep the public informed of processes and to provide opportunities for input given the resources available to it. While more potentially could have been done in the past to encourage more involvement, we are unaware of any noticing that did not meet applicable codes. Due to extremely high staff turnover during part of 2021 direct outreach to certain groups was unable to be completed. It appears that those groups are now well engaged and able to participate in the remainder of the process. Their comments on the content of the element are well taken.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant

difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: Program 3.f, Allow and Facilitate ADUs, Program 3.g, Monitor ADU Production and Program, Program 3.h, Back up to Address Shortfall in Anticipated ADUs and Program 3.i, ADU Amensty Program have all been updated to address HCD comments and provides a realistic path for the incentivizing the production of ADUs to meet the City's RHNA.

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We

stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

- **How addressed:** The commentor's frustration with the state mandated system is noted, and in receiving a RHNA that is challenging in the context of South Pasadena's small area and built-out character. The City explored all options in appealing the allocation when that opportunity was offered, but recent court decisions have made it clear that further legal action on the allocation is not available. Some jurisdictions have posed challenging the statewide basis of the RHNA allocations, but the City has not chosen to proceed in that manner. The City has been actively working toward complying with the complex web of new requirements and the RHNA allocation in order to adopt a compliant housing element as is required under the law.

GENERAL COMMENTS

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

- **How addressed:** Thank you for your comment.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

- **How addressed**: Program i.e. - Environmental Health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino.

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

- **How addressed:** Thank you for your comments climate change will be addressed in the updated General Plan.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

- **How addressed**: Program 2.b Affordable Housing Production identifies that the City will establish a Housing Divisions to help fund and build affordable units on sites in higher-income neighborhoods to facilitate housing mobility.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

- **How addressed:** The commentor's statement is noted.

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

- **How addressed:** SB381 provides a way for housing currently owned by the state to be put into use again. It allows the City to be part of the process to ensure that such housing is made available. The City has chosen to move forward with evaluation with each eligible property on

a parcel-by-parcel basis. The housing element does not mandate that any one parcel be accepted by the City, let alone that all do. The housing element does not, nor can it, amend the provisions of the state law created by SB 381. The housing element creates a program to proceed under the SB 381 process. The housing element recognizes that these parcels are an important part of how the city will address its housing needs. However, it does not mandate and outcome on any specific property at this time.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

- **How addressed**: Thank you for your comments.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

- **How addressed:** Thank you for your comment.

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

- **How addressed**: See response above.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

- **How addressed:** The commentor appears to be addressing concerns about retaliatory actions by landlords against tenants who complain about substandard living conditions. Such retaliatory behavior by landlords is illegal under state law. The city supports challenging such unlawful behavior with referrals to the Housing Rights Center (HRC). These efforts are addressed through Program 5.a.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

- **How addressed:** Thank you for your comment.

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

- **How addressed**: The commentor's position regarding a past project is noted. The data evaluated from CalEnviroscreen 4.0 showed that South Pasadena had cumulative scores for air pollutants below the thresholds for further action. Parcel level site analysis is done at the time of individual project evaluation, not at the housing element level. The analysis performed did show a threshold for further analysis for water contamination. Program 1.e was included to address the water contamination issues. The city has already begun to address the water contamination issues through remediation activities, seeking reimbursement through legal action against responsible parties, and continued monitoring of water quality. These are addressed through Program 1.e.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

- **How addressed:** Thank you for your comment, please check back with the City's Virtual Planning Desk to find out about housing project applications.

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

- **How addressed**: Program 2.h has been updated to address HCD comments.

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

- **How addressed**: Program 2.j has been updated to address HCD comments.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open

space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

- **How addressed:** Implementation of a City-owned affordable housing sites inventory will occur after adoption of the Housing Element. Please check back with the City after Housing Element adoption for status updates of this program.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

- **How addressed:** This program is required due to the RHNA allocation to the City. It is being revised, and will demonstrate compliance with State law, including efforts to move toward objective standards and non-discretionary processes for housing.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

- **How addressed:** Parcel level zoning detail is not required for approval of a Housing Element. The zoning for particular parcels follow the policy level determinations under the Housing Element. Pursuant to Government Code section 65754(b), City's zoning code is required to be completed within 120 days after the Housing Element has been amended by the City Council.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that

residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

- **How addressed:** Please refer to California Government Code Section 65915(c)(3).

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

- **How addressed:** Program 3.d has been updated to address HCD comments.

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

- **How addressed**: Short-term rental analysis will be included in the City's General Plan update.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

- **How addressed:** Jurisdictions are not required to adopt or evaluate SB 10. The timeframe stated for examining SB 10 is to allow sufficient time for analysis and community outreach should the City decide that its provisions would be beneficial for housing production.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

- **How addressed**: BP refers to Business Park Zone.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the

Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

- **How addressed**: Program 4.a includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

- **How addressed**: Program 4.b includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

- **How addressed**: California Senate Bill 35 (SB-35) was signed by Governor Jerry Brown on September 29, 2017 and was effective January 1, 2018. SB-35 applies in cities that are not meeting their Regional Housing Need Allocation (RHNA) goal for construction of above-moderate income housing and/or housing for households below 80% area median income (AMI). SB-35 amends Government Code Section 65913.4 to require local entities to streamline the approval of certain housing projects by providing a ministerial approval process. Please refer to the Government Code Section 65913.4 for more information.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

--

Davis White he/him

yimbylaw.org

(415) 298-0788

- **How addressed:** The City plans to review the SB9 urgency ordinance adopted in December 2021. Such review will allow for review of the standards noted and an implementation process to be addressed. Although this process has been delayed due to other department priorities, a revised ordinance will be developed in consideration of more recently issued comments and interpretation of SB9's provisions.

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

- **How addressed:** Sites included in the Housing Element must allow for and be suitable for residential development. Inclusion in the Housing Element is not a guarantee of residential units being built on a site.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in

relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

- **How addressed:** All APNs ending in 900, 901, 904, and 905 have been removed. APN 5308032902 has also been removed. 5312016015, 5312016014, 5301028036, 5301028035, 5301028034, 5301028054, 5301028053, 5301028052, 5301028051, 5301028050, 5301028049, 5301028055, 5306006024, 5306006025, 5306006053, 5306006048 have also been removed because they would have to have the road developed.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

- **How addressed**: Ralphs and Vons have been removed from the inventory and Pavillions remains included and is counting the parking lot and not the whole building.

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

- **How addressed**: Only the parking lot portion of Pavillions is being included in the land inventory. Development would include ground floor parking and residential above.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

- **How addressed:** This parcel is 2.73 acres and owned by the City. The southern portion of the parcel is not underneath the overhead lines. The 15 units assumed for this site were anticipated to be able to be developed on this southern portion of the site.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

- **How addressed**: This site was removed from the inventory. Appendix A says the parking lot doesn't provide required parking for the commercial uses to the west meaning that parking doesn't address parking spaces required to be provided by the City.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

- **How addressed**: This site was removed from the inventory.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

- **How addressed**: From Appendix A: "Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services."

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

- **How addressed:** This site is a city owned site and the current CIP includes a comprehensive assessment of City-owned facilities that are be suitable for relocation of the public works yard, in order to vacate the property for an affordable housing project. The City will remediate any environmental constraints on this site prior to development for residential.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications

with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

- **How addressed**: The commentor's statements regarding the request to produce documents are disputed by the City. The City endeavors to comply with all PRAs through a process monitored by the Office of City Clerk. The city is unaware of any outstanding requests from the timeframe noted, and has provided all non-exempt, responsive documents to the respondent in this context in the city's possession. Since this comment, the city has responded to several other PRA request from the commentor.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and

italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page 13)

https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

- **How addressed:** The sites included in Table VI-44 that are on slopes are all on slopes less than 20 percent and are developable in accordance with the City's hillside ordinance. Additional detail about projects approved on slopes in included on Page 168 in blue highlighting.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** This site was removed from the inventory.

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** The Rite Aid sites has been removed from the inventory.

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed**: Program 2.e has been updated to address HCD comments.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

- **How addressed**: The City will comply with state ADU regulations and coordinate with. local fire and safety requirements for allowing future ADUs.

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

- **How addressed**: Thank you for your comment.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

- **How addressed**: The ongoing evaluation of CIP needs and the action taken on May 23, 2022 does not negate the program in 3B to pursue transportation facilities for people without vehicles.

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

- **How addressed:** The particular project made reference to on May 23, 2022 has a long history associated with it and the Council used their independent judgment as to *that* location, not as to bike lanes in general as the comment would suggest.

  The bike plan is a more accurate reflections of the city's commitment to multimodal transportation, and is properly referenced in other elements of the General Plan, rather than the housing element. It is included in the draft GP due to be released soon.

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

- **How addressed**: This site was removed from the inventory.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

- **How addressed:** Site 21 was removed from the sites inventory. Site 20 remains included due to the current renovations being minor in nature and would not preclude redevelopment of the sites. In addition, the only portion of Site 20 being counted is the parking lot and redevelopment of the parking lot would include ground floor parking with residential above. It was also stated by participants at the Developer Forum on August 15, 2022 that the City has sufficient parking and should reduce parking requirements where feasible.

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

- **How addressed:** Program 3.m requires the City to develop guideless for SB 9 units by December 2022. There are no SB 9 units being counted towards meeting the City's RHNA.

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

- **How addressed:** That is correct.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

- **How addressed:** In March 2022, the City Council modified its lease with the South Pasadena Theatre Workshop so that it would be a month to month lease to allow for the future development of the City-owned Site 14 without the constraint of a long-term lease.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

- **How addressed:** Site 9 is owned by the City and the unit assumptions were updated to address HCD comments.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

- **How addressed**: These sites inventory has been updated to reflect realistic capacity.

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

- **How addressed:** ADU assumptions have been updated to address HCD comments in Table VI-46.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

- **How addressed**: ADU affordability analysis has been updated on Page 231 with additional survey of ADU costs.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

- **How addressed**: Thank you for your comment.

0A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

- **How addressed**: Program 3.a requires the City to rezone to meet the City's RHNA requirement.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

- **How addressed**: The City has included Program 3.n – Zoning Changes, the City will review and revise development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will need revising include height limits, open space standards, parking requirements including variances and findings for design review.

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

- **How addressed:** The City is unaware of delays in this project attributable to the City, its staff, or its codified processes. The Mission Bell project has been moving through B&S, with many rounds of corrections to the developer-provided plans needed to get the plans to comply with building code. There is also delay related to their electrical connection (Edison), again as a result of developer design issues regarding compliance with state codes rather than the City code or staff related issues.

  Published comments from various news sources often do not have the full picture of what has transpired. The ability to address that record here is appreciated.

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

- **How addressed**: "Program 2.m – Update Inclusionary Housing Regulations.

Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

- 10 unit threshold
- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

- **How addressed**: The City will update the Inclusionary Housing Ordinance as described in Program 2.m above.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

- **How addressed:** The City held a forum with local developers on August 15, 2022 to discuss development constraints, including the City's Inclusionary Housing Ordinance. In attendance were numerous developers that have a history of working in South Pasadena or who are currently processing projects in the city, including Victor Tang. The Inclusionary Housing

Ordinance was not identified by the developers in attendance as a general constraint, but was identified as a constraint for projects less than five units.

Program 2.m, Update Inclusionary Housing Regulations requires that the City revise its Inclusionary Housing Ordinance to ensure that it is not a constraint for future development.

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

- **How addressed:** See above response.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

- **How addressed:** The commentor's position and opinion is noted. There is a record of the outreach efforts that were made over the past two years. As noted in Appendix B, prior to the release of the previous public review draft of the Housing Element, the City held public workshops on:
  - May 30, 2020;
  - June 2, 2020;
  - September 23, 2020; and
  - October 21, 2021.

  In addition, the City held the public hearings on:
  - July 21, 2020 at Planning Commission;
  - August 5, 2020 at City Council;
  - August 11, 2020 at Planning Commission;
  - September 8, 2020 at Planning Commission;
  - December 15, 2020 at Planning Commission;
  - January 26, 2021 at Planning Commission;
  - May 25, 2021 at Planning Commission;
  - October 12, 2021 at Planning Commission;
  - November 9, 2021 at Planning Commission; and
  - November 17, 2021 at City Council.

  During this time period, the City was operating under and emergency declaration due to the COVID-19 pandemic, which prevented most of the meetings from being held in person and required them to occur online.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

- **How addressed:** Appendix B has been updated to include public comments received on the draft Housing Element and responses to comments in the draft Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to

develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

- **How addressed**: Vons and Ralph's grocery stores were removed from the inventory. Pavillions remains on the inventory and only the parking lot is being included in the inventory and any future development would include ground floor parking and residential above.

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

- **How addressed:** The Rite Aid site was removed from the inventory.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels. The sites inventory has been updated to reflect this information.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

- **How addressed**: This site was removed from the inventory.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

- **How addressed**: The City made contact with the property owner and they support rezoning for future multi-family development.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of

being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

- **How addressed**: Sites previously listed on Harriman Ave have been removed from the inventory.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

- **How addressed**: The City has included Program 2.n Citywide Height Limit Ballot Imitative to facilitate destines above 50 dwelling units/acre on sites in the Housing Element.

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

How addressed: The analysis done as part of the housing element update process indicates that upzoning all CG, M and R zones adjacent to commercial corridors in South Pasadena is not necessary to meeting the City's RHNA. However, upzoning is necessary in certain areas of the city, as shown in Program 3.a - Rezone and Redesignate Sites to Meet RHNA, The City will redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A to address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended.

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

" The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold

- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold
  - In-lieu fees and cost of a comparable unit
  - How the inclusionary regulations relate to state Density Bonus law"

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

Appendix B

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

- **How addressed**: Thank you for your comment, the City will continue to explore all options to provide more housing in the City of South Pasadena.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

- **How addressed**: The Housing Element has been revised to include documentation of transportation network improvement, including Fremont/Huntington Mobility Active Transportation Project, North-South Corridor (Fair Oaks) Intelligent Transportation System Deployment, Rectangular Rapid Flashing Beacons at three locations in the City's lower-income residential area, and the Mission Street Slow Street Pilot Program. Additional transportation network updates will be addressed in the forthcoming revision to the City's General Plan and the Downtown Specific Plan.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

- **How addressed**: The City's Slow Streets Program is intended to provide space for residents to safely walk and ride, and to support local businesses' use of outdoor space for dining or other purposes. The next step in this program is the installation of temporary program equipment purchased with grant funding for short-term installation, such as temporary striping, curb extensions using reflective delineators, and bicycle lanes using short-term paint/tape and signs. Other placemaking elements are also incorporated like furniture, plants, art pieces, and parklet structures outside of businesses, to create usable street space. The temporary installation is planned for Spring 2023 and is expected to be in place for 6-months, after which an assessment of the design's observable performance, and an evaluation of the community's experience, will be conducted – this should inform the future consideration of potential permanent changes to Mission Street.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

- **How addressed**: Bicycle lanes along Mission Street and Pasadena Avenue are included in the City's adopted Bicycle Master Plan. Temporary bicycle lanes are expected to be implemented along Mission Street in 2023 within the Slow Streets Program, and the incorporation of bicycle lanes at the intersection of Pasadena Avenue and Mission Street are being evaluated in the current street resurfacing project, which is in the mid-design phase.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

- **How addressed**: City Council has directed staff to focus the next round of Metro Measure M Multi-Year Sub-Regional Program funding requests on bicycle facilities and pedestrian crossing improvements. Staff plan to focus this funding request evaluation on neighborhoods containing schools.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

- **How addressed**: A Class 1 bicycle lane is not proposed to replace the existing Class 2 bicycle lane along Marengo Avenue in the City's adopted Bicycle Master Plan, however, a Class 1 bicycle path is proposed parallel and adjacent to Marengo along the Southern California Easement from Garfield Park to the City of Alhambra.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

  4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025. Timeline: For the

last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

- **How addressed**: A Class 3 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

- **How addressed**: The City currently has 1 planning manager, 3 associate planners, 1 assistant planner and 1 planning counter technician FTE positions funded this fiscal year. The assistant planner began employment on Sept. 6 and the city is currently recruiting for the Planning Counter Technician position. In the meantime, a part-time planning management intern assisting until the Counter Technician position is filled.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

8. The pre-application is eliminated, effective immediately.

- **How addressed**: The pre-application is intended to be a tool for developers and it is optional. The Pre-Application process helps streamline the overall entitlement process by helping the applicant and staff identify and resolve critical issues very early in the process.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

- **How addressed**: The City remains committed to allowing project planners to be hired by applicants willing to expedite their projects. Such process does not affect the remining projects in the queue as no staff members are used to review such projects to the detriment of non-expedited projects.

To ensure that no delay occurs due to this project opportunity, the City will facilitate special meetings of the planning commission and city council (as applicable) to ensure sufficient time for projects to be considered without delay.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

12. Removal of CUP for all projects under 50 units.

- **How addressed**: The requirement for a CUP has not been identified previously as a constraint on development and has not been included as one of the specific policies in the Housing Element. However, this comment will be considered when developing the Downtown Specific Plan's requirements for residential development.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

- **How addressed**: Developments in these areas of the city will need to comply with CEQA, including analysis for transportation, noise, climate, and utility impacts. Developments will be considered for categorical exemptions if they are eligible.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

- **How addressed**: Such requirement is a undue burden on the City and staff, and would cause delays in other aspects of duties by the planning division, while providing only marginal benefit towards the production of additional housing opportunities. City will continue to monitor ways other agencies are updating such information and evaluate if new technologies can be employed to address this issue.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

17. The FAR requirements as stated in SB 478 are implemented immediately.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of that amendment.

19. Private open space required for all projects changed to 75 sq ft per unit

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

20. Common Open Space required cut in half for all projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

21. Removal of all requirements for how the private open space is accessed from the apartment.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

22. Removal of all dimension requirements for the common open space.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

23. Elimination of all open space requirements of elevation

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

24. Removal of all uncovered area requirements

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

25. Open Space, either common or private, can be on the roof of the building.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

27. Removal of all commercial parking requirements within the downtown specific zone.

- **How addressed**: New development standards will be included as part of the Downtown Specific Plan.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

29. Single family parking requirements lowered to one spot.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of this amendment.

30. Signage made by the city for all public parking lots. This should be done by 2025.

- **How addressed**: This comment does not relate to the Housing Element. It will be addressed in other parts of the General Plan.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

- **How addressed**: Changes to the Inclusionary Housing Ordinance will be made as part of Program 2.m.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

- **How addressed**: The height limit will be considered consistent with the court order and Program 2.n.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate alternative funding sources for such project requirements for multifamily housing projects.

34. Removal of the Public Art Fee

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

35. Water connection and Sewer connection should be at cost.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

36. Removal of all fees for ADUs.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

- **How addressed:** The Housing Element has been updated to more fully address the City's history of using land use controls as a way to make South Pasadena an exclusive community. The goals and programs throughout the Housing Element are intended to open South Pasadena up and expand the housing opportunities throughout the City.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."

2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

- **How addressed:** These two dates are for different programs. Site 3 is not a vacant site, and is therefore addressed as part of Program 2.k. The Housing Element currently anticipates the construction of 8 above moderate income units on the site, which is consistent with the application the developer has submitted to the City for this site.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. Permit Streamlining Act provision requiring completeness determination within 30 days

2. Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

- **How addressed:** Program 3.b requires that the City adopt objective development standards for mixed-use and adaptive re-use projects within 120 days of the adoption of the Housing Element. Additionally, Program 3.e requires that the City develop an electronic permitting system to help streamline the approval process and address many of the issues raised by this comment.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

- **How addressed:** Program 3.f requires that the City to review its ADU ordinance within six months of receipt of comments from HCD regarding the ordinance.

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** Program 2.m requires that the City update its Inclusionary Housing Ordinance within six months of adoption of the Housing Element. Program 2.i requires that

the City monitor the effectiveness of the Inclusionary Housing Ordinance and to make changes by the end of 2023, then annually thereafter as revisions are needed.

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

- **How addressed:** Program 2.n and the court order require that the City place a measure on the ballot by December 31, 2024 to remove or amend the height limit to allow for the densities necessary to meet the City's RHNA requirements under this Housing Element. As part of this ballot measure, the City will work with developers and community members to determine an appropriate height limit and to build support for the ballot measure.

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

- **How addressed:** The draft housing element acknowledges past exclusionary practices and states commitment through policies to ensure that there are housing opportunities for all current and prospective residents, regardless of income. (pages 76-77).

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

"The first three objectives of the Land Use Plan were stated as:

> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

> *" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)*

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

- **How addressed:** The recent reorganization of the Community Development Department includes creation of a housing division and additional Planning staff (Programs 2.b, 3.l), with a senior analyst to focus on housing program implementation. City staff will work with the SPTU to review the CHO to address any barriers to affordable housing that could be removed through updates to the CHO.

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership. However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

- **How addressed:** As detailed in Program 1.b, existing state law (SB 381) requires that the California Department of Transportation (Caltrans) sell the surplus residential property it owns in South Pasadena for use as affordable housing. The law requires that Caltrans offer the unoccupied surplus residential properties to the City of South Pasadena first, and then to the Los Angeles County Development Authority (LACDA) and then to housing related entities. The City of South Pasadena has expressed interest to Caltrans to purchase all of the unoccupied surplus properties in the city, and is currently analyzing the feasibility of purchasing the properties for use as affordable housing. Whether the City or another entity purchases the surplus properties, any entity purchasing the properties will be required to maintain them as deed restricted affordable properties.

Tenant Protections, Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts

tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities. Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

- **How addressed:** South Pasadena implements State law regarding tenant protections. Program 1.c states the intent "to reduce displacement risk of tenants living in currently substandard housing." When implementing a proactive program based on the survey conducted (Table VI-26), those units that have substantial violations or are dilapidated will be prioritized. It should be noted that these units are all single-family properties, and do not include multi-unit rental properties. The protection of any tenants will be included as part of this program. Program 3.c confirms replacement of lower-income housing units when new construction is proposed, in addition to the creation of new affordable housing units through the inclusionary housing program.

Maintaining Affordable Housing Inventory

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

- **How addressed:** SPMC Section 36.350.200.K (ADUs) currently prohibits renting out ADUs for a period of less than 30 days. The City has the option to require a deed restriction to enforce this regulation.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

- **How addressed:** The most updated data that the City has in regard to unhoused people is discussed in the Housing Needs section (page 56). However, after publication of this draft of the Housing Element for public review, the County of Los Angeles published the 2022 Point in Time count numbers, which showed that South Pasadena's homeless population increased from 15 in 2020 to 50 in 2022. The City's response system, detailed in Program 2.f responds to the data from recent County homeless counts and reflects the City's partnerships to address the issues regionally.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney

that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

- **How addressed:** The new Housing Division will be reviewing the contract with HRC, which is pending renewal, and will confer with the SPTU to ensure that the revised contract, as well as its oversight, improves service to the public and meets the needs of tenants.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

- **How addressed:** The details of the ballot initiative will be developed with significant community outreach, as discussed in Program 2.n., with the goal of facilitating the densities needed to implement the RHNA.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Comments on the 3rd Draft Housing Element

Yvonne LaRose (November 11, 2022)

The Wednesday night joint Council-Planning Commission meeting brought out and discussed a number of issues in relation to a state mandated 2,065 dwelling units increase. We struggle to meet that requirement.

However, after the meeting, Alan Erlich and I talked. He pointed out that San Marino (which has a smaller population than South Pasadena) is only required to increase its dwelling units by 100. Similarly,

I think Alan mentioned Alhambra, which also has a smaller population than South Pasadena, is being required to increase its dwelling units by 200.

Alan also pointed out the reason for the drastically different requirements of the three cities. It is because South Pasadena is considered to be a transportation rich city due to the fact that the Gold Line passes through it.

While it is definitely true that the Gold Line is part of a reliable rail system of public transportation that's available on a 24-hour, 7 days a week, at 15 to 20 minute intervals, and the line does, indeed, pass through an area near the heart of the city, it deposits passengers at a public transportation bus stop (MTA Line 258) that is essentially an afterthought.

Line 258 runs every 60 minutes along Mission Street, Monday through Friday. It is not operational on Saturday or Sunday. It has 29 stops; among them are CSULA, where it appears it only stops two times, at 9:23 PM and 10:23 PM. Of the three routes it offers, one terminates at Avenue 63 and York Bl. as it passes along South Pasadena via Mission Street.

South Pasadena also has the benefit of MTA Line 260 which runs the length of Fair Oaks from the Alhambra border, through South Pasadena (past Huntington Hospital), and then into Pasadena. That line runs every everyday, starting from the Artesia Station at 4:21 AM and ends at 10:31 PM. at approximately 15 to 20-minute intervals.

South Pasadena offers its residents who are seniors and/or disabled transportation five days a week (Monday through Friday) from 8:30 AM to 4:00 PM via Dial a Ride. We have learned through the Community Services highlight during a Council meeting that the new scheduler considers all passengers are interested in getting to medical appointments or shopping, typically for groceries. The scheduler will confirm a reservation but makes an independent, subjective determination as to whether the reservation should be honored and will (sometimes without notice to the passenger) cancel or change a reservation, leaving the client without transport and needing to change their business itinerary and appointments for that day unless they are able to use an alternative transportation service.

Dial a Ride has become a dismally unreliable means of transportation in and around South Pasadena.

While there are other transportation alternatives such as Uber, Lyft, Access, or taxi, the above three public transportation systems constitute the "rich transportation" of South Pasadena. Given the limited availability of the City's staple transportation, it can be said with accuracy that South Pasadena is definitely not a transportation rich city.

Based on this analysis, the City should challenge the requirement to develop 2,065 units. The burden on a city of 2.5 square miles is too great. The "rich transportation" is imaginary. What does exist can barely support the 25,000 residents; to add even 2,000 additional people (let alone dwelling units) would overtax all of the City's resources.

Viva

Yvonne LaRose

Organization Development Consultant: Diversity/Title VII, Harassment, Ethics

Consultant's Desk - http://consultantdesk.blogspot.com

The Desk - http://thedesk.wordpress.com

Cell: 626-606-4677

- **How addressed:** There are many different factors that are taken into account when determining a City's Regional Housing Needs Assessment, including the proximity to jobs and transit access. The City was allocated 2,067 units after the reallocations by SCAG after several agencies made various appeals and many factors were weighted. The City is addressing the full amount of its share of housing needs as determined through the RHNA process, and this Housing Element has been drafted to meet those housing needs.

Yvonne LaRose (November 12, 2022)

It seems Agenda Items 3.3 and 3.4 had exhibits to be used with them. Those exhibits were not in the Council chamber when the meeting started. Perhaps they were available at the booth in the lobby of City Hall. The lack of such exhibits for the public made grasping all of the proposed details difficult to navigate. Some members of the audience had questions about the proposed changes but were unable to present those questions and concerns. Frustration was the result.

One of the properties involves Foremost Liquor at Monterey Rd. and Pasadena Ave. The proposition is to remove that structure and convert the property into a different type of use, possibly residential. The issue with that prospect is that is the only convenience store in the area and appears to generate more business and revenue than the small businesses on the west side of Monterey Road. Perhaps there are other alternatives to removing that business. Interpretation of the proposed change seemed to be tear out the liquor store and rebuild with a multi-use/family dwelling.

- **How addressed:** Foremost Liquor (Site 5 in Appendix A) will be rezoned as part of the larger Ostrich Farm Mixed-Use area to remove barriers to and incentivize the production of housing units. The City is not "tearing out" the liquor store. This mixed-use area will include additional retail opportunities for the west side of the city, which may include a liquor store.

There was also discussion of the Pavilion's parking lot. The proposal is to resurface the parking lot (which was recently completed), install additional parking, as well as build a residential building on the lot. No one in the audience could envision a dwelling unit on that lot that would aesthetically blend in with the area. There also seems to be quite limited space for a proposed dwelling unit in that location. The proposed changes do not appear to be feasible.

- **How addressed:** The Pavilions parking lot (Site 16 in Appendix A) is approximately 2.67 acres of flat land within a transit rich area. As discussed in the letter from the property owner, the owner intends to redevelop the entire site with a new store which would include a housing component. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Moving just one-half block to the south of the Pavilion's site is Golden Oaks Restaurant, which is also proposed as a site for demolition and erection of a multi-unit dwelling, plus parking spaces. Again, the aesthetics of that type of change is questionable, not to mention there is scant space to make those types of changes.

- **How addressed:** Aesthetics are not an issue that is considered or addressed under state law in the Housing Element. Such issues are addressed through zoning regulations such as the Downtown Specific Plan that will come after the Housing Element indicates were to locate housing resources. Parking is not required in this area due to recently enacted state law under AB 2097 prohibiting cities from imposing minimum parking standards for residential and commercial projects within one-half mile from public transit. Program 3.b has been revised to commit the City to updating its zoning code to conform to the parking standards set by state law.

It sounded as though the Public Works yard is also being planned for renovation and demolition. It's troubling to try to understand where Public Works will be located if their base is removed. Perhaps what was missed in the interpretation of the proposal is that the yard will somehow be upgraded (perhaps with more energy refueling pumps) and remain in the same location.

- **How addressed:** The City's existing Capital Improvement Program includes a list of sites suitable for relocation of the activities currently conducted at the Public Works yard. The City intends to vacate the Public Works Department from this site so it can be redeveloped as affordable housing with no Public Works activities remaining on the site.

These are the proposals that more significantly stand out in my recollection of Wednesday's meeting.

Viva

Yvonne LaRose

Cell: 626-606-4677

Josh Albrektson (November 21, 2022)

For APN 5308034015 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308034015 has been removed from the Housing Element.

Josh Albrektson (November 21, 2022)

1131 El Centro St is a 3 story condo complex built in 1988. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1131 El Centro St. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1131 El Centro St. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that these 34 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

700 Orange Grove Ave is a 3 story Condo Complex built 20 years ago. You guys are claiming there is a chance that this 3 story Condo Complex might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

For APN 5314020007, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** There is an existing public driveway that provides access to APN 5314020007

Josh Albrektson (November 21, 2022)

715 Prospect Ave and 807 Prospect Ave are 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 715 Prospect Ave. and 807 Prospect Ave. are not identified sites for affordable housing production. 715 Prospect Ave. and 807 Prospect Ave. are part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The Housing Element simply says that the possibility exists, and that the Housing Element programs make it more likely, that these sites will be redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

Every single house in the next two pictures are single family homes that South Pasadena claims will be torn down and replaced with a low income unit. By law, south Pasadena is required to subtract the current unit count from any potential future unit count, so for all of these they should not be able to claim any housing.

- **How addressed:** Images were not provided as part of this comment. It is unclear which single family homes are being discussed in this comment.

For every current housing site in the downtown specific plan South Pasadena didn't subtract the current units on the site as required by law. For example at 820 Mission there is a 38 unit condo complex. South Pasadena is claiming 17 units at this site and not subtracting any of the current condos.

This is the case for 50 of the sites claimed in the Downtown Specific Plan.

Sent from my iPad

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The projected number of units for 820 Mission St. does subtract the existing dwelling units from the calculation of the projected net increase in housing units on the site. The site is an approximately 1.75 acre and is located in the proposed Downtown Specific Plan area. This area will allow for a maximum of 70 du/ac, which means the site will accommodate up to 122 dwelling units. As mentioned in the comment, there are currently 38 existing units on the site, which would net 84 housing units if it were to be redeveloped. The analysis of the Downtown Specific Plan anticipates there is a 20% likelihood that a parcel in the Downtown Specific Plan is redeveloped. Twenty percent of 84 housing units is 16.8, which was rounded to 17 as the number of net new housing units anticipated on the site prorated for the likelihood of redevelopment of the site.

Josh Albrektson (November 22, 2022)

All page numbers refer to the 3rd draft page numbers

For APN 5315021008 on page 191 South Pasadena claims 27 units on a 0.57 lot. This is the southern part of the mission meridian complex built in 2006 and there are already 23 units on this lot.

For APN 5315021031 on page 191 SoPas claims 20 units on a 0.45 lot. This is the middle part of the Mission Meridian complex built in 2006 and there are already 20 units on this lot.

For APN 5315021051 on page 188 SoPas claims 24 units on a 0.65 acre lot. This is the north part of the Mission Meridian complex built in 2006 that already has 23 condos on the lot.

For APN 5315007055 on page 185, SoPas claims 22 units on a 0.91 acre lot. This is a 21 unit condo complex built in 1988.--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

On page 193 it is claimed that the realistic capacity is based on 20% of the sites being developed at 100% capacity.

The total acreage is 54.95 acres with a density of 50 DU/acre. This is a maximum capacity of 2748.

20% of 2748 is 550 units, not 642 units as claimed.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The maximum density of the Downtown Specific Plan is 70 du/ac, not 50 du/ac. Table VI-51 has been corrected in the Fourth Draft to reflect the corrected maximum density. Table VI-51 does identify the total acreage of the Downtown Specific Plan area that has the potential to be redeveloped as 54.95 acres. At a density of 70 du/ac, the maximum capacity of this area is 3,846 units. Twenty percent of 3,846 is 769, which is more than the 642 units that is anticipated to be developed in the Downtown Specific Plan area during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5310016028, this is a 15 foot wide lot that is somebody's garden.

https://twitter.com/JalbyMD/status/1538996186765348864?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

https://twitter.com/JalbyMD/status/1538996243224924160?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5310016028 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

1522 Mission Street is the historic Fair Oaks Pharmacy that has been operating for over 100 years. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??? It made it 100 years, it is going to close in the next 7??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1522 Mission Street is not an identified site for affordable housing production. 1522 Mission Street is a part of the Downtown Specific Plan area and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

1401 Mission Street is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1401 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

At 820 Mound Ave the city is about to install electric panels and have a long term lease with SoCal Edison. This was just voted on 3 months ago. Is South Pasadena planning on breaking this lease??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 820 Mound Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 820 Mound Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For Site 16 you guys claim that only the parking lot will be developed and not the newly renovated grocery store that had a grand re-opening on August 3rd.

You can hear the city council and planning commission trying to explain possible ways that the parking lot could be developed without disrupting the grocery store from 27:00 to 31:00 of the November 9th meeting. They were discussing what they would say that HCD would find acceptable. It is pretty obvious that the owner is not themselves considering developing just the parking lot.

http://www.spectrumstream.com/streaming/south_pasadena/2022_11_09.cfm

How can you guys claim there is substantial evidence that the parking lot will be developed when it is clear from the meeting that the owner is not actually considering it??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store within the 6th Cycle. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 22, 2022)

For Site 14 the owner is getting a new foundation for one home and once that homes foundation is finished he is planning on moving on and doing the foundation of the second home. This site is 2 blocks from city hall. You guys can go down and see the Foundation Repair LA INC sign in front of 1508 El Centro right now. Attached to this e-mail is a picture of this sign if it doesn't make it into the comments section of the Housing Element.

How can you guys claim there is substantial evidence that the current use is being discontinued when the current owner of these single family homes is getting two new foundations at this time??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 14 has confirmed with the city that they are interested in redeveloping the site with multifamily housing.

Josh Albrektson (November 22, 2022)

802 Fair Oaks is the Fair-Hope building and is one of the few remaining early twentieth century structures in South Pasadena Fair Oaks Corridor. This is South Pasadena designated cultural heritage landmark number 49. Are you going to allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 802 Fair Oaks is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 802 Fair Oaks is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5308002059 this is a front yard and driveway

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002059 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following APNS do not exist in the Los Angeles County Records and if claims that homes could be built on them they should have APNs that actually exist:

5308023004

5317009909

5310034900

5310018903

5314017901

5314016044

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The APNs identified in this comment have been updated in the Housing Element to reflect the new APNs given to these parcels since the Housing Element was first drafted.

Josh Albrektson (November 22, 2022)

For APN 5311001018, at the Design review board meeting of Sept first a plan was approved for a new commercial building. This site is not eligible to be considered for housing.

https://www.southpasadenaca.gov/home/showpublisheddocument/30612/638000752592000000

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311001018 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following is a list of single family homes and duplexes that South Pasadena is claiming will be new housing in the 3rd Housing Element/Downtown Specific Plan. In every case you guys are claiming the homes would be torn down and replaced by a low income unit in this planning period without subtracting the original home from your calculations. Sometimes you guys have a duplex that would turn into one low income unit, which is a net -1 home.

You are required to subtract out the original housing and only claim NET housing for RHNA.

Single family homes

515 Mission st

519 Mission St

802 Orange Grove Ave

815 Magnolia

821 Magnolia

827 Magnolia

805 Prospect

700 Prospect

704 Prospect

909 Magnolia

913 Magnolia

806 Meridian

808 Meridian

810 Meridian

1007 Hope St

808 Fairview

806 Fairview

804 Fairview

1103 Hope st

1107 Hope St

1111 Hope St

803 ½ Fremont Ave

807 Fremont Ave

812 El Centro

1011 Mound Ave

825 Brent Ave

Duplexes

706 Prospect

521 Mission St

1115 Hope St

1117 Hope St

1123 Hope St

833 Brent Ave

817 Adelaine

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** All of these properties are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 23, 2022)

1100 El Centro is the South Pasadena Unified School District. They just purchased this building last year and moved all of their offices into this building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you talked to anybody at the school district?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1100 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1100 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5314018010 it is in the middle of the block and no access.

https://twitter.com/JalbyMD/status/1538994198770339843?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314018010 is a flag lot that has access to Bank Street.

Josh Albrektson (November 23, 2022)

1050 Fremont Ave is Calvary Presbeterian Church. It is one of the oldest churches in the city, at least 4 stories tall, and probably the best looking church in the city. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for

low income sites??? Have they talked to the church? It also has a preschool Monday to Friday which is one of the more popular pre-schools in the city but they are COVID deniers.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1050 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1050 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

The building at 1019 El Centro is the South Pasadena Bank Building. It is the first bank in the city and is South Pasadena designated cultural heritage landmark number 8. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1019 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1019 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For Site 16, Can you guys point to examples of grocery stores that have had their parking lot turned into housing while the grocery store remained open??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner for Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 23, 2022)

1023 Fair Oaks Ave is the historic Rialto Theater. It was built in 1925 and is one of the most historic theaters in San Gabriel Valley. There currently is a lease by Mosaic Church for another 20 years. It is South Pasadena designated cultural heritage landmark number 25. Would South Pasadena allow this historic theater to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1023 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1023 Fair Oaks Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5311010065 this is someones front yard

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311010065 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

1000 Mission Street is the Century House. It is also where Micheal Myers lived in the movie Halloween. It is the second oldest building In South Pasadena built in 1888 and was South Pasadena designated cultural heritage landmark number 34. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1000 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1000 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

1500 to 1518 Mission Street were all built over 100 years ago and considered to be part of the historic business district. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The buildings at 1500 to 1518 Mission Street are not a part of a designated historic district, although they are eligible to become part of a historic district. The buildings at 1500 to 1518 Mission Street are not identified sites for affordable housing production. The buildings at 1500 to 1518 Mission Street are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

For APN 5314016030, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314016030 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

815 Fairview is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 815 Fairview is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

For APN 5317011025, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317011025 has been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

For APNs 5308034018, 5308034018, and 5306006001, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034018, 5308034018, and 5306006001 have been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

1501 Mission Street was built in 1923 and is South Pasadena designated cultural heritage landmark number 37. What is the substantial evidence the current use will be discontinued as required for low income sites??? It also has an apartment on top and you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1501 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

804 to 810 fairview and 1103 to 1123 Hope street contained multiple single family homes and apartments. You are required to subtract the current unit count from any proposed unit count.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 804 to 810 Fairview and 1103 to 1123 Hope Street are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

954 Mission Street is the Mission Hotel and one of the oldest buildings and is considered historic by South Pasadena. It is South Pasadena City Landmark number 26. Is South Pasadena going to allow a

by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 954 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 954 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 25, 2022)

For Low Income site number 3 there are 8 above moderate income units. This is clearly stated on A1-15. There is a duplex on one APN, a duplex on one APN, and a 4 plex on the 4th APN. On Page 183 Table VI-50, instead of putting 2, 2, and 4 as the unit count for Site three, you guys put 8 on one APN and then claimed 7 and 14 low income units on the other APNS that you shouldn't be able to claim. So there are actually 21 low income units you are claiming on Site 3 that you cannot claim. Please remove these 21 units from your calculations.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Table VI-50 has been updated to correct reflect what is shown in Appendix A.

Josh Albrektson (November 26, 2022)

1001 Fremont Ave is the South Pasadena Post Office. It is a historic building and the main Post Office of South Pasadena that includes all sorting for delivered mail. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you guys talked to anybody at the United States Postal Service??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1001 Fremont Ave is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 26, 2022)

For APN 5320018022 this is a silver of land with a homes garden on it.

https://twitter.com/JalbyMD/status/1538998300530970626?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320018022 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

820 Mission street is a group of Condos that were built in 2017. You actually site them as representative examples of recent building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** See discussion of 820 Mission Street in response to comment dated November 22, 2022.

Josh Albrektson (November 26, 2022)

For APN 5311017018, there is half a home on the land

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311017018 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5320030038, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320030038 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5311006068 there is a home on the land

https://www.redfin.com/CA/South-Pasadena/1250-Oak-Hill-Ave-91030/home/7003471

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311006068 has been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

For the following APNs there is no street access:

5311010028

5311010029

5311010030

5311010033

5311010034

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As noted in Notes 3 to Table VI-44, These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Josh Albrektson (November 27, 2022)

For APNs 5308034017 and 5308034003 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034017 and 5308034003 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

913 Meridian Street is the historic Meridian Iron Works Building. It was a Japanese history museum but when South Pasadena kicked their Japanese residents out of the city in 1942 it was confiscated. It is now the home of the South Pasadena Preservation Foundation. It was built in 1887 and is City Landmark number 5. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued as required for a low income site?? Will South Pasadena allow it to be torn down?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 913 Meridian Street is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 27, 2022)

For APNs 5312016016 and 5308021009, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5312016016 and 5308021009 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

920 Fremont Ave is Grace Brethren Church. The building was built in 1907 and is City Landmark number 22. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites??? Have they talked to the church?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 920 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 920 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 27, 2022)

Baranger Studios at 729 Mission St is one of the oldest buildings in South Pasadena and considered Historic by South Pasadena standards. It is South Pasadena designated cultural heritage landmark number 27. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://www.pasadenanow.com/weekendr/historic-iconic-baranger-studios-building-in-south-pasadena-is-sold-for-6-8-million/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 729 Mission St is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 729 Mission St is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

812 Fremont is a 3 story condo complex. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Fremont Avenue is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308002064, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002064 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5317009903, the actual APN is 5317009033 and this is someone's garden.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317009903 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

824 FairOaks is the Comerica Bank Building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 824 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 824 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

For APN 5308022009, there is a home on the land (real APN of 5308022043

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308022009 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5312031029 there is a home on the land

https://www.redfin.com/CA/SOUTH-PASADENA/20-SHORT-WAY-ST-91030/home/7004227

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5312031029 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308019034 this has a home and backyard on it

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308019034 is a developable lot between two existing homes. Currently it contains a patio structure for one of the neighboring homes.

Josh Albrektson (November 28, 2022)

812 Orange Grove, 810 Orange Grove and 802 Orange Grove are all 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are not identified sites for affordable housing production. 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period. The Downtown Specific Plan will allow for heights at least six stories or 60 feet, in accordance with Program 2.n.

Josh Albrektson (November 28, 2022)

For Low income site number 12 the city only owns 0.19 acres (35%) of the site. This is not large enough for a low income site. If the city does not have ownership of the whole site by Jan first, 2026, would it be willing to remove it as a low income site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Program 3.o requires the City to evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites no later than December 31, 2024 and December 31, 2026. Site 12 will be part of this review and evaluation.

Josh Albrektson (November 28, 2022)

The block surrounded by Meridian, El Centro, Diamond, and Mission street is a national historic district and has been since 1983. These buildings cannot be torn down.

https://catalog.archives.gov/id/123859524

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** While some of the building on this block are identified in the National Registrar of Historic Places with local historic significance, some of the buildings in this block have been deemed to not contribute to the historic character of the district. Furthermore, buildings identified as historic identified in the National Registrar of Historic Places can be adaptively reused (see Program 3.b) and added on to so long as the character defining features of the existing structures remain.

Josh Albrektson (November 28, 2022)

1200 Fair Oaks is an Arco station that was recently sold. In the listing brochure it mentioned that Arco has a 15 year lease on the property. What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1200 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1200 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308034016 and 5308021008 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034016 and 5308021008 have been removed from the Housing Element.

Josh Albrektson (November 29, 2022)

700 Orange Grove Ave is a 3 story apartment building. You guys are claiming there is a chance that this 3 story apartment building might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to comment dated November 21, 2022, 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The

possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308002072, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002072 is a buildable lot that has existing driveway access through APN 5308002060.

Josh Albrektson (November 29, 2022)

The former bank at 901 Fair Oaks Ave just underwent an extensive renovation changing it from a Bank to 5 commercial units including Chiptole and Habit Burger (which I eat at 4 times a week). An ATT store just opened and Rice and Nuri is about to open in the next couple of months. What is the substantial evidence the current use will be discontinued as required for low income sites???

https://southpasadenan.com/fairoaksmission-project-chipotle-coming-to-south-pasadena/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 901 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 901 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

Lewis Markey building at 634 Mission Street is the South Pasadena designated cultural heritage landmark number 31. It was built in 1928 and was designated a landmark 35 years ago. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://calisphere.org/item/e5794b9f06005a528fedab717bb7332b/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 634 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 634 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

The Trader Joes at 613 Mission is the second Trader Joes in history. It is also one of the most active grocery stores in the city. What is the substantial evidence the current use will be discontinued as required for low income sites??? And you also removed this site in previous drafts because you didn't believe the current use would turn over.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 613 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 613 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

For Low Income Site number 8 you describe an underground gasoline tank and soil contamination. How much would it actually cost to remediate the site?? Can you find costs or similar sites that have been used for housing?? And there is no 0.71 acres of extra land in South Pasadena that the public works yard could be moved to. Is South Pasadena willing to state that there will be a RFP issued by Jan first, 2025 and if there is no plans for housing by Jan 2026 than the site would be removed as a possible site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Appendix A has been revised with additional information regarding the environmental constraints for Site 8. Program 3.o has been modified to require the City to "evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites" no later than December 31, 2024 and December 31, 2026.

Josh Albrektson (November 30, 2022)

For APNs 5311010027 and 5308006024 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5311010027 and 5308006024 have been removed from the Housing Element.

Josh Albrektson (November 30, 2022)

For Low income site Number 2 there is a claim that Bullseye Glass and Judson studios are relatively new tenants. If you label the 6 buildings from west to east, these are buildings 1 and 2.

Those Bullseye and Judson have been there since November 2016 as shown in this google image:

https://goo.gl/maps/s95ehqP1Z7uUU8ZBA

It is actually the entire second floor of building number 3 and the entire building number 5 that just were leased in the past year to Yellow Pike Media and Elementary. How can you guys claim there is substantial evidence that the current uses will be discontinued when there were just new leases signed at the site??

Loopnet Brochure for the listings for buildings 3 and 5.

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As stated in Appendix A, Site 2 is an under-utilized commercial building that will be redesignated as mixed-use. The land owner has expressed interest in redeveloping the site under the new land use, once adopted.

Josh Albrektson (November 30, 2022)

707 to 809 Meridian is a 3 story condo complex built in 2006. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 707 to 809 Meridian is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 707 to 809 Meridian is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

1124 Fair Oaks Ave is a 3 story Freemason building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1124 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1124 Fair Oaks Ave is a part of the

Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Sam Shink, The Albertsons Companies (December 1, 2022)

Albertsons Companies

WRITER'S TELEPHONE NUMBER: (714) 300-6727
WRITER'S E-MAIL: SAM.SHINK1@SAFEWAY.COM

December 1, 2022

Angelica Frausto-Lupo
Community Development Director
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Via Hand Delivery

Subject: Pavilions #2228; 1213 South Fair Oaks Avenue, South Pasadena

Dear Ms. Frausto-Lupo:

I am writing in response to your request related to the City's draft General Plan Housing Element to advise you that ACI, parent company of Pavilions, is considering redevelopment of the subject property sometime prior to 2029. The plans being considered include redevelopment of the entire site and would consist of a new store, residential uses, and parking. We look forward to continuing to serve the residents of South Pasadena.

Very truly yours,

SAM SHINK
Director of Real Estate

letter to city of SP regarding redevelopment plans

Working together to be the *favorite local supermarket*™

Amigos · United Express · Randalls · Albertsons · SAFEWAY · Tom Thumb · PAVILIONS · shaw's · ACME · star · CARRS · Market Street · VONS · Jewel-Osco · United supermarkets · Lucky · Albertsons market · Super Saver

- **How addressed:** Appendix A has been updated with additional information from property owner.

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

Program 1.b. - Convert Caltrans Homes to Affordable Housing

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** As detailed in Program 1.b, the City is complying with the acquisition process authorized by SB 381 for the acquisition of the surplus Caltrans properties. The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

Comments on the Public Review 4th Draft Housing Element

Josh Albrektson (December 5, 2022)

Page A1-11 has an outdated picture

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Josh Albrektson MD

Neuroradiologist by night

Appendix B

Crime fighter by day

- **How addressed:** The map on page A1-11 has been updated.

Josh Albrektson (December 5, 2022)

The following APNS you are claiming 100% chance of 100% development in the downtown specific plans, including the Mission Meridian condos:

Page 187, the condos behind the post office you are claiming 22 condos will turn into 22 low income units

5315007055

The following 3 are the mission meridian Condos that you are claiming a 1 for 1 replacement with low income units.

Page 190

5315021051

Page 193

5315021008

5315021031

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to the comment dated November 22, 2022 regarding these same parcels, each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element..

Delaine Shane (December 6, 2022)

To the Housing Element Consultant and City Management:

Enclosed are my comments pertaining to the red-lined version of the Draft Housing Element, Version 4. Frankly, I didn't read your recent document—just skimmed it. No realistic time was given to us to allow for a thoughtful read through. In addition, while I appreciated the City's turnout at our most

recent walk through in the Meridian neighborhood that has several of the vacant Caltrans properties, having the Consultant snap a picture of us and marking that check box as being part of public engagement is a false narrative.

A mindset at City Hall continues to exist, as exhibited in this draft document, that the non-legislative alternative to SB 381 and the Caltrans properties is either non-existent or illegal. It is NOT illegal. I and others have already provided you with information readily available on the internet that it has been done and can be done in California by government entities.

Nothing in Caltrans' regulations prevents that agency from implementing the non-legislative alternative that the South Pasadena Preservation Foundation has so clearly prepared and presented to the City on numerous occasions. Just because Caltrans says NO? So, why aren't our City officials meeting with our state legislators to convince Caltrans otherwise? This wouldn't be the first time that Caltrans is misusing its powers to the detriment of our community. I and my neighbors expect that our City management and Consultant support us and not dictate a choice that they themselves would not appreciate if they lived in our community.

All we want are for the vacant properties to be sold to qualified buyers (be they present/former Caltrans tenants or other qualified buyers) who will fix up their homes, live in them, pay their fair share of property taxes, and contribute to our wonderful and diverse neighborhood. This can still happen if the Housing Element is revised to include the very viable non-legislative alternative to SB 381, i.e., side-by-side escrow agreements. These properties were what the Freeway Fighters were fighting to preserve for over 60 years. It would be a harsh and cruel irony if the houses were torn down not by Caltrans but by the City or its designees (HREs).

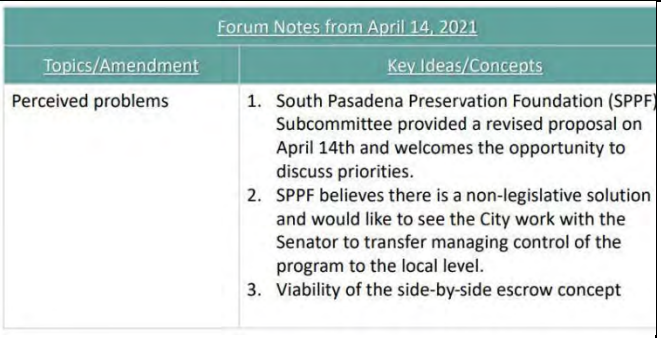
Sincerely,

Delaine Shane

2003 Meridian Avenue

[Continued on next page]

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
1	2-3	"SB 381 requires that Caltrans offer unoccupied homes for sale to the City of South Pasadena. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE)."	This statement does not include the non-legislative approach on the disposition of vacant Caltrans housing that the South Pasadena Preservation Plan (SPPP) has been presenting to the City of South Pasadena (City). That is, the more efficient, economic, and expeditious process of side-by-side escrow agreements for unoccupied homes. Yes, this section of the Housing Element is on legislation; however, MANY discussions between the City and the public also concerned a parallel track involving a viable non-legislative track in conjunction with SB 381. The City did agree to consider this non-legislative approach during previous discussions between the City Council and Ad Hoc Committees. This process is legal and is done by other governmental entities. If Caltrans is not interested in such an approach, why isn't our City Council seeking relief on this matter with our newly elected State Assembly Member Michael Fong or other prominent state legislators? Getting entangled in a large real estate portfolio and process could result in the City Council not meeting its other mandates to its residents. As a reminder, here is a slide from the City Council Agenda, Item No. 14, July 21, 2021 (though I vehemently disagree that this is a "perceived problem"):	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do no exist under existing law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			 Forum Notes from April 14, 2021 Topics/Amendment: Perceived problems Key Ideas/Concepts: 1. South Pasadena Preservation Foundation (SPPF) Subcommittee provided a revised proposal on April 14th and welcomes the opportunity to discuss priorities. 2. SPPF believes there is a non-legislative solution and would like to see the City work with the Senator to transfer managing control of the program to the local level. 3. Viability of the side-by-side escrow concept The City should behave as a pass through to allow current/former tenants and/or qualified home buyers and not get into the real estate developer's market nor sell to HREs. Our community want the homes to be returned to homeowners that meet the criteria of the Roberti Act so that these properties return to the tax roll. Sixty plus years of these Caltrans homes have yielded NO PROPERTY TAXES! It is time for this situation to be changed by relying on side-by-side escrows. THEY ARE NOT ILLEGAL!!! Specific text should be added to the fourth version of the Housing Element that includes the option of side-by-side escrows.	
2	3	"AB 2011, the Affordable Housing and High Road Jobs Act of 2022, was signed into law on September 28, 2022. AB 2011 allows for ministerial, by-right approval of affordable housing on commercially-zoned lands, and allows for mixed-income	How does the City intend to be a good steward of our precious historic resources in light of AB 2011? What protections will there be for the City's approved historic landmarks and potentially historic structures have in commercially zoned lands? It is difficult to view specifics in Appendix A as to which structures would fall under AB 2011, but I have been told that the Kaldi's Coffee building could	AB 2011 does not apply to projects where, "the development would require the demolition of a historic structure that was placed on a national, state, or local historic register."

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		housing along commercial corridors so long as the project meets certain labor and environmental criteria."	be vulnerable to being torn down. This is the City's first bank and still retains its integrity, association, and context from a historic perspective. Does that mean that many of our landmarks whether on the City's list or not, can be destroyed? Also, what is meant specifically by the phrase "…certain labor and environmental criteria?' This is a legal document and one which will be available to the public. The residents do not necessarily have the time or the opportunity to cross check AB 2011 with other documents to understand what this means or what the ramifications are for them and for the City.	
3	5	Program 1.b - Convert Caltrans Homes to Affordable Housing "The California Department of Transportation (Caltrans) is obligated by State law to offer unoccupied Caltrans-owned surplus residential properties located in South Pasadena for sale to the City of South Pasadena. The City has expressed interest to Caltrans in purchasing these twenty (20) unoccupied surplus properties through this State program, which contain twenty-two (22)	Please clarify the text -- will this conversion program result in rental property or home ownership? My neighbors and I support affordable home ownership for these vacant homes where the owners will fix the houses up and live in them and contribute to the well being of our neighborhood, which is quite diversified. The homeowners, like us, will then be paying property taxes. Currently, Caltrans pays zero in property taxes. The vast numbers of these vacant houses are in the southwestern portion of the City. If they go to HREs, then the houses will continue to not be on the tax rolls. The neighborhood will continue to be disproportionately impacted due to the legacy of the SR 710 Extension Project.	These decisions regarding whether the homes will be for-sale or rental, or whether an HRE will be involved in the renovation or other aspects of the project, have not been made by the City at this time.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		housing units. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on these surplus properties ensuring that they are made available for purchase by moderate-income households or for rent to lower income households to moderate or lower income households. Through this Program, if economically feasible, the City will preserve and rehabilitate these properties, and make them available to moderate and lower income households."	This program is biased and not equitable where affordable housing should be distributed throughout the City. The City Council has already approved several large mixed-use developments with NO affordable units (except for Mr. Odom Stamp's project at 625 S. Fair Oaks Avenue). Yet, these Caltrans homes that have been allowed to deteriorate over the decades are being considered as affordable rentals rather than as affordable home ownership that will put these properties back on the tax roll. The City should NOT be involved with rehabilitating these homes. Our streets have not been paved for decades, the failing West Side Reservoir is a human disaster waiting to happen, we don't have decent street lighting, we deal with speeders that don't even live in our neighborhoods but wear out our pot-holed and ever deepening cracks (which in turn will impact existing substructures embedded below the streets), etc. How can the City consider funding this program through the General Funds or relying on HREs? Why not provide the residents who live here now with the services that we deserve. As mentioned in Comment No. 1, the City should employ the non-legislative approach, i.e., the side-by-side escrow agreements. The City has had issues with HREs in the past who don't take responsibility in managing their properties, not to mention the loss in tax revenues to the state and City. There is also nothing	

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			mentioned about providing security of the Caltrans houses between the times of the purchases by the City and the properties eventual sales. We have been living in fear with the brazenness of squatters and more importantly the danger that these decrepit houses pose, including faulty electrical wiring, mold, asbestos, sewage spills/leaks, etc. that could be released should the squatters inadvertently initiate a catastrophic event. Our houses are so close together that we fear our homes would suffer whatever happens to the nearby Caltrans homes caused by squatters. There is nothing here in this document that alleviates our concerns about our safety.	
4	62	"Development may have also been hindered by the City's decades-long struggle to reverse the planned 71 Freeway extension, which was finally cancelled by Caltrans."	The "71 Freeway"? I've noticed a lot of spelling errors throughout the document. We are paying the consultants a lot of money to write properly. "Cancelled by" Caltrans? A number of individuals, organizations, and municipalities rose up and fought against this useless project and Caltrans for decades. This statement makes it seem as if Caltrans just changed its mind. Revise this statement to interject reality and accuracy.	The identified typo has been corrected.
5	63	"These incentives include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects."	The author was originally correct by stating "concessions" rather than the revision to "incentives." What are the eligible residential projects? List specifics and how much is the City giving away to the developers? Will there be any yards in the future for new housing? Where will the cars be parked since most residents will still be using their own transportation, whether gas powered or	The identified changes to development standards are incentives for projects to include affordable units. These incentives are required by State law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			electric powered? How tall will the height increases be? Does our Fire Department have the capability to put out fires on high rise buildings?	
6	209	"Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. "Funding has been secured for a feasibility study on	Same comment as in Comment No. 1. No mention about the non-legislative and legitimate approach of relying on side-by-side escrow agreements. And just what will the Housing Division do when "administrating affording housing?" Will the City or its designee, an HRE, manage the affordable units, collect the rent, and maintain the units? How can that be when so much of our neighborhood needs vital services and maintenance activities now? The City is not qualified to handle this major endeavor and to pass it to an HRE will just be a repeat of Caltrans' past behavior.	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do not exist under existing law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H)."		
7	219-220	Discussion related to Program 1.b - Convert Caltrans Homes to Affordable Housing	Same comment as Comment No. 3. Security costs will be excessive with respect to the program and to date those costs have not been estimated. Occupancy by October 2024 is also overly optimistic. Given the bureaucratic processes of both agencies, the costs and distribution of supplies and equipment, labor availability, the unanticipated repairs that are yet to be discovered until rehabilitation occurs, and the requirement that if HREs are involved that they can pay prevailing labor wages is naïve thinking at best when dealing with renovation projects of this magnitude. Selling these properties immediately in side-by-side escrows will substantially alleviate the risks to the City and will enable the City to focus on existing and urgent City matters and services. As yet again a reminder, just look at the snail's pace of the City in turning two vacant former Caltrans lots into pocket parks. Several years have passed and the City is still working with designers/engineers with no results at this time. Imagine if security was focused on those sites? Such costs would be astronomical.	The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

South Pasadena Tenants Union and Care First (December 8, 2022)

City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

CC: California Housing and Community Development
Paul.McDougall@hcd.ca.gov
Connor.finney@hcd.ca.gov

Regarding: South Pasadena Housing Element, Fourth Draft

Dear Ms. Frausto-Lupo,

Care First South Pasadena and the South Pasadena Tenants Union write jointly to provide feedback about South Pasadena's third draft of the Housing Element.

Executive Summary

- South Pasadena should develop affordable housing throughout the City to create income diverse neighborhoods and promote fair housing. We want the City to:
  - Use the 20 vacant Caltrans house sites,[1] which the City will purchase in the coming months, to develop a blend of duplexes, triplexes, quads, and denser multi unit buildings for affordable ownership and rental opportunities. A number of the vacant houses are 0.25-0.50 acres and could accommodate multi-unit development.
  - Pilot an affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus).
  - Recruit 100% affordable developments through non-profit low-income housing developers, identify at least four (4) viable locations for 100% affordable developments, and identify potential financial and regulatory incentives the city could offer such developers.
- South Pasadena should take more steps to support and protect renters and maintain availability of existing below-market units, including:
  - Enact an urgency ordinance before January 1, 2023 to amend South Pasadena's no-cause eviction ordinance to require landlords to pay tenants increased relocation assistance if they are being evicted.
  - Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent.
  - Enact a rent control ordinance.
  - Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

I. Promoting Affordable and Fair Housing Development

The Housing Element determined that the City's "prior race and ethnicbased socio-economic discrimination had a long-term impact on racial diversity in the City" which is only 3.6% Black or African

[1] For a sites inventory of the vacant Caltrans properties, see a map we created at https://www.google.com/maps/d/viewer?mid=1nt13dEdP-7ddQxN85ewo35xhQEKD-kc&ll=34.11207520783854%2C-118.1570014&z=15 (last updated Dec. 7, 2012).

American and only 18.5% Latinx. (Redline of Fourth Draft Housing Element at 39). Limiting multifamily development has made South Pasadena unaffordable, which contributes to the City's lack of diversity. Zoning data from August 2021 revealed that approximately 75% of all residentially zoned land in South Pasadena is zoned exclusively for one or two dwelling units per parcel that do not allow for higher density housing such as apartments or condominiums (Id. at 104). Jurisdictions with the highest proportion of exclusively single-family zoning have the highest percentage of White residents and lower rates of diversity generally. (Id.).

During the last housing element cycle, only 10 affordable units were permitted out of 93 new units. The City has not tracked whether any affordable units have, in fact, been developed.

Despite these deeply concerning data, the City's Fourth Draft Housing Element falls far short of what is needed.

Vacant Caltrans Houses. Under SB 381, the City will soon acquire 20 vacant houses currently owned by Caltrans.[2] The houses are dilapidated from years of vacancy and lack of maintenance. They are in residentially-zoned areas. Under SB 381, the houses must become deed-restricted affordable housing for low- or moderate-income people for a period of 45 or 55 years, depending upon whether they become owner occupied housing units or rental units, respectively.

The vacant Caltrans houses represent a monumental opportunity for South Pasadena to expand affordable multifamily housing in South Pasadena, yet they are scarcely mentioned in the Housing Element. The City proposes Program 1b to "preserve and rehabilitate" the vacant houses and make them "available to moderate or lower income households." This program was modified from the Third Draft, but in the wrong direction by committing to "preserve and rehabilitate" the houses.[3]

Care First and the Tenants Union implore the City to:

- Add the vacant Caltrans houses to the site inventory, including data regarding the lot size, year constructed, and historic designation (or not), and maximum potential number of affordable units that could be made available at each site for rental and/or ownership.[4]
- Upzone residentially zoned areas in South Pasadena, including along the 710 corridor, to accommodate denser housing.
- Implement SB 9 and SB 10 at the vacant Caltrans sites by clearing a path for multifamily housing in the form of duplexes, triplexes, quads, and 10-unit buildings where possible.[5]

[2] Following this first phase of acquisition, the City will likely have future opportunities to purchase more Caltrans homes if they are refused by current occupants. To prepare for this near future, the City should apply a similar framework as we propose here for the conversion of these properties into multi-unit affordable housing, while preventing displacement or meeting the housing needs of current tenants. The City should account for these plans in the Housing Element.

[3] The significance of this change, though seemingly minor, is that the South Pasadena Preservation Foundation has been lobbying the City to bypass SB 381 and sell all 20 vacant Caltrans properties at fair market value to private buyers who would restore them as single-family houses. At a City Council meeting on December 7, 2022, the Chair of the City's Cultural Heritage Commission told the City Council that he has petitioned to add all the Caltrans houses to the national historic registry. The City Council is capitulating to the demand that it "preserve and rehabilitate" the houses. The vacant houses are dilapidated; each will cost hundreds of thousands of dollars to restore. In other words, these houses are teardowns but for the primacy of "historic preservation" in our town. We recognize that South Pasadena is home to beautiful architecture. But valuing historic preservation above all else is backward in the midst of a severe housing crisis.

[4] Given that the City has included a number of non-vacant sites in its sites inventory, it follows that the City should add the tenant-occupied Caltrans houses to its sites inventory as well as potential sites for affordable housing development.

[5] The Housing Element claims that South Pasadena is built out, and that "[i]t is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local

- Develop auxiliary dwelling units as affordable rental units at as many of the houses as possible.

We ask the City to explore denser development with the larger houses, such as:

- 535 Meridian St. (21,920 sq. ft., ~ 0.5 acres),
- 530 Orange Grove Ave. (7500 sq. ft.) and 534 Orange Grove Ave. (10,010 sq. ft.) (adjacent parcels that represent 17,510 sq. ft., ~0.40 acres),
- 1131 Columbia St. (16,998 sq. ft., ~ 0.39 acres),
- 529 Prospect Ave. (15,419 sq. ft., ~0.35 acres),
- 540 Prospect Ave. (11,505 sq. ft., ~0.26 acres),
- 217 Fremont St. (13,310 sq. ft., ~0.31 acres)
- 216 Fairview Ave. (13,240 sq. ft., ~0.30 acres),
- 1110 Glendon Way (11,250 sq. ft,. ~0.26 acres).

Compare these lot sizes to the lot sizes in Table VI-49 (at 182), Representative Projects on Small Sites in Region. In Pasadena and Santa Monica, developments on comparable lots accommodate 15-53 units. Conservatively assuming 20 units per parcel on the large lots listed above, **the City could add 160 affordable rental units on these parcels alone.**

The Fourth Draft Housing Element slates virtually all of the housing affordable to very low- and low-income people in areas zoned as Business Park, Commercial, Community Facilities, Mission Street zoning areas save for one site in the Estate and Very Low Density Residential area (335 Monterey Rd.). (Table VI-50).

The Housing Element's allocation of all low-income housing to transit corridors, outside of residential single-family neighborhoods, does not comply with principles of fair housing. Concentrating dense low-income housing in certain limited areas is antithetical to affirmatively furthering fair housing. It undermines meaningful housing integration in this exclusionary town. The City should rezone single-family areas within the City, including along the 710 freeway corridor, to allow for more affordable housing. The vacant Caltrans houses could provide housing to low-income people within single-family home residential areas, and further the City's goal of creating income-diverse neighborhoods.

SB 381 allows the City to sell seven (7) houses designated as historic "as-is" at market rate to private buyers, so long as it uses the funds to develop affordable housing at a 3:1 ratio. The City **should not** opt for this route. There is no scarcity of large estate houses in South Pasadena. There is an acute shortage of affordable housing. The City should develop multi-unit housing on the historic and non-historic Caltrans parcels alike.

If the City does sell the historic houses, the **Housing Element should reflect its plans to commence construction of affordable units *within three years*, as required by statute**. As evidenced in this draft of the Housing Element, the City is short on available sites for affordable housing development and has identified no potential affordable housing projects that will start or be completed within this short time frame. The Housing Element should identify where those units will go, how they will be financed, what type of housing it will build, etc.

No matter what, the City should not aim to "preserve and rehabilitate" these homes by pursuing historic designation of new properties. These were strategies used once to prevent the building of the 710

codes." (143). But South Pasadena is in the driver's seat regarding these 20 properties. It must start leading on implementing the state laws rather than passively wait to see what homeowners do.

freeway, which is no longer at issue. Historic designation, starting with the commencement of nomination to historic and endangered listings, is antithetical to affirmatively furthering fair housing in South Pasadena. Historic designation of homes would make them unaffordable and environmentally unsustainable to maintain, cementing the city's 20th century redlining policies into the future.

South Pasadena must complete another draft Housing Element that fully accounts for the vacant Caltrans houses it will buy in the near future, with concrete proposals about how to use these parcels to expand affordable housing. Since the City intends to purchase the vacant homes in the coming months, thus making these City owned properties, we expect to see these parcels listed on the Inventory Site list in the next draft.

100% Affordable Developments. Care First urges the city to actively recruit 100% affordable developments through non-profit low-income housing developers (i.e. bolster its commitment to Program 2.h).[6] We recognize that the City has identified two City-owned sites (9 and 14) as candidates for 100% affordable. (229 & Table VI-50). We propose that the City Council double down on its efforts to identify two more viable locations for a total of four (4) for 100% affordable developments, excluding the Caltrans properties discussed above (which are all slated for affordable housing anyway by statute). Additional sites should be for very low, low and moderate income households combined and provide housing opportunities for families.

Auxiliary Dwelling Units. The Housing Element relies heavily on ADUs to create affordable housing and to further fair housing. But the evidence is thin that encouraging ADUs will be anywhere close to sufficient.

South Pasadena has no system in place to ensure that the ADUs it permits actually become rental units, much less affordable ones. The code states that ADUs are not to be rented for a period less than 30 days, but the City currently has no enforcement mechanism in place to monitor the use of ADUs.[7] It is just as likely that ADUs will become short term rentals listed on apps like airbnb, home offices, and guest houses for visitors. The existing ordinance does not go far enough to ensure homeowners who take advantage of a program designed to increase housing opportunities for those who need housing are using the dwelling as intended by the spirit of State law

Even when ADUs are rented, the data emerging so far suggests that these units are not affordable. (176). Finally, the whole endeavor relies on homeowners investing large sums of money to build these ADUs. Rising inflation may dampen ADU construction.

We recommend that the City pilot an affordable ADU program, like Backyard Homes in Los Angeles. Affordable ADU programs offer free or heavily discounted ADUs to homeowners in exchange for covenants to charge below-market rental rates. The Backyard Homes project, run through LA Mas, offers a few model ADU options and charge discounted construction and design fees in exchange for

[6] The city's previous position was that it would simply work within the San Gabriel Valley Housing Trust to build affordable housing in the region. Care First is encouraged to see that the third draft of the housing element takes a more proactive approach.

[7] It is common for short term rental operators in our city to rent their units for two months at a time. While that complies with the letter of the code, the owners are benefiting financially via an unlicensed commercial short term rental at market rates.

renting to a Section 8 voucher holder.[8] Piloting an innovative model like that could spur ADU construction and support affordable housing and income-diverse neighborhoods.

II. Protections for renters

South Pasadena residents are more than 50% renters. Renters account for most of the demographic and economic diversity in South Pasadena. More than two-thirds of renter-households are rent-burdened, with 64% spending more than 30% of their household income for housing.

The Housing Element sets conservation of existing housing stock as a prominent goal, and contains some general provisions aimed at protecting renters. (220). But monitoring affordable units, offering technical assistance to landlords, and vague commitments to vouchers will not be enough to prevent dislocation and erosion of existing below-market rental units. (220-221). **The City cannot accomplish a goal of preventing tenant displacement without enacting more tenant protections**. Currently, South Pasadena relies almost entirely on Statewide protections set in AB1482. These have proven not to go far enough in protecting tenants from evictions or self evictions due to unbearable rent increases due to current inflation.

The landlords and homeowners have "rent control." When they buy the apartments, the mortgage payment they pay is set for 30 years. It does not change even if inflation happens. Renters are demanding, not even the same stability, just something where their rent remains close to inflation, and the right to stay in their home if they pay their rent.

Landlords are making massive profits on rent. Most "mom and pop" landlords in South Pasadena purchased their apartments 20 to 30 years ago. Over the past year, 13 apartment buildings have sold in South Pasadena at an average of $1.6 million. Meanwhile, the average original purchase price of these 13 apartments was $256,000. Most "mom and pop" landlords are realizing massive profits off people struggling to stay in South Pasadena.

Renters love South Pasadena and want to make it their home just like homeowners. Tenants have a right to be a part of this long-term community and not have to worry if the housing crisis means someone richer will take their place.

No cause eviction protections. South Pasadena Tenants Union and Care First South Pasadena request an urgency ordinance to stem the tide of no-cause evictions expected in early 2023. Building on the progress advocates made with its just cause eviction ordinance in 2019 and its substantial renovations ordinance in 2021, we ask that the City update the law to require landlords effectuating no-cause evictions to provide relocation assistance that goes beyond AB1482.

The relocation amount should be equal to two (2) times the daily pro-rata portion of the tenant's current rent. All units removed for owner occupancy must be held off the market for no less than three years. If an owner evicts a tenant for no-cause because that unit will be taken off the market for owner occupancy, the owner must register the unit with the City as "owner occupied." If the owner violates the ordinance and puts the unit back on the market within the three year period, a $50,000 fine will be levied. Funds collected from fines would support Housing department staff and enforcement staff.

[8] Sam Lubell, Los Angeles Times, March 5, 2021, "Well-designed rentals that L.A. can afford. That's the mission of the Backyard Homes Project." https://www.latimes.com/entertainment-arts/story/2021-03-05/backyard-homes-project-adu-los-angeles

For evictions due to justified substantial renovations, the ordinance should include a first right of return for tenants who do not want to relocate out of South Pasadena. The owner should cover the rent or cost of housing during renovation up to what the tenant was paying for rent at the unit undergoing renovation. The tenant should be allowed to return to the unit at the same rate as was being charged prior to renovation. If temporary relocation due to verified substantial renovation exceeds 120 days, the landlord may terminate the tenancy with the additional payment of relocation assistance as follows: (1) 2.5 times the monthly Fair Market Rent (published by HUD) plus (2) a Moving Expense Allowance of $1,338 (if all occupants are adults) or $4033 (if any of the occupants are minors, a senior, or a person with a disability.

These protections would provide much more support to South Pasadena renters than the municipal code currently provides, and prevent displacement.

Rental assistance. The City currently allocates its CDBG funding to meals on wheels for seniors and sidewalk repairs. We demand that the City initiate a rental assistance program with some of the CDBG funding plus allocate yearly amounts from its General Fund to provide low- and moderate-income residents and prospective tenants to pay security deposits and rent. The program should also offer rental assistance to moderate-income rent-burdened residents. Additionally, the City should pay partial rent for Section 8 voucher holders to make up the difference between rent and the voucher. Because many Section 8 voucher holders in Los Angeles County are unable to secure housing in time and lose their vouchers as a result, the City should help ameliorate this problem by incentivizing and assisting landlords within the City to join the Section 8 program. At present, there is an abysmally low number of Section 8 voucher holders residing in the city (10 total according to the Housing Element). Referring residents to the County (224-25) will not help anyone get into affordable housing when there are no voucher-accepting units in South Pasadena.

Rent control. The City should adopt a rent stabilization ordinance. A local rent control ordinance would give low income and moderate income families, seniors, the disabled and students and workers a fighting chance to stay in South Pasadena. The bleeding out of affordable existing rentals is gradually affecting the diversity of our schools, local culture and economics. South Pasadena being almost an exclusively high rent community, means more transient households that are less likely to support our community health through civic participation and investment in our churches, nonprofits, and schools. With a lack of enthusiasm for building new affordable housing, the City needs do more to maintain the little existing affordable housing we have and protect all tenants from further displacement because of ever increasing rents and cost of living that does not mirror increases in incomes.

This would include, but not be limited to, provisions such as limiting rent increases to no more than 2-6% based on inflation, with the ceiling set at 6%. The ordinance would maintain a floor of 2% allowable regardless of percentage of inflation. If inflation is 1%, rent can be raised 2% The ordinance would apply to all buildings as allowed under Costa Hawkins. If Costa Hawkins is repealed or modified to allow newer buildings, then rent control in South Pasadena automatically applies 20 years after certificate of occupancy.

The ordinance would require a lease term of one year (12 months), and 60-day notices for rent increases. If a unit become available due to an eviction, rent on the unit can only be raised up to 20% of what the landlord was charging the previous tenant. The ordinance should also include the establishment of a local rent control board to establish yearly rent increases, monitor enforcement, and adjudicate tenant and landlord disputes, among other duties

Funding improvements in exchange for affordability covenants. Policies 1.1-1.3 in the Housing Element are focused on improving energy efficiency and bringing older housing units up to code (218). There is a real risk, however, that requiring owners to make financial investments to update older units will result in rent increases, evictions for substantial renovation, and dislocation of low- and moderate income renters in South Pasadena.

We ask that the City provide funding to make needed improvements to make housing units habitable and safe for tenants contingent upon the landlords' covenants not to evict tenants or raise rents excessively once the units are improved. The City has already identified potential funding sources for such improvements. (220).

Thank you for the opportunity to provide feedback. We look forward to participating in the process as it proceeds.

Best regards,

South Pasadena Tenants Union & Care First South Pasadena

- **How addressed:** The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time. It is the intention of the City to preserve these homes as affordable housing, not as historic resources. The Housing Element has been updated to more clearly make this point.

The Housing Element focuses on encouraging the development of new housing throughout South Pasadena. It is anticipated that sufficient new housing will improve the housing market for both renters and buyers looking to live in South Pasadena.

As shown in Program 2.l, the City has committed to issuing an RFP to affordable housing developers for one of the city-owned affordable housing sites no later than December 2024, and other RFPs in 2026 for the development of housing on these city-owned site.

Program 3.g commits the city to monitor the ~~numberof~~number of ADUs built, and to survey ADU owners annually to collect data on rental rates to determine how many moderate- and lower-income units have been produced. ~~Progarm~~Program 3.h commits the city to modify its zoning code or identify additional affordable housing sites if it is determined that the affordability of ADUs is less than expected in the Housing Element. This survey is scheduled to begin in 2023.

Comments on the 4th Draft Housing Element

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

Program 1.b. - Convert Caltrans Homes to Affordable Housing

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** Program 1.b has been revised to substantially match the proposed language in this comment.

Josh Albrektson (December 19, 2022)

South Pasadena comments:

Downtown Rezoning

They are going to 70 DU/ACre and 60 ft/6 stories which is good. Of note, most buildings need 7 stories to get 70 DU/Acre.

They have a TON of bullshit sites that would never be developed. When Los Angeles did their analysis they got rid of these sites. It is one thing to claim 20% of developable sites will be developed at 100% capacity. It is quite another to claim 100% of a complete downtown would be developed when 30% of the downtown has zero chance of actual redevelopment.

I will be doing a twitter thread on it and there will be EXTENSIVE complaints if these bullshit sites are allowed to be counted. These include multiple official South Pasadena historical monuments, multiple condo complexes that are 15 years old, Historic theaters, Micheal Myers House from halloween, single family homes on 4,000 sq ft lots, 100 year restaurants, 10 foot alleys, historic banks, etc, etc.

Every condo complex built in the last 22 years, every historical monument, all buildings over 70 years old, and all single family homes under 0.2 acres should be removed from the calculations and only the

buildings that ACTUALLY has a chance of development should be counted as 20% likely to be developed.

Inclusionary Housing Ordinance

Their own study shows that 15% is not viable in South Pasadena. They also believe that they can make the 15% Very Low or 7.5% Very low and 7.5% Low.

I have attached an e-mail from the Mission Bell owner to the planning director on Sept 29th stating that his fully market rate project is not currently financially viable. If their fully market rate project is not viable then a 15% IHO is not viable.

South Pasadena should be required to change their IHO to 10% Low OR 5% Very Low and if housing is actually built using the IHO, then they can increase it if they find housing is actually being built, rather than go the other way around.

Especially since they intentionally killed all projects with their 10% Low and 10% Very low which is currently still in place.

Realistic Development Capacity

They are claiming that almost every non-vacant low income site will be built out at 95% Capacity, even though every one is on a primarily commercial street. You rejected Santa Monicas draft for this reason and you have cited multiple cities for this.

Here is Danville:

https://twitter.com/JalbyMD/status/1602454496822497282?s=20&t=qjjmEng2_VMCWagab4n-dw

[twitter.com]In May 2021, before Chris Holden called your director, you had a problem with South Pasadena claiming 80% RDC.

It is completely unacceptable that you guys are allowing South Pasadena to claim a ridiculously high number.

Processing Timelines

South Pasadena has had 4 mid level projects proposed from 2018 on. As of yet, none of them have building permits. It is absolutely unacceptable that you guys say that they can be by right at 20% affordability in order to avoid these processing times.

Santa Monica committed to making all projects that fit the zoning under one acre by right. And they have actually historically produced housing. South Pasadena has not.

I even sent you information about how they required a preliminary application a year before a real application and how they forced 815 fremont to undergo TWO complete redesigns.

In the Housing Element you have a letter from Victor Tran about how he submitted applications in March of this year that South Pasadena hasn't even acknowledged they have been turned in.

South Pasadena was one of two cities to receive a grant from SCAG to pay for objective design standards for all it's multifamily housing. They need to be required that all projects with 10% low be by right.

Something needs to be explicitly written out in the Housing Element with actionable measures to ensure projects are processed. They also need to commit to following the law on the permit streamlining act which they currently regularly violate.

Low Income Sites

You will receive separate more in depth individual e-mails where Gustavo and Megan are CCed with these low income sites and the exact part of the law that are being ignored if these sites are approved. I want to be sure that they will not be able to claim they didn't know that the laws are intentionally being ignored when this comes up in the future.

I did a twitter thread, which I will also submit as a different comment:

https://twitter.com/JalbyMD/status/1602435712846290944?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 2

Just to be clear, two of the biggest buildings JUST GOT LEASED:

https://twitter.com/JalbyMD/status/1602449467042430976?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]And I just want to say it is fucking bullshit that Paul thinks I have to prove they are not short term leases. South Pasadena gets to lie about what is leased and that is okay, but when I show that buildings that make the site undevelopable are lease, I am required to get teh leases to show they are not short term leases…..

This is a copy of the exact part of AB 1397 talking about leases that you are choosing to ignore the actual legislation passed by the legislator and signed by the governor and not to apply to this site.

https://twitter.com/JalbyMD/status/1602450748377370624?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 8

There is no replacement site, if they had a replacement site they would have pay millions for the site, they would have to pay millions to build a new public works yard, then they would have to pay to tear down the building and remove the gas tanks, and then after the multi-millions spent, only then could it be offered for an affordable housing project.

Before Chris Holden called your director you actually cared about this site. When I posted it on twitter a developer told me he estimated it would cost "Tens of Millions" just to replace the site and make it available for house.

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Site 12:

The City doesn't own most of the site. They own 0.19 and do not have plans to buy he rest. Also see Site 15 comment for sites under 0.5 Acre.

Site 13:

The City has a lease going through 2024 for this site. They actually turned down someone who wanted to build affordable housing on this site. They added a single family home that they do not own to get over 0.5 acre.

Site 14:

You ignored almost all the actual laws passed by considering this site.

Link to video:

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Just to be clear, both homes are getting brand new foundations. They have hired an architect to renovate the homes (Harvest Architecture). This site is under 0.5 Acres. I sent you an e-mail from the owner stating his plans were to renovated the home s(which is actually happening right now.)

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by saying South Pasadena has substantial evidence the current use will be discontinued in the planning period.

https://twitter.com/JalbyMD/status/1602438163506794498?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by allowing a under 0.5 Acre site to be considered a low income housing site:

https://twitter.com/JalbyMD/status/1602447693690720256?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 16:

Newly renovated grocery store with grand Re-Opening August 3rd. You can read my tweets on it here:

https://twitter.com/JalbyMD/status/1602439866897211393?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They first claimed it was the whole grocery store, then it was just the parking lot, then you guys told them how to lie to you so that the parking lot would be acceptable. Here is a link to the mayor spitballing ideas of how they could lie to you about the parking lot:

https://twitter.com/JalbyMD/status/1602443223150256129?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They got a letter from the owner in the Housing Element which I am sure they wrote what SoPas asked them to write.

Site 17:

I recently received all e-mails from South Pasadena and the site owner. In the e-mails the owner is asked if they are considering housing on the site and he says "I think we are good." When asked if they want to still be on the Housing Element site list, he replies "I guess"

Along with the brand new lease signed this year this is pretty damn good evidence that the owner has no interest in developing housing in the planning period.

Please refer to the above link to the law talking about how leases should be considered.

Programs:

South Pasadena needs specific objective circuit breakers in their Housing Element programs. As mentioned in the call, you can pay a consultant to produce a study proving the highest inclusionary housing ordinance in the state is viable even when it is blatantly not, and that is exactly what South Pasadena did. They cannot be trusted to evaluate their sites in 2024, update the inclusionary housing ordinance, look into reducing parking and open space requirements, or do a realistic rezone if the ballot measure fails. These things need to be spelled out in this housing element so they are enforceable.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been substantially revised to address these comments, including increasing the height limit, removing identified sites, and revising the analysis of the DTSP sites to account for additional constraints such as historic designations.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as

a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future.

Site 14 is two single family homes. Paul McDougall has an e-mail that the owner sent to the city in 2020 stating he was planning on flipping the homes and selling them.

That renovation is happening right now and Paul McDougall KNOWS that the homes are being renovated. They are currently getting brand new foundations by Foundation Repair LA (https://foundationrepairla.com/ [foundationrepairla.com]). These are the same people who repaired my foundation.

They also have an architect, Harvest Architecture based in South Pasadena that are designing the interiors. https://www.harvestarchitecture.com/

[harvestarchitecture.com]Here is a video where you can see the signs for both of these companies and one of the single family homes getting the foundation as it is being filmed.

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

These single family homes are literally being renovated to be BETTER single family homes and Paul McDougall knows this and doesn't care.

But not only that, these sites are below 0.5 Acre. THIS IS SPECIFICALLY OUTLAWED BY AB 1397.

Again, citing the law passed by the legislators and sign by the governor:

(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.

Sites 12 (0.19 acre owned by city) and Site 13 (0.42 owned by the city) Both fall under this category.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Site 14 has been removed from the Housing Element. Site 12 is 0.56 acres.

Josh Albrektson (January 2, 2023)

This is one of a few e-mails you will be getting where I am going to cite a "low income site" that South Pasadena is claiming could be turned into low income housing this cycle and the exact law that specifically outlaws these sites.

Every one of these sites Paul McDougall said was okay in our November 15th meeting.

I just want to be sure that Jason and Gustavo cannot say in the future that they did not know that Paul McDougal and Megan Kirkeby are intentionally not following the laws passed by the legislator and signed by the governor.

I will be sharing these e-mails with every legislator if South Pasadena is allowed to claim these sites, along with the hundred other examples of illegal low income sites that I personally e-mail Paul McDougall about and he approved.

I get that Chris Holden had a personal and urgent phone call with Gustavo to discuss the South Pasadena Housing Element, but that does not mean that HCD should decide not to enforce the laws that are the actual laws.

Site two is a businesspark in South Pasadena. They literally just leases two new businesses this year and these two businesses occupy the entire buildings for two of the 6 buildings.

Check out the leasing brochure. This is high quality offices:

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf [images1.loopnet.com]

This is from the summary of AB 1397:

This bill would require the methodology to consider, among other things, the city's or county's past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment, as specified.

And here is the actual text from the law:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

Paul McDougall knows these buildings were JUST leased, and he doesn't care. When I told him again that they were leased this year, he asked me to prove they were not month to month leases.

The job of HCD is to enforce Housing Laws, and Paul McDougall should not be allowed to just ignore the laws at his will, and that is currently what is happening under Gustavo's leadership.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for Site 2 to further encourage the redevelopment of the site. Furthermore, development standards for this site, as well as all mixed-use parcels, will be revised to encourage redevelopment.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future. Site 8 is the Public Works yard for South Pasadena. You can see a video of the yard in this tweet:

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=U_d2X2e5GgNUrylao7D03w

[twitter.com]Let me be clear about what South Pasadena is claiming for this site. Sometime in the next 7 years, they will find a replacement site. They do not have any open land right now for this replacement site, but they will find one somewhere. They will then build a brand new public works yard on this replacement site. They will then tear down the old public works yard. They will then remove the gas tank that has been there for decades. They will then remediate any toxins in the soil from this being a public works yard for 40 years.

We are talking about tens of millions of dollars spent before this site could even be considered for low income housing. This site is the kind of bullshit sites that will NEVER be housing but cities like to claim it so they don't have to zone for housing somewhere else.

In the last letter from Paul McDougall, HCD actually explains how the city should lie to HCD in a manner they would be willing to accept.

"For Site 8 (Public Works Yard), the element should discuss the impacts of the underground gasoline tank and filing station and soil contamination on the timing and cost of development in the planning period."

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis

of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to further describe where the existing uses of Site 8 will be relocated and to address the potential environmental constraints on the site.

Josh Albrektson (January 9, 2023)

I have come across this information from a respected individual. They believe that the density that can be built at 45 feet is about 40 to 44 DU/Acre. The is under 1 DU/Acre per ft of height.

If a City such as South Pasadena wants to claim 70 DU/Acre, they need to have a height limit of at least 75 ft.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the height limit of the mixed-use zones.

Josh Albrektson (January 12, 2023)

Please consider this thread on the downtown rezoning and the extensive number of buildings that could NEVER be developed included in their calculations.

https://twitter.com/JalbyMD/status/1613662763473342465?s=20&t=YWu-t552VhhJiPuR8JBnXA [twitter.com]

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The analysis of the DTSP area has been extensively revised to address this comment. Revisions include removal of many of the identified parcels from the analysis, and additional considerations regarding the probability of redevelopment of parcels within the DTSP area.

Josh Albrektson (January 31, 2023)

Please consider the following separate comments:

1. Glendon and Meridian from Monterey to the 110 freeway should be included in the Downtown Specific plan and significantly upzoned, especially since they are touching the train station.

2. Monterey Road from Pasadena Ave Southwest should be significantly upzoned. This abuts a mountain, and has very close access to parks and an elementary school and has a lot of run down single family homes that can be upzoned.

3. I like the idea of SB 10 around Fair Oaks and Huntington

4. Consider upzoning Fremont Ave from Monterey to the 110 freeway.

You are actually further away from compliance than you think. HCD has not certified a Housing Element that doesn't have a significant buffer (They recommend 15%) and I doubt you will be the first.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity in all of the areas identified in this comment.

Josh Albrektson (February 1, 2023)

I just read through the staff report for tonight's meeting. After reading through it, I expect that your next draft will also be rejected.

There are two major issues.

In the 4th draft for low income units you were required to have 1155 and you showed 1178 for 23 total excess. That is a 2% buffer. Some of the sites you have will not be allowed, so once you remove those sites you will actually be under the required amount.

To date HCD has not allowed a Housing Element to be accepted without a significant buffer. Most accepted Housing Elements have a minimum buffer of 10% or greater. In their memo on the bottom of page 22 they state you should have a 15 to 30% buffer.

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

I sent a separate e-mail noting the 4 places I would upzone. If you guys do choose to try to submit another Housing Element without a buffer it will be the first issue I raise with them.

The second problem is that you actually need to create programs to affirmatively further fair housing (part 3 in the letter). South Pasadena has yet to actually propose an AFFH program and what is described in the staff report definitely would not be good enough.

San Marino and Santa Monica both legalized 2 to 4 plexes for their AFFH program. If you guys don't want to do that, you can probably get by implementing rent control and stating that allows people to stay in their homes.

And I hope after having been told many many many times that they need to put firm data and specific information in the Housing Element, your staff will realize they need to:

1. Spell out exactly what development standards will be relaxed in what manner

2. Specify what fee reductions and streamlining will be implemented

3. The exact IHO percentage

4. The number of units the IHO applies to

5. The hard trigger that would show if the IHO is effective or not with the change that will be made if the trigger is not met

6. If the city will remove the height limit completely or change the height limit to 84 ft and 7 stories

One thing to note about the height limit. As it stands SB 828 will give South Pasadena another 2,067 units in 2030. If you do a limited height restriction removal, you will have significant problems at that time. And I doubt HCD would give you 2 years to put it on the ballot since you will end up with plenty of warning in the years leading up to it.

Also note that because you are including a lot of historic properties in your Housing Element (Specifically downtown), and your ability to stop a development on these properties is going to be very limited. Anybody who wants to buy the Fair Oaks pharmacy or Rialto Theater and tear it down for apartments can.

I strongly suggest you guys consider what buildings you want off limits, remove them, and upzone a different part of the city you do not care as much about. This could probably even be done after you have a compliant Housing Element.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity to account for a 15% buffer for lower income units and more than a 30% buffer across all income categories.

Josh Albrektson (February 6, 2023)

I cannot make the meeting do that previous commitments. I want to put this comment in the public record. I support all of the zoning changes and programs mentioned on the February 1 city Council meeting by city Council and staff with one exception. I think great progress is being made.

I do believe the historic downtown properties should be completely removed from the zoning so that they cannot be re-developed. I will have a much more extensive letter in support of the housing element once I get back.

It would be great if this meeting was recorded and published.

Also, the staff does not need to respond to my comments on the previous draft due to the fact, I think there will be significant changes on the draft. Please refer to this paragraph and not waste any time responding to previous comments.

- **How addressed:** The zoning changes and programs mentioned during the February 1st City Council meeting have largely been implemented in the Housing Element, as refined during the City Council meetings held on February 9th and 15th.

Josh Albrektson (February 6, 2023)

Just to be specific.

Please withdraw all comments from me that were received after the last housing element was published. If they need to be included in the record please do not feel to respond and refer to this comment saying SoPas does not need to respond.

- **How addressed:** The previous comments are included in this Appendix with brief responses.

Josh Albrektson (February 13, 2023)

I got back from my cruise and listened to the Thursday meeting. I think you guys are doing a great job and I'll do whatever I can to help you get compliance with the zoning.

So this is what I have for my letter that would give you substantial evidence. Once you guys finish your plans, I will add onto it.

https://docs.google.com/document/d/1WJf1YEmjngsUVDaCq3lcy9SIMGx-E3q80K6tCtWeBPU/edit?usp=sharing

I fully believe that with either citywide 4 plexes with right of return OR Transit 4 Plexes with right of return and rent control, you will pass AFFH. I have talked to Anne and you heard from John. If you guys include a program for rent control, you will have a strong letter from the SPTU asking HCD to find you in compliance.

With my letter and SPTU's, I think you should get compliance.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to allow for four-plexes citywide, expect in high fire hazard areas, and to include a right to return policy (Program 6.b.).

Josh Albrektson (February 13, 2023)

So I talked to Matt Gelfand (CCed on email) and told him about my idea for a grocery overlay zone.

It would be to give Ralphs and Vons the same zoning that Pavilions requested, but since they are much less likely than Pavilions to develop in the planning period, only counting 25% realistic development capacity of the maximal density.

So for Vons it would be 3.96 Acre x 140 DU/Acre x 0.25 chance of development for 139 units

Ralphs would be 3.09 acre x 140 DU/acre x 0.25 chance of development for 108 units.

Matt is okay with removing those sites from the banned sites for this kind of zoning and calculation. It is part of your agreement, not stipulation, so it would just require you guys signing a piece of paper.

I also don't think HCD would have a problem with it since the calculation is just like what they have on the top of Page 22 and I will be including it in my letter providing you with substantial compliance.

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

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Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for these parcels, along with all of the parcels adjacent to Fair Oaks Ave., to 110 du/ac.

Alan Ehrlich (February 14, 2023)

Hi Angelica, Armine,

Like you and many others, I would like to see the city submit a HE that can be accepted by HCD with this next go. My general sense from the questions and comments of the special council meeting last week is that members of the council finally seem to 'get it" and are (mostly) ready to accept the additional changes which will be necessary in So Pas's 5th draft submittal.

With that it mind, and in spite of pushback I expect you would receive from certain members of the community, please accept these suggestions for inclusion in this next draft. Like you, I believe we would all like to see this phase of the HE to be done so we can get on to the next part of our lives.

1) Remove the 45 year CHC review from the planning code. According to Mark Gallatin, state law permits the same review and in the 6 instances where a property was reviewed during Mark's term on CHC, all have been approved. This is a gimme.' Effectively, the city is giving up nothing, but to HCD it will appear the city is removing a constraint. CHC will squawk, but by Mark"s own statements, there is no there there.

2) Mark Gallatin corrected a public comment I made about SB 381 requiring 3 housing units for each CT property sold. Mark clarified that this only applies to the 7 historic properties of the 67 lots within our city. In my comment I had said that if the city committed to 3 AFFH for all properties, that would provide a minimum of 60 units, giving the HE the cushion needed for this section. HCD is obviously very aware of the CalTrans properties and the potential they represent to meeting the city's AFFH and RHNA targets. Instead of continuing to battle HCD on this point, allow me to suggest that the 5th draft commits to adding a minimum 3 AFFH for every CT property, regardless of whether the city redevelops the site, partners with an HRE, or sells the site to a private buyer. If the requirement exists for the 7 historic properties, it is not a stretch to apply the same condition to the 20 non-historic properties as well. It does not prevent the city from acquiring and selling the 20 properties, it just provides HCD an assurance that the sale of public land will be used for public housing purposes. Standardizing the rule, respectfully, this is also a gimme, a no-brainer.

3) As a practical matter for the elected members of the city council (and feel free to share this with them), this is perhaps the optimal time to go for broke and submit the plan that HCD will approve. 2022 elections are over, so anything submitted/approved now would not affect Michael or Janet in

2026 and we are stilll far enough from the 2024 elections for it to concern Jon, Evelyn or Jack. On the other hand, if the city continues to fight HCD by submitting bad HEs, there will no doubt be several builder remedy projects filed before 20024 and the voters will remember that when they had the chance, Jon, Evelyn and Jack did nothing and will be held to blame.

4) One final recommendaion, please add a slide to the presentation showing the number, names and $$$ of grants available to provide, restore and rehabilitate AFFH. HCD, SCANPH and SCAG send NOFA's out regularly announcing new programs, many of which I have forwarded to you Given the estimated costs of what it will take to rehabilitate the CT homes, it is only appropriate that the council and members of the community know how many hundreds of millions of dollars the city is leaving on the table by not having an approved HE and not being eligible to apply. It would be the understatement of the year to say the city has neither the funds, staffing or expertise to manage any of the CT properties.

As I've suggested to both of you before, I don't know what the perfect plan is, or even if one exists, but I do know, and you know, that there are a variety of options out there that could work. Its time to get off the crazy train. If the city needs to be engaged with lawsuits over the HE, I'd rather it against the neanderthals holding the city back than CA Homeowners and Chris Suttons of the world. Let the Urquharts, Shanes, Takedas, Carlsons, Gallatins, Nuckols and thier ilk put their money at risk fighting state mandates, rather than making the rest of the city's taxpayers assume the cost of their NIMBYism.

I'm looking forward to seeing you both at tomorrows council meetings. I do not have Grant's email address, otherwise I would have included him as well.

best, Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-

"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

- **How addressed:** The Housing Element has been revised to further address the Caltrans homes and to greatly increase the zoning capacity throughout the city.

Care First (February 15, 2023)

Re: **Special Joint Meeting of the City Council and Planning Commission, February 15, 2023**

Comment, Agenda Item No. 2, Receive Housing Element Presentation and Provide Direction on 5th Draft

Dear Mayor, City Councilmembers, Planning Commissioners:

Care First South Pasadena is pleased to submit the following comments on the fifth draft of the City of South Pasadena's Housing Element. At this critical juncture where the city stands to lose local control over the development of the city, we strongly recommend the city to adopt the following policies to affirmatively further fair housing, encourage the development of more affordable housing in an equitable manner, and preserve existing affordable housing.

Care First continues to demand:

- A commitment to use the 20 vacant Caltrans house sites, which the City will purchase in the coming months, to develop on site a blend of duplexes, triplexes, quads, and denser multi-unit buildings for affordable ownership and rental opportunities (A number of the vacant houses are 0.25-0.50 acres and could accommodate redevelopment with even more housing units.);
- A pilot affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus); and
- Recruitment of 100% affordable developments through non-profit low-income housing, developers for at least four (4) clearly identified and viable locations for 100% affordable developments, plus spelling out specific financial and regulatory incentives the city could offer such developers.

The City should also adopt the following policies as ordinances with accompanying budget allocations as needed to implement the programs, within six (6) months from the date the Housing Element is adopted:

- Rent stabilization with an 8 percent annual cap for all apartment complexes that have ten or more units;
- Provide tenants the right of return in the event they must vacate their rental units to accommodate substantial renovation or redevelopment; and
- Increase relocation assistance for tenants subject to no-cause evictions.
    - Landlords would be required to pay households at or below 140% of median income for Los Angeles County a relocation allowance equal to two (2) months fair market rent as established by the U.S. Department of Housing and Urban Development (HUD).
    - In addition to the relocation allowance, a landlord must also pay the tenant a moving expense allowance in the amount of $1,120 for adult households or $3,364 for households with dependents, disabled or senior members.
- Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent, by committing to evaluate the city's available funds during each budget cycle and to dedicate a reasonable amount to achieve this goal; Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

We incorporate the details of these tenant protections from the South Pasadena Tenants Union comment, dated February 14, 2023.

Additionally, to further the goals of fair housing, the City should"

- Eliminate historic preservation policies and practices—including in ordinances, the Historic Preservation Element, and duties entrusted to the Cultural Heritage Commission—that impede development of affordable housing in the city, especially those impacting the city's transit corridors and Caltrans property sites;
- Review all properties that have been nominated for or placed on the city's Inventory of Historic Resources and/or designated as historic under the city's historic preservation policies;
- Codify the city's Sundown Town Resolution by adopting an ordinance that prohibits the use of historic preservation policies and practices that would cause discrimination or disproportionate economic harm on the basis of race, ancestry, national origin, color, religion, sex, or sexual orientation;

- Upzone currently zoned R-1 (single-family only) to R-4 (allowing for fourplexes) in the city's transit corridors, as identified in previous presentations delivered by the city this month;
- Implement Senate Bill 9 to encourage lot subdivisions and higher density in single-family neighborhoods rather than impede its use.

Best regards,

Care First South Pasadena

- **How addressed:** The Housing Element has been revised to address this comment by: 1) revising the program related to the surplus Caltrans homes and committing the City to add additional units to these properties as ADUs or Missing Middle housing where feasible; 2) adding a new goal and programs related to tenant protections, including a rental registry, right to return, relocation assistance, and rent stabilization; and, 3) committing the City to allow for Missing Middle housing citywide, except for in high fire hazard areas.

Comments on the 5th Public Review Draft Housing Element

South Pasadena Preservation Foundation (March 3, 2023)

Let it be stipulated and acknowledged at the outset that the process for the acquisition and disposition of Caltrans surplus properties in the City of South Pasadena created as a result of that agency's decision not to build a northerly extension of State Route 710 through the city is governed by myriad state laws and regulations, including but not limited to, SB 381 (2021). The purpose of providing the following alternative language for Program 1.b. of the Housing Element is not to circumvent or ignore the requirements of SB 381, an amendment to the Roberti Law, but rather to seek to prevent some very real externalities that perhaps were not contemplated when the legislation was drafted and signed into law, but which nevertheless will cause implementation of the letter of that law to undermine whatever well-intentioned spirit brought it into existence in the first place. These externalities include the inflation of rehabilitation costs created by requirements placed on the City or other Housing Related Entities that private individuals and families are not subject to, making acquisition and rehabilitation by those entities financially unfeasible. Another example of an unintended consequence of the existing law would be the concentration of affordable housing in one or two neighborhoods of the city where the surplus properties are located, rather than a more equitable and dispersed concentration throughout all parts of the city. The South Pasadena Preservation Foundation wishes to see the City promote creation of new affordable housing with as few constraints as possible, so that it has the flexibility to respond creatively and nimbly to a dynamic housing market and evolving community needs.

Program 1.b - Maximize the proceeds from the sale of the Caltrans surplus properties to create new affordable housing throughout the city

The California Department of Transportation (Caltrans) currently owns 68 surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City will leverage the 20 unoccupied Caltrans surplus properties, two vacant lots and those of the remaining 46 occupied Caltrans surplus properties that are not purchased by former or existing tenants and use the proceeds from the sales of such properties to generate capital to create new, deed restricted affordable housing units throughout the city, whether on city-owned land, or on privately owned property. These proceeds can serve as a "force multiplier", by unlocking the combined equity of those properties and leveraging it to maximize funding for affordable housing creation and housing element implementation. Several alternatives exist within State law and Caltrans regulations for the City to partner with Caltrans to maximize the proceeds from the sales of the

Caltrans properties and place them directly into a restricted account (i.e. the SR 710 Rehabilitation Account) dedicated solely for the use of the City of South Pasadena to create affordable housing. Some other alternatives, after further study, may be financially infeasible so in order to promote affordable housing in South Pasadena all alternatives, including that proposed here, must be considered.

Eight-year Objective: To facilitate the acquisition and disposition of the maximum number of Caltrans surplus properties to individuals and families and to leverage the proceeds from the sale of these properties to generate capital for the creation of deed-restricted affordable housing units throughout the city to expand housing mobility opportunities for lower-income households and revitalize underutilized areas.

Funding Source: SR 710 Rehabilitation Account

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Begin implementation of sales program in 2023 and at least annually throughout the planning period until disposition of all surplus properties is complete.

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Josh Albrektson (March 3, 2023)
Love the Housing Element and I am pretty sure it will be accepted.

I think you guys accidentally didn't include that the IHO would not apply to buildings under 10 units. I would add that.

On the South side of Monterey Road you have Victor Trans Site 3. He has mentioned before that he would like to put about 50 units on the site. I would consider making that half of the road Residential High Density zoning instead of Residential Medium Density. You could also then count Site 3 as 1.26 acres*45 units/acre rather than the 8 above mod units you are counting now. I'm not gonna complain about this but he is going to reach out to you.

The right of return program is also not quite right but that is something that could be worked on later. Here is a LA Times article on it.
https://www.latimes.com/opinion/livable-city/la-ol-gaisford-right-to-remain-gentrification-20180212-story.html

I've read the rest of it and I could not find anything else missing.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** The Housing Element has been revised to include an exemption to the IHO for developments under 10 units. Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element. Proposed tenant protection programs will be further researched and refined.

Victor Tang (March 5, 2023)
Hi Angelica,

This is Victor Tang, the developer for 181, 185, 187 Monterey Road with 1.25ac land and site #3 in city's site inventory. Our site is vacant and ready for development.

In the special joint meeting on 2/15/2023, Housing Element consultant Mr. Grant Henninger had proposed an Extended Ostrich Farm Zone with 70u/ac density that included Monterey Road. It had the support of planning commission members as Monterey road was wide with all the utilities available. However this zone was not implemented in the latest Housing Element Draft.

Although we have submitted a development plan for 8 market rate units, we are interested in a new development for 50-80 units including low income housing. Current Housing Element's density for our site is 30u/ac. We need a higher density (probably 50u/ac) for a new development to be financially feasible. If the city can give our site a higher density, we can withdraw existing 8-unit plan and the city can count additional RHNA from our site.

Best regards,
Victor Tang,

- **How addressed:** Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element.

John Lawrence (March 6, 2023)

The proposal to allow mult-unit housing anywhere in South Pasadena is a terrible proposal that would ultimately destroy the character, uniqueness and quality of life in South Pasadena. I understand there are concessions that are going to have to be made to the state housing plan but to simply say, "well OK, we will abdicate all control, all ability to self-manage our own destiny is irresponsible and destructive.

Who supports it his dystopian vision of South Pasadena? I'd really like to know. I suspect it is a purely political position being pushed by people who have no history, no investment, emotional or otherwise, and life connection at all to the city. Must be nice to look in from outside and advocate destruction when it doesn't affect you.

- **How addressed:** The comment misstates what is being proposed as there is not a proposal to allow "multi-unit housing anywhere" in the city. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Samuel Lin (March 6, 2023)

Dear whomever it may concern:

My wife has grown up in South Pasadena since she was a young little girl and I have since just moved been a resident for about 5 years. South Pasadena has always been known to be as a quaint small town everyone knows each other.

Until recently, there's been a lot of traffic, kids have been stuffed in schools. Even our own small elementary school in Marengo has a waiting list for the very same people who would live on the same street.

This proposal is not only going to bring in more congestion and traffic, it is going to change the very nature of our small city. We don't have the capacity to fit medium density because we eliminated the 710 freeway, we have a lot of traffic on Fremont. Also, you're going to turn our small beautiful city in a dense packed traffic, terrible place. I strongly urge you to reconsider the elimination of single family zoning, we do not need dense housing in this city, we cannot handle the traffic and we don't have the resources.

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Ed Donnelly (March 6, 2023)

City Planning staff,

It has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

This will significantly impact the very things that define living in South Pasadena. Over the past several years I have worked side by side with fellow residents to secure city revenue through the UUT and the increased local sales tax. We have worked diligently to secure and sustain funding for our schools and our public library. Those campaigns, while a tremendous amount of work, were ultimately personally rewarding for our volunteers because what we were truly campaigning for was sustaining our way of life here in South Pas. And voters here in 91030 overwhelmingly agreed with us

in every case. This is much the same as the generation before us fought tooth and nail to prevent the 710 freeway from tearing the town asunder. And despite all of this an existential threat now looms unnecessarily.

I fully support responsible development and the building of affordable housing here in South Pasadena. There are sensible options. In addition, I completely understand the demands of the HCD and the consequences of not complying with them as we are already seeing with the project on the Shaker's property. Embracing strategies that will immensely impact our police and fire departments, infrastructure and schools while drastically reducing tax revenue due to diminished property values isn't just simply foolish, it's irresponsible governance.

I urge you to find another way to realistically meet the RHNA numbers without destroying the fabric of our way of life here and dooming the city to be just another banal concrete wasteland on the edge of Los Angeles.

Ed Donnelly
1935 Edgewood Dr.
SOUTH PASADENA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Delaine W. Shane (March 7, 2023)
Dear Community Development Department Staff and Management:

The fifth version of the Housing Element is insufficient. Furthermore, it does not adequately address legitimate questions and concerns that I brought up in my earlier comments on the previous versions. As a professional environmental planner with decades of experience, I know when I've been "blown off." So, my original comments stand and are part of today's comments to you. My intent is for you to reconsider some of the policies and make them more nuance or simply more limited in your approach and understand the underlying ramifications of them including financial burdens that will be placed on our city.

This whole process has been messed up. The housing element should have been part of the general/specific plan update. Now, it is not. When the CEQA process (environmental review) is finally undertaken for the plans, it's very essence has been destroyed. Since the housing element will be approved, it can not be modified during the general/specific plan environmental analysis. Even if the housing element causes significant environmental impacts as determined in the general/specific plans EIR, there is little recourse of modifying the housing element to lessen such impacts unless the council modifies the housing element itself. And that of course will not happen. The council won't do it and who will be paying for potential mitigations? It won't be the developer that's for sure. "Little things" like upgrading the Fire Department's capabilities to reach high rise fires, new and/or more expensive water supply sources to meet the needs of new housing units not to mention how water pressure can be created for such high rises, etc. It will be on the residents and businesses of this small city.

You can say that the issues of infrastructure, traffic, water supply, etc. is not a requirement of the housing element. That it will be part of the plan updates. But, really, they are all interrelated. So, maybe HCD doesn't care about our aging and inadequate infrastructure and public services, but the City governance needs to address these issues and plan on how to fix them NOW. And, that includes the financing of such improvements! "Kicking the can" down the road is irresponsible. What happened to the wishes of over 1,000 residents who initially participated in the general/specific planning process when David Watkins was the Planning Director? Residents had participated in that process for months and brought up reasonable growth scenarios of somewhere between 700 and 1,000 new housing units that could be accommodated in the next 20 years. The delays and the petty politics created what we now face. Credit of this latest fiasco is given to the planning consultants (all including the current one) that have failed to please HCD several times before. This version will probably be the one that HCD approves of because the consultant has given everything that the agency demands. The consultant should be responsive to our community and not have hidden YIMBY agendas. He doesn't even live in this region.

He indicated that we must accept SB 381 (Program 1.b-page 254). That is misinformation. Documented evidence has already been supplied to you that the side-by-side escrow can work and has been done before without implementing SB381. Many of my neighbors and I continue to support the return of the Caltrans housing to current/former Caltrans tenants or qualified buyers who will purchase these properties, fix them up, and live in them, and thereby add to the property tax base and contribute to the neighborhood's charm. Our neighborhood already has dense housing and our existing infrastructure is in terrible condition. Affordable housing as described in the housing element needs to be distributed in various areas throughout the City. It is also states that the City WILL construct ADUs on these parcels. First, it should be the homeowners' decisions as well as the practicality of building anything on some of these small parcels. Second, the "City WILL build" presumes the City owns the properties outright, and that would be a terrible mistake. Where is the funding for this? There are many problems with our existing infrastructure that equally need to be addressed but have been ignored due to a lack of funding. Or, at least that is what we have been told over the years.

For the special needs program (Program 2.h-page 263): The housing element states: "Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties." Are these related to the Caltrans housing? Or is this separate? There is no Huntington Avenue, it's Huntington Drive (it figures for a consultant that doesn't live here). Why isn't Fair Oaks/Mission/El Centro considered as well?

He indicated that we must comply with SB 10. Page 268 has a policy that states: "Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption." SB 10 is strictly voluntary and it is my understanding that the council had publicly backed away from supporting this previously. Why, therefore, is it in this housing element version?

For the height limitations policy (Program 2.n-page 267), why is the City so inclined to place so many limits on itself at this time? By having so many YIMBY restrictions and conditions, the will of the people that live in this City is being curtailed. This is clearly undemocratic and thwarts local control. Clever architects and innovative developers can create smaller housing units within our currently defined building height limit. But, apparently that isn't even considered in this version of the housing element.

For rezoning (Program 3.a-page 268), do the residents really know that you are proposing to rezone their properties in this fashion? The way this housing element has been advertised, you must know that most residents are unaware. As a cautionary aside, I remember traveling to Sedona, Arizona to view the red rocks over the years. Just before the pandemic, my husband and I took our then teenage daughter to Sedona. It was a disaster! Where once it was a sweet town with some tourists, it was now a complete zoo and utter chaos. Turned out that the State of Arizona had permitted opportunities for the Airbnb-type businesses and there would be no local control. In time, developers had bought up many, many houses and used each bedroom to rent short term to tourists. Local schools were impacted and at least one had closed because the population had shifted from residents to tourists. And the sites themselves had been compromised by such heavy influx. We can't correct a national crisis in housing by destroying our community. It's just a 3 ½ square mile city. The rezoning needs to be more nuanced than what is now being proposed. It is too much.

For mixed use (Program 3.b, page 268) developments and adaptive re-use, such tall buildings and limited to no parking, we might as well become either Glendale or Pasadena Annex. The height of the buildings alone question the ability of the Fire Department to respond to high rise fires, as well as the necessary water pressure to support fighting fires or having operational fire water sprinklers. Parking availability? Most people do not rely on the Gold (L) Line to get anywhere except perhaps to go to special events. The Mission/Meridian garage was noted years ago in a L.A. Times article that people were parking there from elsewhere to do shopping. Few to none were actually parking to use the Gold Line for work outside of South Pasadena. Families with kids or elderly relatives will still need cars whether gas- or electric-operated. Parking is going to be worse (not a CEQA issue but a real life experience nonetheless).

For demolition of vacant properties (Program 3.c, page 270), how does this program relate to the Caltrans housing? Does the program mean that automatically if a vacant Caltrans housing is "viewed" as not fixable, it will be torn down and replaced with three units at that site? Many of the Caltrans vacant properties are small and located on hills where soil stability may be an issue.

I do not support Program 3.d, page 271 (Enable Parcel Assemblage) as currently written. It emphasizes a strong and lopsided City-developer partnership when maybe the homeowner doesn't want to sell their property. There has to be support for the property owner as well. Forcing the property owner to sell their property would in turn create hardship for that resident. Home prices and mortgage rates are too high now and in the foreseeable future and so that property owner would not be able to resettle elsewhere in South Pasadena. That is outrageous. And your consultant never answered my question as to whether eminent domain would be invoked if the property owner was unwilling to sell.

Program 3.h, page 274, states that if the ADU numbers fail to materialize that MORE rezoning will take place! There are many reasons why people don't want to or are unable to build an ADU. But, regardless, if this magical number doesn't happen, we will be further rezone? Just how many people are we going to have here in a 3½ square mile area? Has that been calculated? Again, the financing for this unlimited rezoning journey? The schools? The streets? The water? This is ridiculous. Why

not just obliterate the zoning and put out the welcome mat for hordes of people? Watch the tax base shrink further because there will actually be fewer property owners. Floating bonds? Reducing municipal services? But, yes, make the YIMBYs happy. Whatever happened to responsible planning and considering possible future scenarios and costs?

I could go on, but I end with a plea. Look at the policies, each one very carefully. Are they really helpful to the residents and can they be financed and monitored in a productive and positive way by the City? Or, are they just offerings to appease YIMBYS? The financing must also be considered seriously.

Most of us agree to responsible and sustainable growth in the next eight years. I personally witnessed that with the individuals I met at the planning charettes years ago. Before you rush off this version to HCD, please review the policies individually and responsibly. Edits are needed to ensure sustainable growth.

Thank you,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The lawsuit brought against the City for failure to comply with State Housing Law caused environmental evaluation to be completed pursuant to Government Code Section 65759. The Housing Element is not subject to environmental review at this time. The City is preparing an Environmental Assessment that will be considered at the time of Housing Element adoption in accordance with applicable laws.
- **How addressed:** The City must follow SB 381 regarding the purchase and dispensation of the surplus Caltrans properties. The other options suggested in the comment are not legally valid. Per the March 7th draft, Staff will explore possible solutions.
- **How addressed:** Affirmatively Furthering Fair Housing (AFFH) is a requirement of the Housing Element under state Planning Law. The City is not opting into SB 10 citywide, but instead is using the framework of the law to create the Missing Middle Housing program to achieve the AFFH goals. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character.
- **How addressed:** The current height limit is a constraint on development. The City must eliminate identified constraints on development. HCD has questioned whether a building could be designed at 70 du/ac or more with a 45 foot height limit. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City held three public meetings, on February 1st, February 9th, and February 15th to discuss the proposed zone changes to allow for missing middle housing.

Kristine Kwong (March 7, 2023)

I am requesting the City change the section of the housing element to limit the area that allows four-flex parcels on major traffic corridors only or near the Metro station. Since the City has a voter imposed height limit, I suggest removing the mention of 7-10 story building that are above the current limit until the time the voters have had a chance to consider this issue.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit must be stated for certain parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. The recommended height limit change only applies to those specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Peter Giulioni (March 7, 2023)
Dear Armine,

Hopefully this finds you and your family continuing to be safe and healthy.

This is an out-reach from a SoPas community member, rather than a commissioner, so, please consider it through that lens.

Recently, it has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. Is my understanding correct?

While I'm a relative new-comer to SoPas (I moved here with my family in 1996) I believe this will significantly impact the very things which define living in our community.

Over the past several years I have worked side by side with fellow residents to ensure passage of the UUT and the increased local sales tax. We worked to secure and sustain funding for our schools through SPEF initiatives, and even our public library. While a tremendous amount of work, it was/is personally rewarding for us as volunteers because we were truly campaigning for sustaining our way of life here in SoPas. And please note, I used the word "sustaining" not "protecting" - I am a proponent of thoughtful and conscious growth and expanded thinking. The advocacy of many of my SoPas neighbors can be seen as a continuation of the spirit shown by the generation before us who fought to prevent the 710 freeway from bisecting our town.

While not completely conversant around the demands of the HCD and the consequences of not complying with them; embracing potential solutions that will impact our police and fire departments, infrastructure and schools while potentially reducing tax revenue due to diminished property values seems counterproductive at best and irresponsible at worst.

Please consider this a "formal" request that you direct the city staff to find another way to "meet the numbers" without negatively impacting the very nature of our way of life here in SoPas. I believe we are special in so many ways, and don't want to see us become yet another "characterless" wasteland on the edge of Los Angeles.

As always, please feel free to reach out for more information or clarification.

Stay safe and healthy, warm regards, Pete

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Leonard Mlodinow (March 7, 2023)

To whom it may concern: I just heard that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. I feel strongly that this would have an enormous negative impact on our community and that it is not in character with what I and my neighbors understand and appreciate as South Pasadena. I hope you can illuminate those changes from the plan.

Leonard Mlodinow

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023. The recommended height limit change applies only to specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Brian Bright (March 7, 2023)

Hi Council,

Living in South Pas has been a great experience. This city has a long history of preserving its identity, history, and way of life. South Pasadena was bisected in the 40's by the 110 and the people said "never again" to be pushed around by Sacramento, so they fought when the 710 expansion was going to decimate the city by splitting it into fourths with the 110. South Pasadena prevailed, thankfully, or this city would have been split up.

Now the overlords in Sacramento want to control our town again, adding an unreasonable amount of new construction due to a blanket law that pays no attention to the amount of apartments vs single family homes in each community. South Pas is almost evenly split with rentals vs single family homes, unlike many of our neighboring cities (looking at you San Marino). To make things worse, we have paid shills for the development industrial complex who have infiltrated our town and are on social media complaining about a lack of housing ad nauseum, all the while living in their affluent single family homes. How this expansion of units effects our schools, infrastructure, and way of life is never discussed in a logical debate.

Unfortunately, city council did not fight hard enough against the state punching down a few years ago, and here we are. 10 story buildings in South Pas, our of historic homes being able to be 4 plex apartment buildings...seriously? Lets fight now to preserve our town, we owe it to those who fought the good fight in years past and to every homeowner in this city!

Sincerely,
Brian Bright

- **How addressed:** The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Donna Scott (March 7, 2023)
To whom it may concern:

The new zoning proposal for South Pasadena is unacceptable.
Eliminating zoning for SFRs, as well as increasing building heights to 7-10 stores will completely change the character of our town.
Also, there seems to be a movement to push through this HUGE change without much discussion, or publicity.
I would request slowing the process down, making details known through local papers etc.,in order to get more input and allow for the proposal of different options.

Thank you.
Donna Scott
1970 La France Avenue
South Pasadena
626 840 7189

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss these changes. The City has a court-imposed timeline for responding to HCD's comments, which necessitates the speed with which the City is acting on these policies. Additionally, the City has a page dedicated to the Housing Element where all updates have been posted.

Bruce A. Finstead (March 7, 2023)
We are writing you because we fear that South Pasadena's approach to the state mandated Housing Element requirements may destroy the small-town atmosphere of the city where our family has lived since 1971. We are well aware of the NIMBY potential of our comments and the difficulties you have in balancing the desires of our small community with the societal need to provide additional affordable housing for California residents. We further realize the frustrations of dealing with regulations that may well not take into account the divergent needs and desires of small vs large communities.

Of paramount concern to us is the proposal to eliminate single family residential zoning throughout the city. Among the many characteristics of our city that make it special are its neighborhoods of people living next to one another in single family homes. Neighborhoods have people with bonds developing over years; this cannot occur if multifamily dwellings with relatively short-term residencies are intermingled with homes of families living there for years, or even generations. Expanding the areas or corridors where multifamily residences are allowed is not the ideal situation, and may be necessary, but to eliminate single family residential zoning for the entire city should not even be under consideration.

South Pasadena does not have much undeveloped land; it may well be necessary to go up rather than out to obtain more developable space; raising the building height limits may be aesthetically undesirable, but it may be a necessary concession to the state. It might be more tolerable if mixed use buildings were required with businesses on the ground floor and residences above. Is it possible to provide financial incentives to current "tall" building owners to convert their buildings to mixed business/residential use?

Thank you for your consideration. If you wish additional input from us, we would be pleased to provide it.

Bruce A. Finstead, M.D.
Melissa Finstead
1947 La France Avenue, South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Michael Girvigian (March 7, 2023)
Hello,

As a longtime resident of South Pasadena, I urge the city staff to significantly re-think the latest draft of the city's housing element.

I understand there is a statewide mandate to increase housing, which is several years old now.

This statewide mandate, however, was made at a time when the projected state population by 2040 was 50 million people.

The population growth has stopped, and the state population is shrinking.

The state's population could remain stagnant for the foreseeable future.

There are a number of reasons for this, which include: increased out-migration, reduced immigration, low birth rates.

Future mass transit ridership adjustments are already underway based on new projections of shrinking population growth.

High speed rail update gets closer to reality, but major risks remain
https://www.masstransitmag.com/rail/news/53027098/ca-how-many-people-will-use-californias-bullet-train-planners-lower-ridership-estimates
High speed rail update gets closer to reality, but major risks remain

Thus, destroying the quality of life of the people in small towns, in the name of an outdated mandate, is not fair or equitable.

I urge the city staff to re-think this latest draft of the housing element.

Sincerely,

Michael Girvigian
310 Meridian Ave.
South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Cathleen Hoadley (March 7, 2023)
I've been made aware that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

I can't even imagine South Pasadena suddenly having a skyline with buildings higher than four stories; it will completely change our little town. The other issue is that we have neighborhoods with single family homes, and also certain parts of town with high density apartment buildings, and then there are some areas with a healthy mix of both, but none are higher than four stories.

My neighborhood of Buena Vista/Foothill/Prospect/Meridian/Highland/Fairview, nestled between Fremont on the east, Orange Grove on the West, and just north of the 110 freeway (Foothill) and bordered by Columbia on the north, has no apartment buildings at all; if someone were to purchase a home, and raze it, and put up a multi-unit apartment building, that would completely change the nature of the neighborhood I have been fortunate to live in for the past nearly 23 years. I have neighbors on all sides who have lived on Buena Vista for coming up on 50 years. These are the people who fought the 710 extension which would have ruined South Pasadena forever. I know many people are creating ADRs, which are welcomed, but perhaps not enough.

Please be mindful of how being able to construct a new apartment building with four units in the middle of a solely single family neighborhood will drastically impact the nature of these traditionally single family home neighborhoods.

Thank you,

Cathleen Hoadley
1109 Buena Vista St.
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Sandy Kitto (March 7, 2023)
To: The City of South Pasadena

As long-time residents of the city, we reviewed the current draft of the City of South Pasadena (City) 2021-2029 General Plan Housing Element with concern. The elimination of single-family zoning, and the height limitations for multi-family residential units reaching 7-10 stories would negatively impact the appearance and personality of the city that attracted so many residents like us.

These concerns are as follows:

- The universal elimination of single-family zoning is short-sighted in allowing up to four units being built on a single parcel anywhere in the city. Many parcels in the city, such as our house on Bonita Drive, would be challenging if not impossible to accommodate four units, yet that would be permitted. The construction would create unimaginable chaos for the neighborhood, and a parking nightmare afterwards.

We suggest that a parcel size requirement be included that would limit this expansion to parcels that could reasonably accommodate the units and parking for the residents.

- The current plan eliminates the requirement for parking for any construction within a half-mile of mass transit, most likely the Gold Line at Mission Street and Meridian Avenue. Imagining multiple seven story buildings in that neighborhood, would create mammoth parking issues. Just because people live near the Gold Line does not mean they work in an area serviced by the Metro. And even if that were the case, it does not eliminate the necessity of having a car in the Los Angeles metro area for errands and weekend travel. Even the grocery stores on Fair Oaks Avenue may exceed the resident's willingness to remain pedestrians while carrying groceries.

So many of these residents will still have vehicles clogging the limited parking available. This potentially would impact the merchants along Mission Street by blocking customers from accessing the area.

We suggest reducing the height restriction (and thereby the number of units), AND requiring parking accommodation be part of the project.

- From an aesthetic point of view, allowing new construction of 7-10 stories is a dramatic change from the current situation in the city. A sudden influx of 7-10 story buildings would forever alter the landscape of South Pasadena; blocking mountain views, casting huge shadows on adjacent parcels, and reducing the charm of the neighborhood. The Eclectic Music Festival, and semi-annual Arts Crawl would be a completely different "vibe," as would daily living.

We suggest limiting the height maximum to a more reasonable 4 stories to maintain the City's appeal.

For these reasons, we urge the City leaders to reconsider the plan as currently proposed.

Sandy Kitto and Joe Walters
911 Bonita Drive
South Pasadena, CA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements, as well as incorporate other state requirements such as elimination of parking requirements in close proximity to transit. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Sally Kilby (March 7, 2023)
To Whom it May Concern:

One change I would request is that buildings of up to a fourplex be limited to parcels on such major traffic streets as Fair Oaks, Huntington, and Fremont, and to those near the Metro South Pasadena station. I would also recommend excluding mention of 7-10 story buildings since South Pasadena has a voter-imposed building height limit. Citizens can be asked to vote on this at an upcoming local election.

Sally Kilby
City Clerk, Retired
1000 El Centro Street
South Pasadena

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit for parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. As to the actions regarding the height limit, indeed the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Linda Poore & John Poore (March 7, 2023)
I have lived in South Pasadena for 47 years and taught many years at all 3 elementary schools. This community is filled with many creative innovative people who have solved many problems over the years including The 710 freeway corridor , library funding, numerous tax raises to improve services, etc. It's time to find solutions that involve input from many residents, including reviewing how other small communities are complying to the new requirements. Please feel free to contact me at any time.

Linda Poore & John Poore
1964 La France Avenue
South Pasadena, CA 91030-4608

1-626-390-0059

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Mike Mitchell (March 7, 2023)

As a new owner of a single family home in South Pasadena I have serious concerns about the changes being suggested by local and state government. I am understanding of the need for more units and lower income housing to create more access to housing for a wider range of individuals, but the changes are too extreme and will have deleterious effects on the community.

As someone who has spent over a year waiting to get planning permission, I understand that the city takes very seriously the cohesiveness of neighborhoods and how that cohesiveness affects home ownership for us all. Suggesting that it is acceptable to go from areas entirely comprised of single family homes to suddenly giving large investors the right to build complexes over 7 stories high is incredibly extreme. Even tempering this suggestion to complexes of 3-4 stories would have an impact, but would be understandable given the state mandate for increased housing. People have invested huge sums of money in their home here to live in what feels like a special community. We want more people to have access to it, but not at the expense of damaging those people's investments.

It may seem callous to talk about investment in a community in financial terms, but those investments are people's future stability, and in Southern California represent a huge portion of a person's material wealth. It is even more callous to wantonly disregard how difficult home ownership is in this state by diminishing people's values and subsequently their future stability.

Change is needed in order to bring new, lower income families into this city, and more of them. Change should however, be brought about in ways that do not damage the existing balance in the community but rather improve it. I would like to think that the very intelligent members of our local government can find a way to bring about the changes we need while preserving what drew people to this community to begin with.

thank you,

-Michael Mitchell

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Keith Tsang (March 7, 2023)

Hello,

I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a voter imposed height limit, I

would recommend removing the mention of 7-10 story buildings that are above the current limit until such a time when the voters have had a chance to weigh in on this.

Keith Tsang
1440 Indiana Ave

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Nicholas Greco (March 7, 2023)

The city's infrastructure cannot handle the additional volume of residents should the four Plex allowance be authorized. Homeowners pay the majority of taxes and this will lead to an undue burden on the homeowners of South Pasadena and a decline in the quality of schools and city services that we all cherish. State mandated ADU add ons that are rentable will bring in additional residents while also allowing for increases in property tax revenue by the homeowner. Please don't disrupt our way of life and diminish the quality of our quaint town. We hope that the City Council considers this as they were elected to protect the way of life that South Pasadena homeowners and residents have come to appreciate.

Sincerely,

Nicholas W Greco MD, FACEP
Operations Director
Emergency Department
Huntington Hospital

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

South Pasadena Tenants Union (March 8, 2023)

Dear Ms. Becker and Ms Fausto:

South Pasadena Tenants Union leadership are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are however surprised to learn that as of last night, the original draft of March 2nd has already been substantially revised and without any published responses/comments indicating public input. In reviewing the March 7 redline version, we are disappointed to see that the proposed program addressing the fate of the CalTrans homes and the implementation of SB381 has changed drastically from the March 2 version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest change.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change with a modification. We can support triplexes and fourplexes being limited to the high transit areas but we will need the City to commit in the Housing Element to a rent stabilization ordinance that is fully enacted no later than June 2024. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

> *For program 6.d, SPTU asks that you include within the 5th draft a deadline of no later than June 2024 for implementation of a rent stabilization ordinance.*

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We appreciate and trust that staff will do as proposed, but will need to see good faith that the City weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Jenny Bright (March 8, 2023)
Very well said!! I am in agreement that we need more affordable units. It is the heavy hand of Sacramento overriding local control with threats that is not in the spirit of South Pasadena. Rezoning is the wrong direction. There are still locations in town to add affordable housing that we can support financially without having to erode the entire character of the City. We already have >50% rentals here so it is not as if we are out of balance.

On Wed, Mar 8, 2023 at 8:15 AM richard schneider <rdschneider0@yahoo.com> wrote:

> I am certainly in favor of the city having a mixture of housing for different income levels. We need more units for low and moderate income levels. When I and my wife moved here years ago we were low income renters. But I think the provisions suggested for the new Housing Element, however well intentioned, are going in the wrong direction. What is needed is state subsidies for affordable units distributed throughout the city. Some of that subsidy money could be obtained by market rate sale of Caltrans properties. There are thousands of Caltrans properties around the state which could be utilized.
>
> The current housing crisis was not caused by the City of South Pasadena nor its residents. And responsibility for crisis solution should not be transferred from the state to local communities.
>
> Yours very truly,
>
> Richard D.Schneider, MD

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable

homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Dan Evans (March 8, 2023)
Ladies and Gentlemen:

I believe it may be a mistake to treat this issue as normal, administrative "compliance" with properly-enacted state law. In reality, we do not face normal legislation in SB 9, SB 10, etc. What we face is an attack on the way of life we choose to live in South Pasadena. Big-government social activists have seized the single-party government in Sacramento for a social revolution – to eliminate the middle class by removing our choices on how we live. We choose to live in single-family homes with gardens, not in massive housing projects as the social revolutionaries in Sacramento insist.

Confronted with a social revolution, "compliance" is a weak, conciliatory approach which will further empower the social revolutionaries. South Pasadena led the way against big-government plans to build a freeway through town, we should also lead resistance to these Big Brother housing efforts. Our resistance will lead to litigation; eventually cooler heads in court will see that SB 9, SB 10, etc. constitute a "taking" of property without due process. (fyi – I have taught Constitutional law.) We must stand up for the way of life we choose to live, not cave to big-government activists!

Dan Evans
dmevans@southpas.org
(626) 403-0575

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Felix Gutierrez (March 8, 2023)
Dear South Pasadena City Leaders:

I understand that an elimination of Single Family zoning in South Pasadena has been proposed and is being considered by the city government.

Please register my strong support for continuing Single-Family Housing Zoning in the range of zoning options available to the city and residents. Other options should also be included and new ones added without eliminating one that has served the city well over the years and is needed for the future.

Single-family homes are a defining characteristic of some of our neighborhoods. Eliminating that zoning option could lead to overcrowded lots, schools, streets and parking spaces, not to mention additional demands on police, fire and other first responder services. We have already seen these overcrowding impacts on nearby cities.

I strongly urge you to keep South Pasadena's best long-ranges interests in mind as you contemplate possible changes.

Sincerely,

Félix Gutiérrez
632 Milan Avenue
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The Housing Element includes policies that commit the City to allow for missing middle housing types along high-quality transit corridors, if property owners so choose.

Laurie Chatham (March 8, 2023)
Dear All Concerned,

The DRAFT Housing Element has come to my attention via my concerned neighbors. I wanted to give my input as a concerned community member, having lived in South Pasadena for 26 years, and having visited my Great Aunt in this city since 1958.

Is it true that the DRAFT includes elimination of zoning for single family homes throughout the entire city? Is it true that there is a proposed height limit for buildings being increased to seven story structures? These proposals will have a negative impact on South Pasadena and are extreme. We have seen how other neighboring communities have allowed higher density development on lots that previously contained a single family home. There is significantly more traffic and the community atmosphere is negatively impacted. Please consider limiting the change in zoning to the high transit corridors (not city-wide) and elimination of references to seven or more story buildings in South Pasadena.

Thank you for your consideration,

Laurie Chatham
1915 La France Ave.
South Pasadena, Ca. 91030

How addressed: No, it is not true that zoning for single-family homes throughout the City is being proposed. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. It is also not true that the height limit is being increased. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Deni Sinnott (March 8, 2023)
I am writing to comment before today's deadline on South Pasadena's plan to build affordable housing.

I am confused by the fact that the city wants to march forward on the plan to supply affordable housing but has decided the Golf Course is off limits.

From Appendix B:

Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing? - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

Who is the council affiliated with that they need to back off from using this piece of land for the plan?

It would seem to be ideal and could be used to create housing in the Arroyo which is idyllic compared to some of the sites proposed, in particular, JAMMING housing on smaller parcels or even in between current houses that exist on residential streets.

I am in favor of lifting height restrictions on buildings but those newer, taller buildings would need to be built on major thoroughfares.

We do need to build more housing and there are some buildings/parcels that I just know could be purchased to accomplish this tasks are:

- Crash Champions Body Shop on 300 Fair Oaks- two large lots could accommodate 1 building each.
- 1499 Huntington Drive office building at Fair Oaks (old and needing rehab) Occupancy is not 100%. I believe this is taller than 4 stories already!
- Bargain Market and adjacent retail could also be used for new homes/apartments/condos.

I am sure there are many more places in the city that could be repurposed without disturbing the streets where we have mostly single family homes. If ADU is a desired route, the city should subsidize the building of those to homeowners who would like to participate and STREAMLINE the permitting process to be less onerous.

--

Deni Sinnott
Homeowner, 2066 Fletcher Avenue, South Pasadena
CLPF, NCG, MBA
626-233-4128

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the City. The Housing Element does consider these other parcels as potential candidates for redevelopment, but the City does not have substantial evidence that they will be redeveloped during the planning period. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

Mary Urquhart (March 8, 2023)

The recommendation to repeal the current 45-foot height limit on any residential or mixed-use project is in opposition to the vast majority of residents. The minimum requirements of 84 feet and 7 stories or 110 feet and ten stories, depending on whether the project is in an area with a density of 50 or 100 units per acre, respectively, is unacceptable.

However, the approach of layered zoning in major corridors has the potential to be a bonus to our City. Mixing affordable housing with middle and higher-income housing options along with retail in major corridors that have a much higher traffic flow, such as Huntington Drive, should be listed as an option. Once the HE is approved, we can explore ways to work with our community to do this where this may be a bonus to our community. Areas that may apply to this concept are located on Huntington Drive and Arroyo, which are currently not offered in the current HE.

The second area that is of deep concern in the 5th draft is the implementation of SB9 and SB10, the Missing Middle Housing (MMH). SB10 is NOT a mandate and our City and our City were not considering this. Why was this included? Can you imagine this being allowed in our historic Bungalow Heaven? This language should not appear in our HE.

I do applaud the hard work that our City Planning Department has done in the past few months to pass an acceptable HE.

- **How addressed:** The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing (AFFH) and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. Removing or increasing the current height limit is the only way to accommodate the RHNA requirements without upzoning the existing low-density residential zones. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The policies in the Housing Element fulfill the requirements of AFFH.

Mary Farley (March 8, 2023)

There was given no time for working people in South Pasadena to respond to this proposal. We are being railroaded and this needs to be litigated. The impact on our tiny town is wildly disproportionate compared to contingent communities.

When my family moved to South Pasadena from Boston forty three years ago, we asked my husband's employer, USC, what would be a good place for a mixed race family to relocate near the medical school, and the suggestion was South Pasadena.

The introduction of racial elements into this battle over development is bogus and there should have been adequate time in which to challenge it.

- **How addressed:** Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss the Housing Element revisions. State law requires that all housing elements address racial wealth and homeownership gaps as part of the Affirmatively Furthering Fair Housing (AFFH) analysis.

Eric Hausner (March 8, 2023)

Dear City of South Pasadena,

As a home owner and resident of South Pasadena, I wanted to provide feedback on the proposed General Plan Housing Element. In particular, I am concerned with allowing duplexes, triplexes or fourplexes throughout the city.

This change will fundamentally harm the fabric of South Pasadena that makes it so unique and special. Instead, I would suggest limiting these changes to major traffic corridors only, such as Huntington, Fremont, Fair Oaks, Mission (near downtown) or near the Metro station.

I also think it's a good idea to wait on revising the height limit until voters have had a chance to cast their votes on the matter.

I understand the enormous pressure the city is under to make these changes. However, hopefully we can find a way to be compliant while also preserving the character and history of this amazing city.

Respectfully,

Eric and Emily Hausner
1722 Milan

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. The Housing Element does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced.

Helen Mendoza / Pamela Privett (March 8, 2023)
To the City Council:

While we are in favor of increasing and diversifying housing within the city of South Pasadena, we believe the new draft of the Housing Element is at best, extreme and out-of-line, and at worst, thoughtless and irresponsible. As we understand it, the new draft 1) eliminates zoning for Single Family Homes 2) allows for development of up to 4 units on any property city-wide and 3) raises building height limits to 7-10 stories.

These are outrageous rules and will 1) negatively impact the property values for all residents in the city 2) severely encumber a school district already stretched to the limits on space and resources and 3) destroy the very character and quality of life that has made South Pasadena the kind of community people want to live and raise their families. In addition, we feel you have failed to consider that the city's infrastructure is neither designed nor capable of dealing with the increased need for resources should these new rules go into effect.

Yes, we need to find a solution for affordable housing for the city's residents and those who want to move here. However, doing so by creating rules that will make it possible to fundamentally change the fabric of our town and destroy the value of historic neighborhoods like Buena Vista in the northside or Edgewood/Milan/Stratford to the south side or those in Monterey Hills would be irresponsible and negligent.

South Pasadena's "calm" within the "chaos" of Los Angeles is what brought us here. We wanted to raise our children in good schools and live in a diverse and welcoming community. It was the history of the old house we got to restore, and the small town neighborliness we love that have kept us here.

There is a saying about buying real estate — don't purchase a single family home that has a multiple family unit on the block. The city's new plans will make it possible to put multi-unit apartments on ANY property… and that would devalue all the property for all residents.

These new Housing Elements would fundamentally destroy the face and skyline of the city, and it would in turn dismantle South Pasadena's character and heart.

Every city is having difficult conversations about how to deal with their fluctuating population densities. The draft presented, however, is short-sighted and misguided. Surely the city can find more creative solutions to these issues than what has been put forward.

Helen Mendoza / Pamela Privett
Buena Vista Neighborhood
201 Beacon Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Jenny Bright (March 8, 2023)
South Pasadena is a wonderfully unique City with a balanced housing stock of owners and renters and also a balanced and diverse population of residents. Eliminating single family zoning would erode the entire character of the City that attracted its diverse population in the first place. It would make the City indistinguishable from every other community just outside of LA. Raising the height limit of buildings would be an irreversible step and make this City that has been so thoughtfully preserved for the last 135 years unrecognizable. We can and should add affordable housing units but we can do this without destroying the City.

-Jenny Bright

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. As to the actions regarding the height limit, the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Jim Tavares (March 8, 2023)
I believe there is general consensus that it is the right thing to create more housing within South Pasadena; the concerns are how that housing is created, what it looks like, and ensuring it does not

create unintended consequences of congestion and loss of South Pasadena's community feel. If South Pasadena simply becomes a place, and no longer a community, the process will have failed.

I don't think that has to happen.

I think roundly rejecting SB 10 is a must, as is rejecting the idea of a ballot measure for unlimited building heights at 50 du/acre. It will create endless disharmony between opportunistic developers and residents and break the character of our community. An 8,000 sf lot with ten units on it will accomplish the density needed to exceed 85 feet in height and shadow a residence next door.

Market rate sale of Caltrans properties can go a long way for Los Angeles as well as South Pasadena to fund more affordable housing projects vs. repurposing of these homes and the costs to do so--private owners can purchase and rehabilitate the homes with the sale profits going to other projects throughout the city, retaining the character of existing neighborhoods.

I think it is folly to have any properties that do not supply parking at a rate below one per unit, and higher form 2+ bedroom units, despite proximity to public transportation. While I hope public transportation will be used and ease congestion, ridership has trended down over the past 5 years, and while it has recently been on the upswing among certain demographics, safety concerns and reliability/destination proximity will likely force many into their cars, no matter where they live, straining surface streets for parking access.

Lastly, massing at the street and a provision for length of unbroken wall in a given plane and raking of massing from the street, with some green space around structures can go a long way to preserving the community feel so many have come to South Pas to experience. these details need to be ironed out in the Housing Element to ensure development that people want to stay within and around.

Very truly yours,

Jim Tavares

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

How addressed: SB381 has state-mandated requirements on how to acquire, utilize, and transfer homes currently owned by Caltrans. The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Mark Gallatin (March 8, 2023)

The City of South Pasadena has made tremendous progress under unprecedented circumstances toward the development of a housing element that can satisfy the rigorous requirements of state law. Now however, with a court-appointed deadline for completion looming, this progress could be endangered by two proposed programs in the 5th draft of the element that, as presently constituted, do not yet reflect the most creative approaches to the issues they seek to address and will quite likely provoke opposition from many residents.

The first of these is Program 2.n, the Citywide Height Limit Ballot Initiative. This program calls for a referendum on repeal of the current 45-foot height limit on any residential or mixed-use project on which the housing element anticipates a base density in excess of 50 units/acre. It proposes to replace the current height limit with either no height limit or a minimum requirement of 84 feet.

The reason for essentially doubling the current maximum height to a new minimum height is ostensibly to accommodate the greater densities planned in localized areas to stated density goals in order to help the City meet its RHNA target and to achieve the densities identified in the Downtown Specific Plan (DTSP). Despite being revised to reflect a lower minimum height limit, the current language of Program 2.n still tracks with that from the State of California's Department of Housing and Community Development. As such, it does not yet reflect a locally developed solution created with input from community members, appointed and elected officials seeking to maximize compliance and minimize harm, a thoughtful, more nuanced approach that better aligns with the tradition and character of the city's built environment.

What might such an approach look like? For starters, it would restate the modest proposal made by the City's original general/specific plan consultant to consider raising the height limit along Fair Oaks Avenue frontage properties within the DTSP from 45 feet to 50 feet to facilitate well designed and proportioned four-story buildings on Fair Oaks Avenue.

Second, it would draw on the incredible depth of talent, expertise and experience of design and architectural professionals that call South Pasadena home, as well as interested laypeople, to fashion a strategy that de-emphasizes governing metrics such as minimum height in feet or number of stories and instead focuses on standards such as floor area ratio (FAR) and unit size to create a "building envelope" capable of accommodating the desired densities within the confines of the existing height limit or a modesty increased one. That such an approach can yield the densities contemplated in the DTSP or in overlay zones on arterial corridors has already been demonstrated by projects completed in cities across the region, in locations as diverse and different as Santa Monica and San Gabriel. The inclusion of some of these standards in the latest draft of Program 3.b is a good beginning but it is hoped they are just the starting points for further discussions rather than faits accomplis, as the real work will begin when drafting new zoning provisions to implement the adopted element. Creative approaches to density, such as the "layered zoning" approach on major corridors, as recently presented at a WISPPA forum on the housing element, should be given serious consideration and embraced, lest we become consigned to monolithic housing blocks with minimal setbacks and amenities. Density simply doesn't have to be done that way, as history both here and abroad should have taught us.

The second program of concern in the 5th draft is Program 3.m, Implement SB 9 and SB 10. Missing Middle Housing (MMH) is a key strategy in helping the City meet its housing goals but it should in no way be conflated with SB 10. MMH was being successfully implemented in California and other states long before SB 10 was even dreamed of. SB 10 is not a mandate to be blindly followed by cities under threat of penalty but is in fact legislation that requires that cities opt into it voluntarily. Our City Council wisely voted not to opt into SB 10 when presented with the opportunity to do so. MMH can

be implemented with greater flexibility without choosing to opt into SB 10. By placing the very valuable strategy of MMH under the aegis of SB 10, Program 3.m unnecessarily stokes fear in residents to the detriment of acceptance of the housing element as a whole.

The key policy question for the city as regards the implementation of MMH is whether to apply it only in selected areas of the city or allow it citywide as what planners refer to as a "floating" zone. Such a zone is not tied to a specific area, but rather would make MMH a possibility on any residential property that meets certain objective design and development standards. The latest draft of Program 3.m favors the former approach by establishing a nexus between the location of MMH housing types and proximity to high-quality transit corridors and/or transit stops. Such a nexus is logical, given the importance high-quality transit corridors and/or transit stops played in determining the City's RHNA allocation. Suffice it to say that perhaps preliminary criteria, such as minimum lot size, can be established to screen out areas where MMH might be infeasible, being mindful of the fact that some neighborhoods have a preponderance of lots less than 5,000 square feet in size.

In conclusion, the shortcomings of Programs 2.n and 3.m not withstanding, the latest update of the 5th draft of the Housing Element is appreciated and raises hopes that the conversation around implementation changes from one about terms like density, multi family and upzoning and instead begins to focus on form, scale and housing types. The first version of the 5th draft was representative of a philosophical approach which has dogged the preparation of the housing element from the beginning. That is, whether to craft a creative comprehensive and inclusive grassroots approach to housing policy that reflects and respects the will of the people or to place trust in the community's future with an all-knowing, all-powerful state government dictating and mandating from on high. With the element so close to completion now, it is sincerely hoped that the choice will be the former, rather than a community vision of the state, by the state and for the state.

- **How addressed:** The new height limit in Program 2.n is not a minimum height, it a revised maximum height limit to allow for the densities identified in the Housing Element. If the height limit is replaced, the new height limit shall be no less than 84 feet. Nothing in this would prevent a land owner or developer from proposing and constructing a building that is less than 84 feet. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The Housing Element is specific about which housing types the city is going to consider as part of its missing middle housing implementation, as well as the areas of the city where missing middle housing will be allowed.

Delaine W. Shane (March 8, 2023)

Dear Community Development Department Staff and Management:

Thank you so much to be willing to making last minute text edits on the proposed housing element. I will limit my response in this email to Program 1.b concerning the fate of the Caltrans housing. Some of your yellow highlighted text I get are meant to be a compromise, but they are so wishy washy that

"explore" means nothing. There is no real commitment. Here are my suggested revisions, based on the latest version online

Program 1.5 - Convert Caltrans Homes to Affordable Housing The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB381 that respond to the cost constraints of particular properties.	Acquire and convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas. Maximixe the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.	General Fund; HRE; public (federal, state, regional) grants, loans and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)	Caltrans; Community Development Department/City Manager's Office	Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State; target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

CITY OF SOUTH PASADENA MARCH 2023
2021-2029 PUBLIC REVIEW DRAFT GENERAL PLAN HOUSING ELEMENT UPDATE Page 5

If financially feasible and demonstrated as such in writing by a qualified financial expert, the City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by an experienced, qualified development partner in the affordable housing construction industry. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City may purchase some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will prioritize and pursue alternative solutions, including the side-by-side escrows or double escrows, outside of SB381 that respond to the cost constraints of particular properties.

Acquire, if financially feasible, and as a last measure, convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas, so long as the neighborhoods of the remaining Caltrans properties are not overly represented. Expanding housing mobility opportunities shall be shared equally and distributed throughout the City.

The statement in the right column at the bottom states: "Units will be available to occupants by October 2024." Seems to be overly optimistic. Recommend deleting it or saying X months after work has been completed that the units will be fit for occupation. You have no control over construction/rehab contractors, supply distribution systems, and actual materials. Delays are unfortunately part of our new normal post pandemic. Why box yourself in a corner with HCD by setting an unrealistic and really naïve date?

Thanks again for allowing input by the public in this manner.

Sincerely,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Ed Elsner (March 9, 2023)
Dear Director Frausto-Lupo,

Avoiding displacement of existing residential tenants should be a higher priority in the City's housing element.

The 5th draft housing element proposes to include Huntington Drive as part of the Downtown Specific Plan, change the zoning of medium and high density residential parcels to mixed-use, and increase density to 70 du/ac -- a higher increase than the 30 du/ac and 45 du/ac proposed for medium and high density residential zones elsewhere in the City.

This proposed rezoning of Huntington Drive would promote displacement of existing tenants residing in multi-unit apartment buildings along Huntington Drive, and while the housing element's proposed tenant protections may help mitigate the displacement, as a practical matter the displacement will be permanent.

Displacement most acutely affects families with children (who may have to be pulled out of school mid-year), the elderly, and the disabled, and the impacts can be devastating.

In my experience representing residential tenants in eviction cases off and on for 30 years, the "right of return" is illusory in most cases.

This is primarily because two moves are required. While the landlord would be required to pay relocation assistance to the tenant on the way out, the right of return typically does not include a requirement for the owner to pay moving expenses for the return move. The right of return depends on the landlord giving the displaced tenant a written offer, and the tenant typically has a limited period of time (typically, 30 days) to accept the offer. The mailed notice may or may not be received, whether because of problems with mail delivery, a property owner who is a bad actor who does not follow the notification rules, a tenant who has moved and neglected to provide a forwarding address, etc.

If the notice is received, it may come years after the tenant was evicted. The tenant may have moved out of the area and established roots in another community, the tenant may not be able to afford the return move, the tenant may be in the middle of a fixed term lease that the tenant cannot break, etc. A successful tenant must be vigilant in monitoring the construction process and may have to hire an attorney to enforce their rights. But most importantly, the tenant's personal situation must be flexible enough that the tenant can make a quick decision at some uncertain time in the future to make the return move, and the tenant must have the financial resources to do so.

A 2018 Los Angeles Times article illustrates the practical reality of the right of return in a City with a well-funded, fully staffed housing department.

The 5th draft housing element also appears to understate the number of existing units on Huntington Drive that would be affected by redevelopment.

To take a random example, parcel 5319037001 (1170 Huntington Drive) is identified in the draft housing element as high density residential parcel with 0 existing units. However, this is actually a 20-unit apartment building. There are many other examples of parcels identified in the draft as medium or high density residential parcels having 0 or 1 existing units when the parcels actually have multi-unit apartment buildings.

Rezoning of medium and high density residential parcels on Huntington Drive should be the same as for medium and high density residential parcels elsewhere in the City.

The "missing middle housing" program in the pre-March 7th draft had good potential to increase housing production while minimizing displacement of existing residential tenants. This is because eligible properties would be single-family parcels occupied in most cases by the property owner, who would be making a voluntary decision to participate or to sell the property to a developer and relocate.

However, the March 7th update may have effectively gutted the program. Before the March 7th update, the missing middle housing program would have applied citywide in all residential zones except high fire hazard areas, and there was a commitment to implement the provisions of SB 10. In the latest update, only parcels in "low-density residential zones along high quality transit corridors and/or transit stops" (and not in a high fire hazard area) would be eligible, and the scope of the program is yet to be determined "by the community, Planning Commission, and City Council."

It is unclear which low-density residential zones would be considered to be "along" the City's high quality transit corridors, identified in SCAG's Data/Map Book as Fair Oaks Avenue and Huntington Drive east of Fair Oaks, as there is no low-density residential zoning actually on either street, and the March 7th update does not identify parcels or zones that would potentially be eligible (subject to a future scope determination).

The housing element should include a more robust missing middle housing program.

Thank you for your consideration,

Ed Elsner
edelsner44@gmail.com

- **How addressed:** Goal 6 and the policies within that goal will be developed after further research to mitigate the potential for and impacts of displacement. The number of existing units was pulled from building permit data. The data was spot checked, but may be incomplete for some parcels.

Ed Elsner (March 9, 2023)

Dear Director Frausto-Lupo,

I'm writing to describe a possible alternative to program 2.n. in the 5th draft housing element (as updated on March 7, 2023), the Citywide Height Limit Ballot Initiative. The alternative would be a general plan amendment modifying the forty-five foot height limit established by local initiative in 1983.

This general plan amendment could be implemented on the same 120-day timeline as the housing element's other rezoning programs (which include other amendments to the land use element of the general plan), and with more certainty than the proposed 2024 ballot measure.

Recognizing that this alternative program may not be viable politically, I'm hoping this comment at least provides additional perspective that may be useful as the City works towards achieving its housing element goals.

The General Plan and the Land Use Hierarchy

The state Planning and Zoning Law establishes the authority of local governments to regulate the use of land. Gov't Code § 65000 et seq.; Neighborhood Action Group v. County of Calaveras (1984) 156 Cal.App.3d 1176, 1182. Each city must adopt a general plan for the physical development of the city. Gov't Code § 65300. The general plan takes precedence over other local zoning laws:

> The general plan is atop the hierarchy of local government law regulating land use. It has been aptly analogized to "a constitution for all future developments." [Citation omitted.]...Subordinate to the general plan are zoning laws, which regulate the geographic allocation and allowed uses of land. Zoning laws must conform to the adopted general plan. [Citations omitted.] These enactments provide the authority and the criteria for the regulation of land uses.

Neighborhood Action Group, 156 Cal.App.3d at 1183; Gov't Code § 65850 (authorizing cities to adopt zoning ordinances).

Local Initiatives and General Plans

Although a city's general plan may be amended by local initiative (DeVita v. County of Napa (1995) 9 Cal.4th 763), the electorate must have adequate notice of the purpose of the initiative:

> We cannot at once accept the function of a general plan as a "constitution," or perhaps more accurately a charter for future development, and the proposition that it can be amended without notice to the electorate that such amendment is the purpose of an initiative. Implied amendments or repeals are disfavored in any case [citation omitted], and the doctrine may not be applied here.

Lesher Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531, 540-541. "Since we cannot presume the existence of such intent [to amend the general plan], it must be found, if it exists, in the ballot measure itself or the explanatory material in the ballot pamphlet." Id. at 542. Stated another way, in order to amend the general plan, the text of the local initiative or the explanatory ballot materials must provide notice that the measure is something "other than an ordinance in the nature of a zoning ordinance." Id. at 544.

The 1983 Height Limit Initiative

In a 1983 special election, South Pasadena residents voted to approve a local initiative establishing a citywide height limit of forty-five feet (Reso. 5642):

The initiative did not identify a provision of the general plan that it would amend, nor did it state that it was adding to the general plan; therefore, absent some other basis in the ballot materials to conclude that its purpose was to amend the general plan, the 1983 initiative has the status of a zoning law subordinate to the general plan in the land use hierarchy. Lesher Communications, 52 Cal.3d at 541.

Amending the General Plan to Modify the Height Limit

Section 9217 of the Election Code generally provides that local initiatives may not be amended or repealed except by a vote of the people, and program 2.n. assumes that the City's forty-five foot height limit cannot be modified without voter approval.

However, if the 1983 initiative is subordinate to the general plan, section 9217 would not restrict the City Council's authority to amend the general plan to modify the height limit, and once amended, the general plan would prevail over the inconsistent subordinate law:

> The Planning and Zoning Law itself precludes consideration of a zoning ordinance which conflicts with a general plan as a pro tanto repeal or implied amendment of the general plan. The general plan stands....The Planning and Zoning Law does not contemplate that general plans will be amended to conform to zoning ordinances. The tail does not wag the dog. The general plan is the charter to which the ordinance must conform.

Lesher Communications, 52 Cal.3d at 541.

For similar reasons, the 1983 initiative cannot be interpreted as superordinate to the general plan. The local electorate's right to initiative is co-extensive with the legislative power of the local governing body (DeVita, 9 Cal.4th at 775), so if the City Council cannot enact a land use law above the general plan in the land use hierarchy -- which it has no authority to do under the Planning and Zoning Law -- neither can the electorate via local initiative. Legislature v. Deukmejian (1983) 34 Cal.3d 658, 674-675 (initiative power is subject to the same limitations as legislative action).

The Housing Accountability Act provides additional support for the suggested general plan amendment. If a proposed housing development project is consistent with objective general plan standards and criteria, but the zoning for the project site is inconsistent with the general plan (for example, because a zoning ordinance includes a lower height limit), the project will be deemed "not inconsistent" with applicable zoning standards and criteria for purposes of approval of the project's land use application. Gov't Code § 65589.5(j)(4).

The 1983 initiative could have included clear language that it was amending the general plan, but as written, it left the door open for the City Council to modify the height limit through a superseding general plan amendment.

Noncompliance with the Housing Element Law

The City has been out of compliance with the housing element law since October 2021, and because it missed the October 2022 deadline to adopt a housing element and to obtain certification from HCD, the City will remain out of compliance until the City adopts a compliant housing element and completes the related rezoning programs.

Given recent media attention, there is more widespread awareness of the consequences of noncompliance with the housing element law, including the loss of authority to disapprove land use applications for housing projects that are inconsistent with the City's zoning laws, also known as the "builder's remedy." Gov't Code § 65589.5(d)(5). As a result, the electorate has a better understanding why South Pasadena needs to obtain housing element compliance sooner than later, and anyone following the progress of the City's housing element should understand how a modified height limit in designated higher-density zones is critical to achieving that goal while avoiding a radical upzoning of the the entire city.

Thank you for your consideration,

Ed Elsner

edelsner44@gmail.com

- **How addressed:** The Housing Element proposes a program to amend the zoning code height limit which was adopted by the voters. Any ordinance enacted by the voters may only be amended by the voters. The Housing Element establishes a program to put this question to the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

Julie Pearson (March 9, 2023)
To our city staff,

As a resident of the city for 25 years, married to a resident of over 50 years, who is the child of a resident of nearly 60 years, we oppose the city's intention to remove all single-family zoning requirements, city wide. We also oppose the city's intention to allow structures in the city to rise more than 6 stories.
These proposed changes in our opinion would change the feel of our town as well as the neighborhoods, and be detrimental to the family friendly environment that is central to our city.

Thank you for considering my comments.

Sincerely,
Julie Pearson, Keith Pearson and Margie Pearson
1749 Via del Rey

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Bill Kelly (March 9, 2023)
Public Comment on Second Draft of Draft 5 (March 7, 2023) of South Pasadena's Housing Element
(Submitted March 9, 2023)

Greetings:

Thank you for the opportunity to comment on the second draft (March 7, 2023) of the fifth draft (March 2, 2023) of South Pasadena's proposed Housing Element 🤓 in my hopes that it will result in a third draft of the fifth draft.

The comments below first cover general concerns with the latest draft. The second part covers various concerns reflected in previously published and verbalized community comments regarding state housing requirements, as well as an email sent by a resident to unspecified individuals aimed at

prompting comments and complaints to City management and Councilmembers, which you have no doubt received.

Specifically, I urge you to:

- End R-1 zoning throughout the city (except in areas with wildfire and geologic hazards); and

- Get started with affordable housing by committing in the City's housing element to seeing that denser affordable housing is built on as many of the unoccupied Caltrans properties as possible. (The well documented need for affordable housing amid the widely discussed housing crisis need not be amplified here. It is a well-established feature of the landscape.)

In submitting the next draft of the Housing Element to the state, foremost please remember that zoning does not build housing, only investment does, and the vacant Caltrans properties at this point represent the only palpable prospect the City can increase its stock of desperately needed affordable housing in the next few years. Moreover, change will not come overnight with rezoning. Change will come only over a decade or more. Indeed, many of us who are debating housing will be dead and gone before any appreciable change.

General Concerns

First of all, South Pasadena is not alone among cities that to date have failed to see their housing elements approved. It is clear that cities are dealing with relatively recently passed laws and emotional divisiveness among their residents as change rarely is easily accepted. Nowhere, perhaps, is that more true than in South Pasadena, one of the few communities across the nation that stopped the extension of a freeway. That said, much of the traffic the freeway would have conveyed now travels on city streets, including Fair Oaks and Fremont that are regularly gridlocked. Meanwhile, polluting diesel trucks hauling containers from the region's ports don't pass through South Pasadena to reach logistical centers on the periphery of the region, but instead travel along the 60 and I-10 freeways through less affluent communities, many of which are predominantly of color. At the same time, the City has been essentially unable to agree and carry out any significant effort to use available funds for traffic calming, active transportation facilities, and surface street projects, as other cities move forward.

When it comes to housing, some City residents have fought any efforts or plans to allow for increased density, instead seeking to shoehorn density into narrowly prescribed strips along commercial streets and major arterials. In addition, the city's planning and permitting process is lengthy and tedious. As a result, there has been relatively little change in the landscape in the more than thirty years I've lived here. Indeed, residents—including freeway fighters, historical preservationists, and many prosperous owners of large single family homes on large parcels, aided by others prone to fear of change—have managed to keep South Pasadena more or less the way it has been since the post-World War II era, a quaint bedroom community that celebrates the days of Route 66, classic cars, good schools, and beautiful gardens, a community that many residents view as charitable and charming. And no doubt all these things contribute to South Pasadena's much locally celebrated and revered "neighborhood character."

Personally, I must admit that I was drawn to the community upon returning to Southern California in 1988 due to its neighborhood character. However, a lot has happened since then and as I've witnessed the changes—hollowing out of the middle class, offshoring of manufacturing, stagnation of wages, growing inequity, increasing social and racial tension, rampant drug addiction and social

dysfunction, growing homelessness, overcrowding, housing insecurity, a wave of mental illness, and the astronomical cost of housing, and rapidly accelerating climate instability—my view of what it means to live here in South Pasadena, in the region, and in the world has changed dramatically. Today, it's become increasingly apparent that the magnitude of change needed to address this complex of interrelated problems has become so great that over the next ten to 20 years just about everything around us must change, including here in South Pasadena. However, this view is assuredly not shared by apparently influential residents who say they support "thoughtful and conscious growth and expanded thinking" as long as it's not next door. They complain about any proposal to add much needed housing, grasping at any potential plausible objection, such as lack of water, lack of power, traffic, burdens on schools and services, lack of open space, ***and mostly the perception that growth will diminish their property values***. They dispose of anything that's seemingly proposed, yet never articulate on their own what a housing element, or general plan should include. And history has shown their tendency is to get the city to legally contest many state requirements aimed at solving these problems, and then slow roll any local actions developed to meet the requirements once legal actions play out. This pattern clearly is based on the view that South Pasadena is exceptional and should be left to manage its own affairs without regional and state oversight. Yet, this is despite that the source of the wealth here stems from proximity to the second largest metro area in the nation situated on the rim of trans-Pacific trade and in the heart of a state with one of the world's biggest economies. ***Indeed, the message seems to be: I'll enjoy the personal wealth the region offers, but don't ask me to contribute much toward solving the region's problems. Moreover, don't call us irresponsible, because we supported local tax measures and contribute to local charities that are "truly . . . sustaining our way of life here in SoPas." In this case sustaining is a substitute for "not changing."***

However, as city officials and Councilmembers it is incumbent on you to lead, rather than to cater to such provincialism. Just imagine that the story is much the same in small cities across the region and the state when it comes to the state's housing requirements. Note too that such attitudes have prevailed for decades, while problems have mounted and festered. Indeed, it's the lack of any local effort to address the housing crisis that led lawmakers in Sacramento to enact new state requirements. So now, it's reckoning time. Unless we look in the mirror as a community and make the change, the problems that everyone seems to acknowledge and agree must be solved, won't be solved by doing the same as we have done in the past.

Addressing Specific Contentions Voiced in the Community

City-wide R-4 zoning will diminish property values

Don't tread on me and my property value by continuing to maintain R-1 zoning. Numerous studies cited below show that increasing density, particularly everywhere, will result in rising property values and likely check rising rents and housing costs. In addition, the city's inclusionary housing ordinance will require more affordable units.

https://masslandlords.net/gentle-density-increases-nearby-property-values-evidence-shows-contrary-to-popular-belief/

https://www.strongtowns.org/journal/2022/1/18/what-would-mass-upzoning-actually-do-to-property-values

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

Also, increasing allowable density city-wide will open better housing opportunities to all and destigmatize affordable housing residents. It will address the baked in ongoing classism in the City and its racist legacy during the Sundown Town era.

We don't have the water or power to add additional housing units

Housing not lawns is the rejoinder. Indeed, half or more of the water is used outside to water lawns. If the lawns had housing on them, water use would not increase. Indeed, more than half the people dwelling in multi-unit housing in South Pasadena use only half the water used by the less than half that live in single family homes. That's because half the water use at the average-sized single family residence is used to water lawns.

Table 4-1 Demands for Potable and Non-Potable Water - Actual

Submittal Table 4-1 Retail: Demands for Potable and Non-Potable[1] Water - Actual			
Use Type	2020 Actual		
Drop down list May select each use multiple times These are the only Use Types that will be recognized by the WUEdata online submittal tool	Additional Description (as needed)	Level of Treatment When Delivered Drop down list	Volume[2]
Add additional rows as needed			
Single Family		Drinking Water	1,962
Multi-Family		Drinking Water	992
Commercial		Drinking Water	450
Institutional/Governmental		Drinking Water	85
Landscape		Drinking Water	4
Losses		Drinking Water	46
Other	Fire Protection	Drinking Water	7
		TOTAL	3,546
[1] *Recycled water demands are NOT reported in this table. Recycled water demands are reported in Table 6-4.* [2] *Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Table 2-3.*			
NOTES:			

From: https://www.southpasadenaca.gov/home/showpublisheddocument/27639/637738897658270000

In fact, one study shows that on R-1 lots in the area, as much as 70 percent of water use is for lawn irrigation.

https://deeply.thenewhumanitarian.org/water/community/2017/08/09/city-wide-study-shows-how-much-water-urban-landscaping-really-uses

Lack of Power

California utilities are in the midst of major distribution circuit upgrades to increase capacity to deliver power. The California Public Utilities Commission and California Independent System Operator require utilities to show they have enough power for each coming year by performing a "resource adequacy study." To pass the test, the utilities must show they have adequate power purchase contracts for a one-in-ten-year weather event. Utilities also are subject to long-term transmission planning requirements, as well as power procurement requirements.

Overwhelming Transportation Infrastructure

Look Ma, no traffic. A Montreal residential neighborhood at rush hour in fall of 2022.

Contrary and seemingly counterintuitively, density does not necessarily result in increased traffic. Instead, low density single-family development increases traffic. Montreal is a case in point. The four million who live within the city limits there get around by walking, biking, and riding the clean, well maintained, and extensive subway system. Retail, including supermarkets, drug stores, etc. are scattered throughout the city. This has enabled Montreal to minimize the space it allocates for the auto compared to the typical U.S. city, particularly in suburban areas. That has opened up public spaces, which are distributed throughout the city.

Indeed, a new study conducted at U.C. Davis recently showed that increased density will help meet greenhouse gas and other air pollution reduction goals by minimizing the need to drive, even in electric cars. This will help reduce dependence on foreign metal mining for batteries, magnets, etc. used in electric vehicles.

https://www.theguardian.com/us-news/2023/jan/24/us-electric-vehicles-lithium-consequences-research

https://www.climateandcommunity.org/_files/ugd/d6378b_3b79520a747948618034a2b19b9481a0.pdf

Impact on Schools & Open Space

Schools have the ability to expand by building up. Schools also can cooperate with the City to close streets to expand playgrounds and athletic fields. In fact, SPUSD did this when South Pasadena Middle School was rebuilt more than 15 years ago. Moreover, even South Pasadena freeway fighters who support maintaining R-1 zoning have touted closing the 1-710 stubs in Los Angeles and Pasadena, respectively, to expand the Cal State Los Angeles campus and to create new park space in Pasadena. Why not expand elementary school campuses by closing or narrowing adjacent streets where possible.

In addition, areas in Garfield Park under the SCE lines and also areas around the periphery of the fields in the Arroyo could be used to site local basketball courts, etc., or additional community gardens. They are not well maintained and are under-utilized. At one point the updated general plan, which still is pending years later, contemplated placing a walking trail under the SCE lines paralleling Fair Oaks in the Marengo District. It hasn't been done or pursued as the general plan remains in limbo after years of discussion.

Conclusion

To conclude, we are only limited due to our limited way of viewing the world, despite that those voicing opposition to density claim they back expansive thinking. By increasing allowable density citywide and by beginning with seeing that quads, triplexes, etc. are built on the vacant Caltrans lots where feasible, South Pasadena can begin to address the complex of interrelated problems that we all want to solve. However, if South Pasadena and hundreds of other cities continue to do what they have in the past, the problems will continue to grow and make life—with its traffic, pollution and climate change, homelessness, and social inequity—worse and worse. We can either be part of the solution or part of the problem. That's why we must look ourselves in the mirror and decide to truly bring about the change that is so clearly is needed and so long forestalled.

Bill Kelly
South Pasadena Resident

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore possible solutions. The remainder of the comment does not include any proposed changes to the Housing Element, but supports many of the policies already contained in the Element.

Jeremy D (March 6, 2023)
I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a height limit, I would recommend removing the mention of buildings that are above the current limit until the time when the voters have had a chance to weigh in on this.

Page 26:

Additionally, the City will permit "Missing Middle" housing types in all residential zones citywide, except for in high fire hazard areas. Missing Middle housing types shall include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts. The City will adopt objective design standards for each housing type.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. Program 2.n does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting

the RHNA housing goals. Pursuant to the Court order in the existing litigation regarding failure to adopt a compliant Housing Element by the statutory deadline, the City is required to place a measure on the ballot to revise the height limit for residential uses. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Josh Albrektson (March 11, 2023)
This e-mail is CCed to City Council. SoPas planning Staff, and HCD. This is meant mostly for HCD.

There are two major problems with the 4th draft South Pasadena Housing Element. At first I thought they were mistakes but after my conversation with SoPas staff on Wednesday I realized they were intentionally done.

South Pasadena's housing element should not be accepted without these being changed, and it is my hope that South Pasadena changes them before the Housing Element is submitted on Monday. I told them they needed to fix it at our Wednesday meeting and in a subsequent e-mail.

1. The city is using intentionally low FAR to ghost zone the 70 DU/Acre and 110 DU/Acre and make them not feasible.
The March 2nd draft had FARs of 7.0 and 10.0 respectively. They released a new draft on March 7th that changed it to 2.5 FAR. That 2.5 FAR makes 70 and 110 impossible to build and staff knows this.

815 Fremont Ave is a 50 unit density bonus project approved by South Pasadena in April 2022. It has a FAR of 3.3, a density of 61.7 DU/Acre, and a height of 56 feet.

This is a real world example of the FAR needed to build in South Pasadena. Based on this approved project, the FAR for 70 DU/acre should be at least 3.75 and for 6.0 FAR for 110 DU/Acre.

The 2.5 FAR makes both of these densities impossible and the Housing Element needs to be changed to at least the numbers I listed above.

I raised this issue with SoPas staff at my 3/9 meeting, and I found out this was intentionally done.

When I told Allison Becker (AB) that the 2.5 FAR made 70 and 110 infeasible, she told me that General plans, specific plans, and housing elements need to be internally consistent and they changed it to 2.5 FAR because that is what was in the 2020 proposed Downtown Specific Plan (DSP).

I told her that was BS, because the Housing Element was going to have densities of 70 and 110, and if you actually wanted the documents to be internally consistent than the FARS needed to be changed because the 70 and 110 are going to be in the Housing Element and the FAR should be changed to be consistent with the required density.

She then changed her response to say that the community didn't support over 2.5. AB stated 2.5 FAR is what the community agreed to in the DSP in 2020.

AB and Grant Henninger (GH) then stated that the 2.5 FAR is there because of the 45 foot height limit and when the community votes to raise the height limit there will then be a discussion at that time with the community as to what the appropriate FAR should be.

Of note, I have an e-mail from Woody Tescher of Placeworks who wrote our 2020 DSP. The reason he said 2.5 FAR was picked was because that is the biggest building that could be built with 50 DU/Acre and 45 ft height limit. If that is the biggest that can be built under those conditions, then 2.5 FAR is absolutely inadequate for 70 Du/acre and 110 DU/acre at 84 feet.

This kind of ghost zoning is just as bad as their repeated claims that 70 DU/Acre was feasible under the 45 foot height limit and the Housing Element should be changed so that the FAR allows the density stated in the Housing Element to be built. It should be 4.0 for 70 DU/Acre and 6.0 for 110 DU/Acre.

2. SoPas is intentionally setting the zoning for site 3, Pavilions, significantly under what the owner's representative stated was needed for financial viability.

At the Feb first City Council meeting SoPas asked the owner of Pavilions to give a public comment stating that they wanted to redevelop the property and was not concerned about parking during construction. Mr Anderson, the owners lawyer, went much further than that.

Here is the link to the video. Starting at 2:07:30 he gave a 3 minute public comment and then at 2:12:08 he was called back to answer a question from Council Member Braun until 2:14:00. I really encourage you to listen to everything he said.

http://www.spectrumstream.com/streaming/south_pasadena/2023_02_01.cfm

He said he was asked to sign a letter stating intent to redevelop and he did. He also said that he REPEATEDLY told SoPas staff that the zoning proposed in previous housing elements were not financially viable.

He said that the only way they would redevelop the property with housing is if they could replace the grocery store with a bigger grocery store and they were very interested in that.

He also stated that they needed 150-160 DU/acre for the zoning and 140 DU/acre was the absolute minimum needed for financial viability. He also said they could do it at 84 ft.

South Pasadena is zoning this lot for 110 DU/Acre and this is intentionally below what Mr. Anderson said was needed to be viable.

In the March 2nd draft the zoning was 10.0 FAR, 110 feet. and 110 DU/Acre. In the March 7th draft they changed it to 2.5 FAR, 84 feet, and 110 DU/acre.

In my meeting with SoPas Staff I told them that with the changes they were now zoned for less than the very specific requirements Mr. Anderson stated.

AB told me that they had removed Pavilions, like I asked them to. I said no you didn't. It is still there. AB said well they planned to. GH interrupted her and said that they should have this conversation offline.

It appears that there had been discussions in SoPas staff to remove site 3 with the zoning proposed.

AB then asked me "Well, don't you think that this was just an ambitious proposal from the owner used as a negotiating tactic??"

The goal of a Housing Element and SoPas staff should be to actually have the housing be built. It should not be a negotiation with the owner to make the feasibility of a project so low with the least amount of apartments so that the project may or may not be built. This site is one of the best sites to build housing in all of SoPas and SoPas should be doing whatever is possible to put the most possible units on this site.

Instead they are intentionally making sure the zoning would not allow redevelopment.

This Housing Element should be rejected unless South Pasadena zones this site for 160 DU/acre as Mr. Anderson specifically stated was required.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** There is no intent by the City to make sure zoning standards do not achieve stated Housing Element goals. The City is committed to taking such actions within the required 120 days post-adoption to amend zoning and other codes to address the goals of the Housing Element.
- **How addressed:** The stated FAR and other development standards outlined in Program 3.b of the Housing Element are consistent with the current height limit. When adopted, within 120 days after adoption of the Housing Element, the General Plan, Downtown Specific Plan, and other zoning amendments will need to be consistent with the current height limit. If the height limit is repealed or increased through voter initiative, development standards for affected zones with residential uses will be updated to be consistent with the new height limit within 120 days thereafter.
- **How addressed:** This draft of the Housing Element represents a significant increase in the density allowed on Site 15, from 70 to 110 du/ac. At the February 1st City Council meeting, the representative of this site indicated that they analyzed the site's feasibility using the existing inclusionary requirement of 20%, as well as a higher requirement of 30%, and under those requirements would need at least 140 du/ac to make redevelopment of the site be feasible. The City is reducing the inclusionary requirement to 15% and providing significantly more incentives and reduced development standard requirements to ensure that redevelopment of sites like this one are feasible. Furthermore, this site is not necessary for the City to meet its RHNA numbers, and instead the site only adds to the City's RHNA buffer.

Mike Thurman (March 12, 2023)
Hi Michael!

I wanted to reach out and share my thoughts on a win-win approach to meeting the State's housing element requirements. I looked over the City's draft proposal and was surprised at the low estimate for ADU conversions (50 over the next eight years) in meeting the 2,067 additional unit requirement.

I believe that our city has hundreds of unpermitted ADU units that are currently fully occupied by low-income residents that are not being counted because of their status. Issuing permits for these fully-occupied units would immediately:

1. Lift the City's count of the number of low-income residents that currently live in these units.
2. Increase homeowner property values by increasing the habitable square footage of their properties.
3. Allow homeowners to fully insure their properties for the full replacement value of their properties, including the ADU units.
4. Avoid any new construction and associated impacts for these additional units.
5. Avoid any new parking impacts for these existing units where residents are already housed.

City leadership may be under the impression that the City's previous efforts to encourage ADU conversions generated only limited results, and therefore this might not a viable option for generating significant additional low income units. However, that impression is incorrect.

Based on my own experience, although City staff prepared a brochure and encouraged residents to apply for ADU conversions, suggesting these would involve low-cost and low-documentation reviews, in fact once the Building Department became involved it immediately become apparent that the costs associated with the conversion, including completion of a complicated application and architectural and structural engineering plan requirements, would be prohibitive, and my hunch is that the City received very few applications from that effort.

However, it is important to appreciate the fact that all of these unpermitted units in South Pasadena are already occupied, meaning that this prohibitive ADU conversion process has simply prevented existing units from being permitted and has guaranteed that they remain uncounted.

Another unfortunate reality is it appears from the Report that the City has no accurate count of the number of these units in the City. I firmly believe there are at least a dozen of these units located in just my neighborhood, one street within the City. My sense is this could, and should, be a much more significant element in the City's plans for complying with the State requirements.

I believe our City could make a significant dent in meeting the State's additional housing requirements, and at the same time support many of our homeowners, by carefully examining the ADU conversion process, simplifying it and providing additional resident support in the process. I can foresee (and will volunteer to lead or be part of) a citizen-led promotion of such a program to encourage and maximize ADU conversion application submissions by South Pasadena residents who own these units.

Thank you for considering these thoughts and for your continued service to our City. Please feel free to contact me with any questions or feedback on this issue.

Best wishes to you and your family,

Mike Thurman
(626) 399-6205 (cell)
michael@thurmanlegal.com

- **How addressed:** The Housing Element includes a significant discussion of the City's existing ADUs, as well as projected ADUs accounting for a portion of the City's RHNA requirements. Additionally, the Housing Element includes programs to encourage and monitor the construction of ADUs to ensure that ADU production meets the projections throughout the planning cycle.

Care First South Pasadena (March 12, 2023)

City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

CC: California Housing and Community Development
Paul.McDougall@hcd.ca.gov
Connor.finney@hcd.ca.gov

Re: South Pasadena Housing Element, Fifth Draft (March 7)

Dear Ms. Frausto-Lupo:

We are dismayed by the City of South Pasadena's unilateral revisions of the Fifth Housing Element draft between March 2 and March 7. These changes set back progress on the development of the 20 vacant Caltrans properties. The City is no longer committing to converting these properties to affordable housing on site and, instead, is returning to entertaining "alternative solutions" to Senate Bill 381.

The Caltrans properties are the only certain parcels of land for the development of 100% affordable housing in the foreseeable future in South Pasadena. Other programs and sites identified in the Housing Element are only ideas for potential developments. Similarly, zoning, building, and other code changes will not guarantee affordable housing development, functioning only to support and incentivize prospective projects.

The City's March 7 revisions to the Caltrans properties continue the City's decades-long history of racial and economic exclusion and do not affirmatively further fair housing.

It comes as no surprise that both the March 2 and March 7 drafts also fail to address our comments about the City's use of historic preservation policies. The City will continue to use these policies to impede affordable housing development and maintain much of its racial and economic exclusion in higher resource neighborhoods. And, the City has no plans to stop doing so.

Worse, not only is the City attempting to skirt existing laws on fair housing and Caltrans properties, but the City has also eluded the public participation process required for the Housing Element. Nothing in the March 7 version explains why the City made significant revisions from the March 2 version. Prior to March 2, the City held three public meetings on February 1, 9, and 15 to receive public comment and to direct City staff on how to revise the Housing Element. The March 2 version reflected these discussions. We can reasonably surmise that between March 2 and March 7, the City received comments from residents and Councilmembers and changed the draft accordingly, outside of the public process. The City must disclose in this draft, with opportunity for public comment, all communications it received pertaining to the fifth Housing Element draft.

Program 1.b. – Convert Caltrans Homes to Affordable Housing

Constructing affordable units on the Caltrans sites is critical to bringing in any new affordable units in the City because there are no other sites in the City that are already obligated to hold 100% affordable housing. While the City committed to converting Caltrans homes to affordable housing on site in the

March 2 version of the Housing Element draft, it completely changed course on March 7. **The City should adopt the March 2 version of this program.**

In the **March 2 version**, the City wrote:

> [T]he City *will* construct additional units, either as ADUs or Missing Middle housing, on *the parcels* to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 266 (emphasis added).

> In the **March 7 version**, the City added a new provision about alternatives to Senate Bill 381, and walked back its commitment to construct additional units on the sites of the Caltrans properties:
> To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any *alternative solutions to those provided by SB 381* that respond to the cost constraints of particular properties.
>
> . . .
>
> [T]he City *may consider* the construction of additional units, either as ADUs or Missing Middle housing, on *certain* parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 267 (emphases added).

Senate Bill 381 is not just one option for the disposition of the Caltrans homes. It is the only option because it is the law that governs what the City must do upon acquiring the homes from Caltrans.

In a March 8 meeting with Care First, City staff shared it is the City's intention to comply with the spirit of Senate Bill 381—to convert the properties into affordable housing—but also it would like to explore "alternative solutions" for certain properties. These are contradictory goals. The City identified exempt properties to include ones that have the main subject of community debate: those located in the City's higher resource neighborhoods. When we asked for the City's inspection reports and other documents they are relying on to determine the feasibility of development, the City declined to share this information.[9] The City fails to provide any evidence in this Housing Element to support its conclusions that some properties are not financially feasible for development.

As explained in our December 8, 2022, comment, the City has not disclosed legally viable "alternative solutions" to the public. Mayor Jon Primuth, alongside Cultural Heritage Commission Chair Mark Gallatin (who simultaneously sits on the board of the private non-profit organization, the South Pasadena Preservation Foundation), has publicly advocated for these solutions, despite the City Attorney's opinion that these alternatives are unlawful.[10] One such alternative is selling the Caltrans

[9] The City has approved contracts for inspection services. See Agenda Items 22 and 23, City Council Meeting, July 20, 2022, https://www.southpasadenaca.gov/home/showpublisheddocument/30038/637934174414530000.

[10] On November 2, 2022, then-Mayor Pro Tem Jon Primuth, as one of the two members of the SB 381 implementation committee, stated at a city council meeting: "There's a proposal that we look at an alternative to SB 381. We are exploring

properties through a double escrow process and selecting preferred homebuyers vetted by the Cultural Heritage Commission. Again, Senate Bill 381 does not allow for this or other alternatives. Moreover, the Cultural Heritage Commission, which has a mandate to enforce the City's historic preservation laws rooted in racial and economic exclusion, must not be allowed to participate in any homebuyer selection process.

If the City insists on continuing to explore "alternative solutions" to Senate Bill 381 in the Housing Element, it must explain what these alternatives are and why they are legally viable. Otherwise, the Department of Housing and Community Development should not approve this Housing Element which contains policy decisions that violate the law.

Program 3.m. – Implement SB 9 and SB 10

In the **March 2 version**, the City proposed to permit Missing Middle housing types "in all residential zones citywide, except in high fire hazard areas." The City did not specify the types of Missing Middle housing types for each category of residential costs, only that they could include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts.

In the **March 7 version**, the City narrowed the Missing Middle zones to "low density residential zones along high-quality transit corridors and/or transit stops, except for in high fire hazard areas." At this time, our position is neutral on these changes. However, we note several areas for improvement and change:

- Specify Missing Middle housing types to include triplexes and fourplexes. Without concrete commitments on density, the City risks falling short of its promises to allow for greater density

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that as one of our options as well." See http://www.spectrumstream.com/streaming/south_pasadena/2022_11_02.cfm# (starting at approximately 02:44:00).

Yet about two months prior, Primuth conceded in an email to local residents that these alternatives to SB 381 are not legally viable:

> The dilemma of what to do now under the requirements of SB381 is real. But there is a persistent talk that SB381 is optional. That's not my interpretation of the law. It's not our city attorney's interpretation of the law. It's the interpretation of the attorney designated by the SPPF [South Pasadena Preservation Foundation] proponents for the city to retain to obtain independent advise [sic]. All the public comment we will receive tonight is based on a false assumption, repeated against the overwhelming legal counsel they have received. I've spent hours exploring the option presented by SPPF in many public comments. I pointed out the problems and dead ends with their legal strategy. I've obtained a concession from a prominent SPPF member that their route requires bending the rules. There has been no concessions from the SPPF proponents. I am sorry to go on the record to criticize them, as they are fine, trustworthy friends and neighbors.

See Attachment 1 (November 2, 2022 email).

On December 7, 2022, Mark Gallatin made public comment at a city council meeting (starting at 1:04:00) sharing that the South Pasadena Preservation Foundation had "nominated the Caltrans homes in the historic 710 corridor . . . for inclusion on the 2023 list of America's 11 Most Endangered Places [maintained by the National Trust for Historic Preservation]." During the 710 freeway fight, designating South Pasadena as an endangered city was of "invaluable assistance" to keeping the freeway away. Gallatin continued in his comments: "We need nationwide attention again to return our historic neighborhoods to pre-Caltrans conditions and get the houses sold." Returning historic neighborhoods to pre-Caltrans conditions is code for maintaining their high income levels at the exclusion of lower income households and, as a result, disproportionately excluding Black and Latinx people. See http://www.spectrumstream.com/streaming/south_pasadena/2022_12_07.cfm.

in these targeted areas. For example, if the City only allows for duplexes, that will not be financially feasible for developers and will not result in greater density.

- Designate upzoning as the default policy (not an opt-in program). Staging this as an opt-in program creates another administrative hurdle in the development process rather than streamlining it; thus, this component of the program should be removed.
- Define "high fire hazard areas." The City leaves "high fire hazard areas" undefined in this draft. Based on the City Council and staff's public outreach discussions (e.g., Special Joint Meeting of the City Council and Planning Commission, February 15, 2023), the intent of this provision is to account for areas that have a high risk of fire. This provision should be narrowly interpreted and should not be used broadly to designate as many neighborhoods as possible as high fire hazard areas.

  The City currently defines the High Risk Fire Area as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border. This is broad and vague, with little empirical data to back these findings. The City lacks the specificity found in the surrounding municipalities (see https://egis.fire.ca.gov/FHSZ/) and should not use this means of determination. It would be more appropriate to examine these based on street width and availability of fire hydrants. Further, any measurable risk determination should shape the design methods used not prevent development. This blanket designation fails to acknowledge the many existing construction methods that can mitigate these risks.

- While the City is separated into zoned parcels (RE, AM, RS, RM, RH, MSSP), the City is not utilizing data that correlates household demographic information to these parcels. The City is using census tract data boundaries to define that demographic data. That is entirely inadequate, given that the city only intends to increase density along transit corridors.

  The parcels that currently contain the most demographic diversity will have their densities increased while the more homogenous regions will remain significantly lower – despite their proximity to available resources and their relatively flat topography. The largest, flattest, lots in the City are currently zoned RE – and the current draft of the Housing Element largely omits those lots from any future density development. Given the small area of the City, restricting density to transit corridors largely serves the purpose of keeping density contained where it currently exists.

- Allow lot subdivisions. Another inadequate method being proposed is the use of SB 9 lot splits to achieve greater density. To date there has not been a single SB 9 lot split approved in the City. Studies have shown that the legal requirements of SB9 splits make them prohibitive (see https://ternercenter.berkeley.edu/research-and-policy/sb-9-turns-one-applications/). South Pasadena relies on this inadequate method because there is not true intention to allow for more diverse development. The underlying principle in the city's programming is that current property owners can increase density via ADUs. But this does not provide equitable pathways to ownership and upwards mobility, it reinforces existing socioeconomic boundaries. A much more equitable means would be allowing lot subdivisions. The city's Housing Element has only allowed for lot consolidations along existing corridors.

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 to City Council these policies, the draft should contain a firm date on implementation for each policy to ensure Councilmembers follow through with their commitments. The implementation date for all policies should be no later than the end of December 2023.

Thank you for considering our comments.

Sincerely,
Care First South Pasadena

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore additional possible solutions.
- **How addressed:** The Housing Element does specify which types of missing middle housing will be allowed, including tri-plexes and four-plexes. As noted in the letter, the City does have a current definition of "high fire hazard areas."
- **How addressed:** The Housing Element includes significant areas of Very Low and Low Density Residential uses where missing middle housing will be allowed, all within ½ mile of high quality transit corridors along Fair Oaks Avenue and Huntington Drive.

Gail Maltun, et al (March 12, 2023)
Dear City Manager Chaparyan , Council Members and City Planning Staff,

We are writing to express our profound dissatisfaction with the 5th Draft of the Housing Element. While we understand that South Pasadena has been mandated by the State to provide more than 2,000 units of housing, we strongly believe that this can be achieved without the ill-conceived and draconian solutions proposed in this draft.

We are further distressed by the City's failure to present this Draft to the citizens of South Pasadena. The housing policies proposed in this document will drastically alter the architectural character of our City. Despite this, the Draft was released only to people who had previously signed up for updates on the Housing Element. That email went out on March 2, notifying us that comments on the more than 500-page document would be due in less than a week. The Neighborhood Pulse, distributed to the community by the City, included a cheery note about South Pasadena's 135th Birthday, but not a word about the Housing Element.

A few of our major objections are detailed below:

- The new height limit is dictated to be a minimum of 84 feet. We support a modest increase in height to allow for well-designed four and five story buildings, but 84-foot buildings—with 110 feet mentioned elsewhere--would drastically change the character of our town.
- In Program 3M, titled "Implement SB9 and SB10", you commit the City to participating in SB 10. This is a voluntary program that the City had previously vowed to opt-out of. SB 10, as you know, will allow massive upzoning (with CEQA exemptions) of much of the City—anything within ½ mile of the Gold Line Station and possibly within ½ mile of major bus stops as well.
- An "Affordable Housing Overlay"—otherwise known as rezoning—has been proposed in Program 2J/k. This overlay would allow "up to 30 units per acre" in "selected sites outside of the Downtown and Mixed-Use districts". Where this upzoning might land is completely unspecified: it might be on any street in town.
- The City commits to building "100% Low Income" units on several City-owned properties in the Downtown district. This is just terrible, outdated planning. Low-income units need to be incorporated into buildings that also include moderate and market rate units. To do otherwise is to stigmatize the residents of the low-income buildings and to create contemporary versions of the blighted "projects" of decades past.
- The "missing middle" units may sound great in concept, but what that means is eliminating single family zoning in a very large portion of the City. We believe most residents will find this objectionable.
- Perhaps our largest objection is the complete and intentional elimination of the more than 30 acres of City-owned land in the Arroyo from any consideration for development. The Arroyo Seco Golf Course and the Stables constitute, by far, the largest undeveloped land in the City. They could accommodate the development of many hundreds of housing units – and produce a huge financial windfall for the City in a potential joint venture with a developer. These properties are used by relatively few South Pasadena residents. Golf courses are water-guzzling facilities that are being redeveloped for housing throughout the State. The Stables are used primarily by upper-income horse owners, with stable prices ranging from $685-$785 per month, per horse. And the stables and golf course generate very little income for the city. Despite these properties being characterized in the report as open, natural space, neither are "natural space," and both are fenced off from the general public. Unlike the playing fields and park in the Arroyo, neither the Stables nor the Golf Course should be considered sacrosanct. The Arroyo, both in South Pasadena and in the City of Los Angeles, already contains both single-family and multifamily housing. In the course of public meetings, both the stables and the golf course were proposed for housing sites. If we have to choose between putting housing on these two sites and eliminating single-family residential zoning in most of our city and allowing □-10 story buildings, we believe the wiser choice is clearly to develop the stables and golf course properties. That the City excluded these two properties from our planning for housing at a time when the State is demanding more than 2,000 new units in our community demonstrates a level of ineptness and lack of imagination that borders on malpractice.
- We also object to the general tone of self-flagellation that permeates the document. The inclusion of the excerpt from "When South Pasadena was a Sundown Town", by Jerry Friedman (P. 104), and the heavy emphasis on our 70-year-old "Sundowner" past, in Section 6.4.6, "South Pasadena History," is a biased, one-dimensional view of our City. It ignores the fact that we long ago evolved into one of the most racially, ethnically and economically diverse

cities in the area. Moreover, it is irrelevant to the task that the State has asked us to execute: namely, locate sites for 2,000 housing units: nothing more, nothing less.

It will be difficult to incorporate more than 2,000 new housing units in South Pasadena in the next few years. No one thinks this task will be easy. But we believe that it is possible to do this without destroying the architectural character of South Pasadena. By adding the Golf Course and the Stables to the sites available for development; by concentrating larger multifamily complexes that combine lower/moderate/market units on major streets such as Huntington and Fair Oaks, the Ostrich Farm area, and the Gold Line Station area; and by a modest increase in height limits to allow well designed four and five story buildings in selected sites—we think that we can achieve a successful Housing Element that will spark a more vibrant downtown while preserving our peaceful streets and small town character.

Sincerely,

Gail Maltun
Alan Maltun
Niles A. Pierce
Gillian Pierce
Diemha Hoang
Kathy Eastwood
Michael Eastwood
Shelley Stephens
Valerie Greco
Nicolas Greco
Nichole Dunville
Mary Farley
Christina Schwarz
Benjamin Schwarz
Eileen Lee
David Lee
Mark Haines
Julie Winkle Giulioni
Peter Giulioni
Terry Halberg
Lilian Lu
Henry R. Jones
Margie Ferree Jones
Joe Jacob
Bonnie Tsang
Corey Miller
Charlene Miller
Katherine Adamson
Tina LaMonica
Clarice Knapp
Harry Knapp
Michael Messner
Pierrette Hondagner-Sotelo
Valerie Huber
Jenny Teal

David Ho
Vicki Ho
Deni Sinnott
Mako Koiwai
Donna Bartlett
Kevin Lutz
Deborah Lutz
Stephen Lawes
Gina Lawes
Joanne Nuckols
Tom Nuckols
Peter Lam
Wendy Lam

- **How addressed:** The City held three public meetings to discuss the changes made in this draft of the Housing Element, and ensured the community had ten days to provide public comments. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Julian Petrillo (March 13, 2023)
Hello there. Julian Petrillo here, going on 25-year resident of South Pasadena. Recently it came to my attention that there's a draft of a new SP housing element which would consider allowing multi-unit dwellings just about anywhere, and also that height limits of 7-10 stories are under consideration. These policies will change the way of life that all residents of 91030 prioritize and strive for when they pay their significant property taxes. I urge the city and staff to find another way to meet occupancy and density requirements, rather than taking on new regulations such as those.

Thank you for your consideration.

Julian Petrillo
800 Adelaine Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements.

Mary Urquhart (March 13, 2023)
The 5th Draft on Housing Element is nearing its completion. However, I did want to make an additional comment before the final deadline.

We have City properties that should be considered when developing additional housing in order to provide affordable housing for City staff and the community at large. These properties could be considered alternatives to other options already identified by the City. We currently have an 18-hole golf course, which could be turned into a 9-hole golf course to allow for a girls' softball field and possibly another playground and outside tennis courts. That would allow the city to build additional housing and affordable housing on the City-owned site located at 1102 Oxley Street, which actually "fronts" the intersection of Mission Street and Orange Grove Avenue, adjacent to a softball field and playground. The mechanical repair and storage building at that location should be moved to a

location outside of the area so critical to transportation. The community building at that location needs significant repairs and has limited historical relevance. A conversion to housing, moving the recreation facilities to the golf course area, would be a great solution. Using a 'layering approach' we can be creative to redesign this area to respect the adjacent homes and helps solve our housing crisis. The proximity to the train station is key, and there is close access to the 110 Freeway.

Changing single-family residential neighborhoods to densify our city should change only after we have exhausted all available corridors on Fair Oaks, Huntington Drive, Mission Drive (west of The Gold Line), and the Arroyo.

Thank you for your consideration,

Mary Urquhart

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the city. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

South Pasadena Tenants Union (March 13, 2023)
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030
Attn: Allison Becker and Angelica Fausto

Re: AMMENDED 5th Draft Housing Element – Public Comment

Dear Ms. Becker and Ms Frausto-Lupo:

After further contemplation, South Pasadena Tenants Union leadership is submitting this amended public comment on the March 7, 5th Draft Housing Element.

We are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are not happy to learn that the original draft of March 2nd was substantially revised and without any published responses/comments indicating public input. In reviewing the March 7th redline version, we oppose the proposed program addressing the fate of the CalTrans homes. In this draft, the proposed implementation of SB381 has changed drastically from the March 2nd version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest

change and urge the City to revise the draft submitted to HCD to include the original text from March 2.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change. In order to ensure that the City can maximize housing for lower wage earning residents and middle income residents, we support triplexes and fourplexes being limited to the high transit areas with a rent stabilization ordinance that is fully enacted no later than December 2023. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

For program 6.d, SPTU asks that you include within the 5th draft implementation of a rent stabilization ordinance by December 2023.

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We are aware that at least one Councilperson had requested that her constituents oppose major components of the March 2 draft with letters to the City Manager. Within hours of that email being circulated, the March 7 redline version was published.

South Pasadena Tenants Union expects that the City act in good faith and weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Joanne Nuckols (March 13, 2023)
I am opposed to any unbundling or separating of parking from any housing development as on page 153 referencing Downtown Specific Plan. This would be a disaster with many unintended consequences. Any reference should be removed from the HE draft unless and until there is a thorough study of the negative impacts of doing so.

Joanne Nuckols
South Pasadena

- **How addressed:** The Housing Element incorporates existing California law with regards to parking in proximity to high-quality transit.

Ed Elsner (March 22, 23, and 24, 2023)
[**Note from City:** The City received three comments from this commentor over the course of three days all on the same subject. All three comments are shown below, and only one response is provided to these three comments since they deal with the same subject.]

March 22, 2023 comment letter
Dear Director Frausto-Lupo,

The draft housing element's rezoning capacity analysis (Table VI-51) is seriously flawed.

The table undercounts existing housing units. For example, every listed site whose current land use is High Density Residential is incorrectly shown as having "0" existing units. This error means that thousands of existing units have not been counted, and that the total Maximum Additional Development Capacity for the listed sites is therefore overstated by the same amount.

On the other side of the coin, the Table VI-51 miscalculates the total Development Capacity Adjustment for every listed site with a residential zoning capacity of 50 du/ac or more. Although these sites are ostensibly given a 400% development capacity adjustment, the 400% adjustment is not included in the calculation of the total adjustment for any site, resulting in the understatement of total Anticipated Development Capacity by hundreds of units, possibly more. Anticipated Development Capacity is perhaps the most critical metric in the housing element.

These errors have obvious and serious implications for policy making.

For example, as a last-minute addition to the draft housing element, the rezoning of Huntington Drive (to mixed-use with 70 du/ac density) will promote the displacement of many residential tenants. As a practical matter, the displacement will be permanent, for the reasons discussed in my previous comment published at page B1-234 of the draft. The human impacts of mass eviction and involuntary displacement can be devastating, and the decision to rezone Huntington Drive was a rushed decision that was not supported by reliable data.

Every listed Medium Density Residential site and High Density Residential site whose existing unit count is shown as "0" or "1" is suspect and should be checked by searching the APN on the County Assessor's online portal (https://portal.assessor.lacounty.gov/). The existing unit count for each site should be updated as necessary.

Also, the 400% density adjustment should be included in the total development capacity adjustment for every listed site with a residential zoning of 50 du/ac or more. There is likely a formula error in the spreadsheet that needs to be resolved.

Once these errors are fixed, a determination should be made whether it is really necessary to rezone Huntington Drive to mixed-use, 70 du/ac, in order to meet the city's RHNA obligations. If the city is able to rezone residential sites on Huntington Drive to 30 du/ac (medium density) or 45 du/ac (high density), as it is doing elsewhere in the city, this would minimize the displacement of existing tenants.

Thanks again for your continuing work on the housing element and for your consideration of these comments.

Ed Elsner
edelsner44@gmail.com

March 23, 2023 comment letter
A quick follow up to my comment submitted yesterday:

Once the 400% development capacity adjustment is correctly applied to listed sites with a density of 50 du/ac or more, the new total anticipated development capacity is 3,819 housing units according to my calculation.

To put this in perspective, this is 2641 more housing units than the 1,178 total anticipated development capacity stated in the draft housing element for the sites listed in the uncorrected Table VI-51.

It is also 574 more housing units than the city's entire RHNA allocation of 2,067.

With an accurate count of existing units, the total anticipated development capacity will decrease.

But the magnitude of the capacity adjustment error suggests that the city will be able to meet its RHNA obligations without needing to increase density on Huntington Drive to 70 du/ac.

In any event, I don't think the city should be committing to the rezoning programs included in the draft housing element until a corrected Table VI-51 is reviewed and analyzed, even if that means delaying the submission of the draft to HCD.

Thanks again,

Ed Elsner
edelsner44@gmail.com

March 24, 2023 comment letter
Dear Director Frausto-Lupo,

Thank you again for the opportunity to comment on the 5th draft housing element that will be submitted to HCD later today.

The draft indicates that the development standards for the Huntington Drive zone will mirror the standards for the Mission Street Zone of the Downtown Specific Plan.

One suggestion would be to clarify that with respect to residential parcels in the Huntington Drive zone whose current land use is Medium Density Residential or High Density Residential, a specific allowable density is yet to be determined through a zoning process subsequent to the adoption of the housing element, with input from the community and especially from residential tenants who live on Huntington Drive, who would be at risk of displacement from redevelopment.

Stated another way, the allowable 70 du/ac density for the Mission Street Zone in the Downtown Specific Plan should not be considered an objective general plan standard or criteria for the Medium Density Residential or High Residential Density parcels in the Huntington Drive Zone, but a possible allowable density along with 30 du/ac or 45 du/ac mentioned in my previous comments.

A 70 du/ac density in the Huntington Drive zone should be reserved for existing commercial parcels which would be more suitable for redevelopment as mixed-use projects, and I'm

confident that the city can still meet its RHNA obligations with lower densities for residential parcels on Huntington Drive.

One final suggestion, there should be protections against tenant harassment as part of the package of protections for residential tenants, with appropriate remedies to deter bad actors from improperly influencing tenants to vacate in order to avoid compliance with the other tenant protections the city is proposing.

Thanks again, and best of luck with the submission of the draft.

Ed Elsner
edelsner44@gmail.com

- **How addressed:** City staff met with commenter on 3/24/23, prior to his final comment, to discuss his concerns. Staff acknowledged the limitations of the dataset that is used for the capacity analysis (Table VI-51). Data was pulled from our vendor's site and was not closely screened before building the new table. Staff also acknowledged the possibility of a formula error in the table. Upon further review after the meeting with the commenter, the City's Housing Element consultant determined that there is not a formula error in the table.

  Staff clarified that the purpose of the table was to illustrate the breadth of the future rezoning areas and that the upcoming general plan update process would be used to refine the rezoning strategies. Staff clarified that our obligation with the housing element is to identify areas where development can be achieved and our commitment is to engage in a public process to rezone within the areas identified to accommodate our RHNA obligations with a reasonable buffer in order to produce a responsible long-range general plan.

  Staff addressed the potential impact of rezoning on existing multi-family residential buildings and underscored the City's commitment to developing a slate of tenant protection programs.

  Staff clarified that in the instance of Huntington Drive, the term "mixed-use zone" was used to reflect the existing corridor conditions with comingled multi-family and commercial zoning. New "mixed use" is contemplated for existing commercially zoned properties, and increased development capacity is contemplated for existing multi-family properties. The City is not considering converting residential to commercial land uses.

Steven Appleton (March 24, 2023)
Public Comments on the City of South Pasadena 5th Draft Housing Element, Clean Version.
Submitted on March 23, 2023.
Submitted on March 24, 2023 at 11:55 am

COMMENT 1:

In several locations in the 5th Draft Housing Element of the City of South Pasadena the subject of Rental Housing inspections is addressed, including direct mention of Assembly Bill 838. References can be found on pages 7, 67,68,255 and B1-47. The following statement summarizes the City's stated intent:

"To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement but also preventing tenant habitability issues before they emerge. "page 7.

I am a tenant who complained about substandard conditions and requested Code Enforcement inspection of the unit my family rented in South Pasadena, but City refused to inspect even after July 1. 2022 when it was obligated to inspect per the provisions of AB 838. The City continues to state a policy of "no inspection" of rental housing. As such, I question the 8-year timetable for implementing a full inspection program stated on page 7. If the Housing Element is approved with such a liberal timeline for compliance with AB838, it would enable the continuation of practices that play a role in the displacement of tenants.

I offer the below as rational for my comment:

On three occasions after July 1, 2022, I requested Code Enforcement of the City of South Pasadena to inspect the premises because of improper egress (substandard stairs to unpermitted sleeping quarters), fire code violations, and lack of heating etc. In each case I was told that "City of South Pasadena does not have an occupancy inspection program and will not inspect the property." I was referred to a nonprofit tenant's rights group.

City of South Pasadena's refusal to inspect our rental premises is an unfulfilled obligation. The failure to inspect as required by law impacted our move-out. Future tenants are also impacted. Objective code and habitability inspection would reveal unsafe conditions, including structural deficiencies caused by unpermitted construction that continue to pose risk to any future tenants. Therefore, I have continued to request an inspection of the premises based on the fact that the failure to inspect when requested is an unfilled obligation of the City. The response of City staff was to quote the "no rental housing inspection policy of the City," as noted below:

Angelica Frausto-Lupo , Community Development Director, City of South Pasadena, January 17, 2023: "I had my building team look into the matter and there is insufficient reason for further investigation or to open a code enforcement case. Further, the City of South Pasadena currently does not have an occupancy inspection program and as such we will not pursue inspection of these properties."

Paul Riddle, Fire Chief, City of South Pasadena, March 13, 2023:

"I discussed with our Building Department had they advised that this matter has insufficient reason for further investigation or to open a code enforcement case. They also cited the fact, the City of South Pasadena does not have an occupancy inspection program and as such they will not pursue inspection of these properties. Tenants can reach out to a landlord/tenant rights organization such as the Housing Rights Center, https://www.housingrightscenter.org/ or the LA County Department of Public Health to file a complaint.

I suggest that the Housing Element is deficient unless the City of South Pasadena revises it to state that the City of South Pasadena will:

1) Immediately accept and process rental housing inspection requests made by tenants or tenant agents in line with the provisions of AB 838.
2) Immediately instruct all staff to change messaging to reflect that tenants have a right to request an inspection and be informed of the results of inspections.
3) Retroactively inspect any housing where a complaint was made by a tenant after July 1,2022 but City refused to inspect. (If a request was made after July 1, 2022, the City's refusal to inspect is an unfulfilled obligation. The unfulfilled obligation has continuing impacts on past and future tenants.)

COMMENT 2:

I guide you to page Page B1-135 under "How Addressed". In reference to Table VI-26, the document states, "It should be noted that these units are all single-family properties, and do not include multi-unit rental properties."

The Housing Element should clarify that the City will accept and process rental housing inspection requests of tenants of multi-family housing.

Steven Appleton

- **How addressed:** The City acknowledges that at the time of the events Mr. Appleton refers to, the City was unprepared to fulfill its responsibilities under AB 838. The City is currently aware of its responsibilities under AB 838 and we are attempting to comply with the law. Should a tenant contact the City to request an inspection, we will respond in compliance with AB 838. This obligation is being formalized into a program under the Housing Element by including a proposed occupancy inspection program which would entail systemic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes as noted in the Housing Element Program 1.c-"Housing Rehabilitation and Code Enforcement." As stated in Program 1.c., the proposed occupancy inspection program "will support the City's inspection of rental properties in response to tenant's complaints of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge."

Anonymous (March 24, 2023)

As a resident, small developer and commercial property owner on Huntington Drive, I think the city's future development needs require a more aggressive plan for the Huntington Corridor. Right now the Housing Element's main focus is developing the DTSP and expanding the DTSP development standards to other areas including the proposed mixed-use zones.(See Program 3.A and 3.B., Housing Element, 5th draft). But that seems flawed as the DTSP development standards are based on the limits of the downtown area. These include historical resources, the area's existing density, traffic congestion, the small two lane roads that make up Mission St.and Monterey St. and the many more smaller one lane roads that intersect them. However, none of these qualities exist in the same proportion on the Huntington Drive Corridor. Huntington Drive is about 110ft wide. It is a large 3 lane road with NO significant historical resource or comparable density and traffic. Consequently, Huntington Drive can support development standards that are DOUBLE that of the DTSP. With sufficient height and density allowance the majority of the City's RHNA obligations can be satisfied from this area alone. This would create less of a burden to develop the more historically sensitive neighborhoods that make up the DNA of the City's heritage and charms. However, as the area consists largely of income generating commercial and multi family properties, the DTSP development

standards as proposed (namely a 70/110 DU/AC and 2.5 F.A.R. is insufficient to motivate us to risk losing guaranteed existing income.

Consequently, creating a different development standard that provides for even more density and massing than the DTSP is warranted and should be supported. Additionally, developing the Huntington Corridor into a highly dense lively mixed use zone will create desperately needed housing and provide for the City's future growth whilst protecting the City's historic family neighborhood charm.

-Anonymous Resident, Owner and Small Developer

- **How addressed:** The Housing Element accommodates the City's RHNA requirements throughout the city, including within the downtown area and along Huntington Drive.

Josh Albrektson (May 4, 2023)

At the Feb first city council meeting, Mr. Anderson, the lawyer for the pavilions property, clearly stated that he needed 140 to 160 DU/acre in order for the project to be feasible.

In response, the City of South Pasadena set the density to 110 DU/Acre, 35% lower than what Mr. Anderson said was required for feasible. Alison Backer in her meeting with me told me that it was intentionally and they considered removing the site as a possible housing site.

South Pasadena is intentionally trying to make sure the pavilions cannot be redeveloped and they should be forced to rezone the Fair Oaks corridor to 140 DU/Acre.

If they do not do this, then there should be a hard deadline that if they do not have a project proposed on Fair Oaks, say by May 1st, 2026 then it would automatically go to 140 DU/Acre.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** As the City discussed with HCD during its April 24th meeting, Site 15 will be rezoned to allow for 110 du/ac, along with the entire Fair Oaks Avenue corridor. As HCD's research shows, this density is sufficient to ensure the site is viable for redevelopment to residential uses. Furthermore, the comments made by the property owner's representative during the February 1st City Council meeting mentioned a variety of viable densities. While they did state that 140 du/ac would be needed, that was with a higher inclusionary requirement than the city currently has, while the City has committed to reducing its inclusionary requirement, and to review and update the reduced requirement throughout the planning period to ensure that it does not create a constraint on development.

Appendix B

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Appendix C:
Letter to Property Owners

CITY OF SOUTH PASADENA

OFFICE OF THE PLANNING AND COMMUNITY DEVELOPMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: (626) 403-7210 ▪ FAX: (626) 403-7211
WWW.SOUTHPASADENACA.GOV

October 20, 2020

[PROPERTY OWNER NAME]
[PROPERTY OWNER ADDRESS LINE 1]
[PROPERTY OWNER ADDRESS LINE 2]

Re: 2021-2029 Housing Element Update

Dear Property Owner,

The City of South Pasadena (City) is in the process of updating its Housing Element of the General Plan as required by state law. The new Housing Element is intended to address the housing needs of current and future City residents. One of the requirements of the Housing Element is for the City to demonstrate that there is sufficient land to allow the development of a range housing types to include higher density multi-family units.

The City has identified the property at [PROPERTY ADDRESS], which our records indicate you own, as having the potential to be developed with higher density multi-family units. A development with up to 30 units per acre is already allowed in this location either under current zoning or would allowed by the draft General Plan and Downtown Specific Plan, currently undergoing community input and anticipated for adoption in mid-2021. One of the options the community will consider through ongoing outreach is whether to allow increasing the height or density on specific sites or in certain areas of the City to accommodate more affordable housing.

The City would like your input regarding the future of your property.

- ☐ **Are you interested in new residential development at [PROPERTY ADDRESS] within the next 3-8 years?**
  - o **If yes:**
    - ▪ **Have you already begun to explore this possibility?**
    - ▪ **Have you considered a particular type of project?**
    - ▪ **Have you considered developing the property with affordable units?**
    - ▪ **Would an increase in height or density change your perspective?**
- ☐ **Do you have any concerns about your property being identified for potential housing development in the Housing Element?**

We look forward to your input to ensure we develop the most accurate and feasible plan for our housing future. Please send us an email at HousingElement@SouthPasadenaCA.gov to provide us with your feedback by November 3, 2020, so that we can complete our Housing Element update effort. If you have any questions or comments please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development at MLin@SouthPasadenaCA.gov or (626) 403-7236.

Sincerely,

Joanna Hankamer
Director of Planning and Community Development

Appendix D:
Qualified Entities

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
FRESNO	Fresno Housing Authority	P.O. Box 11985	Fresno	CA	93776	(559) 443-8475	Edward Stacy	ned@pacbell.net	(559) 445-898	Local, regional, national nonprofit org.		6/14/17	12/16/98
ALL COUNTIES	American Baptist Homes of the	6120 Stoneridge Mall Road, 3rd F	Pleasanton	CA	94588	(925) 924-7162	Ancel Romero		(925) 924-723	Local, regional, national public agenc	X	8/14/14	12/22/98
ALAMEDA	Housing Authority of City of Alar	701 Atlantic Ave	Alameda	CA	94501	(510) 747-4300	Denise Connors	dconnors@alamedahsg.org	(510) 522-784	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of the City of	3203 Leahy Way	Livermore	CA	94550	(925) 447-3600	Jon D. Hovey	livhsg@prodigy.net	(925) 447-094	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of County of A	22941 Atherton St	Hayward	CA	94541	(510) 538-8876	√	obasgal@aol.com	(510) 727-855	Local, regional, national nonprofit org.			12/23/98
ALL COUNTIES	USA Properties Fund	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Jesse Slansky		(323) 650-474	Local, regional, national public agenc	X	12/13/13	12/23/98
CONTRA COSTA	Rubicon Programs, Inc.	2500 Bissell Ave	Richmond	CA	90804	(510) 235-1516	Tom Matthews	TomM@Rubiconpgms.org	(510) 235-202	Local, regional, national nonprofit org.		6/5/17	12/23/98
KERN	Golden Empire Affordable Hous	3600 CheSte.r Ave. Ste. B	Bakersfield	CA	93301	(805) 633-1533	Gary Kammer		(805) 633-161	Local, regional, national nonprofit org.		6/14/17	12/23/98
LAKE	Lake County Housing Services I	255 N. Forbes St.	Lakeport	CA	95453	(707) 263-2510	Linda Hedstrom	linda_h@co.lake.ca.us	(707) 263-275	Local, regional, national nonprofit org.		6/14/17	12/23/98
LOS ANGELES	West Hollywood Community Ho	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Robin Conerly	robin@whchc.org	(323) 650-474	Local, regional, public agency	X	8/14/14	12/23/98
LOS ANGELES	City of Pomona Housing Authori	505 South Garey Ave	Pomona	CA	91766	(909) 620-2368	Benita DeFrank, Neighborhood Services Director		(909) 620-370	Local, regional, national nonprofit org	X	6/14/17	12/23/98
LOS ANGELES	Hollywood Community Housing	1726 N. Whitley Ave	Hollywood	CA	90028	(323) 469-0710	Christina V. Duncan		(323) 469-189	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Hope - Net	760 S. Westmoreland Ave	Los Angeles	CA	90005	(213) 389-9949	Canoace Whalen	hope-net@pacbell.net	(213) 389-009	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Skid Row Housing Trust	1317 E. 7th St	Los Angeles	CA	90021	(213) 683-0522	Jim Bonar		(213) 683-078	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	The Long Beach Housing Devel	333 W. Ocean Blvd., 2nd Flr	Long Beach	CA	90802	(562) 570-6926	Diana V. McNeel		(562)570-674	Local, regional, national nonprofit org	X		12/23/98
MARIN	Housing Authority of the County	4020 Civic Center Drive	San Rafael	CA	94903	(415) 491-2530	Anna Semenova	ASemenova@marinhousing.org	(415) 491-253	Local, regional, national nonprofit org	X	2/26/14	12/23/98
MARIN	Canal Community Alliance	91 Larkspur St	San Rafael	CA	94901	(415) 454-2640	Tom Wilson	canalca@aol.com	(415) 454-396	Local, regional, national nonprofit org	X		12/23/98
ORANGE	Neighborhood Housing Services	350 Hillcrest	La Habra	CA	90631	(562) 694-2051	Diane Ste.wart	nhs@aol.com	(562) 694-205	Local, regional, national nonprofit org	X		12/23/98
SAN DIEGO	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN DIEGO	San Diego Housing Commissior	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	8/14/14	12/23/98
SAN DIEGO COU	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7590	Dottie Pierce	dottiep@sdhc.org	(619) 578-735	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN FRANCISCO	Tenderloin Neighborhood Devel	201 Eddy St	San Francisco	CA	94102	(415) 776-2151	Don Falk	tndc@ix-netcom.com	(415) 776-395	Local, regional, national nonprofit org	X		12/23/98
SAN JOAQUIN	Stockton Shelter for the Homele	P.O. Box 4803	Stockton	CA	95204	(209) 465-3612	Bill Mendelson		(209) 943-480	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Cambrian Center, Inc.	2360 Samaritan Place	San Jose	CA	95124	(408) 559-0330	Dale J. Harrington	dale2360@ix.netcom.com	(408) 377-047	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Charities Housing Development	195 East San Fernando St	San Jose	CA	95112	(408) 282-1125	Chris Block	chblock@aol.com	(408) 282-113	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Palo Alto Senior Housing Projec	455 E. Charleston Rd	Palo Alto	CA	94306	(650) 494-1944	Genie Dee	gxdee@california.com	(650) 493-743	Local, regional, national nonprofit org	X		12/23/98
SONOMA	Burbank Housing Development	3432 Mendocino Ave	Santa Rosa	CA	95403	(707) 526-9782	John Lowry	burbank@sonic.net	(707) 526-981	Local, regional, national nonprofit org	X		12/23/98
ALAMEDA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702		Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/9/17	12/24/98
ALL COUNTIES	Resources for Community Deve	2220 Oxford St	Berkeley	CA	94704	(510) 841-4410	Dan Sawislak	dsawislak@rcdhousing.org	(510) 548-350	Local, regional, national nonprofit org	X	6/5/17	12/24/98
ALPINE	Amador-Tuolumne Community A	935 South State Highway 49	Jackson	CA	95642	(209) 223-1485 E	Raj Rambob	rrambob@atcaa.org	(209) 223-417	Local, regional, national public agenc	X	5/24/17	12/24/98
CALAVERAS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
COLUSA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
CONTRA COSTA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	East Bay NHS	2320 Cutting Blvd	Richmond	CA	94804	(510) 237-6459			(510) 237-648	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
CONTRA COSTA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
EL DORADO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
FRESNO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
FRESNO	Better Opportunities Builder, Inc	P.O. Box 11863	Fresno	CA	93775	(559) 443-8400	Tracewell Hanrahan	nandersen@bobinc.org	(559) 443-849	Local, regional, national nonprofit org	X	8/14/14	12/24/98
GLENN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
KERN	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
KINGS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
LASSEN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
LOS ANGELES	Housing Authority of the City of	2500 Wilshire Blvd, PHA	Los Angeles	CA	90057	(213) 252-4269	Larry Goins			Local, regional, national public agenc	X	3/3/11	12/24/98
LOS ANGELES	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
MADERA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MADERA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIPOSA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MERCED	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MERCED	Eskaton Properties Inc.	5105 Manzanita Ave.	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
MERCED	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6!	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
MONTEREY	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
MONTEREY	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
MONTEREY	South County Housing, Inc.	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
NAPA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
ORANGE	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
ORANGE	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
PLACER	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
PLACER	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
PLACER	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
RIVERSIDE	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Bill Bolstad		(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
RIVERSIDE	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SACRAMENTO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SACRAMENTO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SACRAMENTO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN BENITO	South County Housing, Inc.	7455 Carmel St.	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SAN BERNARDIN	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN BERNARDIN	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SAN DIEGO	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Harvey Mandel	hmandel@neighbor.org	(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
SAN DIEGO	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
SAN FRANCISCC	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN JOAQUIN	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SAN JOAQUIN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SAN MATEO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN MATEO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN MATEO	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CLARA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CRUZ	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SISKIYOU	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SOLANO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SOLANO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SOLANO	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
SOLANO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SONOMA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
STANISLAUS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
STANISLAUS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6!	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TULARE	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6!	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TUOLUMNE	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
VENTURA	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
YOLO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
YOLO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
ALL COUNTIES	BRIDGE Housing Corporation	345 Spear Strett, Suite 700	San Francisco	CA	94105	(415) 989-1111	Brad Wiblin		(415) 495-489	Local, regional, national public agenc	X	12/24/10	12/28/98
AMADOR	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CALAVERAS	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CONTRA COSTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
EL DORADO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
GLENN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
LOS ANGELES	FAME Corporation	1968 W. Adams Blvd.	Los Angeles	CA	90018	(323) 730-7727	Sandra Hernandez	sandrah@famecorporations.org	(323) 737-571	Local, regional, national nonprofit org	X	8/14/14	12/28/98
NAPA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
NEVADA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
PLACER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SACRAMENTO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SAN JOAQUIN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SHASTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SUTTER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
TEHAMA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YOLO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YUBA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
RIVERSIDE	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SACRAMENTO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
SAN BERNARDIN	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SAN FRANCISCC	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SOLANO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
YOLO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
ALL COUNTIES	Foundation for Affordable Housi	384 Forest Ave., Suite 14	Laguna Beach	CA	92651	(949) 443-9101	Darrin Willard		(949) 443-913	Local, regional, national nonprofit org	X	8/14/14	12/30/98
BUTTE	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
GLENN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
LASSEN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
PLUMAS	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SHASTA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SUTTER	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
TEHAMA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
ALAMEDA	East Bay Asian Local Developm	310 Eighth Street, Ste. 200	Oakland	CA	94607		Lynette Jung Lee	ljunglee@ebaldc.com	(510) 763-414	Local, regional, national nonprofit org.		5/9/17	1/5/99
CONTRA COSTA	East Bay Asian Local Developm	310 Eighth Street, Suite 200	Oakland	CA	94607	(510) 287-5353			(510) 763-414	Local, regional, national nonprofit org.		6/5/17	1/5/99
FRESNO	Fresno Co. Economic Opportun	3120 W. Nielsen Ave., Ste. 102	Fresno	CA	93706	(559) 485-3733	George Egawa	eocnlsn@psnw.com	(559) 485-373	Local, regional, national nonprofit org.		6/14/17	1/5/99
SOLANO	Fairfield Redevelopment Agency	1000 WebSte.r St., 2nd Floor	Fairfield	CA	94533	(707) 428-7688	Lark Solis	lsolis@ci.fairfield.ca	(707) 428-762	Local, regional, national nonprofit org	X		1/5/99
EL DORADO	El Dorado County Housing Auth	937 Spring St	Placerville	CA	95667	(530) 621-6167	Joyce Aldrich	jaldrich@innercite.com		Local, regional, national nonprofit org.		6/14/17	1/6/99
LOS ANGELES	American Family Housing	15161 Jackson St.	Midway City	CA	92655	(714) 897-3221	Donna Gallup	info@compuall.net	(714) 893-685	Local, regional, national nonprofit org	X	1/5/17	1/6/99
SAN FRANCISCC	Bernal Heights Neighborhood C	515 Cortland Ave	San Francisco	CA	94110	(415) 206-2140	Housing Director		(415) 648-079	Local, regional, national nonprofit org	X		1/6/99
SAN FRANCISCC	Mission Housing Development C	474 Valencia St, Ste. 280	San Francisco	CA	94103	(415) 864-6432	Philip Dockow		(415) 864-037	Local, regional, national nonprofit org	X		1/8/99
STANISLAUS	Modesto Redevelopment Agenc	940 11th St	Modesto	CA	95355	(209) 577-5247	Bill Cooper	bcooper@ci.modesto.ca.us	(209) 544-398	Local, regional, national nonprofit org	X		1/8/99
SAN FRANCISCC	Chinatown Community Develop	1525 Grant Ave	San Francisco	CA	94133	(415) 984-1450	Joanne Lee	cchd@hooked.net	(415) 984-149	Local, regional, national nonprofit org	X		1/11/99
ALL COUNTIES	The Trinity Housing Foundation	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	2/26/14	1/12/99
LOS ANGELES	The Long Beach Housing Devel	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	PICO Union Housing Corporatio	1038 Venice Blvd.	Los Angeles	CA	90015	(213) 747-2790	Jesus Torres	jtorres@puhc.org	(213) 743-381	Local, regional, national nonprofit org	X	8/14/14	1/12/99
VENTURA	A Community of Friends	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	Korean Youth & Community Cer	680 S. Wilton Place	Los Angeles	CA	90005	(213) 365-7400	Jimmy Lee		(213) 353-128	Local, regional, national nonprofit org	X		1/19/99
CONTRA COSTA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	tomlf@earthlink.net	(925) 439-083	Local, regional, national nonprofit org	X	6/5/17	1/21/99
IMPERIAL	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
RIVERSIDE	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN BERNARDIN	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN DIEGO	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SOLANO	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	Pacomseru@aol.cn	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
SONOMA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	pacomseru@aol.com	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
ALAMEDA	Community and Economic Deve	250 Frank H. Ogawa Plaza Ste. 5	Oakland	CA	94612	(510) 238-3502	Jefferey P. Levin	jplevin@oaklandnet.com	(510) 238-369	Local, regional, national nonprofit org.		5/9/17	1/27/99
ALAMEDA	Bay Area Community Services	629 Oakland Ave	Oakland	CA	94611	(510) 499-0365	Daniel Cooperman	dcooperman@bayareacs.org	(510) 569-458	Local, regional, national nonprofit org	X	5/9/17	1/28/99
ALL COUNTIES	National Community Renaissan	9421 Haven Avenue	Rancho Cucamor	CA	91730	(909) 204-3508	Tracey Williams	twilliams@nationalcore.org	(909) 483-652	Local, regional, national public agenc	X	5/24/17	5/17/99
ALL COUNTIES	Community Housing Assistance	3803 E. Casselle Ave	Orange	CA	92869		Ken Robertson	chapahq1@aol.com	(714) 744-685	Local, regional, national public agenc	X	8/14/14	5/18/99
CONTRA COSTA	Community Housing Developme	1535 Fred Jackson Way ste A	Richmond	CA	94801	(510) 412-9290	Donald Gilmore	Dgilmore@chdcnr.com	(510) 215-927	Local, regional, national nonprofit org	X	5/24/17	5/19/99
DEL NORTE	Redwood Community Action Ag	904 G St.	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
HUMBOLDT	Redwood Community Action Ag	904 G St	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99
LOS ANGELES	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
MONTEREY	Peoples' Self-Help Housing Cor	3533 Empleo St	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ORANGE	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN BENITO	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	http://www.pshh.org/	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SAN DIEGO	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN DIEGO	Bayview CDC	5100 Federal Blvd, 2nd Floor	San Diego	CA	92105	(619) 262-8403	Stasi Williams		(619) 262-783	Local, regional, national nonprofit org	X		5/19/99
SAN LUIS OBISP	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SANTA BARBAR	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SANTA BARBAR	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
VENTURA	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	X	9/26/08	5/19/99
VENTURA	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ALL COUNTIES	DML & Associates Foundation	6043 Tampa Ave, Ste. 101A	Tarzana	CA	91356	(818) 708-2710	Myron Lieberman		(818) 708-194	Local, regional, national nonprofit org.		5/23/17	5/21/99
ALL COUNTIES	EAH, Inc.	22 Pelican Way	San Rafael	CA	94901	(415) 599-2712	Scott Johnson	scott.johnson@eahhousing.org	(415) 453-368	Local, regional, national public agenc	X	5/23/18	5/21/99
ALAMEDA	Satellite Affordable Housing Ass	1835 Alcatraz Ave.	Berkeley	CA	94703	(510) 647-0700	Susan Friedland	Susanfriedland@sahahomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
KERN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
NAPA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
ORANGE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
RIVERSIDE	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
RIVERSIDE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SACRAMENTO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SACRAMENTO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN BERNARDIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN DIEGO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN FRANCISCO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SAN FRANCISCO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN JOAQUIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN MATEO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA BARBAR	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA CLARA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SOLANO	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
SOLANO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
STANISLAUS	Housing Authority of the County	P.O. Box 581918	Modesto	CA	95358	(209) 523-0705	Rich Chubon	Rchubon@stancoha.net	(209) 522-863	Local, regional, national nonprofit org	X		6/10/99
VENTURA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Abode Communities	701 E. Third St., Ste. 400	Los Angeles	CA	90015	(213) 629-2702	Holly Benson		(213) 627-640	Local, regional, national public agenc	X	8/14/14	3/9/00
ALL COUNTIES	University River Village	7901 La Riviera Drive	Sacramento	CA	95826	(916) 381-2001	Kaci Walsh		(916) 381-732	Local, regional, national public agency		5/10/17	6/1/00
ALL COUNTIES	National Affordable Housing Tru	2335 North Bank Drive	Columbus	OH	43220	(614) 451-9929	Robert Snow	bsnow@naht.org	(614) 451-337	Local, regional, national public agency		5/24/17	6/1/00
SAN DIEGO	San Diego Co. Dept. of Housing	3989 Ruffin Road	San Diego	CA	92123	(858) 694-4805	Alfredo Ybarra	aybarrcd@co.san-diego.ca.us	(858) 694-487	Local, regional, national nonprofit org	X		9/19/00
ALL COUNTIES	California Housing Partnership C	369 Pine Street, Suite 300	San Francisco	CA	94104	(415) 433-6804	Matt Schwartz	mschwartz@chp.net	(415) 433-680	Local, regional, public agency	X	8/14/14	10/23/00
ALL COUNTIES	Solari Enterprises, Inc.	1544 W. Yale Ave	Orange	CA	92687	(714) 282-2520	Bruce Solari	solari@solari-ent.com	(714) 282-252	Profit-motivated individual or organization		5/24/17	12/29/00
LOS ANGELES	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
RIVERSIDE	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
SAN BERNARDIN	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
ALL COUNTIES	Mercy Housing, Inc.	1999 Broadway, Suite 1000	Denver	CO	80202	303-830-3300	Janet Gaf	info@mercyhousing.org	(303) 830-330	Local, regional, national public agency		5/24/17	1/17/01
ALL COUNTIES	California Community Reinvestn	100 West Broadway Ste. 1000	Glendale	CA	91210	818-844-4951	David Saltzman	david.saltzman@e-ccrc.org	(818) 550-980	Local, regional, national nonprofit org	X	5/23/17	1/18/01
FRESNO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
KERN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
LOS ANGELES	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
RIVERSIDE	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN BERNARDIN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
SAN DIEGO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
ALAMEDA	Christian Church Homes of Nort	303 Hegenberger Road, Ste. 201	Oakland	CA	94621	(510) 632-6712	William F. Pickel	bpickel@cchnc.org	(510) 632-675	Local, regional, national public agency		5/9/17	2/6/01
ALL COUNTIES	Goldrich & Kest Industries, LLC	5150 Overland Avenue	Culver City	CA	90230	(310) 204-2050	Carole Glodney	Carole@Gkind.com	(310) 280-576	Profit-motivated individual or organiz	X	8/14/14	4/25/01
LOS ANGELES	LTSC Community Development	231 East Third Street, Ste. G 106	Los Angeles	CA	90013	(213) 473-1606	Takao Suzuki	tsuzuki@ltsc.org	(213) 473-168	Local, regional, national nonprofit org	X	8/14/14	4/25/01
ALL COUNTIES	East Los Angeles Community C	530 South Boyle Avenue	Los Angeles	CA	90033	(323) 269-4214	Ernesto Espinoza		(323) 261-106	Local, regional, national nonprofit org	X	12/24/10	7/13/01
LOS ANGELES	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
ORANGE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
RIVERSIDE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN BERNARDIN	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN DIEGO	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SANTA BARBAR/	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
VENTURA	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SACRAMENTO	Norwood Family Housing	630 I Street, Second Floor	Sacramento	CA	95814	(916) 440-1328	Darren Bobrowsky	dbobrowsky@shra.org	(916) 442-673	Local, regional, national nonprofit org	X		1/9/02
ALL COUNTIES	Bayside Communities	1990 North California Blvd., Ste. 1	Walnut Creek	CA	94596	(925) 482-9406	Basil Rallis	brallis@baysidecommunities.com	(510) 891-900	Profit-motivated individual or organiz	X	5/10/17	9/10/02
ALL COUNTIES	Newport Development, LLC	9 Cushing, Ste. 200	Irvine	CA	92618	(949) 923-7812	Warren Allen	wallen@newportpartners.com	(949) 585-044	Profit-motivated individual or organiz	X	5/24/17	9/10/02
ALL COUNTIES	Mercy Housing California	1360 Mission St., Suite 300	San Francisco	CA	94103	213-743-5830	Ed Holder	eholder@mercyhousing.org	(415) 553-637	Local, regional, national nonprofit org	X	5/24/17	12/9/02
ALL COUNTIES	KDF Communities, LLC	1301 Dove St., Suite 720	Newport Beach	CA	92660	(949) 622-1888	John Bernard		(949) 851-181	Profit-motivated individual or organization		5/23/17	12/13/02
SONOMA	Divine Senior Apartments	P.O. Box 148	Occidental	CA	95465	(707) 874-3538	Richard W. Blanz		(707) 874-353	Local, regional, national nonprofit org	X		5/29/03
ALL COUNTIES	California Human Development	3315 Airway Drive	Santa Rosa	CA	95403	(707) 521-4788	John M. Way	CaliforniaHumanDevelopment.org	(707) 523-377	Local, regional, national nonprofit org	X	8/14/14	6/30/03
ALL COUNTIES	Reiner Communities LLC	100 Spectrum Center Dr. Suite 83	Irvine	CA	92618	(949) 753-0555	Dylan Feliciano	df@reinerllc.com		Profit-motivated individual or organiz	X	5/16/17	6/30/03
ALL COUNTIES	Petaluma Ecumenical Properties	1400 Caulfield Lane	Petaluma	CA	94954	(707) 762-2336	Vera R. Ciammetti	pep@pephousing.org	(707) 762-465	Local, regional, national nonprofit org.		5/10/17	8/19/03
ALL COUNTIES	The John Stewert Company	1388 Sutter St., 11th Floor	San Francisco	CA	94109	(415) 345-4400	Margaret Miller	mmiller@jsw.net	(415) 614-917	State-wide, for-profit	X	5/24/17	8/19/03
ALL COUNTIES	William G. Ayyad, Inc.	9252 Chesepeake Dr., Suite 100	San Diego	CA	92123	(858) 244-0900 *	Rebecca Ayyad	rayyad@udgi.net	(858) 244-090	Profit-motivated individual or organization		5/24/17	8/19/03
MENDOCINO	CDC of Mendocino County	1076 North State Street	Ukiah	CA	95482	(707) 463-5462	Todd Crabtree	crabtret@cdchousing.org	(707) 463-418	Public housing authority		2/26/14	8/25/03
SONOMA	Sonoma County Community De	1440 Guerneville Road	Santa Rosa	CA	95403	(707) 565-7901	Nick Stewart	Nick.Stewart@sonoma-county.org				8/14/14	9/8/03
ALL COUNTIES	Linc Housing Corporation	100 Pine Avenue, # 500	Long Beach	CA	90802	(562) 684-1100	Sid Paul		(562) 684-1137			8/14/14	9/15/03
LOS ANGELES	Francis R. Hardy, Jr.	2735 W. 94th Street	Inglewood	CA	90305	(323) 756-6533	Francis R. Hardy, Jr.		(323) 756-6533				9/18/03
ALL COUNTIES	Domus Development, LLC	594 Howard St., Ste 204	San Francisco	CA	94105	(415) 856-0010	Meea Kang		(415) 856-0264		X	8/14/14	2/4/04
ALL COUNTIES	BUILD Leadership Developmen	P.O. Box 9414	Newport Beach	CA	92658	(877) 644-9422	Tracy Green		(949) 719-971	Local, regional, national nonprofit org.		5/16/17	2/4/04
ALL COUNTIES	Skyline Real Estate Developme	P.O. Box 7613	Newport Beach	CA	92658	(949) 293-4705	Lynn Miller	skylinerealestate@cox.net	(949) 719-971	Profit-motivated individual or organization		5/24/17	2/4/04
LOS ANGELES	A Community of Friends	9 Cushing, Ste. 200	Irvine	CA	92618	(415) 856-0010	Meea Kang	meea@domusd.com	(415) 856-0264		X	8/27/13	2/4/04
ALL COUNTIES	MBK Management Corporation	23586 Calabasas Road, Ste. 100	Calabasas	CA	91302	(818) 444-2100 e	Jessica Robbins	jrobbins@mbkmgmt.com	(818) 337-7578		X	5/23/17	3/4/04
ALL COUNTIES	Cabouchon Properties, LLC	Pier 9, Suite 114	San Francisco	CA	94111	(415) 433-2000	Susan Terrado		(415) 433-2000			5/23/17	4/28/04
ALL COUNTIES	Maximus Properties, LLC	23586 Calabasas Road, Ste. 103	Calabasas	CA	91302	(818)449-4004	Jeffrey S. McGuire	jmcguire@remax.net	(818) 449-4004			5/23/17	4/28/04
ALL COUNTIES	Squier Properties, LLC	1157 Lake Street	Venice	CA	90291	(310) 418-6389	Scott Richards√	gsquier@earthlink.net	(310) 418-638	Profit-motivated individual or organization		5/24/17	4/28/04
LOS ANGELES	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
LOS ANGELES	Winnetka King, LLC	23586 Calabasas Road, Ste. 100	Los Angeles	CA	91302	(818) 222-2800	Rick Macaya		(818) 222-2800				4/28/04
SANTA BARBAR/	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin		(805) 496-4948				4/28/04
VENTURA	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
ALL COUNTIES	Creative Housing Coalition	4612 Alta Canyada Road	La Canada	CA	91011	(805) 736-9342	Jane Anderson		(805) 736-9342			5/23/17	5/19/04
ALL COUNTIES	Fallbrook Capital Corporation	6700 Fallbrook Avenue, #111	West Hills	CA	91307	(818) 712-6931	Brandt Blaken		(818) 712-6931			5/23/17	6/1/04
LOS ANGELES	Los Angeles Housing & Commu	1200 W.7th Street, 9th Floor	Los Angeles	CA	90017	(213) 808-8654	Franklin Campos	fcampos@lahd.lacity.org	(213) 808-8999		X	8/14/14	3/15/05
ALL COUNTIES	West Bay Housing Corporation	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
SAN DIEGO	A Community of Friends	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
ALAMEDA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878	Erin Coyle	erin.coyle@nclt.org	(510) 548-7562		X	8/14/14	6/10/05
CONTRA COSTA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
LOS ANGELES	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
MARIN	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
RIVERSIDE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600x	Todd Cottle		(714) 242-2092		X		6/10/05
SAN BERNARDIN	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN DIEGO	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
SAN FRANCISCO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
SAN MATEO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Riverside Chartable Corporation	3803 E. Casselle Ave	Orange	CA	92869	(714) 628-1650	Kenneth S. Robertson		(714) 628-1657			8/14/14	9/2/05
LOS ANGELES	Home and Community	2425 Riverside Place	Los Angeles	CA	90039	(213) 910-9738	Sabrina Williams		(213) 913-5819				11/28/05
ALL COUNTIES	Wakeland Housing & Developm	1230 Columbia St. Ste. 950	San Diego	CA	92101	(619) 326-6215	Tim Wray		(619) 235-5386		X	5/24/17	12/27/05
LOS ANGELES	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
ORANGE	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
KERN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151			6/14/17	2/8/06
KERN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936			6/14/17	2/8/06
LOS ANGELES	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
LOS ANGELES	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ORANGE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
ORANGE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
RIVERSIDE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
RIVERSIDE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN BERNARDIN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN BERNARDIN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN DIEGO	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN DIEGO	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ALL COUNTIES	Hampstead Development Group	3413 30th Street	San Diego	CA	92104	(619) 543-4200	Chris Foster		(619) 543-4220		X	8/24/11	5/5/06
KERN	Housing Authority of the County	601 24th Street	Bakersfield	CA	93301	(661) 631-8500	Stephen M. Pelz		(661) 631-9500			8/14/14	5/5/06
SANTA CRUZ	Housing Authority of the County	2931 Mission Street	Santa Cruz	CA	95060	(831) 454-5901	Ken Cole					8/14/14	5/5/06
LOS ANGELES	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ORANGE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
RIVERSIDE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
SAN BERNARDIN	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
VENTURA	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ALL COUNTIES	A. F. Evans Development, Inc.	4305 Univeristy Ave. Suite 550	San Diego	CA	92105	(619) 282-6647	Anne Wilson		(619) 282-4145		X	1/26/12	10/11/06
ALL COUNTIES	California Coalition for Rural Ho	717 K Street, Suite 400	Sacramento	CA	95814	(916) 443-4448	Alicia Sebastian	alicia@calruralhousing.org	(916) 447-0458		X	5/23/17	10/11/06
ALL COUNTIES	Chelsea Investment Corporation	725 South Coast Highway 101	Encinitas	CA	92024	(760) 456-6000	Jim Schmid		(760) 456-6001			5/23/17	10/11/06
ALL COUNTIES	Corporation for Better Housing	15303 Ventura Blvd., Suite 1100	Sherman Oaks	CA	91403	(818) 905-2430	Mary Silverstein		(818) 905-2440			5/23/17	10/11/06
ALL COUNTIES	Community HousingWorks	2815 Camino Del Rio South, Ste.	San Diego	CA	92108	(619) 858-9031	Daniel Marcus	dmarcus@chworks.org	(619) 282-414	Local, regional, national nonprofit org	X	6/7/18	10/11/06
IMPERIAL	Calexico Community Action Cou	2306 M.L. King	Calexico	CA	92231	(760) 357-2995	Steve F. Rivera		(760) 357-2923			6/14/17	10/11/06
LOS ANGELES	Clifford Beers Housing, Inc.	1200 Wilshire Blvd. Ste. 205	Los Angeles	CA	90017		James Bonar		(213) 316-0111		X		5/3/07
ALL COUNTIES	USA Properties Fund	2440 Professional Drive	Roseville	CA	95661	(916) 773-5866	Geoffrey C. Brown		(916) 773-5866			5/24/17	7/12/07
CONTRA COSTA	City of Walnut Creek	1666 N. Main Street	Walnut Creek	CA	94596	(925) 943-5899	Laura Simpson	Simpson@walnut-creek.org	(925) 256-3500		X	2/26/14	9/11/07
ALL COUNTIES	Bank of America, N.A.	555 California St., 6th Floor	San Francisco	CA	94104	(415) 953-2631	Gabriel Speyer		(415) 622-1671			5/16/17	12/4/07
ALL COUNTIES	Fairfied Residential LLC	5510 Morehouse Drive, Suite 200	San Diego	CA	92121	(858) 824-6406	Paul Kudirka	pkudirka@ffres.com	(858) 635-8606			5/23/17	12/4/07
MONTEREY	CHISPA Inc.	295 Main Street, Suite 100	Salinas	CA	93901	(831) 757-6251	Normond V. Kolpin		(831) 757-7537				5/29/08
ALL COUNTIES	Allied Pacific Development, LLC	169 Saxony Road, Suite 103	Encinitas	CA	92024	(760) 557-1480			(760) 557-1480		X		5/27/10
ALL COUNTIES	Belveron Real Estate Partners,	268 Bush St., #3534	San Francisco	CA	94104	(415) 273-6801			(415) 520-5688		X		5/27/10
DEL NORTE	Humboldt Bay Housing Develop	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Bonnie Hughes	bhughes@housinghumboldt.org	(707) 826-7319		X	8/14/14	5/27/10
HUMBOLDT	Humboldt Bay Housing Development Corporation (DBA Housing Humboldt)	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Elizabeth Matsumoto	bmatsumoto@housinghumboldt.or	(707) 826-731	Local, regional non-profit	X	8/14/14	5/27/10
ALL COUNTIES	Richman Group of California, LL	21520 Yorba Linda Blvd, Suite G-	Yorba Linda	CA	92887	(714) 837-6138	Pamela Mikus	MikusP@therichmangroup.com			X		5/28/10
ALL COUNTIES	Renaissance Housing Communi	110 Pacific Avenue, Suite 292	San Francisco	CA	94111	(415)0419-4027	David Silver		(415) 789-448		X		8/9/10
ALAMEDA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404	Linda Gardiner	linda.gardiner@ac.gov.org	(510) 670-637	Local, regional, national nonprofit org.		5/9/17	9/27/10
ALL COUNTIES	Mesa Realty Advisors	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
CONTRA COSTA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404			(510) 670-637	Local, regional, national nonprofit org	X	9/27/10	9/27/10
LOS ANGELES	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ORANGE	A Community of Friends	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
ORANGE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
RIVERSIDE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
SAN BERNARDIN	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
ALL COUNTIES	California Commercial Investme	4530 E. Thousand Oaks Blvd., St	Westlake Village	CA	91362	(805) 495-8400			(805) 495-5471		X	8/14/14	12/24/10
ALL COUNTIES	Dawson Holdings, Inc.	300 Turney Street, 2nd Floor	Sausalito	CA	94965	(801) 244-6658	Tim Fluetsch		(801) 733-6116		X	8/14/14	12/24/10
ALL COUNTIES	WNC Community Preservation I	17782 Sky Park Circle	Irvine	CA	92620	(714) 662-5565			(714) 662-4412		X		3/3/11
AMADOR	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Rachel Iskkow	rachel@mutualhousing.com	(916) 453-840	Local, regional, national public agenc	x	4/21/16	3/3/11
SOLANO	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Holly Wunder Stiles	holly@mutualhousing.com			x	8/14/14	3/3/11
ALAMEDA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
BUTTE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
CONTRA COSTA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
EL DORADO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
FRESNO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
IMPERIAL	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KINGS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
LOS ANGELES	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MADERA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MENDOCINO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MERCED	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MONTEREY	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
ORANGE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
PLACER	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
RIVERSIDE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SACRAMENTO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BENITO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BERNARDIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN DIEGO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN FRANCISCO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN JOAQUIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN LUIS OBISP	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN MATEO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA BARBAR	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CLARA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CRUZ	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
STANISLAUS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
TULARE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
VENTURA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101			6/14/17	3/28/12
LOS ANGELES	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
NAPA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
ORANGE	City of Newport Beach	100 Civic Center Drive	Newport Beach	CA	92660	(949) 644-3221	Melinda Whelan				X	8/14/14	3/28/12
ORANGE	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SAN BERNARDIN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SOLANO	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
SONOMA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
VENTURA	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
ALL COUNTIES	Preservation Partners Developn	21515 Hawthorne Blvd. Suite 125	Torrance	CA	90503	(310) 802-6681	Chuck Treatch	Chuck@preservationpartners.org	(310) 802-668	A California limited partnership, for-p	X	8/14/14	1/16/13
ALL COUNTIES	Berkadia	823 Colby Drive	Davis	CA	95616	(916) 769-7768	Al R Inouye	Al.inouye@inouyeapartments.com			X	8/1/16	2/26/14
ORANGE	Jamboree Housing Corporation	17701 Cowan Ave, #200	Irvine	CA	92614	(949) 214-2395	Roger Kinoshita	rkinoshita@jamboreehousing.com	(949)214-2395	Local, region, national, nonprofit org		4/22/16	4/22/16
ALL COUNTIES	American Community Develope	20250 Harper Avenue	Detroit	MI	48225	(313) 884-0722	Derek M. Skrzynski	derek@acdmail.com	(313) 884-072	Profit-motivated individual or organiz	X	9/2/16	9/2/16
ALL COUNTIES	Highland Property Development	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno	p.patierno@highlandcompanies.cc	(626) 698-636	Profit-motivated individual or organization			9/27/16

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ALL COUNTIES	GAL Affordable LP	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno		(626) 698-636	Profit-motivated individual or organization			10/24/16
ALL COUNTIES	Eden Housing, Inc.	22645 Grand Street	Hayward	CA	94541	(510) 582-1460	Andrea Osgood	aosgood@edenhousing.org	(510) 582-652	Local, regional, national nonprofit org	X		11/8/16
LOS ANGELES	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
ORANGE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
RIVERSIDE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN BERNARDIN	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
VENTURA	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN DIEGO	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/7/17
ALL COUNTIES	Lincoln Avenue Capitol, LLC	680 5th Avenue, 17th Floor	New York	NY	10019	(646) 585-5524	Andrew Mika	andrew@lincolnavecap.com		Profit-motivated individual or organiz	X	8/30/19	5/3/17
LOS ANGELES	Community Development Comm	700 W. Main Street	Los Angeles	CA	91801	(626) 586-1812	Larry Newnam	larry.newnam@lacdc.org	(626) 943-381	Loca., regional, national public agency		11/6/17	8/17/17
FRESNO	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org.		4/10/18	4/10/18
ALL COUNTIES	Colrich Multifamily Investments,	444 West Beach St.	San Diego	CA	92101	(858) 490-2300	Danny Gabriel	dannyg@colrich.com	(858) 490-026	Profit-motivated individual or organization			4/16/18
ALL COUNTIES	Standard Property Company, IN	1901 Avenue of the Stars, Suite 3	Los Angeles	CA	90067	(310) 553-5711	Brad Martinson	bmartinson@standard-companies.	(310) 551-166	Profit-motivated individual or organization			6/4/18
ALL COUNTIES	Jonathon Rose Companies	551 Fifth Ave, 23rd Floor	New York	NY	10176	(917) 542-3600	Nathan Taft	nathan@rosecompanies.com	(917) 542-360	Profit-motivated individual or organization			6/27/18
ALL COUNTIES	JEMCOR Development Partners	1700 El Camino Real Suite #400	Sna Mateo	CA	94402	(415) 941-5847	Michael McDermott	mmcdeormott@jemcorpartners.com		Profit-motivated individual or organization			8/8/18
ALL COUNTIES	Catalyst Housing Group, LLC	21 Ward Street, Suite 2	Larkspur	CA	94939	(415) 205-4702	Jordan Moss	Jordan@CatalystHousing.com		Profit-motivated individual or organization			12/11/18
LOS ANGELES	Los Angeles County Developme	700 W. Main Street	Alhambra	CA	91801	(626) 586-1816	KeAndra Cylear-Dod	keandra.cyleardodds@lacda.org		Local, regional, national public agency			4/18/19
ALL COUNTIES	Veritas Urban Properties LLC	2050 Hancock Street, Suite B	San Diego	CA	92110	(619) 746-5191	Gilman Bishop	gbishop@bishopventures.com		Profit-motivated individual or organization			4/24/19
LOS ANGELES	Santa Fe Art Colony Tenants As	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	CA	90058	(310) 663-6665	Sylvia Tidwell	sylvia@sylviatidwell.net		Tenants' Association			5/2/19
SANTA CLARA	Silicon Valley at Home	350 West Julian Street, Building 5	San Jose	CA	95110	(669) 254-1009	Mathew Reed	mathew@siliconvalleyathome.org		Local, regional, national nonprofit org.			7/10/19
LOS ANGELES	San Gabriel Valley Habitat for H	400 S Irwindale Ave	Azusa	CA	91702	(626) 709-3277	Mark Van Lue	mvanlue@sgvhabitat.org		Local, regional, national nonprofit org.			8/12/2019

Appendix E: Accessory Dwelling Unit Projection Methodology

Analysis for projecting accessory dwelling units as part of meeting South Pasadena's Regional Housing Needs Allocation (*Revised: September 2022*)

As part of the Housing Element Update for the City of South Pasadena (City) and to ensure that the City is able to meet the Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments (SCAG), the City may project the number of Accessory Dwelling Units (ADUs) that is expected to be built over the course of the 6th Round Housing Element Cycle. The California Department of Housing and Community Development (HCD) recognizes that ADUs have become more popular in recent years and expects the trend to continue. ADUs are seen as an attractive option for developing housing given their affordability to lower-income renters, relatively low cost to construct, and their ability to provide income and alternative housing options to homeowners.

Assuming a certain number of ADUs will be developed over the course of housing element implementation has been acceptable to the State of California since ADU law was instituted in 2003. These projections are based on recent past ADU development trends in the jurisdiction and the current market rents for ADUs in the jurisdiction. State law regulating ADUs has changed significantly since 2016, requiring local jurisdictions to allow ADUs more broadly across a jurisdiction and with development standards and other regulations that reduce cost and other barriers to ADU development. This includes changes to require less on-site parking, allow fewer fees to be charged related to ADUs, and allow conversion of existing structures to ADUs.

HCD "Safe Harbor" Calculation

HCD's Housing Element Site Inventory Guidebook, finalized in June 2020, has clarified parameters for analyzing ADU past performance and using it to project the number of ADUs expected to be developed as part of meeting the City's RHNA. HCD has explained that the quantity of ADU building permits issued in previous years, particularly since 2018 as effects of the changes to the law began having more impact, may be used as a baseline for making the calculations. According to HCD, to project the number of ADUs expected, there are two methods that are acceptable to arrive at a 'safe harbor' number for projected ADUs. Both are based on past approvals of ADUs in a jurisdiction. Based on preliminary discussions with HCD for South Pasadena, the safe harbor number can be relied on in the 6th Round Housing Element in combination with programs to comply with state ADU regulations and monitor ADU production. The two options for 'safe harbor' analysis are described here:

- Use the number of ADU building permits in the jurisdiction since January 2018 to estimate new production. Take the average number of ADUs that have received building permits per year since the beginning of 2018. That average number can be assumed to be the average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029). The 6th Cycle RHNA projection period begins June 30, 2021.
- Assume an average increase of five times the previous planning period ADU construction trends prior to 2018. Take the average number of ADUs with building permits issued per year between January 1, 2014, and December 31, 2017, which is the part of the 5th Housing Element RHNA projection period occurring before January 1, 2018, when many of the new ADU laws began to take effect. Multiply that average by five. That average number can be assumed to be the

average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029).

A jurisdiction may choose to use one or the other of these approaches if better data is available for one of the timeframes. Before 2018, South Pasadena had only approved one ADU (during the 5th Cycle). During that time, the ADU regulations in the City were much more limiting and ADUs were only allowed on parcels larger than 12,000 square feet. Once the new state laws took effect, the ADU numbers began to increase. Between January 1, 2018, and the present (mid-2022), an average of 16 ADUs received planning permits per year with an increase every year.

Four ADUs received building permits in 2018, seven in 2019, eight in 2020, 19 in 2021 and 38 during the first two-thirds of 2022 (by August 31), for an average of over 16 ADUs per year receiving building permits during that timeframe.

When 16 ADUs per year on average are projected through the end of the projection period, the City estimates a safe harbor number of 148 ADUs between June 30, 2021, and October 15, 2029.

Projection Based on Data Reflecting South Pasadena's Specific Circumstances

If a jurisdiction expects a higher number of ADU approvals in the 6th Cycle than what is projected using one of the safe harbor options, additional data, analysis of trends, and supporting programs, including a monitoring program, must be included in the Housing Element. The City of South Pasadena does expect a higher number of ADUs will be permitted than the safe harbor number of 148 ADUs, because of the recent upward trajectory following updates to the City's ADU zoning regulations that went into effect in early June and December 2021, and based on the results of other ADU programs and initiatives that have been implemented or are planned at the City.

Over five years, ADU building permit activity has increased as follows:

- 2017 to 2018 – increase from 1 to 4 ADUs that received building permits
- 2018 to 2019 – increase from 4 to 7 ADUs that received building permits
- 2019 to 2020 – increase from 7 to 8 ADUs that received building permits
- 2020 to 2021 – increase from 8 to 19 ADUs that received building permits
- 2021 to June 30, 2022 – increase over 6 months to 29 ADUs (or 58 ADUs projected to an annualized number) that received building permits

The 19 permits issued in 2021 and 29 permits issued in the first half of 2022 far exceeded the City's earlier (Public Review Draft) projection of 12 ADU permits. The increase can be attributed to two important policy actions taken by the City Council:

Adoption in December 2021 of an urgency ordinance with standards for constructing ADUs on historic properties, along with comprehensive design guidelines that pave an administrative (by-right) path for owners of historic properties to build an ADU. Council adopted the same ordinance permanently into the Municipal Code on February 2, 2022. These changes to the code resolved issues that have delayed approval of ADUs and reduced application submittals. Staff immediately noticed an increase in interest and new applications with approval of the new standards. Additionally, the City streamlined the application process with new forms and electronic submittal. Accordingly, more complete applications have been received and approved more quickly.

Additionally, at the end of 2021, the City added four new Planning staff to increase permit processing

capacity, including ADU applications.

With increased staffing and clear, objective Code standards, the City has increased confidence in the projections provided in the first two public drafts. The City has already initiated several of the programs in this 2021-2029 Housing Element, including homeowner education and assistance and the ADU amnesty program for property owners with an existing unpermitted ADU on their property to legalize based on compliance with the Building Code. A list of the programs and initiatives the City is undertaking related to ADUs is included at the end of this memo.

The trend in ADU application submittals since the Code was amended, documented above, supports an assumption that the "safe harbor" is far below reasonably projected numbers, and given the City's RHNA, it is important to use a projection that is reflective of the permit activity experienced since conditions changed starting in June 2021. As the third Public Review Draft is released, data through August 2022 shows a sharp increase in applications and building permits, and the City expects to issue 58 ADU building permits in 2022. To maintain a conservative forecast, this sharp increase will be considered to 8 represent a "bubble" due to pent-up demand, with future years of the planning period remaining as forecast earlier (39 annually) as shown in Table 1. In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts.

Table 1. Accessory Dwelling Unit Projection

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29
2023	55	39
2024	55	39
2025	55	39
2026	55	39
2027	55	39
2028	55	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	**470**	**320**

It is quite possible that the projection in Table 1 is too low, as market trends show growing popularity for ADU construction. Applications on historic properties in particular are just beginning to be submitted. For informational purposes, a second, more robust, scenario is included in Table 3 that assumes that 2022 was a bubble, but which projects a stronger growth trend throughout the planning period, with 75% of applications moving forward to building permit issuance.

ADU Affordability Analysis

SCAG prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for

South Pasadena. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that do not reach the rental market. ADU research conducted by the University of California, Berkeley's Center for Community Innovation[i] indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or below-market rental rates. SCAG conservatively estimated that 15 percent of the ADUs in their region would be in this category and thus rented to the extremely low-income category of households. Table 2 lists the projected 297 ADUs by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena.

Table 2. Projected ADUs - Affordability

Percentage	Number of ADUs	Income Category Affordable To:
15%	45	Extremely Low Income
9%	27	Very Low Income
44%	131	Low Income
2%	6	Moderate Income
30%	89	Above Moderate Income
100%	**297**	**Total**

An Alternative Projection Based on the 2021-2022 ADU Permit Trend

As noted above, Table 3 presents a scenario that reflects the actual number of approved ADU Planning applications and building permits issued in 2021, accounts for 2022 ADU permits as a bubble, and assumes an increase in applications from 2021 to 2023 that continues for three years before leveling off. This scenario also assumes that 75 percent of approved Planning applications will receive building permits. Based on these assumptions, this more robust scenario projects a total of 403 ADUs between January 1, 2022, and October 15, 2029.

Table 3. Possible Higher Accessory Dwelling Unit Projection

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits.
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of applications for the remainder of 2022 (same as Table 1)
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	
2026	72	54	
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022-October 15, 2029	**560**	**403**	

Projections Relative to Existing Single-family Housing Stock

In 2019, South Pasadena's single-family housing stock consisted of 5,642 units. 30 ADU permits were issued in the previous housing element cycle, including the first half of 2021.

The projection of 297 units, which is used for RHNA and program purposes in this housing element and Table 3 both project many more ADUs, and for context, it is informative to consider the number of single-family properties within the city and whether those projections make sense within that context. Table 4 includes the 30 5th cycle ADUs, the 9 units permitted in the 2nd half of 2021, together with the actual and projected 2022-2029 ADUs for both projection scenarios and calculates them as a percentage of the 2019 housing stock. As shown, the more conservative projection would result in about 6 percent of single-family properties that have ADUs in 2029. The more aggressive scenario results in 7.8 percent. In either case, more than 92 percent of single-family properties remain unchanged.

Table 4: Percentage of ADUs Projected Relative to Housing Stock			
Housing Stock (5,642 units)	5,642	Additional ADUs as a % of housing stock	Total ADUs as a % of housing stock
297ADUs (+30+9)	336	5.4%	6.6%
Table 3 ADUs (+30+9)	442	7.3%	7.8%

Additionally, the estimate of ADUs as a percentage of single-family properties does not take into account that some ADUs will be constructed on multifamily properties. It is anticipated that these will become more popular as apartment building owners get savvier regarding ADU law. As of 2022, the City has already approved the first such applications. Furthermore, the City's program creating an amnesty process for illegal units, to recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on this information, it can be concluded that both of the ADU projection scenarios are realistic within the context of the overall existing housing stock in South Pasadena.

City of South Pasadena ADU Initiatives and Programs for 2021-2029

Program 3.f – Allow and Facilitate ADUs

Assumption of same level of applications and 75% moving forward to building permits

Program 3.i – ADU Amnesty Program

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Program 3.k – ADU Education and Promotion and Homeowner Outreach

[i] Chapple et al. 2017. *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver.* University of California, Berkeley's Center for Community Innovation.

Appendix F:
Realistic Capacity Analysis

Justification of the 95 percent Realistic Capacity Assumption Applied to Downtown and Mixed-Use Sites

Much of the City of South Pasadena's lower-income Regional Housing Needs Assessment (RHNA) is proposed to be accommodated in the Draft Downtown Specific Plan (DTSP) area and the mixed-use Neighborhood Centers proposed in the General Plan Update. These sites are included in the set of sites with detailed exhibits and descriptions in Appendix A. Where full redevelopment of a site or adding to existing structures is assumed for the Housing Element analysis, a realistic development capacity of 95 percent is assumed. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity and by new policies requiring inclusionary housing and providing design incentives, FAR bonuses, height concessions and other options to increase density (state density bonus) for projects on these sites. This appendix is included to provide the background and analysis to support that 95-percent assumption.

Multi-unit Housing: Trending Upward in South Pasadena and Regionally

The City of South Pasadena is nearly built out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of sites that include a portion or all of the site with new residential units.

After a hiatus following construction of South Pasadena's first new mixed-use, transit-adjacent development in 2005, several multiple-unit residential or mixed-use projects containing higher density housing have recently been constructed or approved in South Pasadena (see Table 1), demonstrating an increasing interest to construct multi-family housing in the city. These are all on sites that were previously developed. The Mission Bell Project, approved in 2020, includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was approved in 2020 under the City's first state density bonus application. The Seven Patios Project, with 60 housing units, was approved in 2021. All three projects were able to achieve higher densities with a range from 22 to 50 dwelling units per acre (du/ac) without accounting for removal of the nonresidential portions of the project from the total parcel or site in the case of the mixed-use projects. All three projects achieved higher than 95 percent of allowed development capacity and two achieved higher than 100 percent. While the trend toward higher density, mixed-use development in South Pasadena is more recent, it is consistent with what is happening in the region, where projects containing multi-family housing of various densities, unit sizes, and architectural styles are being developed at 100 percent or higher percent of allowed capacity on previously developed sites (See Housing Element Tables VI-44 and 42). Most are receiving the entitlements with the inclusion of dedicated affordable units as a prerequisite to receiving significant density bonuses that are attractive to developers and make the project feasible.

Table 1. Representative Projects on Non-Vacant Sites in South Pasadena

Address/ Project Name	Assessor's Parcel Numbers	Acres	Entitled, Under Construction, or Completed?	Zone	Previously Developed With/ Existing Uses	Project Description	Total Number of Dwelling Units	Density	Percentage of Allowed Capacity	Similar Sites in Table VI-46 (and Site ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; Construction anticipated in 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-use, transit-oriented development (TOD), multifamily housing (studios, lofts, flats, and townhomes), and street-fronting commercial uses (restaurant and retail).	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.45 FAR	Odd-shaped sites near transit: Gold Line Storage (10); North side of Mission (8, 11, 13, 14); Other sites near rail transit: City Yard (9); Fremont/Mission (13, 14), Arco (9)
Mission Bell 1101, 1107, 1115 Mission Street	5315-008-045 5315-008-043	0.72	Entitled in 2020; Construction anticipated in 2022	MSSP	A portion of the existing historic building to be demolished and the other portion adaptively reused Two parcels were consolidated	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.48 FAR	School Site -12 (historic resource); Site Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined);
Eight Twenty 820 Mission Street	5315-017-094 5315-017-082 5315-017-067 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses.	38	20	109% of allowed FAR (allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined)
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in spring 2020	CO	Commercial retail with underutilized parking lot No parcel consolidation for redevelopment	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (17, 18, 22, 23, 24)
Mission Meridian Village Meridian Avenue and Mission Street	5315-021-001 5315-021-079 5315-021-047	1.6	Built in 2005	MSSP	Lower-density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre.	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 11)

Source: PlaceWorks and City of South Pasadena, 2021

Why this trend will continue and likely increase: Inclusionary Housing and Density Bonus

Chapter 6.5 (Housing Development Resources) provides a full narrative of the inclusionary housing ordinance (see *Zoning Provisions to Encourage Affordable Housing*), which Council adopted in May 2021. The projects in Table 1 were developed prior to the City's adoption of this ordinance. Only one of them voluntarily included affordable units and received bonus density and height, achieving 138% of the underlying density (allowed capacity), the highest of the five projects. Now that the inclusionary units are required, coupled with by-right density bonus, this has become a central component of the strategy to build affordable units and forms an important component of the basis for anticipating the 95-percent realistic capacity.

Because the properties identified in the Sites Inventory (Appendix A) with a 95-percent realistic capacity assumption are eligible for the design incentives in the adopted Inclusionary Housing Ordinance and because the Inclusionary Housing regulations apply to all residential projects of more than three units, the realistic capacity on these sites takes the Inclusionary Housing regulations into consideration.

The inclusionary housing regulations streamline use of the State Density Bonus to increase the amount of affordable housing approved in the City. This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan, both currently being updated, to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. These changes will be adopted at or near the same time as Housing Element adoption. Zoning updates to codify those changes will occur shortly after the General Plan and Downtown Specific Plan are adopted. The City has been conducting outreach and gathering input from the community and decision makers since early 2019 and support has been expressed for the proposed increased density.

State and Local Regulations encourage full development of allowed capacity for project feasibility

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects with 20% affordable units as required by the ordinance. The City has not been made aware of any pending applications that were cancelled due to adoption of the inclusionary housing regulations. In fact, the effect thus far has been as anticipated; the City has received more inquiries from developers since adopting the inclusionary housing regulations.

In September 2021, the City received the first Design Review application subject to the inclusionary housing code, for 108 one- and two-bedroom condominium units in a mixed-use, 84,198 square-foot, 50-foot height project. The proposed project would include 20% of its base units as affordable. The applicant is requesting to comply with the streamlined density bonus provisions and receive Code-allowed concessions. However, staff understands that many developers need to wait for density increases in the forthcoming General Plan and Downtown Specific Plan before submitting applications.

Ongoing Analysis and Monitoring

In July 2021, the City contracted with EPS, an economics consultant firm, to prepare an Inclusionary Housing In-Lieu Fee Study and develop Affordable Housing Program Recommendations. This work will analyze the inclusionary housing regulations and make recommendations for the City's affordable

housing program or participation in a regional affordable housing production program. The analysis will also support the City's understanding of housing production trends and confirm the assumptions that it is realistic to anticipate that developments will be proposed at 95 percent of the zoning capacity. The City has committed in the programs section of this Housing Element to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if needed at that point.

Conclusion

Based on the trends and regulations analyzed, the assumption of 95 percent of realistic development capacity on the DTSP and mixed-use sites is reasonable and potentially conservative based on the fact that the most recently approved and developed multifamily and mixed-use with multifamily projects are developing at a higher percentage of allowed capacity. Table 2 shows the number of units on these sites at 95, 100, and 110 percent of allowed capacity under the proposed DTSP and General Plan. Note that the figures include the small number of sites that have a lower-capacity assumption in the DTSP and mixed-use areas. The realistic capacity percentages are lower on those sites because of existing uses that are anticipated to remain on part of the sites.

While 95 percent is the assumption used for this housing element, the number of units potentially possible at 100 and 110 percent of capacity are included in Table 2 to demonstrate what could easily happen if the recent trends to take advantage of state density bonus law for multifamily projects in South Pasadena continue.

Table 2. Capacity Assumption Alternatives

	95% Capacity	100% Capacity	110% Capacity
Units	1,545	1,623	1,781

City Council Agenda Report

ITEM NO. 4

DATE: May 30, 2023

FROM: Arminé Chaparyan, City Manager AC

PREPARED BY: John Downs, Interim Finance Director
Hsiulee Tran, Deputy Finance Director

SUBJECT: **Review of the Draft Proposed Fiscal Year 2023-2024 Budget**

Recommendation
It is recommended that the City Council review the Draft Proposed Fiscal Year 2023-2024 Budget.

Background
The Finance Commission received a first draft of this document on May 16, 2023, staff implemented the recommended changes, as well as any remaining clean up measures in finessing the document. The Finance Commission will review a revised draft on June 1, 2023 for their consideration to recommend for approval, and the City Council will receive the final proposed budget for consideration and adoption on June 7, 2023.

The Finance Department has made considerable efforts in engaging the community in the budget process. An online survey, community outreach about engagement opportunities have been publicized, and two in-person and virtual budget input sessions were held on May 18, 2023. These are in addition to the draft budget discussions with each member of Council with Department Directors, two budget workshops for staff, as well as the opportunity to engage on this document at the Finance Commission meeting.

Discussion/Analysis
Enclosed is the updated draft Proposed Fiscal Year 2023-2024 Budget. The focus of this report will be the integrity of the document for final review from the Finance Commission and a subsequent review and approval from the City Council.

Fiscal Impact
This document is meant to ensure the city's finances for the upcoming fiscal year.

Attachments:
1. Draft Proposed Fiscal Year 2023-2024 Budget
2. Budget Changes
3. Position Control Report
4. Master Fee Schedule

ATTACHMENT 1

Draft Proposed Fiscal Year 2023-2024 Budget

City of SOUTH PASADENA

Proposed DRAFT Budget For the 2023-2024 Fiscal Year

Mayor
Jon Primuth

Mayor Pro Tempore
Evelyn G. Zneimer

Councilmember
Jack Donovan

Councilmember
Janet Braun

Councilmember
Michael A. Cacciotti

City Treasurer
Zhen Tao

City Manager
Arminé Chaparyan

Population 26,314 (2021)

Draft May 30, 2023

DRAFT

MISSION STATEMENT

The City of South Pasadena is committed to providing effective and efficient municipal services for the community while preserving our quality of life and small-town character in a 21st Century environment.

VISION STATEMENT

We are a culturally and economically diverse, and fiercely independent community that cherishes creativity, education and our small-town character, committed to building a more just and environmentally and financially sustainable future.

CORE VALUES

not in priority order

- Honesty and Integrity
- Teamwork
- Outstanding customer-friendly service
- Responsiveness
- Open and accessible government
- Community participation
- Fiscal responsibility

DRAFT

Table of Contents

About South Pasadena 6
Municipal Organizational Chart 8
City Manager's Budget Message 9
FY22/23 Fund Balance 24
FY22/23 Reserves Balance 25
FY23/24 Fund Balance 26
FY23/24 Reserves Balance 32
Revenue Detail 33
Expenditure Summary by Fund 42
General Fund Revenue Summary 51
General Fund Expenditure Summary 52
Capital Improvement Projects 53
City Council 66
City Council / 101-1010-1011 67
City Manager 44
City Manager / 101-2010-2011 46
Economic Development / 101-2020-2012 49
Community Promotion / 220-2010-2301 50
Key Performance Indicators 51
Management Services 44
Management Services / 101-2030-2031 47
City Clerk / 101-2030-2033 50
Elections / 101-1020-1022 53
Human Resources / 101-2030-2034 54
Legal Services / 101-2010-2501 57
Information Services / 101-2030-2032 58
Key Performance Indicators 61
Finance 67
Finance / 101-3010-3011 69
Non-Departmental Overhead / 101-3010-3041 72
Insurance Fund / 103-3010-2501 73
OPEB Trust Fund / 110-3010-3011 75

DRAFT

SLFRF Fund / 206-XXXX-XXXX 76
Utility Billing / 500-3010-3012 77
Key Performance Indicators 79
City Treasurer 80
City Treasurer / 101-3000-3021 82
Police 83
Police / 101-4010-4011 85
Facilities and Maintenance Equipment / 105-4010-4011 90
Measure H / 241-4010-4011 91
Asset Forfeiture / 270-4010-4011/4015 92
Police State Grant – AB 3229 / 272-4010-4018 93
Homeland Security Grant / 274-4010-4019 94
Key Performance Indicators 95
Fire 97
Fire / 101-5010-5011 99
Emergency Preparedness / 101-5010-5012 104
Key Performance Indicators 105
Public Works 107
Public Works Administration / 101-6010-6011 111
Environmental Services / 101-6010-6015 114
Facilities Maintenance / 101-6010-6601 120
Sewer Maintenance / 210-6010-6501 123
Traffic Signals / 215-6010-6115 127
Street Lighting / 215-6010-6201 128
Street Tree Maintenance / 215-6010-6310 131
Median Strips / 215-6010-6416 134
Street Maintenance / 230-6010-6116 135
Prop "A" Maintenance / 232-6010-6417 138
Measure R / 233-6010-6011 139
Measure M / 236-6010-6011 140
Measure W – Safe Clean Water Act / 239-6010-6011 141
SGVCOG / 247-6010-6011 143
Water Distribution / 500-6010-6710 144
Water Production / 500-6010-6711 148
Water Efficiency Projects / 503-6010-6713 152

DRAFT

Key Performance Indicators 155
Community Development 157
Community Development / 101-7010-7011 159
Housing Authority / 228-7200-7220 163
Key Performance Indicators 164
Library 166
Library / 101-8010-8011 168
Key Performance Indicators 172
Community Services 173
Senior Services / 101-8030-8021 177
Community Services / 101-8030-8031 180
Recreation and Youth Services / 101-8030-8032 183
Prop "A" – Local Transit Administration / 205-2010-2210 187
Prop "A" – Transit Planning / 205-8030-8024 188
Prop "A" – Dial A Ride / 205-8030-8025 190
Prop "C" – Local Transit Administration / 207-2010-2260 193
Dial-A-Ride / 207-2010-8025 194
Mission Meridian Public Garage / 226-2010-2029 195
CDBG Senior Nutrition Program / 260-8030-8023 196
Recreation and Youth Services / 295-8030-8032 197
Arroyo Seco Golf – Administration / 295-8040-8041 198
Arroyo Seco Golf – Course Maintenance / 295-8040-8042 200
Arroyo Seco Golf – Driving Range / 295-8040-8043 201
Arroyo Seco Golf – Shop / 295-8040-8044 202
Arroyo Seco Golf – Food and Beverage / 295-8040-8045 203
Key Performance Indicators 204
Successor Agency – CRA Debt Service / 227-7200-7211 205
Redevelopment Obligations Trust / 927-9800-9811 205
Full-Time Authorized Positions 206
Part-Time Authorized Positions 210
Position Distribution by Funding Source 211
Glossary of Budget Terms 213
Description of Funds 216
Financial Policies 221

DRAFT

Basis of Budget Accounting 222
GANN Limit 223

DRAFT

About South Pasadena

The City of South Pasadena is located approximately six miles northeast of downtown Los Angeles, between the cities of Pasadena, San Marino, Los Angeles and Alhambra. It has a population of 26,314. Founded in 1874 by the Indiana Colony, the City was incorporated as a General Law city of the State of California on March 2, 1888. South Pasadena is known for its tree-lined streets, historic California Craftsman-style homes, unique small businesses and its outstanding public schools. This small-town atmosphere makes South Pasadena one of California's most desirable locations. South Pasadena has quality education, a strong religious community, an extensive network of parks and a rich architectural heritage. Dynamic civic organizations, a population of ethnic and cultural diversity, and a vital seniors' group further enrich our small-town quality of life. Small, proud and independent, the City of South Pasadena has battled for a hundred years to preserve its status as a distinct—and distinctive—community. South Pasadena possesses a full-service City government that provides high-quality services in general administration, police, fire, library, public works, community development, and redevelopment projects.

City History

In early 1874, the area that is now South Pasadena was a part of the San Gabriel-Orange Grove Association. In 1875, the stockholders of the association voted to name their town Pasadena and just three years later, residents living in the southern portion of Pasadena considered themselves South Pasadenans.

In February of 1888, in order to control their own territory, South Pasadenans voted eighty-five to twenty-five for incorporation. A board of trustees was elected and Ammon B. Cobb was appointed as the first marshal, with Marshal B. Selmen as his deputy.

On March 2, 1888, South Pasadena officially incorporated with a population of slightly over 500.

The City's boundaries established in 1889 are essentially the same today. South Pasadena consists of 3.44 square miles of prime residential property. In 1876, unimproved land with water was selling from $75 to $150 an acre. Today a vacant lot in South Pasadena can be sold for more than $200,000.

Few cities in California are better recognized for the quality of its small-town atmosphere and rich legacy of intact late 19th and early 20th century neighborhoods and residences. South Pasadena also has a strong claim to having the oldest and most historic sites in the San Gabriel Valley. For many centuries, its adjacency to a natural fording place along the Arroyo Seco had served as a gateway to travel and commerce for aboriginal peoples here and along the coast. It was here that Hahamognas greeted Portola and the missionaries who later established the San Gabriel Mission a few miles to the west.

The initial buildings on the Rancho San Pascual, which subsequently gave birth to the Cities of Pasadena, South Pasadena and Altadena, were built here. The first of these adobe structures became headquarters for General Flores and his staff in 1847 where they agreed to surrender to American forces, ending Mexican Colonial rule in California.

In 1888, South Pasadena incorporated the southern portion of the Indiana Colony and land south and eastward to the Los Angeles border, becoming the sixth municipality in Los Angeles County. With the establishment of the Raymond Hotel and the Cawston Ostrich Farm, the small community was able to attract tourists and increasingly large waves of new residents to the Pasadena area in the late 19th and early 20th Centuries. With completion of the Pacific Electric Short Line, putting the entire city within easy walking distance of the "red car" stations, South Pasadena also became one of the first suburbs of Los Angeles. It is now certainly one of the best-preserved cities, maintaining a small-town quality and humanity in the scale of its buildings, its residential streetscapes and historic commercial core.

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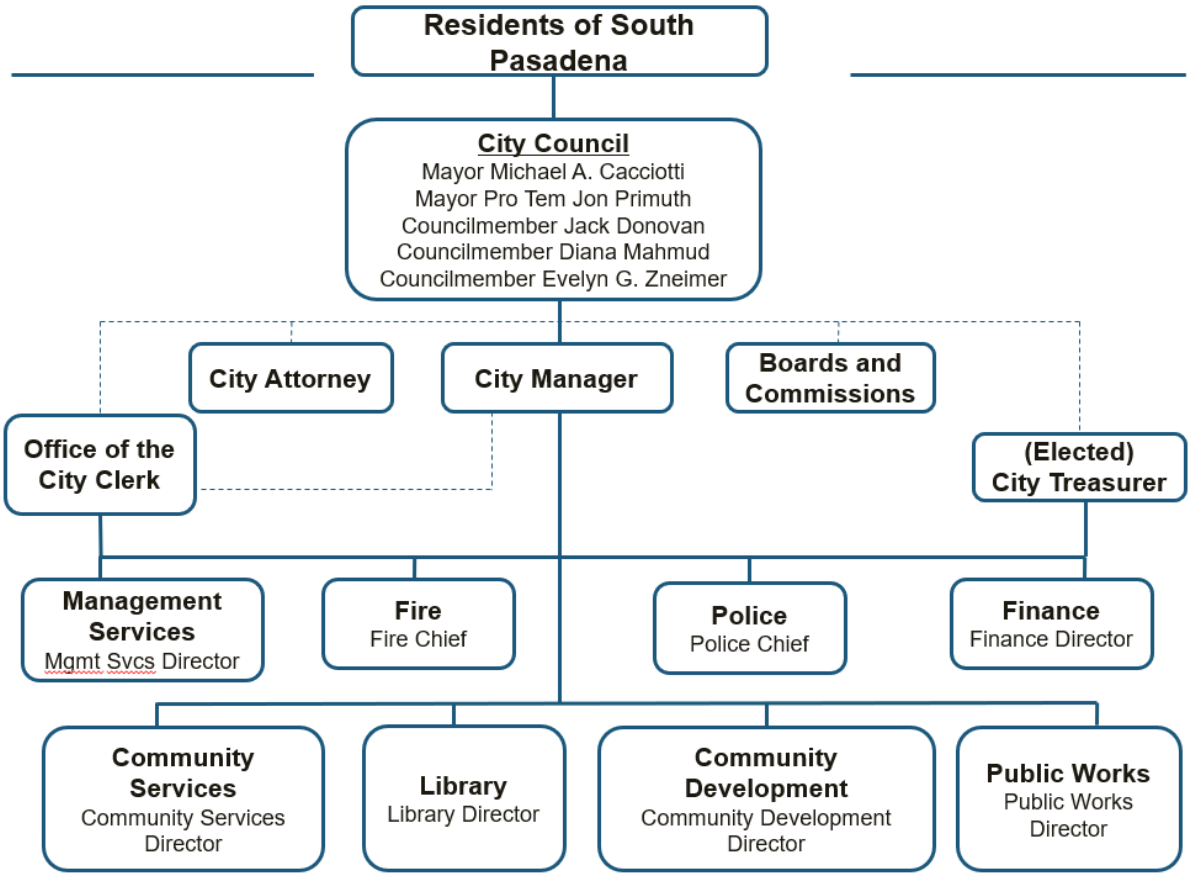
Municipal Organizational Chart



City Manager's Budget Message

Fiscal Year 2023-24

June 7, 2023

Honorable Mayor and City Council,

It is my pleasure to present to you the Fiscal Year (FY) 2023-2024 Annual Budget, which we embarked on under the theme of continued Transparency and Collaboration. As we close out this year, we reflect on the progress and improvements made during Fiscal Year 2022-23 across all our City departments, in professionalizing the agency and delivering it to new standards, and in the level of service we provide our community.

This year, we continued our efforts in completing organizational assessments, including the Finance and Community Services departments, and embarking on the Police assessment. These assessments provide the agency an opportunity to review staffing and resources, work flows and outputs, research and incorporate industry best practices, review and improve upon policy, and deliver each department, and the agency, to the next level. The Library has also completed a Strategic Plan and held a Joint study session with the City Council and Library Board of Trustees to discuss the future of the site. On the topic of site assessments, we have completed a facility assessment of the Library site, and will be beginning the City Hall site assessment shortly.

Hand in hand with the assessments, the City has remained committed to hiring the best and the brightest in our industry, and have facilitated over 50 recruitments and hirings in the last year, and also experienced the transitioning of a number of staff during this unprecedented recruiting season. New hires including the hiring of a new Deputy Finance Director/Controller for operational oversight, and a Senior Management Analyst in creating the City's Housing Division, in late 2022. This budget resources our departments to transition from temporary to permanent staffing, and allows us to focus the year ahead. **GWD:** Get Work Done.

The City continues implementing the 2021-2026 Strategic Plan, which highlights and resources the priorities of the City Council and community. With the City's Strategic Plan over 50% completed, and the onboarding of a new Councilwoman and City Treasurer in early 2023, staff will facilitate a Strategic Plan revisit, including community engagement and input, in Fall 2023, to revisit our priorities and ensure we are on track to meet the needs of the community.

We have engaged with our community more than before, and continue that commitment. Our launch of the City's mobile app, SouthPas Mobile, provided resources, information and customer requests at community member fingertips, and also provided another engagement tool with our constituents. We have released a Request for Proposal for a new City website, anticipated to launch end of year, which will be a user-friendly, welcoming resource to community members, visitors and staff. Community engagements and surveys gleaned information on communications preferences, input on the proposed budget, the housing element, and more. In working with the City Council, we have better utilized the tremendous brain power and servitude of our City commissions in providing actionable recommendations for consideration in policymaking, as well as come together on a number of study sessions focused on streets, housing, and the future of the library site, for brainstorming and priority setting efforts.

This year saw the return of our City's events and programming, including the Commissioner Congress as well as a City Hall Open House event to introduce the new staff to the community

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and welcome everyone back post-COVID. In this budget we have included a wish list of items we have heard back on from the City Council and the community, with the first phase costs listed below:

- Vision 2050- $100,000
- Library Master Plan- $150,000
- Multi-Cultural City Celebration- $50,000

As we close out our pandemic years, we look to the future and to transitioning to the new normal, which includes a further commitment to resident and business support, resources and service. Our Economic Development Team continues building upon their programming and service to the City, working to put our business community on the map, in championing and strengthening the local economy, and in welcoming new investment to the community. Another significant transition includes the award of a new contract for City Attorney Services. The City Council directed staff to work with a Council sub-committee in developing and released a Request for Proposal for City Attorney Services, and staff from the City Manager's Office worked diligently on the process—City Council will consider the award of contract in June 2023.

We have established a Housing Division in the Community Development Department, and they have hit the ground running on key priorities and programs, including the Housing Element and various programs, the Caltrans surplus properties and the policy decisions that City Council will soon begin to make on the opportunity to exercise first right of refusal on those properties, research on the no-fault eviction moratorium as it related to our 52% of renter residents. The budget proposes almost $1M in Housing Element implementation and programmatic efforts, including:

- Tenant protection- $400,000
- Racially Restrictive Covenants- $100,000
- Cultural Heritage Ordinance Update- $200,000
- Inclusionary Housing Ordinance (IHO) In-Lieu Fee Study- $23,000
- Ballot Measure on Height Limit Study- $100,000
- General Plan/ Downtown Specific Plan consultant (Rangwalla)- $150,000

We have also furthered our commitment to the social services, veterans, elder adults and various partner agencies. While not a direct service provider, the City recognizes that a number of service providers touch and serve our community, and we have identified the opportunity to establish a Social Services Task Force, which leverages resources available to our community, identify gaps in service to pursue further partnerships. The team has launched a Social Services Resource Guide and a Elder Adults Resource Guide, and will continue looking for opportunities here.

The year ahead holds many priorities and goals: implement the City Hall Electrification Project, which includes infrastructure investments at City Hall and the transition of the Police fleet vehicles to electric, street repaving and infrastructure improvements, the programmatic efforts in our Housing Element and transitioning to compliance and implementation including the finalizing of the General Plan and Downtown Specific Plan, the implementation of the Slow Streets Program. Staff will actively look for opportunities to solicit grant funding for City programming. We look forward to the progress we will make with our City Council, Commissions and Boards, community members and staff.

Finances

Specifically, on the City's financials, we have made great strides. The City has adopted citywide policies and protocols, delivered a timely Mid-Year Budget Report to Council, has made notable improvements on the City audit, and is delivering a timely budget and 5-year Capital Improvement Program (CIP). We delivered on our commitment for transparency and information sharing, having delivered quarterly budget updates that have now shifted to monthly updates, delivering monthly operational status updates during a height of transition, and intentionally sharing pertinent information with the Finance Commission along with the City Council. We continue the commitment to share information and bring the community along with our efforts as good stewards of our finances.

The agency is financially healthy, and great efforts are being made to implement best practices, policies and protocols to best serve our agency and community. The City received $6.1 million in State and Local Fiscal Recovery Funds for the fiscal year 2022-2023. City Council prioritized partial use of the funds toward significant resource replacements and citywide technological advances to support improved service and oversight, as well as improving the user experience.

For the FY 2023-2024 Budget, the Finance Department embarked on establishing a zero-base budget, and worked with all City Departments in utilizing this process to provide a collaborative product that provides a clean start to the budget document in justifying all appropriations. The FY 2023-2024 proposed Budget includes a minimal increase in expenditures verses the revenue received, and also addresses two large issues that staff became aware of in March 2023: an outstanding invoice of $1.6M due to CJPIA, and about a $1M structural issue in Workers Compensation Insurance Fund. These items have been accounted for and addressed in this budget, and staff will prioritize a review and improvements of the City's insurance procedures, carriers and process in the year ahead.

Financial Policies and Procedures

On September 7, 2022, the City Council adopted the 2022 Finance Policies and Procedures in order to, among other things, establish rules and regulations to establish efficient procedures for the purchase of supplies, services and equipment at the lowest possible cost commensurate with quality needed, to exercise positive financial control over purchases, to clearly define authority for the purchases function, and to assure the quality of purchases. On December 7, 2022, City Council adopted the Second Reading and Adoption of an ordinance of the City of South Pasadena, California, Amending Section 2.99-29 of Article XI Relating to "Purchasing Procedures", and Sections 2.99-35 and 2.99-37 of Article XIII "Awarding Public Works Contracts" of Chapter 2 of the South Pasadena Municipal Code.

On March 15, 2023, the Finance Department presented the Fiscal Year 2022-23 City Council Budget Policies at the Joint meeting of the City Council with Finance Commission, for review and direction. After deliberation, the City Council voted on the document with some edits to be made in working with the Finance Commission, and that document was approved at the May 16, 2023 Finance Commission and May 17, 2023 City Council meetings, respectively. The Finance Department will continue working with the Finance Commission on establishing a bi-annual review of the City Council's adherence to these policies, at the mid-year mark and at the end of each fiscal year. Together, these documents and efforts will continue to contribute to our commitment of good financial stewardship of our agency and community, coupled with working on a five-year projection of forecasting into the new fiscal year.

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Budget Input

The FY 2023-24 Budget document includes the detailed Proposed Fiscal Year 2023-24 Budget document, Capital Improvement Plan and Miscellaneous Fee Schedule. Staff conducted Community input opportunities by hosting an online survey for Budget input, which gleaned 165 comments. The two major items determined from the online survey were continued Public Safety support, and improvements to infrastructure. The City also hosted two in person and virtual Community Budget Forums on May 18, 2023, and a review of the final proposed document to Finance Commission on June 1, 2023.

The budget process has focused on a zero-based budget that included a major clean up of the budget document as well as the Capital Improvement Program (CIP) five-year document. The process was collaborative across all City departments, and resources requested are to provide for workload catch up as well as adding capacity to meet the needs of the years ahead.

Thanks to the City Council, our Finance Commission, and all City Departments and staff for their diligence, hard work and efforts in producing this guiding document. I appreciate the continued support of the South Pasadena residents of the City and our efforts in serving our community. We look forward to a positive and fruitful 2023-24 fiscal year.

Respectfully submitted,

Arminé Chaparyan
City Manager

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General Fund Operating Revenue History

The chart below summarizes the General Fund Operating revenues from FY 2019/20 to the Adopted FY 2022/23. The Budgeted FY 2022-2023 Revenues were estimated to be $42,849,230, and the estimate for June 30, 2023 is $36,588,626. The difference in estimated revenues for FY 2022-2023 is due to recording the State and Local Fiscal Recover Funds (SLRF) of $6,059,235 from the General Fund into it's own fund, but the City is anticipating an increase to $39,523,631 for FY 2023-2024 due to increases of $1,162,715 in Property Taxes, $166,712 in Sales Taxes, $289,359 in Utility Users Taxes, $54,477 in Franchise Fees, $450,906 in Uses of Money and Property, $239,866 in Fire Interagency Support, $517,257 in Current Services and $53,838 of other revenues.

Revenue Category	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Property Taxes	15,491,557	16,773,318	17,906,070	18,140,368	18,537,792	19,700,384
Assessments & Special Taxes	342,237	347,931	364,223	360,000	360,000	375,149
Sales Taxes	2,864,474	5,132,645	6,096,613	6,346,000	6,311,321	6,478,033
Utility Users Taxes	3,445,454	3,738,531	3,875,268	4,299,703	4,063,103	4,352,462
Franchise Fees	950,130	1,200,408	1,289,532	1,217,000	1,217,000	1,271,477
License & Permits	861,697	808,280	814,081	903,280	764,777	796,200
Fines & Forfeitures	264,601	143,449	52,291	140,000	56,500	58,000
Use of Money & Property	989,984	4,788,970	(495,381)	508,500	894,109	1,345,014
Other Agencies	64,239	955,205	179,525	6,489,295	235,634	475,500
Current Services	2,985,842	3,079,621	3,836,129	3,877,200	3,624,263	4,141,520
All Other Revenues	74,367	183,717	250,501	84,500	40,743	46,508
Reimbursement From Other Funds	483,384	483,384	483,384	483,384	483,384	483,384
Total GF Revenues	**28,817,965**	**37,635,460**	**34,652,238**	**42,849,230**	**36,588,626**	**39,523,631**

General Fund FY 2022-2023 Projected Summary

The General Fund Balance starting July 1, 2022 was $18,931,422. Revenues are $36,588,626 and expenditures are expected to total $35,681,208. Transfers out of $2,210,847 and reserve adjustments of $1,834,998 leave a projected end balance for June 30, 2023 of $19,462,991. The increase of expenditures and transfers out is due to unanticipated vendor payments for prior years services, additional positions, higher utility costs and incurring an unanticipated CJPIA invoice related prior years general liability and worker's compensation claims of $1,654,761.

General Fund	
Beginning Balance 07/01/22	$18,931,422
Revenues	36,588,626
Expenditures	(35,681,208)
Transfers Out	(2,210,847)
Reserves Adjustment	1,834,998
Projected End Balance 6/30/23	$19,462,991

Fund Balances reflect spendable (unassigned) balances and excludes reserves.

General Fund FY 2022-2023 Projected Reserves

The projected General Fund Reserves end balance for June 30, 2023 totals $4,464,943, with deletions totaling $1,834.998 from the Storm Water Reserve, Library Park Drainage Reserve, Slater Reimbursement Reserve, SR-110 Interchange Project (Rogan Fund Match), and the Stables CIP Reserve.

	Beginning Balance FY 22-23	Additions	Deletions	Ending Balance FY 22-23
Arroyo Golf Course / Bike Trail	600,000			600,000
CalTrans Vacant Lot Purchases	392,000			392,000
Legal Reserve	500,000			500,000
Library Expansion	200,000			200,000
Maint. Yard / Comm. Ctr	267,067			267,067
Renewable Energy Sources Reserve	700,000			700,000
Storm Water	600,000		300,000	300,000
Library Park Drainage Reserve	22,000		22,000	-
Financial Sustainability Reserve	900,000			900,000
Slater Reimbursement Reserve	345,876		40,000	305,876
Vehicle Replacement Reserve	100,000			100,000
SR-110 Interchange Proj (Rogan Fund Match)	1,410,000		1,410,000	-
Stables CIP Reserve	62,998		62,998	-
Mental Health Reserve	200,000			200,000
Total:	**6,299,941**	**-**	**1,834,998**	**4,464,943**

General Fund Summary for FY 2023-2024 Projected Summary

The General Fund Balance starting July 1, 2023 is estimated to be $19,462,991. Revenues are estimated at $39,523,631 and expenditures are expected to total $39,630,567. Transfers In of $4,693, transfers out of $1,265,000 and reserve adjustments of $500,000 are projected leaving a projected end balance for June 30, 2024 of $18,595,748. The increase of expenditures are due to Employee Labor negotiations and salary adjustments, one-time costs primarily due to the development of the City's Housing Element, new permitting software and furniture purchases as well as the impact of inflation on the purchase of goods and services.

General Fund	
Beginning Balance 07/01/23	$19,462,991
Revenues	39,523,631
Expenditures	(39,630,567)
Transfers In	4,693
Transfers Out	(1,265,000)
Reserve Adjustments	500,000
Projected End Balance 6/30/24	$18,595,748

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General Fund FY 2023-2024 Projected Reserves

The projected General Fund Reserves end balance for June 30, 2024 totals $3,964,943, with deletions totaling $500,000 from the Storm Water Reserve as well as the re-programming of the Mental Health Reserve toward staffing costs, in consideration of the significant funding that has been allocated by Senator Portantino and Congresswoman Chu toward the San Gabriel Valley Care (SGV CARE), previously known as the Mental Health Mobile Co-Response Team.

	Beginning Balance FY 23-24	Additions	Deletions	Ending Balance FY 23-24
Arroyo Golf Course / Bike Trail	600,000			600,000
CalTrans Vacant Lot Purchases	392,000			392,000
Legal Reserve	500,000			500,000
Library Expansion	200,000			200,000
Maint. Yard / Comm. Ctr	267,067			267,067
Renewable Energy Sources Reserve	700,000			700,000
Storm Water	300,000		300,000	-
Financial Sustainability Reserve	900,000			900,000
Slater Reimbursement Reserve	305,876			305,876
Vehicle Replacement Reserve	100,000			100,000
Mental Health Reserve	200,000		200,000	-
	4,464,943	**-**	**500,000**	**3,964,943**

General Fund Revenues

A majority of General Fund Revenues continue to come from Property and Sales Tax:

- $20,075,533 (51%) comes from property taxes and special taxes
- $6,478,033 (16%) from sales tax
- $4,352,462 (11%) from utility users tax
- $4,141,520 (11%) from current city services
- Remainder 11% from use of money & property, and other revenue sources

General Fund Expenditures

The goal for the Fiscal Year 2023-24 budget season was to build a status-quo budget based on a zero-based budget, which allowed each Department to go through the exercise of starting from zero to build their respective budgets from the ground up, and to justify every line item. This exercise led to the leaning out of the budget to provide for the funding to make some priority and necessary staffing growth. Employee Wages and Benefits, and City Operations and Maintenance make up more 97% of Expenditures. Increases are due to Employee Labor negotiations and salary adjustments to bring staff that were significantly behind (10-30%) up to more comparative salaries. In this budget we also ask for funding for a complete Comprehensive Classification and Compensation Study to further delve into our staff positions, pay and wages.

As signified in the Midyear Budget report to City Council and Finance Commission, the City continues to feel the impact of inflation, with rising costs to doing business, purchasing goods and materials, across the board.

- $27,102,511 (68%) wages & benefits
- $12,270,055 (31%) operations & maintenance
- $258,000 (1%) capital projects

Positional Changes

- Add one new full-time Accounting Technician I in Finance
- Upgrade two part-time Management Aide positions to one full-time Management Aide position in Community Services
- Upgrade one part-time Community Services Coordinator to one full-time Community Services Coordinator in Community Services
- Upgrade one part-time Management Aide to one full-time Management Assistant in Fire
- Add one new full-time Human Resources Specialist position in Management Services
- Upgrade one part-time Community Improvement Coordinator to one full-time Community Improvement Coordinator in Community Development
- Add one new full-time Management Assistant in Community Development
- Add one new full0time Principal Engineer in Public Works
- Add one new full-time Water Operations Supervisor in Public Works
- Add one new full-time Management Analyst (Water/Sustainability) in Public Works
- Add one new full-time Sergeant (Office of Professional Standards) in Police
- Add one new full-time Police Clerk I in Police
- Add one new full-time Police Administrative Assistant in Police

General Fund Operating Expenditures by Type

The chart below summarizes the General Fund Operating expenditures by types from FY 2019/20 to the Proposed FY 2023/24.

General Fund Operating Expenditures by Type

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
101	Wages & Benefits	19,457,515	22,108,355	25,216,188	24,289,564	24,177,311	27,102,511
101	Operations & Maintenance	6,677,254	5,875,483	7,495,907	12,678,219	11,177,997	12,270,055
101	Capital Outlay	95,613	39,802	13,005	305,400	155,900	258,000
101	Other Expenses	-	-	-	-	-	-
101	Transfer Out	-	-	-	-	-	-
101	Capital Projects	-	-	-	795,000	170,000	-
	101 - General Fund Total	**26,230,381**	**28,023,640**	**32,725,100**	**38,068,183**	**35,681,208**	**39,630,567**

General Fund Operating Expenditures By Department

The chart below summarizes the General Fund Operating expenditures by department from FY 2019/20 to the Proposed FY 2023/24. Of note for this fiscal year:

- Public Safety, composed of the Fire and Police Departments, accounts for 48% of the General Fund budget.
- While the Public Works General Fund portion is only 10%, it is important to note that other functions of the department are accounted for in other funds such as the Water, Sewer and other special funds.

General Fund Operating Expenditures by Department

Department/Program Exp	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
City Council	45,401	35,890	45,446	49,194	71,388	81,903
City Manager	1,512,868	1,577,656	1,815,368	1,201,339	1,116,593	1,274,785
Management Services						
Management Services	-	-	6,615	480,230	415,995	496,105
City Clerk	113,311	115,512	-	470,283	389,517	447,319
Elections	185,743	76,843	93,242	166,000	110,809	63,900
Human Resources	324,830	350,761	-	898,923	905,818	915,553
Transportation Planning	12,835	287	90	-	-	-
Legal Services	492,566	607,285	572,032	895,140	895,140	500,000
Information Systems	573,881	541,110	-	833,200	889,657	1,151,511
Finance						
Finance	755,116	871,011	1,040,325	1,203,880	1,144,568	1,050,473
City Treasurer	9,211	8,444	9,993	8,752	8,752	9,239
Non-Dept/Overhead	1,060,512	996,366	2,264,416	2,694,140	2,669,105	2,539,444
Police	9,171,740	10,400,998	11,384,907	11,032,589	11,020,087	11,512,034
Fire						
Fire	5,435,419	6,315,749	7,716,685	6,670,340	7,198,725	7,300,602
Emergency Preparedness	91,913	31,932	46,904	55,000	51,000	55,000
Public Works	-	-	-	-	-	-
Admin & Engineering	586,534	618,493	572,717	924,621	526,444	1,243,249
Environmental Services	54	653	55,009	304,980	140,241	207,480
Park Maintenance	497,591	476,793	581,680	1,086,294	504,755	975,901
Facilities Maintenance	799,206	826,985	901,702	1,171,959	907,533	1,344,778
Community Development	1,876,257	1,819,769	2,428,641	3,622,199	3,047,629	4,152,225
Library	1,525,685	1,608,369	1,839,131	1,932,290	1,866,927	2,211,234
Community Services						
Senior Services	330,809	202,374	237,957	431,985	390,480	540,765
Community Services	172,667	217,223	276,302	356,440	421,305	466,119
Recreation and Youth Services	656,232	323,135	835,939	783,405	818,737	1,090,949
Capital Projects	-	-	-	-	170,000	-
Total GF Expenditures	**26,230,381**	**28,023,640**	**32,725,100**	**37,273,183**	**35,681,208**	**39,630,567**

FY 2023/2024 Budget Policies Draft

PURPOSE STATEMENT

To enhance fiscal transparency and maintain and improve fiscal sustainability, the City of South Pasadena annually adopts fiscal policies to establish a framework to ensure a balanced budget, maintain healthy reserves, appropriately fund the City's infrastructure needs, establish fees and charges, and ensure compliance with City Council directives. This policy is adopted annually as part of the Budget adoption process and may be revised by City Council action.

1. ANNUAL BUDGET

The City adopts an annual budget. The City's fiscal year starts on July 1st and concludes on June 30th. The annual budget for the new fiscal year will be adopted before June 30th.

The following are key elements of the City's budget and budget process:

- Budgetary appropriations are made by the City Council, through formal budget adoption.
- The City Manager submits the Proposed Budget to the City Council no later than the final City Council meeting in May.
- The budget is adopted by the City Council before June 30th, following a public meeting where constituents are given an opportunity to comment on the Proposed Budget.
- Prior to consideration by the City Council, the Proposed Budget will be reviewed by the Finance Commission.

2. BALANCED BUDGET

The City strives to maintain a balanced operating budget for all governmental funds (all funds except the enterprise funds), with total on-going revenues equal to or greater than total on-going expenditure, so that at year end all these funds have a positive fund balance and the General Fund balance is maintained.

- The budget is balanced at the individual fund level. The estimated revenue sources must be sufficient to cover proposed uses.
- Ongoing operations are funded by recurring revenues.
- City policies on reserve requirements for specific funds are adhered to in the budget.
- If shortfalls are projected after the budget adoption, during quarterly financial reviews, the City Manager will present a plan to address such shortfalls with sustainable measures in order to achieve a balanced budget by fiscal year-end.
- Non-recurring revenues or one-time funding may be used to balance the budget during economic downturns, or as a result of unforeseen events.

3. APPROPRIATIONS AND BUDGETARY CONTROL

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The City Council holds public hearings and adopts the City's annual budget and may modify appropriations with majority approval. During the fiscal year, any budget adjustments (increases in appropriations at the fund level) that cannot wait for the Mid-Year review or that exceed the City Manager's budget authority described below, must be submitted by the City's departments for City Council review and approval. The review and approval may occur at any City Council meeting, at the request of staff or the City Council. The City Council approves any revisions that increase the total budgeted expenditures or revenues at the fund level, and any changes to permanent and full-time positions.

The legal level of expenditures is controlled at the fund level, and appropriations lapse at the end of each fiscal year. Re-appropriation by the City Council only occurs for multi-year infrastructure and capital projects.

Department Heads may, without Council approval, amend individual line items within any fund in the maintenance and operations portions of the budget without increasing total appropriations for that division. The City Manager may, without Council approval, amend individual line items within any fund, and between divisions and programs, in the personnel costs, maintenance and operations, capital outlay and capital projects portions of the budget without increasing total appropriations for that fund.

4. GENERAL FUND RESERVES

General Fund Reserves are described as:

- Unassigned Fund Balance - These reserves are in spendable form and may become either restricted, committed, or assigned. The City strives to attain a General Fund undesignated fund balance equal to a minimum 30% of General Fund revenues at year end.
- Assigned Fund Balance – These reserves are set aside or earmarked for particular purposes, and the authority to designate these reserves can be delegated, and may take less formal action to limit how the reserves are used.
- Restricted Fund Balance – These reserves are subject to restrictions that are legally enforceable by outside parties, such as bondholders.
- Committed Fund Balance – These reserves are designated by the City Council, and are designated for specific purposes, through formal action. Committed balances can be modified by the City Council taking formal action.

Committed (Designated) Reserves shall be reviewed and designated annually by the City Council prior to Budget adoption. Upon designation of a reserve for a specific purpose, the Council will ensure the following:

- The purpose of the reserve will be specified at the time of designation.
- The City Council will also identify whether the designation is a one-time designation or whether an amount specified by the City Council will be added to the designated reserve on an annual basis.

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- Nothing limits the City Council's authority to un-designate, or re-designate any General Fund Designated Reserve for another governmental purpose, pursuant to formal City Council action.

5. ENTERPRISE FUND

The City requires the water, sewer, and golf course enterprise funds be self-supporting. The City recognizes that enterprise funds function with accounting practices that are different from those used by governmental funds. Therefore, for enterprise funds, the City will strive to maintain operating budgets that produce annual net revenues that meet or exceed the compliance requirements of debt coverage rations generally.

The sewer fund was recognized as an enterprise fund starting in FY 2009/10, with the requirement of self-supporting funding. Water and sewer rate increases will assure that revenues exceed operating expenditures, including debt service. Budgeted water capital projects will be paid from a $37.8 million 2016 Water Bond issuance. Bond debt service will be paid out of water revenues. Sewer revenues along with a revolving loan from the State will pay for sewer capital improvements.

The Water Fund will maintain a reserve equal to 30% of revenues. The Sewer fund will maintain a reserve equal to 30% of revenues.

6. INFRASTRUCTURE

The City maintains a long-range fiscal perspective through the use of a Capital Improvement Program to maintain the quality of City infrastructure, including streets, sidewalks, sewers, drains, lighting, buildings, parks, and trees. The City Council adopts capital projects budgets and may modify appropriations with majority approval. All changes in appropriations at the fund level during the year must be submitted to the City Council for approval.

Beginning in FY 2013/14, the City's goal has been to commit a minimum of $2,000,000 per year towards street improvements. This amount has fluctuated based upon available resources

7. ACCOUNTING AND REPORTING STANDARDS

The City will comply with all requirements of generally accepted accounting principles, and will publish an Annual Comprehensive Financial Report (ACFR) in compliance with generally accepted accounting principles, prepared in coordination with our independent auditors, no later than the first quarter of each calendar year. The ACFR, along with the Auditor's report on internal controls and compliance, will be presented to the City Council at a public meeting, after first being presented to the Finance Commission. The City shall endeavor to achieve audits with minimal auditor findings in the form of significant deficiencies. The City shall swiftly and thoroughly respond, to auditor findings of material weakness.

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8. MIDYEAR AND INTERIM FINANCIAL REPORTING

The City will publish a midyear budget update in March of each year. The midyear budget update shall present estimated outcomes and the implications for the budget year. The report shall give attention to the financial issues and policy matters anticipated to have the most significant short and long-term financial planning importance to the City Council. Pursuant to the content of the midyear report, the City Council shall provide specific and general direction to staff for short- and long-term budgetary planning.

To comply with the policy, the City Manager will ensure the following:

- The midyear budget update will be presented to the City Council in February or March of each year.
- At the midyear budget update, staff will present to the City Council any necessary adjustments to the budget. The adjustments are based on additional funding, or major changes in revenues or expenditures, or previously approved budget adjustments.
- Monthly budget updates will be provided to the City Council starting in the Spring of 2023.

9. RISK MANAGEMENT

The City will identify and quantify all areas of financial and operating risk, and prepare contingencies for those risks, including legal liabilities, infrastructure maintenance, emergency response, and contract and employee obligations. The City will work with the City's insurance providers to seek full coverage of actuarially projected needs.

Liability and Workers Compensation liability is reported in accordance with GASB 10, and further explained below.

- The City manages risk through a combination of purchased insurance and self-insurance.
- The City self-insured workers' compensation claims with a self-insured retention of $125,000 and general/auto liability claims, with a self-insured retention of $100,000 per covered claim. Excess workers' compensation and general/auto liability insurance coverage shall be purchased.
- An annual actuarial study shall be conducted to provide an estimate of the self-insured liability to be recorded by the City in accordance with Governmental Accounting Standards Board Statement No. 10. This statement requires the City to accrue a liability on its financial statements for a reasonable estimate of the cost of claims and expenses associated with all reported and unreported claims.
- The City's goal is to maintain reserves to fund its outstanding self-insured liabilities at the minimum level of 70 percent.
- The City shall maintain a Self-Insurance Fund to both fund the liability reserve and workers compensation, and recover all associated risk management costs, including claim payments, insurance premiums and any deductibles, and claim

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administration (internal and external). The fund's revenues shall be generated through assessments to City funds based on their claim experience and outstanding liabilities. These departmental assessments shall be evaluated annually and adjusted as needed.

- Staff shall report to the Finance Commission and City Council at least annually on the claims processed, amounts paid, and steps taken to manage and reduce the City's risk and liability.

10. DEBT AND INVESTMENTS

The City will consider the use of debt for long-term capital assets when the cost of debt is lower than the City's investment return, and when operating revenues are available to pay the debt. We will maximize the investment return on City Cash balances within the higher concerns of safety and liquidity. An investment policy will be submitted annually to the City Council for review and adoption in September or October of each year. The City shall at all times maintain compliance with the California Government Code with respect to the content and function of its Investment Policy.

Annually, the Investment Policy is reviewed by the City's Finance Commission, prior to being approved by the City Council. Additionally, the City Treasurer shall provide monthly reports to the City Council which shall include all reportable elements specified in the City's Investment Policy.

11. CONTROL OF FINANCIAL ASSETS

All financial assets will be under the direct authority of the City Treasurer and Finance Director. Regarding Capital Assets, the City will capitalize assets and equipment with individual minimum value of $5,000 for non-infrastructure assets, and $25,000 for infrastructure assets.

12. SCHEDULE OF FEES FOR SERVICES

The City will publish, and the Finance Department will update, the schedule of fees for services as a component of the annual budget. The Fee Schedule will be reviewed by the Finance Commission prior to implementation each July 1st.

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13. LONG-TERM LIABILITIES

The City shall evaluate long-term liabilities (debt borrowing, compensated absences, claims and judgements, pensions, post-employment benefits (OPEB), on a case by case basis. The City will work with the California Public Employee Retirement System and the City's insurance providers to seek full coverage of actuarially projected needs.

Funding is budgeted on a pay-as-you-go basis for leave liabilities, and retiree health insurance costs. In accordance with GASB 45, a third-party actuarial valuation of the City's liability for annual retiree medical costs has been completed every two years since FY 2008/09.

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14. GANN APPROPRIATIONS LIMIT

The City will annually adopt a Resolution establishing the City's appropriation limit (the Gann Limit) calculated in accordance with Article x111-B of the constitution of the State of California Government code and any other voter approved amendments or state legislation that affects the City's appropriations limit. The Gann Limit will be adopted by Resolution.

The City is restricted to an amount of annual appropriations from proceeds of taxes, and if proceeds of taxes exceed allowed appropriations, the excess must either be refunded to the State Controller or returned to the taxpayers through revised tax rates or revised fee schedules. Alternatively, an excess of one year, may by offset against a deficit in the following year.

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FY22/23 Fund Balance

Fund	Description	Beginning Fund Balance	Year-End Revenues	Year-End Expenditures	Transfers In	Transfers Out	Reserve Adjustments	Ending Fund Balance
101	General Fund (Undesignated)	18,931,422	36,588,626	35,681,208	-	2,210,847	1,834,998	19,462,991
101	GF (Council Designated Reserves)	6,299,941	-	-	-	-	(1,834,998)	4,464,943
103	Insurance Fund	(1,952,514)	3,220,620	4,686,289	1,489,285	-	-	(1,928,898)
104	Street Improvements Program	2,358,321	-	55,183	-	-	-	2,303,138
105	Facilities & Equip. Replacement	2,470,794	34,844	231,853	-	-	-	2,273,785
106	Technology Surcharge	23,225	28,000	-	-	-	-	51,225
108	SR 110 Gen Fund Reserve	-	-	100,000	338,483	-	-	238,483
110	OPEB Trust Fund	1,141,509	56,308	1,000	-	-	-	1,196,817
201	MTA Pedestrian Improvement	(29,951)	-	-	-	-	-	(29,951)
205	Prop "A"	1,858,066	657,124	696,249	-	-	-	1,818,941
206	SLFRF Fund	3,029,618	3,029,618	2,560,519	-	-	-	3,498,717
207	Prop "C"	1,217,459	538,724	276,799	-	-	-	1,479,384
208	TEA/Metro	151,469	2,136	-	-	-	-	153,605
209	Carlyle Library Bequest	-	2,800,000	-	-	-	-	2,800,000
210	Sewer	5,178,182	1,922,864	836,150	-	425,808	-	5,839,089
211	CTC Traffic Improvement	-	-	-	-	-	-	-
213	SB2 Planning Grant	-	50,000	50,000	-	-	-	-
214	Rogan HR5394 Grant	-	-	-	-	-	-	-
215	Street Light & Landscape	94,009	887,644	1,328,283	383,079	-	-	36,449
217	Public, Educ. & Gov't. Fund	189,911	10,195	-	-	-	-	200,106
218	Clean Air Act	153,513	35,407	-	-	-	-	188,920
219	CalRecycle Local Asst. Grant	-	-	-	-	-	-	-
220	Business Improvement Tax	(15,609)	91,125	112,000	-	-	-	(36,484)
223	Gold Line Mitigation Fund	63,408	894	-	-	-	-	64,302
226	Mission Meridian Public Garage	(362,057)	-	9,100	-	-	-	(371,157)
228	Housing Authority	116,972	48,284	11,700	-	-	-	153,556
230	State Gas Tax	919,457	705,028	836,175	-	-	-	788,310
232	County Park Bond	(210,465)	61,500	61,500	-	-	-	(210,465)
233	Measure R	1,443,120	22,668	44,927	-	-	-	1,420,861
236	Measure M	1,796,106	469,472	152,362	-	-	-	2,113,216
237	Road Maint. & Rehab. Acct.	1,242,193	604,433	-	-	-	-	1,846,626
238	MSRC Grant	(152,986)	-	4,550	-	-	-	(157,536)
239	Measure W	281,223	258,815	285,608	-	-	-	254,430
241	Measure H	(87,699)	18,000	-	-	-	-	(69,699)
242	Prop C Exchange	(345,047)	180,188	17,093	-	-	-	(181,951)
245	Bike & Pedestrian Paths	-	-	-	-	-	-	-
248	BTA Grants	(416,948)	-	-	-	-	-	(416,948)
249	Open Streets Grant	(311,796)	-	-	-	-	-	(311,796)
255	Capital Growth	588,529	48,537	100,000	-	-	-	537,066
260	CDBG	(2,584)	-	-	-	-	-	(2,584)
270	Asset Forfeiture	232,477	3,278	60,000	-	-	-	175,755
272	Police Grants - State (COPS)	389,869	227,116	130,000	-	-	-	486,985
274	Homeland Security Grant	(146,371)	-	-	-	-	-	(146,371)
275	Park Impact Fees	805,885	111,582	51,255	-	-	-	866,212
276	Historic Preservation Grant	5,627	79	-	-	-	-	5,706
277	HSIP Grant	(228,661)	69,397	372,256	-	-	-	(531,520)
278	Housing Element Grant	-	-	-	-	-	-	-
295	Arroyo Seco Golf Course	2,038,860	1,279,000	1,336,882	-	-	-	1,980,978
310	Sewer Capital Projects	(386,424)	-	425,808	425,808	-	-	(386,424)
327	2000 Tax Allocation Bonds	924,867	-	-	-	-	-	924,867
500	Water	84,113,145	9,716,510	7,033,455	-	3,006,226	-	83,789,974
503	Water Efficiency Fund	977,507	162,284	174,193	-	-	-	965,598
505	2016 Water Revenue Bonds	(32,554,670)	-	2,500,300	2,448,838	-	-	(32,606,132)
506	SRF Loan - Water	(171,384)	-	264,966	-	-	-	(436,350)
510	Water & Sewer Impact Fees	1,057,608	75,702	-	-	-	-	1,133,310
550	Public Financing Authority	(4,080,707)	-	531,676	557,388	-	-	(4,054,995)
927	Redev. Obligations Trust Fund	132,278	196,500	196,500	-	-	-	132,278
		98,770,697	**64,212,502**	**61,215,838**	**5,642,881**	**5,642,881**	**-**	**101,767,361**
227	Successor Agency to CRA	(206,373)	-	200,193	-	-	-	(406,566)
	Successor Agency Total	**(206,373)**	**-**	**200,193**	**-**	**-**	**-**	**(406,566)**
	TOTAL CITY & CRA	**98,564,324**	**64,212,502**	**61,416,031**	**5,642,881**	**5,642,881**	**-**	**101,360,795**

FY22/23 Reserves Balance

	Beginning Balance FY 22-23	Additions	Deletions	Ending Balance FY 22-23
Arroyo Golf Course / Bike Trail	600,000			600,000
CalTrans Vacant Lot Purchases	392,000			392,000
Legal Reserve	500,000			500,000
Library Expansion	200,000			200,000
Maint. Yard / Comm. Ctr	267,067			267,067
Renewable Energy Sources Reserve	700,000			700,000
Storm Water	600,000		300,000	300,000
Library Park Drainage Reserve	22,000		22,000	-
Financial Sustainability Reserve	900,000			900,000
Slater Reimbursement Reserve	345,876		40,000	305,876
Vehicle Replacement Reserve	100,000			100,000
SR-110 Interchange Proj (Rogan Fund Match)	1,410,000		1,410,000	-
Stables CIP Reserve	62,998		62,998	-
Mental Health Reserve	200,000			200,000
Total:	**6,299,941**	**-**	**1,834,998**	**4,464,943**

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FY23/24 Fund Balance

Fund	Description	Beginning Fund Balance	Year-End Revenues	Year-End Expenditures	Transfers In	Transfers Out	Reserve Adjustment	Ending Fund Balance
101	General Fund (Undesignated)	19,462,991	39,523,631	39,630,567	4,693	1,265,000	500,000	18,595,748
101	GF (Council Designated Reserves)	4,464,943	-	-	-	-	(500,000)	3,964,943
								-
103	Insurance Fund	(1,928,898)	3,671,883	3,566,267	-	-	-	(1,823,282)
104	Street Improvements Program	2,303,138	-	-	-	2,303,138	-	0
105	Facilities & Equip. Replacement	2,273,785	44,395	531,502	144,225	1,525,097	-	405,805
106	Technology Surcharge	51,225	32,000	-	-	-	-	83,225
108	SR 110 Gen Fund Reserve	238,483	-	-	-	70,474	-	168,009
110	OPEB Trust Fund	1,196,817	58,560	1,000	-	-	-	1,254,378
201	MTA Pedestrian Improvement	(29,951)	-	-	-	-	-	(29,951)
205	Prop "A"	1,818,941	821,973	895,569	-	-	-	1,745,345
206	SLFRF Fund	3,498,717	-	3,498,717	-	-	-	-
207	Prop "C"	1,479,384	661,776	2,866	-	300,000	-	1,838,294
209	Carlyle Library Bequest	2,800,000	-	-	-	-	-	2,800,000
208	TEA/Metro	153,605	2,722	-	-	-	-	156,327
210	Sewer	5,839,089	2,288,250	1,240,680	-	958,308	-	5,928,350
211	CTC Traffic Improvement	-	-	-	-	-	-	-
213	SB2 Planning Grant	-	135,000	-	-	135,000	-	-
214	Rogan HR5394 Grant	-	1,087,899	-	-	1,087,899	-	0
215	Street Light & Landscape	36,449	905,062	1,715,682	-	-	-	(774,171)
217	Public, Educ. & Gov't. Fund	200,106	11,433	-	-	-	-	211,539
218	Clean Air Act	188,920	36,011	-	-	-	-	224,931
219	CalRecycle Local Asst. Grant	-	-	-	-	-	-	-
220	Business Improvement Tax	(36,484)	91,875	110,500	-	-	-	(55,109)
223	Gold Line Mitigation Fund	64,302	1,139	-	-	-	-	65,441
226	Mission Meridian Public Garage	(371,157)	-	15,000	-	-	-	(386,157)
228	Housing Authority	153,556	49,427	16,200	-	30,000	-	156,783
230	State Gas Tax	788,310	784,432	1,348,761	-	200,000	-	23,981
232	County Park Bond	(210,465)	118,000	118,000	-	-	-	(210,465)
233	Measure R	1,420,861	506,776	128,472	-	300,000	-	1,499,166
234	Measure M-MAT	-	475,000	-	-	475,000	-	-
236	Measure M	2,113,216	577,234	228,472	-	204,062	-	2,257,916
237	Road Maint. & Rehab. Acct.	1,846,626	691,569	-	-	585,093	-	1,953,102
238	MSRC Grant	(157,536)	246,925	-	-	246,925	-	(157,536)
239	Measure W	254,430	257,722	313,138	-	292,500	-	(93,485)
240	Measure M MSP	-	250,000	-	-	250,000	-	-
241	Measure H	(69,699)	18,500	-	-	-	-	(51,199)
242	Prop C Exchange	(181,951)	-	-	-	-	-	(181,951)
243	Measure R- MIP	-	475,000	-	-	475,000	-	-
245	Bike & Pedestrian Paths	-	31,103	-	-	25,000	-	6,103
247	SGVCOG Grants	-	45,000	45,000	-	-	-	-
248	BTA Grants	(416,948)	-	-	-	-	-	(416,948)
249	Open Streets Grant	(311,796)	-	-	-	-	-	(311,796)
255	Capital Growth	537,066	70,877	-	-	70,474	-	537,468
260	CDBG	(2,584)	427,381	19,599	-	407,782	-	(2,584)
270	Asset Forfeiture	175,755	4,177	60,000	-	-	-	119,933
272	Police Grants - State (COPS)	486,985	233,566	178,011	-	-	-	542,540
274	Homeland Security Grant	(146,371)	-	-	-	-	-	(146,371)
275	Park Impact Fees	866,212	174,757	-	-	1,025,000	-	15,969
276	Historic Preservation Grant	5,706	101	-	-	-	-	5,807
277	HSIP Grant	(531,520)	307,862	-	-	251,507	-	(475,165)
278	Housing Element Grant	-	4,000	-	-	-	-	4,000
281	CA State Library Building Forward	-	368,445	-	-	368,445	-	-
295	Arroyo Seco Golf Course	1,980,978	1,649,650	1,245,087	-	730,593	-	1,654,948
310	Sewer Capital Projects	(386,424)	-	425,808	425,808	-	-	(386,424)
327	2000 Tax Allocation Bonds	924,867	-	-	-	-	-	924,867
400	Capital Improvement Projects Fund	-	-	15,981,568	16,368,071	-	-	386,503
500	Water	83,789,974	15,532,978	9,813,920	-	5,970,826	-	83,538,207
503	Water Efficiency Fund	965,598	282,158	364,442	-	420,000	-	463,314
505	2016 Water Revenue Bonds	(32,606,132)	-	2,501,050	2,501,050	-	-	(32,606,132)
506	SRF Loan - Water	(436,350)	-	264,966	-	-	-	(701,316)
510	Water & Sewer Impact Fees	1,133,310	209,172	-	-	-	-	1,342,482
550	Public Financing Authority	(4,054,995)	-	529,276	529,276	-	-	(4,054,995)
927	Redev. Obligations Trust Fund	132,278	196,600	196,600	-	-	-	132,278
		101,767,361	**73,362,024**	**84,986,718**	**19,973,123**	**19,973,123**	**-**	**90,142,667**
227	Successor Agency to CRA	(406,566)	196,600	200,600	-	-	-	(410,566)
	Successor Agency Total	**(406,566)**	**196,600**	**200,600**	**-**	**-**	**-**	**(410,566)**
	TOTAL CITY & CRA	**101,360,795**	**73,558,624**	**85,187,318**	**19,973,123**	**19,973,123**	**-**	**89,732,101**

FY23/24 Transfers In

TRANSFERS IN FY 23-24			
Fund	Name	Description	Amount
101	General Fund	Accounting Adjustment	4,693
		Total Fund 101	**4,693**
105	Facil. & Equip. Replacement	Tesla Lease Model Y	**144,225**
		Total Fund 105	**144,225**
310	Sewer	Debt Service Principle	253,262
310	Sewer	Debt Service Interest	172,546
		Total Fund 310	**425,808**
400	CIP	Grevalia&Berkshire Pocket Park	825,000
400	CIP	Fremont/Huntington MAT Project	475,000
400	CIP	VoiP Phone System Installation	180,000
400	CIP	Golf Course Netting Replacemen	730,593
400	CIP	North-South Corridor ITS Dploy	1,228,848
400	CIP	CD Permit Management Software	260,000
400	CIP	CD Record Scan & Doc Managmnt	-
400	CIP	City/Civic EV Charging System	352,700
400	CIP	Arroyo Park EV Charging System	-
400	CIP	Fair Oaks Traffic Signal Const	13,042
400	CIP	Street Repairs - 2023	3,886,102
400	CIP	825 Mission Yard Security Gate	160,000
400	CIP	Citywide Facility Repair	366,271
400	CIP	FD Front Bay Door Replacement	80,000
400	CIP	PD Locker/Restroom Improvement	190,000
400	CIP	PD Improvements	17,000
400	CIP	PD Briefing Room Update	19,000
400	CIP	PD1st Floor Inter Paint/Drywal	13,000
400	CIP	War Memorial Audio/Vis. Equipm	-
400	CIP	Pocket Park Construction	-
400	CIP	ADA Sidewalk Repairs	407,782
400	CIP	War Memorial HVAC Repairs	25,000
400	CIP	Rec. Facilities Key System	-
400	CIP	Fair Oaks ITS Project	-
400	CIP	Grevelia/Fair Oaks Int. Imprv	50,000
400	CIP	Ann. Water Main Repairs	2,000,000
400	CIP	Library HVAC Repairs	254,100
400	CIP	Library ADA Ramp, Light. & Imp	20,000
400	CIP	Water Facil. Site Improvements	88,000
400	CIP	Advanced Metering Infr. (AMI)	150,000
400	CIP	Pedestrian Crossing Devices	200,000
400	CIP	Rect. Rapid Flashing Beacons	264,962
400	CIP	Rio Hondo LRS Alham, Wash Trtm	5,000
400	CIP	EV Charging Station (MSRC)	-
400	CIP	Citywide Facilities Assessment/ Security Enh.	226,876
400	CIP	Library Security Camera System	20,000

FY23/24 Transfers In

TRANSFERS IN FY 23-24			
Fund	Name	Description	Amount
400	CIP	Water Facil. Site Improvements	88,000
400	CIP	Advanced Metering Infr. (AMI)	150,000
400	CIP	Pedestrian Crossing Devices	200,000
400	CIP	Rect. Rapid Flashing Beacons	264,962
400	CIP	Rio Hondo LRS Alham, Wash Trtm	5,000
400	CIP	EV Charging Station (MSRC)	-
400	CIP	Citywide Facilities Assessment/ Security Enh.	226,876
400	CIP	Library Security Camera System	20,000
400	CIP	CMMS/Work Order System/GIS	115,000
400	CIP	Elevated Tanks-Raymond/Bilikie	120,000
400	CIP	Sewer Sys. Rep., Rehab&Replace	475,000
400	CIP	Westside Reservoir	525,000
400	CIP	Climate Action Plan	120,000
400	CIP	FD Diesel Exhaust System Replacement	50,000
400	CIP	308 San Pascual Residence Improvements	30,000
400	CIP	Agenda Management System	50,000
400	CIP	City Website System & Design	60,000
400	CIP	Library Facility Improvements	100,514
400	CIP	Library Roof	291,781
400	CIP	Library Master Plan	-
400	CIP	Parks Master Plan	150,000
400	CIP	Snake Trail Improvements	50,000
400	CIP	Senior Center Flooring	60,000
400	CIP	Arroyo Seco San Rafael & San Pascual Projects	437,500
400	CIP	Huntington Drive Green Street	250,000
400	CIP	City Hall Stormwater Project	500,000
400	CIP	Fremont/Huntington MIP Project	475,000
		Total Fund 400	**16,368,071**
505	Water Rev Bonds	Debt Service - Fees	1,250
505	Water Rev Bonds	Issuance Cost Expense	-
505	Water Rev Bonds	Debt Service - Principal	1,035,000
505	Water Rev Bonds	Debt Service - Interest	1,414,588
505	Water Rev Bonds	Def Loss Amort Expense	258,250
505	Water Rev Bonds	Premium Amort Expense - 2016	(208,038)
		Total Fund 505	**2,501,050**
550	Public Financing Authority	Debt Service - Fees	2,000
550	Public Financing Authority	Debt Service-Professional Svc	-
550	Public Financing Authority	Debt Service - Principal - 2013	450,000
550	Public Financing Authority	Debt Service - Interest - 2013	104,988
550	Public Financing Authority	Premium Amort Expense - 2013	(27,712)
		Total Fund 550	**529,276**
		Total Transfer In	**19,973,123**

FY23/24 Transfers Out

TRANSFERS OUT FY 23-24			
Fund	Name	Description	Amount
101	General Fund	VoiP Phone System Installation	180,000
101	General Fund	CD Permit Management Software	125,000
101	General Fund	City/Civic EV Charging System	250,000
101	General Fund	Agenda Management System	50,000
101	General Fund	City Website System & Design	60,000
101	General Fund	City Hall Stormwater Project	300,000
101	General Fund	Arroyo Seco San Rafael & San Pascual Projects	300,000
		Total Fund 101	**1,265,000**
104	Street Imp. Prog.	Street Repairs - 2023	2,298,445
104	Street Imp. Prog.	Accounting Adjustment	4,693
		Total Fund 104	**2,303,138**
105	Facil. & Equip. Replacement	825 Mission Yard Security Gate	160,000
105	Facil. & Equip. Replacement	Citywide Facility Repair	366,271
105	Facil. & Equip. Replacement	FD Front Bay Door Replacement	80,000
105	Facil. & Equip. Replacement	PD Locker/Restroom Improvement	190,000
105	Facil. & Equip. Replacement	PD Improvements	17,000
105	Facil. & Equip. Replacement	PD Briefing Room Update	19,000
105	Facil. & Equip. Replacement	PD1st Floor Inter Paint/Drywal	13,000
105	Facil. & Equip. Replacement	War Memorial HVAC Repairs	25,000
105	Facil. & Equip. Replacement	Library HVAC Repairs	109,263
105	Facil. & Equip. Replacement	Library ADA Ramp, Light. & Imp	20,000
105	Facil. & Equip. Replacement	Citywide Facilities Assessment/ Security Enh.	226,876
105	Facil. & Equip. Replacement	Library Security Camera System	20,000
105	Facil. & Equip. Replacement	FD Diesel Exhaust System Replacement	50,000
105	Facil. & Equip. Replacement	Library Facility Improvements	43,221
105	Facil. & Equip. Replacement	Library Roof	125,466
105	Facil. & Equip. Replacement	Library Master Plan	-
105	Facil. & Equip. Replacement	Senior Center Flooring	60,000
		Total Fund 105	**1,525,097**
108	SR 110 GF Reserve	North-South Corridor ITS Dploy	70,474
		Total Fund 108	**70,474**
207	Prop C	Street Repairs - 2023	300,000
		Total Fund 108	**300,000**
210	Sewer	CMMS/Work Order System/GIS	57,500
210	Sewer	Sewer Sys. Rep., Rehab&Replace	475,000
210	Sewer	Debt Service - Principal	253,262
210	Sewer	Debt Service - Interest	172,546
		Total Fund 210	**958,308**
213	SB2 Planning Grant	CD Permit Management Software	135,000
		Total Fund 213	**135,000**
214	Rogan HR5294 Grant	North-South Corridor ITS Dploy	1,087,899
		Total Fund 214	**1,087,899**
228	Housing Authority	308 San Pascual Residence Improvements	30,000
		Total Fund 228	**30,000**
230	Gas Tax	Street Repairs - 2023	200,000
		Total Fund 230	**200,000**
233	Measure R	Street Repairs - 2023	300,000
		Total Fund 233	**300,000**

FY23/24 Transfers Out

TRANSFERS OUT FY 23-24			
Fund	Name	Description	Amount
234	Measure M-MAT	Fremont/Huntington MAT Project	475,000
		Total Fund 234	**475,000**
236	Measure M	Street Repairs - 2023	177,565
236	Measure M	Rect. Rapid Flashing Beacons	26,497
		Total Fund 236	**204,062**
237	RMRA	Street Repairs - 2023	585,093
		Total Fund 237	**585,093**
238	MSRC	Tesla Lease Model Y	144,225
238	MSRC	City/Civic EV Charging System	102,700
		Total Fund 238	**246,925**
239	Measure W	Rio Hondo LRS Alham, Wash Trtm	5,000
239	Measure W	Arroyo Seco San Rafael & San Pascual Projects	37,500
239	Measure W	Huntington Drive Green Street	250,000
		Total Fund 239	**292,500**
240	Measure M MSP	Pedestrian Crossing Devices	200,000
240	Measure M MSP	Grevelia/Fair Oaks Int. Imprv	50,000
		Total Fund 240	**250,000**
243	Measure R - MIP	Fremont/Huntington MIP Project	475,000
		Total Fund 243	**475,000**
245	Bike & Pedestrian Path	Street Repairs - 2023	25,000
		Total Fund 245	**25,000**
255	Capital Growth	North-South Corridor ITS Dploy	70,474
		Total Fund 255	**70,474**
260	CDBG	ADA Sidewalk Repairs	407,782
		Total Fund 260	**407,782**
275	Park Impact Fees	Grevalia&Berkshire Pocket Park	825,000
275	Park Impact Fees	Parks Master Plan	150,000
275	Park Impact Fees	Snake Trail Improvements	50,000
		Total Fund 275	**1,025,000**
277	HSIP Grant	Fair Oaks Traffic Signal Const	13,042
277	HSIP Grant	Rect. Rapid Flashing Beacons	238,465
		Total Fund 277	**251,507**
281	CA State Library Bld. Forward	Library HVAC Repairs	144,837
281	CA State Library Bld. Forward	Library Facility Improvements	57,293
281	CA State Library Bld. Forward	Library Roof	166,315
		Total Fund 281	**368,445**
295	Arroyo Seco Golf	Golf Course Netting Replacemen	730,593
		Total Fund 295	**730,593**

FY23/24 Transfers Out

TRANSFERS OUT FY 23-24			
Fund	Name	Description	Amount
500	Water	Ann. Water Main Repairs	2,000,000
500	Water	Water Facil. Site Improvements	88,000
500	Water	Advanced Metering Infr. (AMI)	150,000
500	Water	CMMS/Work Order System/GIS	57,500
500	Water	Elevated Tanks-Raymond/Bilikie	120,000
500	Water	Westside Reservoir	525,000
500	Water	Debt Service - Fees	1,250
500	Water	Debt Service - Principal	1,035,000
500	Water	Debt Service - Interest	1,414,588
500	Water	Def Loss Amort Expense	258,250
500	Water	Premium Amort Expense - 2016	(208,038)
500	Water	Debt Service - Fees	2,000
500	Water	Debt Service - Principal - 2013	450,000
500	Water	Debt Service - Interest - 2013	104,988
500	Water	Premium Amort Expense - 2013	(27,712)
		Total Fund 500	**5,970,826**
503	Water Efficiency	Climate Action Plan	120,000
503	Water Efficiency	City Hall Stormwater Project	300,000
		Total Fund 503	**420,000**
		Total Transfer Out	**19,973,123**

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FY23/24 Reserves Balance

	Beginning Balance FY 23-24	Additions	Deletions	Ending Balance FY 23-24
Arroyo Golf Course / Bike Trail	600,000			600,000
CalTrans Vacant Lot Purchases	392,000			392,000
Legal Reserve	500,000			500,000
Library Expansion	200,000			200,000
Maint. Yard / Comm. Ctr	267,067			267,067
Renewable Energy Sources Reserve	700,000			700,000
Storm Water	300,000		300,000	-
Financial Sustainability Reserve	900,000			900,000
Slater Reimbursement Reserve	305,876			305,876
Vehicle Replacement Reserve	100,000			100,000
Mental Health Reserve	200,000		200,000	-
	4,464,943	**-**	**500,000**	**3,964,943**

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Revenue Detail

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4000-000	Property Tax - Current Secured	11,578,594	12,386,279	12,823,306	13,425,000	13,758,186	14,543,151
4010-000	Property Tax - Unsecured	115,324	435,198	759,197	416,300	416,300	448,243
4015-000	Property Tax - Residual SA	133,780	101,674	213,625	135,000	135,000	139,050
4020-000	Property Tax - Prior Years	(29,505)	(23,528)	2,129	(25,000)	3,000	3,090
4030-000	Property Tax - Int & Pen	35,319	45,544	51,961	30,000	30,000	30,900
4035-000	Property Tax - Postponement	-	18,790	29,653	-	-	30,542
4040-000	Highway Rental	117,783	112,115	112,334	112,114	112,114	115,477
4050-000	Homeowners Exemption	60,796	58,805	58,841	60,000	60,000	61,800
4060-000	Supplemental - Sec/Unsec	333,877	320,286	409,925	310,000	310,000	422,223
5002-000	Motor Vehicle In Lieu Adj.	3,145,589	3,318,155	3,445,099	3,676,954	3,713,192	3,905,907
Property Tax		**15,491,557**	**16,773,318**	**17,906,070**	**18,140,368**	**18,537,792**	**19,700,384**
4150-000	Library Special Tax	342,237	347,931	364,223	360,000	360,000	375,149
Assessments & Special Taxes		**342,237**	**347,931**	**364,223**	**360,000**	**360,000**	**375,149**
4200-000	Sales & Use Tax	2,149,095	2,398,132	2,730,069	2,892,000	2,949,321	2,972,321
4200-002	Sales Tax - Measure A	412,661	2,407,750	2,993,038	3,114,000	3,022,000	3,121,000
4201-000	PSAF - Prop 172 Sales Tax	302,718	326,764	373,506	340,000	340,000	384,712
Sales Tax		**2,864,474**	**5,132,645**	**6,096,613**	**6,346,000**	**6,311,321**	**6,478,033**
4230-001	Utility Tax - Water	774,712	960,932	844,642	1,079,703	860,095	903,100
4230-002	Utility Tax - Electric	1,429,355	1,562,810	1,750,422	2,000,000	1,960,473	2,136,916
4230-003	Utility Tax - Gas	450,337	489,887	590,186	570,000	570,000	643,302
4230-004	Utility Tax - Telephone	584,161	410,435	417,483	400,000	400,000	396,609
4230-006	Utility Tax - Cable	206,889	314,466	272,535	250,000	272,535	272,535
Utility Users Tax		**3,445,454**	**3,738,531**	**3,875,268**	**4,299,703**	**4,063,103**	**4,352,462**
4210-001	Franchise - Refuse	556,224	553,981	575,957	567,350	567,350	593,236
4210-002	Franchise - Cable TV	185,465	228,125	223,941	226,000	226,000	230,659
4210-003	Franchise - Electric	-	155,020	163,883	159,650	159,650	168,800
4210-004	Franchise - Gas	53,149	58,579	63,688	54,000	54,000	68,783
4220-000	Real Property Transfer	155,292	204,703	262,064	210,000	210,000	210,000
Other Taxes		**950,130**	**1,200,408**	**1,289,532**	**1,217,000**	**1,217,000**	**1,271,477**
4400-000	Business License	359,324	386,163	381,395	434,000	381,500	391,000
4405-000	Business License SB1186 Fee	9,445	9,779	9,353	9,000	9,000	9,400
4420-000	Bus Lic Penalties & Trans	16,075	6,011	5,497	5,000	11,000	8,000
4440-000	Tobacco Retail Permit	480	240	960	480	-	-
4460-000	Parking Permits	360,898	283,235	280,095	350,000	247,000	252,000
4445-000	Filming Permits	67,487	80,498	86,130	60,000	83,000	85,000
4465-001	Fire Permits	5,015	14,418	19,453	4,000	11,450	12,000
4470-001	Grading Permits	362	-	-	300	-	300
4470-002	Street / Curb Permits	27,117	27,793	25,231	30,000	21,827	30,000
4470-004	Street Closure Permits	5,672	-	4,461	3,000	-	3,000
4470-005	Newsrack Permits	573	-	462	500	-	500
4480-000	FOG Wastewater Permit	9,248	142	1,045	7,000	-	5,000
Licenses & Permits		**861,697**	**808,280**	**814,081**	**903,280**	**764,777**	**796,200**
4600-000	Vehicle Code Fines	46,821	34,108	48,049	30,000	18,000	18,500
4610-000	Parking Citations	207,821	100,057	(437)	100,000	37,000	38,000
4620-000	Other Court Fines	9,959	9,284	4,679	10,000	1,500	1,500
Fines & Forfeitures		**264,601**	**143,449**	**52,291**	**140,000**	**56,500**	**58,000**
4800-000	Interest Income	299,006	238,731	224,197	181,000	509,664	950,437
4802-000	Gain / Loss on Investments	7,853	25,833	(11,890)	-	-	-
4805-000	Unrealized Gain / Loss	201,885	(261,442)	(1,125,662)	-	-	-
4815-000	Chamber Farmers Mkt Cap Impr	2,250	4,665	11,572	3,000	6,455	5,022
4820-000	Rental - Stables	73,149	106,240	129,316	100,000	140,000	140,000
4820-001	Rental - Stables - CIP Rsv	7,678	48,693	69,608	55,000	60,000	60,000
4825-000	Rental - Tennis	63,700	79,100	78,896	75,600	98,000	108,000
4825-001	Rental - Tennis - CIP Rsv	700	4,900	-	8,400	-	-
4830-001	Rental - Cellular Site	-	4,374,440	-	-	-	-
4830-002	Rental - Cell Phone Site	44,536	23,013	-	-	-	-
4830-003	Rental - Cell Site - AT&T	32,392	15,062	-	-	-	-
4830-004	Cell Phone - CW/Bilicke	33,142	20,188	-	-	-	-
4830-005	Cell Phone - Verizon - San Pascual	29,477	17,524	26,197	-	-	-
4830-006	Cell Phone - Cingular OG	36,538	14,617	-	-	-	-
4830-009	Cell Phone - Cingular ASP	35,187	16,090	-	-	-	-
4830-010	Cell Phone - Verizon - MH	22,309	10,416	-	-	-	-
4840-000	Rental - War Memorial Building	26,146	(600)	23,707	50,000	30,000	32,000

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4850-000	Rental - Eddie Park	3,541	-	1,415	3,000	2,000	2,000
4860-000	Rental - Library Comm Room	11,108	2,954	4,182	2,000	19,853	20,000
4870-000	Rental - Racquet Ball Ctr	-	-	-	-	-	-
4885-000	Rental - Sr Citizen Ctr	2,616	-	2,098	3,000	10,000	12,000
4890-000	Rental - Farmer's Market	5,625	11,662	12,617	5,000	16,137	12,555
4891-000	Rental - Orange Grove	2,861	-	-	2,500	-	-
4892-000	Rental - Misc	36,784	35,730	43,647	5,000	-	-
4893-000	Rental - Batting Cages	9,787	1,153	12,642	10,000	-	-
4894-000	Rental - Youth House	1,712	-	2,079	5,000	2,000	3,000
Use of Money & Property		**989,984**	**4,788,970**	**(495,381)**	**508,500**	**894,109**	**1,345,014**
5000-000	Motor Vehicle In Lieu	20,772	-	-	-	-	-
5400-000	Sale of Property	1,167	993	4,314	-	-	-
5020-000	State Reimb - Police Training	14,700	12,562	18,619	30,000	18,000	18,000
5030-000	State Mandated Cost	-	-	-	-	-	-
5071-003	Miscellaneous Grants	500	273,820	5,245	85,060	136,634	136,000
5071-005	Non-Federal Grants - Pub. Works	-	-	-	-	-	-
5071-007	Misc Federal Grant	-	328,205	-	-	-	-
5071-011	Library Svc. CENIC Grant	-	-	12,030	-	-	-
5073-001	Grants-Police	-	6,712	41,046	-	21,000	21,500
5073-002	Grants-Fire	27,100	-	-	-	-	-
5073-005	SLF Recovery Funds	-	-	-	6,059,235	-	-
5077-003	Metro Gold Line Authority	-	-	-	-	-	-
5310-001	Fire Interagency Support Reimb	-	332,914	98,272	315,000	60,000	300,000
Revenue From Other Agencies		**64,239**	**955,205**	**179,525**	**6,489,295**	**235,634**	**475,500**
5150-001	Business License App Fee	25,092	23,741	20,215	15,000	15,000	22,000
5150-002	Non Sufficient Fund Chg	294	105	140	300	-	-
Current Services-Finance		**25,386**	**23,846**	**20,355**	**15,300**	**15,000**	**22,000**
5200-001	Community Development Misc Fee	15,812	-	16,976	20,000	12,492	30,000
5200-002	Planning Fees	256,431	232,459	230,111	680,000	260,000	300,000
5200-003	Plan Check	350,036	334,541	760,453	475,000	635,000	700,000
5200-004	Building Permits	396,542	459,335	558,420	460,000	460,000	600,000
5200-007	Administrative Citations	1,200	1,545	-	1,200	10,000	25,000
5200-008	Design Review Fee	-	-	12,534	-	34,000	38,000
5200-009	Cultural Heritage (CHC) Fee	-	-	9,086	-	25,000	30,000
	Art Development Fee	-	-	-	-	-	7,500
Current Services-Community Development		**1,020,020**	**1,027,880**	**1,587,581**	**1,636,200**	**1,436,492**	**1,730,500**
5220-001	Engineering Fees - Misc	159,689	140,208	138,558	60,000	115,226	110,000
5220-002	Engineering Plan Check	2,786	345	234	2,500	1,176	2,500
5221-000	Public Works Plan Check Fees	-	-	1,044	-	-	-
5223-000	NPDES	101,720	78,305	79,225	90,000	61,733	94,000
5224-000	Public Works - Filming	1,295	-	-	-	-	-
Current Services-Public Works		**265,489**	**218,859**	**219,061**	**152,500**	**178,136**	**206,500**
5230-001	Police Special Svcs	10,926	189,262	3,385	5,000	2,500	2,500
5230-004	Vehicle Impound Fees	30,971	14,418	25,733	20,000	26,000	27,000
5230-005	Police Svcs - Filming	207,875	285,925	119,993	250,000	320,000	326,000
5280-001	Animal Control Fees	857	163	-	800	-	-
Current Services-Police		**250,629**	**489,768**	**149,111**	**275,800**	**348,500**	**355,500**
5255-000	Passport Services	14,646	301	-	7,000	-	-
Current Services-Library		**14,646**	**301**	**-**	**7,000**	**-**	**-**
5260-000	Library Fees	-	-	596	-	736	700
5260-002	Library Fines	30,190	575	79	-	-	-
5260-003	Library Replacements	2,950	763	7,979	5,000	7,500	6,200
5260-004	Library Equip. Rental	-	-	235	-	1,218	1,400
Current Services-Library		**33,139**	**1,337**	**8,889**	**5,000**	**9,454**	**8,300**
5265-002	Sr. Citizens Classes	17,436	41	11,525	28,000	14,000	16,000
5265-003	Sr. Citizens Membership	8,335	1,885	7,754	7,500	8,000	8,000
5265-004	Sr. Citizens Bus Trips	2,605	(40)	(230)	3,000	4,500	3,500
5265-005	Snr. Citizens Center Programs	1,104	300	9	1,000	1,077	1,120
5265-006	Bingo - Coffee - Med. I.D.	897	-	51	500	420	500
5270-001	Camp Med Fees	238,880	11,218	302,382	430,400	300,000	390,000
5270-002	Recreation Classes	108,560	195,086	286,146	250,000	200,000	230,000
5270-003	Special Events	10,262	4,897	8,212	10,000	9,000	10,000
5270-004	MTA Bus Pass - General	-	-	-	-	-	-
5270-005	Park/Field Reservations	26,035	7,296	91,736	60,000	50,000	60,000
5270-007	Adult Sports	-	-	-	-	-	-
5270-008	Concerts in the Park	-	-	1,450	10,000	13,000	25,000
5270-009	War Memorial Kitchen	2,500	-	1,179	2,500	1,250	2,500
Current Services-Community Services		**416,614**	**220,684**	**710,215**	**802,900**	**601,247**	**746,620**

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Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
5289-001	Fire Dept - Filming	113,240	134,098	75,195	100,000	145,860	130,000
5289-002	Fire Dept - Plan Check	57,987	41,646	38,584	45,000	23,227	25,000
5289-007	Fire Dept - Inspection	56,335	114,883	113,825	60,000	109,461	100,000
5290-001	Paramedic Fees	680,353	599,057	681,690	650,000	601,786	625,000
5300-000	Paramedic Subscriptions	27,560	27,108	82,805	27,500	25,000	35,000
5302-000	Fire Command Reimbursements	23,994	180,143	148,774	100,000	130,000	157,000
5305-001	Fire Miscellaneous	449	12	46	-	100	100
Current-Services-Fire		**959,918**	**1,096,947**	**1,140,918**	**982,500**	**1,035,434**	**1,072,100**
Current-Services-ALL		*2,985,842*	*3,079,621*	*3,836,129*	*3,877,200*	*3,624,263*	*4,141,520*
5420-000	Workers Comp Reimb	-	72,416	-	-	-	-
5425-000	Gen. Liability Insurance Reimb	-	-	-	-	-	-
5430-000	Damage to City Property	7,430	1,301	250	-	-	-
5440-000	Candidate Filing Fee	-	1,571	-	-	-	-
5460-000	Recycling Revenue	12,238	2,850	11,710	5,000	12,973	16,508
5460-001	Recycling Container	-	-	-	-	-	-
5490-000	Cash Over/Short	(764)	(1,578)	(21)	-	-	-
5501-001	Donations - Misc	70	3	93	-	-	-
5501-003	Donations - Senior Meals	2,806	23,913	-	54,000	-	-
5501-005	Donations - Library	-	-	-	-	-	-
5505-000	Miscellaneous	37,529	68,511	223,089	20,000	9,200	10,000
5505-001	Duplication Fees	7,698	8,394	1,510	4,000	2,000	4,000
5510-000	Credit Card Transaction Fee	7,360	6,337	8,092	1,500	9,000	9,000
5530-400	PD Reports & Misc Fees	-	-	5,778	-	7,570	7,000
5550-000	Prior Year Adjustment	(0)	-	-	-	-	-
Other Revenue		**74,367**	**183,717**	**250,501**	**84,500**	**40,743**	**46,508**
5610-000	Reimbursement-Sewer Fund	69,022	69,022	69,022	69,022	69,022	69,022
5640-000	Reimbursement-Water Fund	414,362	414,362	414,362	414,362	414,362	414,362
Reimbursements From Other Funds		**483,384**	**483,384**	**483,384**	**483,384**	**483,384**	**483,384**
101 - GENERAL FUND TOTAL		**28,817,965**	**37,635,460**	**34,652,238**	**42,849,230**	**36,588,626**	**39,523,631**
5410-000	Insurance Reimbursement - WC	77,299	53,052	528,610	80,000	360,620	381,137
5410-001	Insurance Reimbursement - GL	48,231	454,257	114,773	55,000	55,000	675,000
5420-000	Internal Service Charge - WC	671,573	681,985	671,480	765,000	765,000	647,946
5425-000	Internal Service Charge - GL	415,312	(408,000)	1,800,000	2,040,000	2,040,000	1,967,800
Other Revenue		**1,212,415**	**781,294**	**3,114,863**	**2,940,000**	**3,220,620**	**3,671,883**
103 - INSURANCE FUND TOTAL		**1,212,415**	**781,294**	**3,114,863**	**2,940,000**	**3,220,620**	**3,671,883**
4800-000	Interest Income	-	-	13,688	-	-	-
4802-000	Gain / Loss on Investments	-	-	(992)	-	-	-
4805-000	Unrealized Gain / Loss	-	-	(77,139)	-	-	-
Use of Money & Property		**-**	**-**	**(64,442)**	**-**	**-**	**-**
5505-000	Miscellaneous	4,000	-	-	-	-	-
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**4,000**	**-**	**-**	**-**	**-**	**-**
104 - STREET IMPROVEMENTS PROGRAM FUND		**4,000**	**-**	**(64,442)**	**-**	**-**	**-**
4800-000	Interest Income	23,208	10,423	7,694	1,000	34,844	44,395
Use of Money & Property		**23,208**	**10,423**	**7,694**	**1,000**	**34,844**	**44,395**
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**-**	**-**	**-**	**-**	**-**	**-**
105 - FACILITIES & EQUIP REPLACEMENT TOTAL		**23,208**	**10,423**	**7,694**	**1,000**	**34,844**	**44,395**
5520-000	Technology Surcharge	-	3,126	20,099	15,000	28,000	32,000
Other Revenue		**-**	**3,126**	**20,099**	**15,000**	**28,000**	**32,000**
106 - TECHNOLOGY SURCHARGE TOTAL		**-**	**3,126**	**20,099**	**15,000**	**28,000**	**32,000**
4802-000	Gains / Loss on Investment	-	-	16,544	-	56,308	58,560
Use of Money & Property		**-**	**-**	**16,544**	**-**	**56,308**	**58,560**
110 - OPEB TRUST FUND TOTAL		**-**	**-**	**16,544**	**-**	**56,308**	**58,560**

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4200-000	Sales & Use Tax	505,425	528,052	642,891	626,217	626,217	768,191
Sales Tax		**505,425**	**528,052**	**642,891**	**626,217**	**626,217**	**768,191**
4800-000	Interest Income	30,002	18,059	5,220	10,000	26,907	34,282
4802-000	Gain / Loss on Investments	391	1,271	-	-	-	-
4805-000	Unrealized Gain / Loss	14,595	(12,865)	-	-	-	-
Use of Money & Property		**44,988**	**6,466**	**5,220**	**10,000**	**26,907**	**34,282**
5266-000	Dial - A - Ride Charges	2,787	1,671	2,217	5,000	2,500	2,500
Charges for Current Services		**2,787**	**1,671**	**2,217**	**5,000**	**2,500**	**2,500**
5500-000	MTA Bus Pass - Senior	3,040	160	1,000	5,000	1,500	5,000
5504-000	Prop A - NTD Disc. Incentive	12,156	30,364	-	10,000	-	12,000
5505-000	Miscellaneous	-	-	-	-	-	-
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**15,196**	**30,524**	**1,000**	**15,000**	**1,500**	**17,000**
205 - LOCAL TRANSIT RETURN "A" TOTAL		**568,396**	**566,713**	**651,328**	**656,217**	**657,124**	**821,973**
5073-000	Miscellaneous	-	-	3,029,618	3,029,618	3,029,618	-
Other Revenue		**-**	**-**	**3,029,618**	**3,029,618**	**3,029,618**	**-**
206 - SLFRF FUND TOTAL		**-**	**-**	**3,029,618**	**3,029,618**	**3,029,618**	**-**
4200-000	Sales & Use Tax	419,251	438,000	533,265	519,430	519,430	637,194
Sales Tax		**419,251**	**438,000**	**533,265**	**519,430**	**519,430**	**637,194**
4800-000	Interest Income	22,104	12,329	3,478	9,000	19,294	24,582
4802-000	Gain / Loss on Investments	296	847	-	-	-	-
4805-000	Unrealized Gain / Loss	11,047	(8,571)	-	-	-	-
Use of Money & Property		**33,447**	**4,605**	**3,478**	**9,000**	**19,294**	**24,582**
4460-001	Parking Revenue	39,021	2,164	5,890	40,000	-	-
Charges for Current Services		**39,021**	**2,164**	**5,890**	**40,000**	**-**	**-**
207 - LOCAL TRANSIT RETURN "C" TOTAL		**491,719**	**444,769**	**542,633**	**568,430**	**538,724**	**661,776**
4800-000	Interest Income	10,843	2,375	475	-	2,136	2,722
4802-000	Gain / Loss on Investments	107	138	-	-	-	-
4805-000	Unrealized Gain / Loss	3,990	(1,400)	-	-	-	-
Use of Money & Property		**14,940**	**1,114**	**475**	**-**	**2,136**	**2,722**
5077-041	MTA Grant - Ped. Improv. - LTF	-	-	-	-	-	-
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**-**
208 - TEA/METRO TOTAL		**14,940**	**1,114**	**475**	**-**	**2,136**	**2,722**
5071-000	Carlyle Library Bequest	-	-	-	-	2,800,000	-
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**2,800,000**	**-**
209 - CARLYLE LIBRARY BEQUEST TOTAL		**-**	**-**	**-**	**-**	**2,800,000**	**-**
4800-000	Interest Income	124,084	68,264	58,032	60,000	101,213	182,699
4802-000	Gain / Loss on Investments	1,609	4,810	(2,579)	-	-	-
4805-000	Unrealized Gain / Loss	60,000	(48,674)	(200,653)	-	-	-
Use of Money & Property		**185,693**	**24,399**	**(145,200)**	**60,000**	**101,213**	**182,699**
5310-000	Sewer Service Charges	1,959,372	2,108,764	2,200,532	2,100,551	1,821,651	2,100,551
5315-000	Penalty - Sewer	3,071	-	-	5,000	-	5,000
5335-000	Water Impact Fees	-	-	-	-	-	-
Charges for Current Services		**1,962,443**	**2,108,764**	**2,200,532**	**2,105,551**	**1,821,651**	**2,105,551**
5505-000	Miscellaneous	-	-	-	-	-	-
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**-**	**-**	**-**	**-**	**-**	**-**
210 - SEWER TOTAL		**2,148,137**	**2,133,163**	**2,055,332**	**2,165,551**	**1,922,864**	**2,288,250**
5071-006	Federal Grant - Rogan HR 5394	-	-	-	-	-	-
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**-**
211 - CTC TRAFFIC IMPROVEMENT TOTAL		**-**	**-**	**-**	**-**	**-**	**-**
5071-000	SB2 Planning Grant	-	-	-	-	50,000	135,000
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**50,000**	**135,000**
213 - SB2 PLANNING GRANT TOTAL		**-**	**-**	**-**	**-**	**50,000**	**135,000**
5071-000	Rogan HR5294 Grant	-	-	-	-	-	1,087,899
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**1,087,899**
213 - ROGAN HR5394 GRANT TOTAL		**-**	**-**	**-**	**-**	**-**	**1,087,899**
4100-000	Street Light Assessments	890,461	892,903	898,450	900,000	887,149	900,000
Assessments & Special Taxes		**890,461**	**892,903**	**898,450**	**900,000**	**887,149**	**900,000**
4800-000	Interest Income	3,834	1,862	1,225	4,000	48	62
Use of Money & Property		**3,834**	**1,862**	**1,225**	**4,000**	**48**	**62**
5430-000	Damage to City Property	-	-	-	-	-	-
5501-012	Donations - Tree Dedications	11,727	13,536	20,437	5,000	447	5,000
Other Revenue		**11,727**	**13,536**	**20,437**	**5,000**	**447**	**5,000**
215 - STREET LIGHT & LANDSCAPE TOTAL		**906,023**	**908,301**	**920,112**	**909,000**	**887,644**	**905,062**

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Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4800-000	Interest Income	2,398	822	564	1,000	2,695	3,433
Use of Money & Property		**2,398**	**822**	**564**	**1,000**	**2,695**	**3,433**
5250-000	PEG Fees	23,744	9,074	7,668	10,000	7,500	8,000
Revenue From Other Agencies		**23,744**	**9,074**	**7,668**	**10,000**	**7,500**	**8,000**
217 - PUBLIC, EDUC., & GOV'T. TOTAL		**26,142**	**9,896**	**8,231**	**11,000**	**10,195**	**11,433**
4800-000	Interest Income	3,285	1,697	393	1,500	2,207	2,811
4802-000	Gain / Loss on Investments	36	121	-	-	-	-
4805-000	Unrealized Gain / Loss	1,326	(1,224)	-	-	-	-
Use of Money & Property		**4,646**	**594**	**393**	**1,500**	**2,207**	**2,811**
5082-000	AB 2766 (SCAQMD) Fees	33,136	33,243	32,872	33,200	33,200	33,200
Revenue From Other Agencies		**33,136**	**33,243**	**32,872**	**33,200**	**33,200**	**33,200**
218 - CLEAN AIR ACT TOTAL		**37,782**	**33,836**	**33,265**	**34,700**	**35,407**	**36,011**
5071-009	CalRecycle SB1383 Local Asst. Grant	-	-	-	-	-	-
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**-**
219 - CALRECYCLE GRANT TOTAL		**-**	**-**	**-**	**-**	**-**	**-**
4800-000	Interest Income	85	20	1	500	-	-
Use of Money & Property		**85**	**20**	**1**	**500**	**-**	**-**
5412-000	Business Improvement Tax	53,771	67,454	56,619	60,000	60,000	60,000
5412-001	BIT - Filming Permits	26,615	30,086	32,760	26,000	31,125	31,875
Other Revenue		**80,386**	**97,540**	**89,379**	**86,000**	**91,125**	**91,875**
220 - BUSINESS IMPROVEMENT TAX TOTAL		**80,471**	**97,560**	**89,380**	**86,500**	**91,125**	**91,875**
4800-000	Interest Income	966	299	195	-	894	1,139
Use of Money & Property		**966**	**299**	**195**	**-**	**894**	**1,139**
223 - GOLD LINE MITIGATION FUND TOTAL		**966**	**299**	**195**	**-**	**894**	**1,139**
4875-000	Rental - MMV Parking	3,685	-	-	-	-	-
Use of Money & Property		**3,685**	**-**	**-**	**-**	**-**	**-**
226 - MISSION MERIDIAN PUBLIC GARAGE TOTAL		**3,685**	**-**	**-**	**-**	**-**	**-**
4800-000	Interest Income	2,901	-	316	-	-	-
4802-000	Gain / Loss on Investments	-	-	-	-	-	-
4880-000	Rental - Nursery Property	-	-	-	-	-	-
Use of Money & Property		**2,901**	**-**	**316**	**-**	**-**	**-**
	Proceeds from Trust Fund	-	-	-	-	-	196,600
Other Revenue		**-**	**-**	**-**	**-**	**-**	**196,600**
227 - SA-CRA TOTAL		**2,901**	**-**	**316**	**-**	**-**	**196,600**
4800-000	Interest Income	1,868	1,007	243	-	1,984	2,527
4802-000	Gain / Loss on Investments	24	68	-	-	-	-
4805-000	Unrealized Gain / Loss	894	(693)	-	-	-	-
4810-000	Rental - Arroyo House	8,350	9,513	10,538	10,428	9,600	10,200
4880-000	Rental - Nursery/Theater Property	12,000	11,000	25,380	35,100	36,700	36,700
Use of Money & Property		**23,136**	**20,896**	**36,161**	**45,528**	**48,284**	**49,427**
228 - HOUSING AUTHORITY TOTAL		**23,136**	**20,896**	**36,161**	**45,528**	**48,284**	**49,427**
4800-000	Interest Income	24,463	12,314	2,825	10,000	13,065	16,646
4802-000	Gain / Loss on Investments	304	842	-	-	-	-
4805-000	Unrealized Gain / Loss	11,354	(8,518)	-	-	-	-
Use of Money & Property		**36,121**	**4,638**	**2,825**	**10,000**	**13,065**	**16,646**
5038-000	State Gas Tax - 2103	180,969	170,923	203,534	252,804	231,452	267,195
5039-000	State Gas Tax - 2105	133,878	130,520	142,999	165,606	162,698	176,937
5040-000	State Gas Tax - 2106	80,727	77,965	86,420	96,966	96,911	105,129
5050-000	State Gas Tax - 2107	169,046	160,651	171,078	226,244	194,902	212,525
5060-000	State Gas Tax - 2107.5	6,000	21,964	6,000	6,000	6,000	6,000
5070-000	State Gas Tax - SB1	29,505	-	-	-	-	-
Revenue From Other Agencies		**600,126**	**562,024**	**610,031**	**747,620**	**691,963**	**767,786**
5535-000	Loader Fee - Athens	-	-	-	-	-	-
Other Revenue		**-**	**-**	**-**	**-**	**-**	**-**
230 - STATE GAS TAX TOTAL		**636,247**	**566,662**	**612,856**	**757,620**	**705,028**	**784,432**

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Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4800-000	Interest Income	-	-	-	-	-	-
Use of Money & Property		**-**	**-**	**-**	**-**	**-**	**-**
5084-006	County Park Bond - (Prop A)	33,014	-	17,649	400,000	-	-
5084-008	County Park Bond - Maint	4,553	-	-	70,000	61,500	118,000
Revenue From Other Agencies		**37,567**	**-**	**17,649**	**470,000**	**61,500**	**118,000**
232 - COUNTY PARK BOND TOTAL		**37,567**	**-**	**17,649**	**470,000**	**61,500**	**118,000**
4200-000	Sales & Use Tax	313,988	328,956	399,884	389,573	-	477,895
Sales Tax		**313,988**	**328,956**	**399,884**	**389,573**	**-**	**477,895**
4800-000	Interest Income	29,154	12,829	3,864	10,000	22,668	28,881
4802-000	Gain / Loss on Investments	364	854	-	-	-	-
4805-000	Unrealized Gain / Loss	13,581	(8,642)	-	-	-	-
Use of Money & Property		**43,099**	**5,041**	**3,864**	**10,000**	**22,668**	**28,881**
233 - MEASURE R TOTAL		**357,087**	**333,996**	**403,748**	**399,573**	**22,668**	**506,776**
5071-022	LACMTA Measure M MAT	-	-	-	475,000	-	475,000
Revenue From Other Agencies		**-**	**-**	**-**	**475,000**	**-**	**475,000**
234 - LACMTA MEASURE M MAT TOTAL		**-**	**-**	**-**	**475,000**	**-**	**475,000**
4200-000	Sales & Use Tax	353,424	372,719	452,515	441,516	441,516	541,615
Sales Tax		**353,424**	**372,719**	**452,515**	**441,516**	**441,516**	**541,615**
4800-000	Interest Income	21,705	15,422	4,907	7,000	27,956	35,619
4802-000	Gain / Loss on Investments	300	1,096	-	-	-	-
4805-000	Unrealized Gain / Loss	11,190	(11,090)	-	-	-	-
Use of Money & Property		**33,195**	**5,428**	**4,907**	**7,000**	**27,956**	**35,619**
236 - MEASURE M TOTAL		**386,619**	**378,147**	**457,422**	**448,516**	**469,472**	**577,234**
5070-000	State Gas Tax - SB1	454,560	474,939	523,795	585,093	584,802	666,557
Sales Tax		**454,560**	**474,939**	**523,795**	**585,093**	**584,802**	**666,557**
4800-000	Interest Income	23,442	8,169	2,748	7,000	19,631	25,012
4802-000	Gain / Loss on Investments	338	515	-	-	-	-
4805-000	Unrealized Gain / Loss	12,606	(5,210)	-	-	-	-
Use of Money & Property		**36,386**	**3,474**	**2,748**	**7,000**	**19,631**	**25,012**
237 - ROAD MAINT. & REHAB. ACCT. TOTAL		**490,946**	**478,413**	**526,543**	**592,093**	**604,433**	**691,569**
5071-014	MSRC Grant	-	-	20,000	-	-	246,925
Revenue From Other Agencies		**-**	**-**	**20,000**	**-**	**-**	**246,925**
238 - MSRC GRANT TOTAL		**-**	**-**	**20,000**	**-**	**-**	**246,925**
4800-000	Interest Income	-	-	439	-	4,491	5,722
Use of Money & Property		**-**	**-**	**439**	**-**	**4,491**	**5,722**
5071-003	Miscellaneous Grant	-	273,748	253,983	251,179	254,324	252,000
Revenue From Other Agencies		**-**	**273,748**	**253,983**	**251,179**	**254,324**	**252,000**
239 - MEASURE W TOTAL		**-**	**273,748**	**254,423**	**251,179**	**258,815**	**257,722**
4200-000	Sales & Use Tax	-	-	-	250,000	-	250,000
Sales Tax		**-**	**-**	**-**	**250,000**	**-**	**250,000**
240 - MEASURE M MSP TOTAL		**-**	**-**	**-**	**250,000**	**-**	**250,000**
5230-007	Homeless Outreach Service	12,394	24,056	43,473	-	18,000	18,500
Revenue From Other Agencies		**12,394**	**24,056**	**43,473**	**-**	**18,000**	**18,500**
241 - MEASURE H TOTAL		**12,394**	**24,056**	**43,473**	**-**	**18,000**	**18,500**
5071-003	Miscellaneous Grants	-	204,264	-	-	-	-
5071-007	Misc. Federal Grants	-	-	7,672	-	180,188	-
Revenue From Other Agencies		**-**	**204,264**	**7,672**	**-**	**180,188**	**-**
242 - PROP C EXCHANGE TOTAL		**-**	**204,264**	**7,672**	**-**	**180,188**	**-**
5071-003	LACMTA Measure R MIP	-	-	-	-	-	475,000
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**475,000**
243 - MEASURE R - MSP TOTAL		**-**	**-**	**-**	**-**	**-**	**475,000**
4800-000	Interest Income	0	75	-	-	-	-
4802-000	Gain / Loss on Investments	-	8	-	-	-	-
4805-000	Unrealized Gain / Loss	-	(83)	-	-	-	-
Use of Money & Property		**0**	**0**	**-**	**-**	**-**	**-**
5035-000	SB 821 State Grants	48,280	-	-	24,172	-	31,103
Revenue From Other Agencies		**48,280**	**-**	**-**	**24,172**	**-**	**31,103**
245 - BIKE & PEDESTRIAN PATHS TOTAL		**48,280**	**0**	**-**	**24,172**	**-**	**31,103**

DRAFT

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
5071-010	SGVCOG Grants	-	-	-	-	-	45,000
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**45,000**
247 - SGVCOG GRANTS TOTAL		**-**	**-**	**-**	**-**	**-**	**45,000**
5071-017	Mission St. Bikeway-BTA Grant	-	-	-	-	-	-
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**-**
248 - BTA GRANTS TOTAL		**-**	**-**	**-**	**-**	**-**	**-**
5071-045	MSRC Grant - Golden Streets	-	-	-	-	-	-
5077-045	Metro Grant - Golden Streets	-	332,000	-	-	-	-
Revenue From Other Agencies		**-**	**332,000**	**-**	**-**	**-**	**-**
249 - OPEN STREETS GRANT TOTAL		**-**	**332,000**	**-**	**-**	**-**	**-**
4800-000	Interest Income	12,354	6,617	1,759	-	8,537	10,877
4802-000	Gain / Loss on Investments	157	445	-	-	-	-
4805-000	Unrealized Gain / Loss	5,848	(4,508)	-	-	-	-
Use of Money & Property		**18,360**	**2,554**	**1,759**	**-**	**8,537**	**10,877**
5215-000	Growth Requirement - Resident	27,901	58,207	36,362	40,000	30,000	50,000
5216-000	Growth Requiremnt - Comm/ Indus	6,303	-	1,233	-	10,000	10,000
Charges for Current Services		**34,205**	**58,207**	**37,595**	**40,000**	**40,000**	**60,000**
255 - CAPITAL GROWTH TOTAL		**52,564**	**60,761**	**39,354**	**40,000**	**48,537**	**70,877**
5075-032	Sr. Program - D99575	-	42,708	18,383	26,281	-	-
5075-049	ADA Sidewalk	-	-	-	105,126	-	407,782
5075-055	CDBG-CV Grant	-	53,000	20,321	105,126	-	-
Revenue From Other Agencies		**-**	**95,708**	**38,704**	**236,533**	**-**	**407,782**
5501-003	Donations - Senior Meals	30,719	20,579	24,354	28,000	-	19,599
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**30,719**	**20,579**	**24,354**	**28,000**	**-**	**19,599**
260 - CDBG TOTAL		**30,719**	**116,287**	**63,058**	**264,533**	**-**	**427,381**
4800-000	Interest Income	1,394	2,465	669	-	3,278	4,177
4802-000	Gain / Loss on Investments	38	181	-	-	-	-
4805-000	Unrealized Gain / Loss	1,408	(1,832)	-	-	-	-
Use of Money & Property		**2,839**	**814**	**669**	**-**	**3,278**	**4,177**
5075-001	Asset Forfeiture - DOJ	140,941	76,501	30,813	-	-	-
Revenue From Other Agencies		**140,941**	**76,501**	**30,813**	**-**	**-**	**-**
270 - ASSET FORFEITURE TOTAL		**143,780**	**77,315**	**31,482**	**-**	**3,278**	**4,177**
4800-000	Interest Income	8,017	4,723	1,279	2,500	7,116	9,066
4802-000	Gain / Loss on Investments	110	298	-	-	-	-
4805-000	Unrealized Gain / Loss	4,105	(3,013)	-	-	-	-
Use of Money & Property		**12,231**	**2,008**	**1,279**	**2,500**	**7,116**	**9,066**
5005-000	State Grant - COPS (AB3229)	155,948	156,727	161,285	100,000	220,000	224,500
Revenue From Other Agencies		**155,948**	**156,727**	**161,285**	**100,000**	**220,000**	**224,500**
272 - POLICE GRANTS - STATE TOTAL		**168,179**	**158,735**	**162,564**	**102,500**	**227,116**	**233,566**
4800-000	Interest Income	-	-	-	-	-	-
4802-000	Gain / Loss on Investments	-	-	-	-	-	-
4805-000	Unrealized Gain / Loss	-	-	-	-	-	-
Use of Money & Property		**-**	**-**	**-**	**-**	**-**	**-**
273 - POLICE SUBVENTIONS - CLEEP TOTAL		**-**	**-**	**-**	**-**	**-**	**-**
4800-000	Interest Income	67	-	-	-	-	-
Use of Money & Property		**67**	**-**	**-**	**-**	**-**	**-**
5036-000	Homeland Security Grant	-	-	-	44,369	-	-
Revenue From Other Agencies		**-**	**-**	**-**	**44,369**	**-**	**-**
274 - HOMELAND SECURITY GRANT TOTAL		**67**	**-**	**-**	**44,369**	**-**	**-**
4800-000	Interest Income	9,414	3,831	2,675	6,000	11,582	14,757
Use of Money & Property		**9,414**	**3,831**	**2,675**	**6,000**	**11,582**	**14,757**
5200-008	Park Impact Fees	187,167	164,527	103,108	160,000	100,000	160,000
Charges for Current Services		**187,167**	**164,527**	**103,108**	**160,000**	**100,000**	**160,000**
275 - PARK IMPACT FEE		**187,167**	**164,527**	**103,108**	**160,000**	**111,582**	**174,757**

DRAFT

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4800-000	Interest Income	78	24	13	-	79	101
Use of Money & Property		**78**	**24**	**13**	**-**	**79**	**101**
5071-015	Historic Preservation Grant	-	-	40,000	-	-	-
Revenue From Other Agencies		**-**	**-**	**40,000**	**-**	**-**	**-**
276 - HISTORIC PRESERVATION GRANT TOTAL		**78**	**24**	**40,013**	**-**	**79**	**101**
5071-016	HSIP Grant	-	2,090	163	554,365	69,397	307,862
Revenue From Other Agencies		**-**	**2,090**	**163**	**554,365**	**69,397**	**307,862**
277 - HSIP GRANT TOTAL		**-**	**2,090**	**163**	**554,365**	**69,397**	**307,862**
5071-001	Miscellaneous Grant - State	-	-	-	-	-	4,000
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**4,000**
278 - HOUSING ELEMENT GRANT TOTAL		**-**	**-**	**-**	**-**	**-**	**4,000**
5071-000	Miscellaneous Grant - State	-	-	-	-	-	368,445
Revenue From Other Agencies		**-**	**-**	**-**	**-**	**-**	**368,445**
281 - CA STATE LIBRARY BUILDING GRANT TOTAL		**-**	**-**	**-**	**-**	**-**	**368,445**
4800-000	Interest Income	154	29	-	2,000	-	-
4802-000	Gain / Loss on Investments	2	2	-	-	-	-
4805-000	Unrealized Gain / Loss	71	(18)	-	-	-	-
Use of Money & Property		**227**	**13**	**-**	**2,000**	**-**	**-**
5275-001	Green Fees / Mini Golf	642,207	1,111,553	945,801	963,000	696,000	997,500
5275-002	Range	312,210	564,930	359,545	540,000	478,000	536,000
5275-003	Golf Shop	51,627	43,937	50,203	86,700	65,000	71,850
5275-004	Food	41,475	36,750	25,987	33,200	28,000	31,700
5275-005	Filming	27,364	9,964	8,767	9,700	12,000	12,600
Charges for Current Services		**1,074,883**	**1,767,133**	**1,390,303**	**1,632,600**	**1,279,000**	**1,649,650**
295-ARROYO SECO GOLF COURSE TOTAL		**1,075,110**	**1,767,146**	**1,390,303**	**1,634,600**	**1,279,000**	**1,649,650**
4800-000	Interest Income	-	-	-	-	-	-
4802-000	Gain / Loss on Investments	-	-	-	-	-	-
4805-000	Unrealized Gain / Loss	-	-	-	-	-	-
Use of Money & Property		**-**	**-**	**-**	**-**	**-**	**-**
310 - SEWER CAPITAL PROJECTS TOTAL		**-**	**-**	**-**	**-**	**-**	**-**
4800-000	Interest Income	9,453	6,969	-	-	-	-
4802-000	Gain / Loss on Investments	291	759	-	-	-	-
4805-000	Unrealized Gain / Loss	10,839	(7,682)	-	-	-	-
Use of Money & Property		**20,583**	**46**	**-**	**-**	**-**	**-**
327 - 2000 TAX ALLOCATION BONDS TOTAL		**20,583**	**46**	**-**	**-**	**-**	**-**
4800-000	Interest Income	29,375	26,394	77,718	70,000	333,291	607,678
4802-000	Gain / Loss on Investments	-	2,824	(4,019)	-	-	-
4805-000	Unrealized Gain / Loss	(5,938)	(28,576)	(312,648)	-	-	-
Use of Money & Property		**23,437**	**642**	**(238,949)**	**70,000**	**333,291**	**607,678**
5320-000	Water Sales	10,816,540	11,508,051	12,102,176	12,572,000	9,296,044	12,572,000
5325-000	Standby Service Charge	26,097	129,569	67,649	74,800	42,389	74,800
5370-000	Penalty - Water/Rubbish	16,256	-	-	-	-	-
5327-000	Efficiency Fee	103,157	(9)	-	-	-	-
5330-000	Private Fire Service	47,294	42,444	37,491	46,795	31,332	30,000
5335-000	Water Impact Fees	-	-	-	-	-	-
Charges for Current Services		**11,009,343**	**11,680,055**	**12,207,315**	**12,693,595**	**9,369,765**	**12,676,800**
5360-000	Rubbish Clearing	(10,122)	-	(8)	-	-	-
5400-000	Sale of Property	-	-	-	-	-	-
5430-000	Damage to City Property	-	-	-	-	-	-
5505-000	Miscellaneous	596,727	-	9,302,561	-	-	-
5510-000	Misc Service Revenue	13,037	22,001	15,408	5,000	11,287	8,500
5525-000	Yard Waste	-	-	-	-	-	-
5530-000	Rubbish Billing Fees	-	-	-	-	-	-
5540-000	Service Fees	13,449	2,735	(81)	10,000	2,167	10,000
5550-000	Prior Year Adjustment	-	-	-	-	-	-
5560-000	Sewer Billing Fees	23,006	-	-	30,000	-	30,000
Other Revenue		**636,096**	**24,736**	**9,317,881**	**45,000**	**13,453**	**48,500**
5071-007	Water Quality Authority	-	-	-	-	-	-
5071-019	Federal Grant - EPA	90,833	-	-	-	-	-
5071-020	Prop 68 Groundwater Remediation Grant	-	-	-	2,200,000	-	2,200,000
5586-000	Loan Proceeds	-	-	-	-	-	-
Revenue From Other Agencies		**90,833**	**-**	**-**	**2,200,000**	**-**	**2,200,000**
500 - WATER TOTAL		**11,759,710**	**11,705,433**	**21,286,247**	**15,008,595**	**9,716,510**	**15,532,978**

DRAFT

Acct	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
4800-000	Interest Income	13,883	4,100	2,714	-	13,467	17,158
Use of Money & Property		**13,883**	**4,100**	**2,714**	**-**	**13,467**	**17,158**
5327-000	Efficiency Fee	105,232	215,966	203,565	225,000	148,817	225,000
Charges for Current Services		**105,232**	**215,966**	**203,565**	**225,000**	**148,817**	**225,000**
5071-003	Miscellaneous Grants	-	30,604	-	40,000	-	40,000
Revenue From Other Agencies		**-**	**30,604**	**-**	**40,000**	**-**	**40,000**
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**-**	**-**	**-**	**-**	**-**	**-**
503 - WATER EFFICIENCY FUND		**119,115**	**250,670**	**206,280**	**265,000**	**162,284**	**282,158**
4800-000	Interest Income	2,799	-	197	-	-	-
Use of Money & Property		**2,799**	**-**	**197**	**-**	**-**	**-**
505 - 2016 WATER REVENUE BONDS TOTAL		**2,799**	**-**	**197**	**-**	**-**	**-**
4800-000	Interest Income	23,940	29,030	18,063	-	-	-
Use of Money & Property		**23,940**	**29,030**	**18,063**	**-**	**-**	**-**
506 - SRF LOAN - WATER TOTAL		**23,940**	**29,030**	**18,063**	**-**	**-**	**-**
4800-000	Interest Income	13,182	4,262	3,139	10,000	15,047	19,172
4802-000	Gain / Loss on Investments	-	-	-	-	-	-
4805-000	Unrealized Gain / Loss	-	-	-	-	-	-
Use of Money & Property		**13,182**	**4,262**	**3,139**	**10,000**	**15,047**	**19,172**
5335-000	Water Impact Fees	(25,955)	121,331	66,383	180,000	57,051	180,000
5336-000	Sewer Impact Fees	17,252	5,112	6,975	10,000	3,604	10,000
Charges for Current Services		**(8,703)**	**126,443**	**73,358**	**190,000**	**60,655**	**190,000**
5550-000	Prior Year Adjustment	-	-	-	-	-	-
Other Revenue		**-**	**-**	**-**	**-**	**-**	**-**
510 - WATER & SEWER IMPACT FEES TOTAL		**4,479**	**130,705**	**76,496**	**200,000**	**75,702**	**209,172**
4800-000	Interest Income	1,842	-	7	-	-	-
4802-000	Gain / Loss on Investments	-	-	-	-	-	-
Use of Money & Property		**1,842**	**-**	**7**	**-**	**-**	**-**
550 - PUBLIC FINANCING TOTAL		**1,842**	**-**	**7**	**-**	**-**	**-**
4800-000	Interest Income	1,987	-	-	-	196,500	196,600
Use of Money & Property		**1,987**	**-**	**-**	**-**	**196,500**	**196,600**
4000-000	Property Tax - Current Secured	193,700	285,849	172,383	196,500	-	-
Property Tax		**193,700**	**285,849**	**172,383**	**196,500**	**-**	**-**
927 - REDEV. OBLIGATIONS TOTAL		**195,687**	**285,849**	**172,383**	**196,500**	**196,500**	**196,600**
	CITYWIDE TOTAL	**50,126,258**	**59,990,586**	**71,050,222**	**75,456,389**	**64,212,502**	**73,558,624**

DRAFT

Expenditure Summary by Fund

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
101	Wages & Benefits	19,457,515	22,108,355	25,216,188	24,289,564	24,177,311	27,102,511
101	Operations & Maintenance	6,677,254	5,875,483	7,495,907	12,678,219	11,177,997	12,270,055
101	Capital Outlay	95,613	39,802	13,005	305,400	155,900	258,000
101	Other Expenses	-	-	-	-	-	-
101	Transfer Out	-	-	-	-	-	-
101	Capital Projects	-	-	-	795,000	170,000	-
	101 - General Fund Total	**26,230,381**	**28,023,640**	**32,725,100**	**38,068,183**	**35,681,208**	**39,630,567**
103	Wages & Benefits	-	-	-	-	-	-
103	Operations & Maintenance	2,941,009	2,167,385	4,276,759	2,596,111	4,686,289	3,566,267
103	Capital Outlay	-	-	-	-	-	-
103	Other Expenses	-	-	-	-	-	-
103	Transfer Out	-	-	-	-	-	-
103	Capital Projects	-	-	-	-	-	-
	103 - Insurance Fund Total	**2,941,009**	**2,167,385**	**4,276,759**	**2,596,111**	**4,686,289**	**3,566,267**
104	Wages & Benefits	-	-	-	-	-	-
104	Operations & Maintenance	-	-	-	-	-	-
104	Capital Outlay	-	-	-	-	-	-
104	Other Expenses	-	-	-	-	-	-
104	Transfer Out	-	-	-	-	-	-
104	Capital Projects	998,213	150,934	15,491	2,298,445	55,183	-
	104 - Street Improvements Program Total	**998,213**	**150,934**	**15,491**	**2,298,445**	**55,183**	**-**
105	Wages & Benefits	-	-	-	-	-	-
105	Operations & Maintenance	(12,802)	-	-	143,000	120,000	531,502
105	Capital Outlay	42,645	77,691	942	120,000	-	-
105	Other Expenses	-	-	-	-	-	-
105	Transfer Out	-	-	-	-	-	-
105	Capital Projects	458	493,994	102,245	1,011,000	111,853	-
	105 - Facilities & Equip. Replacement Total	**30,301**	**571,685**	**103,187**	**1,274,000**	**231,853**	**531,502**
108	Wages & Benefits	-	-	-	-	-	-
108	Operations & Maintenance	-	-	-	-	-	-
108	Capital Outlay	-	-	-	-	-	-
108	Other Expenses	-	-	-	-	-	-
108	Transfer Out	-	-	-	-	-	-
108	Capital Projects	-	-	-	338,483	100,000	-
	108 - SR110 General Fund Reserve Total	**-**	**-**	**-**	**338,483**	**100,000**	**-**
110	Wages & Benefits	-	-	-	-	-	-
110	Operations & Maintenance	-	-	-	1,000	1,000	1,000
110	Capital Outlay	-	-	-	-	-	-
110	Other Expenses	-	-	-	-	-	-
110	Transfer Out	-	-	-	-	-	-
110	Capital Projects	-	-	-	-	-	-
	110 - OPEB Trust Fund Total	**-**	**-**	**-**	**1,000**	**1,000**	**1,000**
205	Wages & Benefits	236,150	187,334	220,062	481,713	377,255	594,528
205	Operations & Maintenance	107,328	63,453	57,560	135,741	124,000	301,041
205	Capital Outlay	-	64,500	-	176,600	169,999	-
205	Other Expenses	-	-	-	-	-	-
205	Transfer Out	-	-	-	-	-	-
205	Capital Projects	-	-	-	-	24,995	-
	205 - Prop "A" Total	**343,478**	**315,286**	**277,622**	**794,054**	**696,249**	**895,569**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
206	Wages & Benefits	-	-	-	-	-	-
206	Operations & Maintenance	-	-	-	5,547,392	2,277,911	3,498,717
206	Capital Outlay	-	-	-	282,608	282,608	-
206	Other Expenses	-	-	-	-	-	-
206	Transfer Out	-	-	-	-	-	-
206	Capital Projects	-	-	-	-	-	-
	206 - SLFRF Fund Total	**-**	**-**	**-**	**5,830,000**	**2,560,519**	**3,498,717**
207	Wages & Benefits	177,463	200,295	157,583	201,462	152,849	2,866
207	Operations & Maintenance	76,298	82,684	116,730	106,323	87,400	-
207	Capital Outlay	-	-	-	-	-	-
207	Other Expenses	-	-	-	-	-	-
207	Transfer Out	-	-	-	-	-	-
207	Capital Projects	-	11,460	21,090	322,450	36,550	-
	207 - Prop "C" Total	**253,761**	**294,439**	**295,403**	**630,235**	**276,799**	**2,866**
208	Wages & Benefits	-	-	-	-	-	-
208	Operations & Maintenance	-	-	-	-	-	-
208	Capital Outlay	-	-	-	-	-	-
208	Other Expenses	-	-	-	-	-	-
208	Transfer Out	-	-	-	-	-	-
208	Capital Projects	223,956	125,801	18,100	-	-	-
	208 - TEA/Metro Total	**223,956**	**125,801**	**18,100**	**-**	**-**	**-**
210	Wages & Benefits	455,309	424,165	420,465	527,144	481,228	586,758
210	Operations & Maintenance	146,680	74,703	410,511	664,222	354,922	653,922
210	Capital Outlay	18,806	77,123	-	-	-	-
210	Other Expenses	354,601	46,183	242,092	-	-	-
210	Transfer Out	-	-	-	-	-	-
210	Capital Projects	17,370	473,091	-	570,000	-	-
	210 - Sewer Total	**992,767**	**1,095,266**	**1,073,068**	**1,761,366**	**836,150**	**1,240,680**
213	Wages & Benefits	-	-	-	-	-	-
213	Operations & Maintenance	-	-	-	-	-	-
213	Capital Outlay	-	-	-	-	-	-
213	Other Expenses	-	-	-	-	-	-
213	Transfer Out	-	-	-	-	-	-
213	Capital Projects	-	-	-	160,000	50,000	-
	213 - SB2 Planning Grant Total	**-**	**-**	**-**	**160,000**	**50,000**	**-**
214	Wages & Benefits	-	-	-	-	-	-
214	Operations & Maintenance	-	-	-	-	-	-
214	Capital Outlay	-	-	-	-	-	-
214	Other Expenses	-	-	-	-	-	-
214	Transfer Out	-	-	-	-	-	-
214	Capital Projects	-	3,211	-	-	-	-
	214 - Rogan HR5394 Grant Total	**-**	**3,211**	**-**	**-**	**-**	**-**
215	Wages & Benefits	163,405	199,179	207,461	258,831	157,933	237,782
215	Operations & Maintenance	669,453	682,020	970,666	1,412,450	1,140,350	1,447,900
215	Capital Outlay	-	-	15,923	30,000	30,000	30,000
215	Other Expenses	-	-	-	-	-	-
215	Transfer Out	-	-	-	-	-	-
215	Capital Projects	50,000	50,000	75,000	-	-	-
	215 - Street Light & Landscape Total	**882,858**	**931,199**	**1,269,049**	**1,701,281**	**1,328,283**	**1,715,682**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
218	Wages & Benefits	-	-	-	-	-	-
218	Operations & Maintenance	73	-	-	-	-	-
218	Capital Outlay	55,038	35,924	-	-	-	-
218	Other Expenses	-	-	-	-	-	-
218	Transfer Out	-	-	-	-	-	-
218	Capital Projects	-	-	-	-	-	-
	218 - Clean Air Act Total	**55,111**	**35,924**	**-**	**-**	**-**	**-**
219	Wages & Benefits	-	-	-	-	-	-
219	Operations & Maintenance	-	-	-	-	-	-
219	Capital Outlay	-	-	-	-	-	-
219	Other Expenses	-	-	-	-	-	-
219	Transfer Out	-	-	-	-	-	-
219	Capital Projects	-	-	-	-	-	-
	219 - CalRecycle Local Asst. Grant Total	**-**	**-**	**-**	**-**	**-**	**-**
220	Wages & Benefits	-	-	-	-	-	-
220	Operations & Maintenance	109,500	107,000	105,500	112,000	112,000	110,500
220	Capital Outlay	-	-	-	-	-	-
220	Other Expenses	-	-	-	-	-	-
220	Transfer Out	-	-	-	-	-	-
220	Capital Projects	-	-	-	-	-	-
	220 - Business Improvement Tax Total	**109,500**	**107,000**	**105,500**	**112,000**	**112,000**	**110,500**
226	Wages & Benefits	-	-	-	-	-	-
226	Operations & Maintenance	8,987	9,650	9,052	15,000	9,100	15,000
226	Capital Outlay	-	-	-	-	-	-
226	Other Expenses	-	-	-	-	-	-
226	Transfer Out	-	-	-	-	-	-
226	Capital Projects	-	-	-	-	-	-
	226 - Mission Meridian Public Garage Total	**8,987**	**9,650**	**9,052**	**15,000**	**9,100**	**15,000**
227	Wages & Benefits	-	-	-	-	-	-
227	Operations & Maintenance	55,222	51,743	44,493	196,500	200,193	200,600
227	Capital Outlay	-	-	-	-	-	-
227	Other Expenses	-	-	-	-	-	-
227	Transfer Out	-	-	-	-	-	-
227	Capital Projects	-	-	-	-	-	-
	227 - Successor Agency to CRA Total	**55,222**	**51,743**	**44,493**	**196,500**	**200,193**	**200,600**
228	Wages & Benefits	-	-	-	-	-	-
228	Operations & Maintenance	15,199	10,361	373	11,700	11,700	16,200
228	Capital Outlay	-	-	-	-	-	-
228	Other Expenses	-	-	-	-	-	-
228	Transfer Out	-	-	-	-	-	-
228	Capital Projects	-	-	-	-	-	-
	228 - Housing Authority Total	**15,199**	**10,361**	**373**	**11,700**	**11,700**	**16,200**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
230	Wages & Benefits	443,708	469,132	497,374	679,918	603,075	925,061
230	Operations & Maintenance	128,122	88,920	115,888	362,500	233,100	358,700
230	Capital Outlay	-	25,185	-	65,000	-	65,000
230	Other Expenses	-	-	-	-	-	-
230	Transfer Out	-	-	-	-	-	-
230	Capital Projects	-	-	-	200,000	-	-
	230 - State Gas Tax Total	**571,830**	**583,237**	**613,262**	**1,307,418**	**836,175**	**1,348,761**
232	Wages & Benefits	-	-	-	-	-	-
232	Operations & Maintenance	42,632	27,957	54,329	106,000	61,500	118,000
232	Capital Outlay	-	-	-	-	-	-
232	Other Expenses	-	-	-	-	-	-
232	Transfer Out	-	-	-	-	-	-
232	Capital Projects	-	-	-	-	-	-
	232 - County Park Bond Total	**42,632**	**27,957**	**54,329**	**106,000**	**61,500**	**118,000**
233	Wages & Benefits	-	-	-	71,376	44,927	78,472
233	Operations & Maintenance	-	-	-	-	-	50,000
233	Capital Outlay	-	-	-	-	-	-
233	Other Expenses	-	-	-	-	-	-
233	Transfer Out	-	-	-	-	-	-
233	Capital Projects	270,116	343,453	31,773	300,000	-	-
	233 - Measure R Total	**270,116**	**343,453**	**31,773**	**371,376**	**44,927**	**128,472**
234	Wages & Benefits	-	-	-	-	-	-
234	Operations & Maintenance	-	-	-	-	-	-
234	Capital Outlay	-	-	-	-	-	-
234	Other Expenses	-	-	-	-	-	-
234	Transfer Out	-	-	-	-	-	-
234	Capital Projects	-	-	-	475,000	-	-
	234 - LACMTA Measure M MAT Total	**-**	**-**	**-**	**475,000**	**-**	**-**
236	Wages & Benefits	-	-	-	71,376	44,927	78,472
236	Operations & Maintenance	-	-	-	100,000	35,000	150,000
236	Capital Outlay	-	-	-	-	-	-
236	Other Expenses	-	-	-	-	-	-
236	Transfer Out	-	-	-	-	-	-
236	Capital Projects	86,000	-	-	250,000	72,435	-
	236 - Measure M Total	**86,000**	**-**	**-**	**421,376**	**152,362**	**228,472**
237	Wages & Benefits	-	-	-	-	-	-
237	Operations & Maintenance	-	-	-	-	-	-
237	Capital Outlay	-	-	-	-	-	-
237	Other Expenses	-	-	-	-	-	-
237	Transfer Out	-	-	-	-	-	-
237	Capital Projects	462,291	451,157	-	585,093	-	-
	237 - Road Maint. & Rehab. Acct. Total	**462,291**	**451,157**	**-**	**585,093**	**-**	**-**
238	Wages & Benefits	-	-	-	-	-	-
238	Operations & Maintenance	-	-	-	-	-	-
238	Capital Outlay	20,000	-	-	-	-	-
238	Other Expenses	-	-	-	-	-	-
238	Transfer Out	-	-	-	-	-	-
238	Capital Projects	121,567	1,151	-	-	4,550	-
	238 - MSRC Grant Total	**141,567**	**1,151**	**-**	**-**	**4,550**	**-**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
239	Wages & Benefits	35,811	26,481	21,886	35,270	30,608	57,138
239	Operations & Maintenance	51,641	16,074	72,809	255,000	255,000	256,000
239	Capital Outlay	-	-	-	-	-	-
239	Other Expenses	-	-	-	-	-	-
239	Transfer Out	-	-	-	-	-	-
239	Capital Projects	21,335	-	-	5,000	-	-
	239 - Measure W Total	**108,787**	**42,555**	**94,695**	**295,270**	**285,608**	**313,138**
240	Wages & Benefits	-	-	-	-	-	-
240	Operations & Maintenance	-	-	-	-	-	-
240	Capital Outlay	-	-	-	-	-	-
240	Other Expenses	-	-	-	-	-	-
240	Transfer Out	-	-	-	-	-	-
240	Capital Projects	-	-	-	250,000	-	-
	240 - Measure M MSP Total	**-**	**-**	**-**	**250,000**	**-**	**-**
241	Wages & Benefits	77,957	38,582	50,982	57,083	-	-
241	Operations & Maintenance	-	-	-	-	-	-
241	Capital Outlay	-	-	-	-	-	-
241	Other Expenses	-	-	-	-	-	-
241	Transfer Out	-	-	-	-	-	-
241	Capital Projects	-	-	-	-	-	-
	241 - Measure H Total	**77,957**	**38,582**	**50,982**	**57,083**	**-**	**-**
242	Wages & Benefits	-	-	-	-	-	-
242	Operations & Maintenance	-	-	-	-	-	-
242	Capital Outlay	-	-	-	-	-	-
242	Other Expenses	-	-	-	-	-	-
242	Transfer Out	-	-	-	-	-	-
242	Capital Projects	148,350	44,618	8,076	-	17,093	-
	242 - Prop C Exchange Funds Total	**148,350**	**44,618**	**8,076**	**-**	**17,093**	**-**
243	Wages & Benefits	-	-	-	-	-	-
243	Operations & Maintenance	-	-	-	-	-	-
243	Capital Outlay	-	-	-	-	-	-
243	Other Expenses	-	-	-	-	-	-
243	Transfer Out	-	-	-	-	-	-
243	Capital Projects	-	-	-	-	-	-
	243 - LACMTA Measure M MAT Total	**-**	**-**	**-**	**-**	**-**	**-**
245	Wages & Benefits	-	-	-	-	-	-
245	Operations & Maintenance	-	-	-	-	-	-
245	Capital Outlay	-	-	-	-	-	-
245	Other Expenses	-	-	-	-	-	-
245	Transfer Out	-	-	-	-	-	-
245	Capital Projects	38,041	10,252	-	25,000	-	-
	245 - Bike & Pedestrian Paths Total	**38,041**	**10,252**	**-**	**25,000**	**-**	**-**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
247	Wages & Benefits	-	-	-	-	-	-
247	Operations & Maintenance	-	-	-	50,000	-	45,000
247	Capital Outlay	-	-	-	-	-	-
247	Other Expenses	-	-	-	-	-	-
247	Transfer Out	-	-	-	-	-	-
247	Capital Projects	-	-	-	-	-	-
	247 - SGVCOG Grant Total	**-**	**-**	**-**	**50,000**	**-**	**45,000**
248	Wages & Benefits	-	-	-	-	-	-
248	Operations & Maintenance	-	-	-	-	-	-
248	Capital Outlay	-	-	-	-	-	-
248	Other Expenses	-	-	-	-	-	-
248	Transfer Out	-	-	-	-	-	-
248	Capital Projects	163,178	7,830	-	-	-	-
	248 - BTA Grants Total	**163,178**	**7,830**	**-**	**-**	**-**	**-**
249	Wages & Benefits	-	-	-	-	-	-
249	Operations & Maintenance	-	10,745	301,052	-	-	-
249	Capital Outlay	-	-	-	-	-	-
249	Other Expenses	-	-	-	-	-	-
249	Transfer Out	-	-	-	-	-	-
249	Capital Projects	-	-	-	-	-	-
	249 - Golden Streets Grant Total	**-**	**10,745**	**301,052**	**-**	**-**	**-**
255	Wages & Benefits	-	-	-	-	-	-
255	Operations & Maintenance	-	-	-	-	-	-
255	Capital Outlay	-	-	-	-	-	-
255	Other Expenses	-	-	-	-	-	-
255	Transfer Out	-	-	-	-	-	-
255	Capital Projects	-	-	-	450,000	100,000	-
	255 - Capital Growth Total	**-**	**-**	**-**	**450,000**	**100,000**	**-**
260	Wages & Benefits	-	-	-	-	-	-
260	Operations & Maintenance	31,026	62,980	65,950	26,281	-	19,599
260	Capital Outlay	-	-	-	-	-	-
260	Other Expenses	-	-	-	-	-	-
260	Transfer Out	-	-	-	-	-	-
260	Capital Projects	-	-	-	321,723	-	-
	260 - CDBG Total	**31,026**	**62,980**	**65,950**	**348,004**	**-**	**19,599**
270	Wages & Benefits	-	-	-	-	-	-
270	Operations & Maintenance	-	-	20,100	10,000	10,000	10,000
270	Capital Outlay	-	-	-	50,000	50,000	50,000
270	Other Expenses	-	-	-	-	-	-
270	Transfer Out	-	-	-	-	-	-
270	Capital Projects	-	-	-	-	-	-
	270 - Asset Forfeiture Total	**-**	**-**	**20,100**	**60,000**	**60,000**	**60,000**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
272	Wages & Benefits	-	-	-	-	-	-
272	Operations & Maintenance	-	-	-	-	-	-
272	Capital Outlay	24,100	24,478	136,767	130,000	130,000	178,011
272	Other Expenses	-	-	-	-	-	-
272	Transfer Out	-	-	-	-	-	-
272	Capital Projects	-	-	-	-	-	-
	272 - Police Grants - State (COPS) Total	**24,100**	**24,478**	**136,767**	**130,000**	**130,000**	**178,011**
273	Wages & Benefits	-	-	-	-	-	-
273	Operations & Maintenance	-	-	-	-	-	-
273	Capital Outlay	-	-	-	-	-	-
273	Other Expenses	-	-	-	-	-	-
273	Transfer Out	-	-	-	-	-	-
273	Capital Projects	-	-	-	-	-	-
	273 - Police Subventions - CLEEP Total	**-**	**-**	**-**	**-**	**-**	**-**
274	Wages & Benefits	-	-	-	-	-	-
274	Operations & Maintenance	-	-	-	-	-	-
274	Capital Outlay	-	-	125,360	1,240	-	-
274	Other Expenses	-	-	-	-	-	-
274	Transfer Out	-	-	-	-	-	-
274	Capital Projects	-	-	-	-	-	-
	274 - Homeland Security Grant Total	**-**	**-**	**125,360**	**1,240**	**-**	**-**
275	Wages & Benefits	-	-	-	-	-	-
275	Operations & Maintenance	-	18,050	15,035	-	-	-
275	Capital Outlay	-	-	-	-	-	-
275	Other Expenses	-	-	-	-	-	-
275	Transfer Out	-	-	-	-	-	-
275	Capital Projects	-	-	-	876,255	51,255	-
	275 - Park Impact Fees Total	**-**	**18,050**	**15,035**	**876,255**	**51,255**	**-**
277	Wages & Benefits	270	-	-	-	-	-
277	Operations & Maintenance	-	-	-	-	-	-
277	Capital Outlay	-	-	-	-	-	-
277	Other Expenses	-	-	-	-	-	-
277	Transfer Out	-	-	-	-	-	-
277	Capital Projects	-	-	-	554,365	372,256	-
	277 - HSIP Grant Total	**270**	**-**	**-**	**554,365**	**372,256**	**-**
278	Wages & Benefits	-	-	-	-	-	-
278	Operations & Maintenance	-	-	-	-	-	-
278	Capital Outlay	-	-	-	-	-	-
278	Other Expenses	-	-	-	-	-	-
278	Transfer Out	-	-	-	-	-	-
278	Capital Projects	-	-	-	-	-	-
	278 - Housing Element Grant Total	**-**	**-**	**-**	**-**	**-**	**-**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
295	Wages & Benefits	-	-	-	-	-	-
295	Operations & Maintenance	976,192	1,077,602	1,259,720	1,298,815	1,317,475	1,245,087
295	Capital Outlay	-	-	-	-	-	-
295	Other Expenses	54,372	53,791	50,784	-	-	-
295	Transfer Out	-	-	-	-	-	-
295	Capital Projects	-	-	-	750,000	19,407	-
	295 - Arroyo Seco Golf Course Total	**1,030,564**	**1,131,393**	**1,310,504**	**2,048,815**	**1,336,882**	**1,245,087**
310	Wages & Benefits	-	0	-	-	-	-
310	Operations & Maintenance	196,987	184,839	183,383	425,808	425,808	425,808
310	Capital Outlay	-	-	-	-	-	-
310	Other Expenses	-	-	-	-	-	-
310	Transfer Out	-	-	-	-	-	-
310	Capital Projects	-	-	-	-	-	-
	310 - Sewer Capital Projects Total	**196,987**	**184,839**	**183,383**	**425,808**	**425,808**	**425,808**
327	Operations & Maintenance	-	-	-	-	-	-
327	Capital Outlay	-	-	-	-	-	-
327	Other Expenses	-	-	-	-	-	-
327	Transfer Out	-	-	-	-	-	-
327	Capital Projects	-	-	-	-	-	-
	327 - 2000 Tax Allocation Bonds Total	**-**	**-**	**-**	**-**	**-**	**-**
400	Operations & Maintenance	-	-	-	-	-	-
400	Capital Outlay	-	-	-	-	-	-
400	Other Expenses	-	-	-	-	-	-
400	Transfer Out	-	-	-	-	-	-
400	Capital Projects	-	-	-	-	-	16,128,868
	400 - Capital Improvement Projects Fund	**-**	**-**	**-**	**-**	**-**	**16,128,868**
500	Wages & Benefits	1,649,908	1,710,650	1,905,784	2,079,506	1,926,984	2,219,369
500	Operations & Maintenance	3,046,082	3,293,633	3,787,602	5,982,111	5,051,471	6,874,551
500	Capital Outlay	56,579	32,708	18,379	460,000	-	720,000
500	Other Expenses	1,915,651	999,203	1,840,220	-	-	-
500	Transfer Out	-	-	-	-	-	-
500	Capital Projects	188,163	10,061	(49,624)	2,958,000	55,000	-
	500 - Water Total	**6,856,382**	**6,046,255**	**7,502,362**	**11,479,617**	**7,033,455**	**9,813,920**
502	Wages & Benefits	-	-	-	-	-	-
502	Operations & Maintenance	-	-	-	-	-	-
502	Capital Outlay	-	-	-	-	-	-
502	Other Expenses	-	-	-	-	-	-
502	Transfer Out	-	-	-	-	-	-
502	Capital Projects	-	-	-	-	-	-
	502 - Water Rate Stabilization Fund Total	**-**	**-**	**-**	**-**	**-**	**-**

DRAFT

Fd	Category/Fund	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
503	Wages & Benefits	107,314	102,376	135,019	51,196	98,768	165,242
503	Operations & Maintenance	20,909	25,678	24,737	159,200	75,425	159,200
503	Capital Outlay	-	-	-	-	-	40,000
503	Other Expenses	-	-	-	-	-	-
503	Transfer Out	-	-	-	-	-	-
503	Capital Projects	31,453	50,839	-	120,000	-	-
	503 - Water Efficiency Fund Total	**159,676**	**178,893**	**159,756**	**330,396**	**174,193**	**364,442**
505	Operations & Maintenance	1,622,075	1,595,899	1,571,200	2,501,050	2,500,300	2,501,050
505	Transfer Out	-	-	-	-	-	-
	505 - 2016 Water Revenue Bonds Total	**1,622,075**	**1,595,899**	**1,571,200**	**2,501,050**	**2,500,300**	**2,501,050**
506	Operations & Maintenance	33,229	104,607	101,869	264,966	264,966	264,966
506	Transfer Out	-	-	-	-	-	-
	505 - 2016 Water Revenue Bonds Total	**33,229**	**104,607**	**101,869**	**264,966**	**264,966**	**264,966**
510	Wages & Benefits	-	-	-	-	-	-
510	Operations & Maintenance	-	-	-	-	-	-
510	Capital Outlay	-	-	-	-	-	-
510	Other Expenses	-	-	-	-	-	-
510	Transfer Out	-	-	-	-	-	-
510	Capital Projects	-	-	-	-	-	-
	510 - Water & Sewer Impact Fees Total	**-**	**-**	**-**	**-**	**-**	**-**
550	Wages & Benefits	-	-	-	-	-	-
550	Operations & Maintenance	145,642	129,376	117,376	531,676	531,676	529,276
550	Capital Outlay	-	-	-	-	-	-
550	Other Expenses	-	-	-	-	-	-
550	Transfer Out	-	-	-	-	-	-
550	Capital Projects	-	-	-	-	-	-
	550 - Public Financing Authority Total	**145,642**	**129,376**	**117,376**	**531,676**	**531,676**	**529,276**
927	Wages & Benefits	-	-	-	-	-	-
927	Operations & Maintenance	-	-	-	-	196,500	196,600
927	Capital Outlay	-	-	-	-	-	-
927	Other Expenses	-	-	-	-	-	-
927	Transfer Out	-	-	-	-	-	-
927	Capital Projects	-	-	-	-	-	-
	927 - Redev. Oblig. Retirement Total	**-**	**-**	**-**	**-**	**196,500**	**196,600**
	CITYWIDE TOTAL	**45,351,443**	**44,931,828**	**52,677,028**	**79,734,166**	**61,416,031**	**85,334,618**

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General Fund Revenue Summary

Revenue Category	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Property Taxes	15,491,557	16,773,318	17,906,070	18,140,368	18,537,792	19,700,384
Assessments & Special Taxes	342,237	347,931	364,223	360,000	360,000	375,149
Sales Taxes	2,864,474	5,132,645	6,096,613	6,346,000	6,311,321	6,478,033
Utility Users Taxes	3,445,454	3,738,531	3,875,268	4,299,703	4,063,103	4,352,462
Franchise Fees	950,130	1,200,408	1,289,532	1,217,000	1,217,000	1,271,477
License & Permits	861,697	808,280	814,081	903,280	764,777	796,200
Fines & Forfeitures	264,601	143,449	52,291	140,000	56,500	58,000
Use of Money & Property	989,984	4,788,970	(495,381)	508,500	894,109	1,345,014
Other Agencies	64,239	955,205	179,525	6,489,295	235,634	475,500
Current Services	2,985,842	3,079,621	3,836,129	3,877,200	3,624,263	4,141,520
All Other Revenues	74,367	183,717	250,501	84,500	40,743	46,508
Reimbursement From Other Funds	483,384	483,384	483,384	483,384	483,384	483,384
Total GF Revenues	**28,817,965**	**37,635,460**	**34,652,238**	**42,849,230**	**36,588,626**	**39,523,631**

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General Fund Expenditure Summary

Department/Program Exp	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
City Council	45,401	35,890	45,446	49,194	71,388	81,903
City Manager	1,512,868	1,577,656	1,815,368	1,201,339	1,116,593	1,274,785
Management Services						
Management Services	-	-	6,615	480,230	415,995	496,105
City Clerk	113,311	115,512	-	470,283	389,517	447,319
Elections	185,743	76,843	93,242	166,000	110,809	63,900
Human Resources	324,830	350,761	-	898,923	905,818	915,553
Transportation Planning	12,835	287	90	-	-	-
Legal Services	492,566	607,285	572,032	895,140	895,140	500,000
Information Systems	573,881	541,110	-	833,200	889,657	1,151,511
Finance						
Finance	755,116	871,011	1,040,325	1,203,880	1,144,568	1,050,473
City Treasurer	9,211	8,444	9,993	8,752	8,752	9,239
Non-Dept/Overhead	1,060,512	996,366	2,264,416	2,694,140	2,669,105	2,539,444
Police	9,171,740	10,400,998	11,384,907	11,032,589	11,020,087	11,512,034
Fire						
Fire	5,435,419	6,315,749	7,716,685	6,670,340	7,198,725	7,300,602
Emergency Preparedness	91,913	31,932	46,904	55,000	51,000	55,000
Public Works	-	-	-	-	-	-
Admin & Engineering	586,534	618,493	572,717	924,621	526,444	1,243,249
Environmental Services	54	653	55,009	304,980	140,241	207,480
Park Maintenance	497,591	476,793	581,680	1,086,294	504,755	975,901
Facilities Maintenance	799,206	826,985	901,702	1,171,959	907,533	1,344,778
Community Development	1,876,257	1,819,769	2,428,641	3,622,199	3,047,629	4,152,225
Library	1,525,685	1,608,369	1,839,131	1,932,290	1,866,927	2,211,234
Community Services						
Senior Services	330,809	202,374	237,957	431,985	390,480	540,765
Community Services	172,667	217,223	276,302	356,440	421,305	466,119
Recreation and Youth Services	656,232	323,135	835,939	783,405	818,737	1,090,949
Capital Projects	-	-	-	-	170,000	-
Total GF Expenditures	**26,230,381**	**28,023,640**	**32,725,100**	**37,273,183**	**35,681,208**	**39,630,567**

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Capital Improvement Projects

Project No.	Project Name	FY 2022-23 Budget	FY 2022-23 Projected	FY 2022-23 Carryovers	FY 2023-24 Additions	FY 2023-24 Budget
General Building & Facilities						
9206	825 Mission Yard Security Gate	160,000	-	160,000	-	160,000
9224	Citywide Facility Repair	150,000	33,729	116,271	250,000	366,271
9226	FD Front Bay Door Replacement	80,000	-	80,000	-	80,000
9229	PD Locker/Restroom Improvement	180,000	-	180,000	10,000	190,000
9230	PD Improvements	16,000	-	16,000	1,000	17,000
9231	PD Briefing Room Update	18,000	-	18,000	1,000	19,000
9232	PD1st Floor Inter Paint/Drywal	12,000	-	12,000	1,000	13,000
9242	War Memorial Audio/Vis. Equipm	50,000	-	50,000	(50,000)	-
9269	War Memorial HVAC Repairs	25,000	-	25,000	-	25,000
9273	Rec. Facilities Key System	75,000	-	75,000	(75,000)	-
9404	Citywide Facilities Assessment/ Security Enhancement	200,000	73,124	126,876	100,000	226,876
New	FD Diesel Exhaust System Replacement	-	-	-	50,000	50,000
New	Senior Center Flooring	-	-	-	60,000	60,000
	Subtotal General Building & Facilities	**966,000**	**106,853**	**859,147**	**348,000**	**1,207,147**
Housing Authority						
New	308 San Pascual Residence Improvements	-	-	-	30,000	30,000
	Subtotal Housing Authority	**-**	**-**	**-**	**30,000**	**30,000**
Information Technology						
9149	VoiP Phone System Installation	200,000	20,000	180,000	-	180,000
9186	CD Permit Management Software	310,000	50,000	260,000	-	260,000
9187	CD Record Scan & Doc Managmnt	45,000	-	45,000	(45,000)	-
9407	CMMS/Work Order System/GIS	120,000	5,000	115,000	-	115,000
New	Agenda Management System	-	-	-	50,000	50,000
New	City Website System & Design	-	-	-	60,000	60,000
	Subtotal Information Technology	**675,000**	**75,000**	**600,000**	**65,000**	**665,000**
Library						
9301	Library HVAC Repairs	25,000	5,000	20,000	234,100	254,100
9322	Library ADA Ramp, Light. & Imp	20,000	-	20,000	-	20,000
9405	Library Security Camera System	20,000	-	20,000	-	20,000
New	Library Facility Improvements	-		-	100,514	100,514
New	Library Roof	-		-	291,781	291,781
New	Library Master Plan	-		-	-	-
	Subtotal Library	**65,000**	**5,000**	**60,000**	**626,395**	**686,395**
Community Services & Parks						
9033	Grevalia&Berkshire Pocket Park	876,255	51,255	825,000	-	825,000
9157	Golf Course Netting Replacemen	750,000	19,407	730,593	-	730,593
9263	Pocket Park Construction	-	-	-	-	-
New	Parks Master Plan	-	-	-	150,000	150,000
New	Snake Trail Improvements	-	-	-	50,000	50,000
	Subtotal Community Services & Parks	**1,626,255**	**70,662**	**1,555,593**	**200,000**	**1,755,593**
Sewer						
9408	Sewer Sys. Rep., Rehab&Replace	500,000	25,000	475,000	-	475,000
	Subtotal Sewer	**500,000**	**25,000**	**475,000**	**-**	**475,000**
Stormwater						
9364	Rio Hondo LRS Alham, Wash Trtm	5,000	-	5,000	-	5,000
New	Huntington Drive Green Street	-	-	-	250,000	250,000
New	City Hall Stormwater Project	500,000	-	500,000	-	500,000
New	Arroyo Seco San Rafael & San Pascual Projects	-	-	-	437,500	437,500
	Subtotal Stormwater	**505,000**	**-**	**505,000**	**687,500**	**1,192,500**
Streets						
9203	Street Repairs - 2023	3,958,538	72,435	3,886,103	-	3,886,103
9264	ADA Sidewalk Repairs	321,723	25,000	296,723	111,059	407,782
	Subtotal Streets	**4,280,261**	**97,435**	**4,182,826**	**111,059**	**4,293,885**
Sustainability						
9188	City/Civic EV Charging System	350,000	100,000	250,000	102,700	352,700
9189	Arroyo Park EV Charging System	50,000	50,000	-	-	-
9402	EV Charging Station (MSRC)	13,650	13,650	-	-	-
9410	Climate Action Plan	120,000	-	120,000	-	120,000
	Subtotal Sustainability	**533,650**	**163,650**	**370,000**	**102,700**	**472,700**

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Project No.	Project Name	FY 2022-23 Budget	FY 2022-23 Projected	FY 2022-23 Carryovers	FY 2023-24 Additions	FY 2023-24 Budget
Transportation & Traffic						
9102	Fremont/Huntington MAT Project	475,000	-	475,000	-	475,000
9161	North-South Corridor ITS Dploy	788,483	200,000	588,483	640,365	1,228,848
9192	Fair Oaks Traffic Signal Const	482,568	469,526	13,042	-	13,042
9278	Fair Oaks ITS Project	-	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	50,000	-	50,000	-	50,000
9350	Pedestrian Crossing Devices	200,000	-	200,000	-	200,000
9351	Rect. Rapid Flashing Beacons	260,915	27,450	233,465	31,497	264,962
New	Fremont/Huntington MIP Project	-	-	-	475,000	475,000
	Subtotal Transportation & Traffic	**2,256,966**	**696,976**	**1,559,990**	**1,146,862**	**2,706,852**
Water						
9300	Ann. Water Main Repairs	2,000,000	-	2,000,000	-	2,000,000
9348	Water Facil. Site Improvements	88,000	-	88,000	-	88,000
9349	Advanced Metering Infr. (AMI)	150,000	-	150,000	-	150,000
9409	Westside Reservoir	550,000	25,000	525,000	-	525,000
9411	Elevated Tanks-Raymond/Bilikie	120,000	-	120,000	-	120,000
	Subtotal Water	**2,908,000**	**25,000**	**2,883,000**	**-**	**2,883,000**
	Totals	**$ 14,316,132**	**$ 1,265,576**	**$ 13,050,556**	**$ 3,317,516**	**$16,368,072**

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City of South Pasadena Capital Improvement Projects

Proposed Draft

Prj ID	Acct	Name / Title	Appropriated 2022-2023	Projected 2022-2023	FY 23-24 Total: Carryover from 2022-2023	FY 23-24 Total: Proposed 2023-2024	Proposed 2024-2025	Proposed 2025-2026	Proposed 2026-2027	Proposed 2027-2028	Total Proposed 5-Year
Total			$ 14,316,132	$ 1,265,576	$ 13,050,556	$ 3,317,516	$ 20,126,656	$ 42,764,075	$ 34,386,934	$ 25,604,056	$ 139,249,792
General Building & Facilities					**$ 859,147**	**$ 348,000**				**Total 5-Year**	**$ 3,432,147**
5140	9206	825 Mission Yard Security Gates	160,000	-	160,000	-	-	-	-	-	160,000
5139	9224	Citywide Facilities Repairs	150,000	33,729	116,271	250,000	500,000	500,000	500,000	500,000	2,366,271
5178	9226	FD Fire Station Front Bay Apparatus Door Re	80,000	-	80,000	-	-	-	-	-	80,000
5175	9229	PD Locker Room Remodel	180,000	-	180,000	10,000	-	-	-	-	190,000
5174	9230	PD Front Counter/Lobby Remodel	16,000	-	16,000	1,000	-	-	-	-	17,000
5176	9231	PD Briefing/Training Room Update	18,000	-	18,000	1,000	-	-	-	-	19,000
5177	9232	PD 1st Floor Interior Paint, Drywall, & Millwo	12,000	-	12,000	1,000	-	-	-	-	13,000
5159	9242	War Memorial Sound System	50,000	-	50,000	(50,000)	50,000	-	-	-	50,000
5141	9269	War Memorial HVAC Repairs	25,000	-	25,000	-	-	-	-	-	25,000
5160	9273	Recreation Facilities Key System	75,000	-	75,000	(75,000)	75,000	-	-	-	75,000
5138	9404	Citywide Facilities Assessment/ Security Enh	200,000	73,124	126,876	100,000	100,000	-	-	-	326,876
TBD	New	FD Diesel Exhaust System Replacement	-	-	-	50,000	-	-	-	-	50,000
TBD	New	Senior Center Flooring	-	-	-	60,000	-	-	-	-	60,000
			966,000	**106,853**	**859,147**	**348,000**	**725,000**	**500,000**	**500,000**	**500,000**	**3,432,147**
Housing Authority					**$ -**	**$ 30,000**				**Total 5-Year**	**$ 150,000**
TBD	New	308 San Pascual Residence Improvements	-		-	30,000	30,000	30,000	30,000	30,000	150,000
			-	-	-	**30,000**	**30,000**	**30,000**	**30,000**	**30,000**	**150,000**
Information Technology					**$ 600,000**	**$ 65,000**				**Total 5-Year**	**$ 940,000**
5144	9149	Voice-over Internet Protocol (VoIP) Phone/Ne	200,000	20,000	180,000	-	250,000	-	-	-	430,000
5142	9186	CD Permit Management Software	310,000	50,000	260,000	-	-	-	-	-	260,000
5143	9187	CD Digital Records Scanning & Document Mg	45,000	-	45,000	(45,000)	-	-	-	-	-
5137	9407	Computerized Maintenance Mgmt System (C	120,000	5,000	115,000	-	-	-	-	-	115,000
5146	New	Agenda Management System	-	-	-	50,000	-	-	-	-	50,000
TBD	New	City Website System & Design	-	-	-	60,000	-	-	-	-	60,000
5145	Future	Customer Care System	-	-	-	-	25,000	-	-	-	25,000
			675,000	**75,000**	**600,000**	**65,000**	**275,000**	-	-	-	**940,000**

City of South Pasadena Capital Improvement Projects

Proposed Draft

Prj ID	Acct	Name / Title	Appropriated 2022-2023	Projected 2022-2023	FY 23-24 Total: $16,368,072 Carryover from 2022-2023	Proposed 2023-2024	Proposed 2024-2025	Proposed 2025-2026	Proposed 2026-2027	Proposed 2027-2028	Total Proposed 5-Year
Library					FY 23-24 Total: $686,395						
					$ 60,000	$ 626,395				Total 5-Year	$ 5,116,256
5148	9301	Library HVAC Repairs	25,000	5,000	20,000	234,100	-	-	-	-	254,100
5150	-	~~Library HVAC for Children's Room~~	-	-	-	-	-	-	-	-	-
5149	9322	Library Northeast Ramp Lighting and Improve	20,000	-	20,000	-	53,055	-	-	-	73,055
5147	9321	Library Security Camera System	20,000	-	20,000	-	-	-	-	-	20,000
TBD	New	Library Facility Improvements	-	-	-	100,514	-	-	-	-	100,514
5151	-	~~Library Repair and Waterproof Children's Roo~~	-	-	-	-	-	-	-	-	-
TBD	New	Library Roof	-	-	-	291,781	-	-	-	-	291,781
5152	Future	Library Radio Frequency Identification (RFID)	-	-	-	-	160,000	-	-	-	160,000
5153	Future	Library Exterior Park Lighting	-	-	-	-	-	169,000	-	-	169,000
5154	Future	Library Public Restrooms Expansion/Remode	-	-	-	-	-	-	450,000	-	450,000
5155	Future	Library Emergency Backup & Storage System	-	-	-	-	-	-	-	500,000	500,000
TBD	Future	Library Master Plan	-	-	-	-	-	-	-	-	-
TBD	Future	Library Fire Alarm Control System	-	-	-	-	64,033	-	-	-	64,033
TBD	Future	Library Electrical Distribution Equipment	-	-	-	-	38,115	-	-	-	38,115
TBD	Future	Library Security & Safety Improvements	-	-	-	-	120,698	-	-	-	120,698
TBD	Future	Library Exterior Paint and Protective Coating:	-	-	-	-	-	74,960	-	-	74,960
TBD	Future	Library Children's Amphitheatre Wing	-	-	-	-	-	-	-	2,800,000	2,800,000
			65,000	**5,000**	**60,000**	**626,395**	**435,901**	**243,960**	**450,000**	**3,300,000**	**5,116,256**
Community Services & Parks					FY 23-24 Total: $1,755,593						
					$ 1,555,593	$ 200,000				Total 5-Year	$ 5,730,367
5157	9033	Grevalia & Berkshire Pocket Parks	876,255	51,255	825,000	-	-	-	-	-	825,000
-	9263	~~Pocket Park Construction~~	-	-	-	-	-	-	-	-	-
5158	9157	Golf Course/Driving Range Netting Replacem	750,000	19,407	730,593	-	-	-	-	-	730,593
5161	TBD	Parks Master Plan	-	-	-	150,000	-	-	-	-	150,000
5162	TBD	Snake Trail Improvements	-	-	-	50,000	300,000	-	-	-	350,000
TBD	Future	Arroyo Seco Master Plan	-	-	-	-	-	-	-	-	-
5163	Future	Garfield Park Fitness Equipment	-	-	-	-	100,000	-	-	-	100,000
5164	Future	Arroyo Park Fitness Equipment	-	-	-	-	100,000	-	-	-	100,000
5165	Future	Eddie Park Restrooms	-	-	-	-	100,000	-	-	-	100,000
TBD	Future	Eddie Park House Improvements	-	-	-	-	156,194	156,194	156,194	156,194	624,774
5166	Future	Orange Grove Gazebo	-	-	-	-	-	150,000	-	-	150,000
5167	Future	Orange Grove Park Playground Replacement	-	-	-	-	-	200,000	-	-	200,000
5168	Future	Garfield Park Playground Replacement	-	-	-	-	-	200,000	150,000	-	350,000
5169	Future	Arroyo Walking Trail	-	-	-	-	-		200,000	-	200,000
5170	Future	Garfield Gazebo	-	-	-	-	-		200,000	-	200,000
5171	Future	Eddie Park Playground Replacement	-	-	-	-	-		150,000	-	150,000
5172	Future	Arroyo Park Sports Complex Renovations	-	-	-	-	-	-	-	750,000	750,000
5173	Future	Orange Grove Sports Complex Renovations	-	-	-	-	-	-	-	750,000	750,000
			1,626,255	**70,662**	**1,555,593**	**200,000**	**756,194**	**706,194**	**856,194**	**1,656,194**	**5,730,367**

Sewer					**FY 23-24 Total:**	**$475,000**							**Total 5-Year $**	**3,997,500**
					$ 475,000	**$ -**								
5179	**9408**	Sewer System Repair, Rehabilitation, & Replc	500,000	25,000	475,000	-	810,000	878,000	820,000	1,014,500	3,997,500			
			500,000	**25,000**	**475,000**	**-**	**810,000**	**878,000**	**820,000**	**1,014,500**	**3,997,500**			
Stormwater					**FY 23-24 Total:**	**$1,192,500**							**Total 5-Year $**	**49,663,586**
					$ 505,000	**$ 687,500**								
5181	**9364**	Rio Hondo Load Redctn (LRS) Alhambra Wsh Ti	5,000	-	5,000	-	50,000	-	-	-	55,000			
5182	TBD	Huntington Drive Green Street	-	-	-	250,000	595,000	5,570,500	5,570,500	-	11,986,000			
	TBD	New City Hall Stormwater Project	500,000	-	500,000	-	-	-	-	-	500,000			
5180	New	Arroyo Seco San Rafael & San Pascual Projects	-	-	-	437,500	-	-	-	-	437,500			
5183	Future	Lower Arroyo Seco Projects	-	-	-	-	2,305,000	8,723,362	8,723,362	14,433,362	34,185,086			
5184	Future	Camino Verde Pocket Park	-	-	-	-	100,000	600,000	900,000	900,000	2,500,000			
			505,000	**-**	**505,000**	**687,500**	**3,050,000**	**14,893,862**	**15,193,862**	**15,333,362**	**49,663,586**			
Streets					**FY 23-24 Total:**	**$4,293,885**							**Total 5-Year $**	**12,773,885**
					$ 4,182,826	**$ 111,059**								
5185	**9203**	Street Repavement & Repairs	3,958,538	72,435	3,886,103	-	2,000,000	2,000,000	2,000,000	2,000,000	11,886,103			
5186	**9264**	Sidewalk Replacement & Repairs	321,723	25,000	296,723	111,059	120,000	120,000	120,000	120,000	887,782			
			4,280,261	**97,435**	**4,182,826**	**111,059**	**2,120,000**	**2,120,000**	**2,120,000**	**2,120,000**	**12,773,885**			
Sustainability					**FY 23-24 Total:**	**$472,700**							**Total 5-Year $**	**1,022,700**
					$ 370,000	**$ 102,700**								
5103	**9188**	Civic Center/City Hall EV Charging Systems	350,000	100,000	250,000	102,700	-	-	-	-	352,700			
5188	**9189**	Arroyo Park EV Charging Systems	50,000	50,000	-	-	-	-	-	-	-			
5200	**9410**	Climate Action Plan	120,000	-	120,000	-	100,000	100,000	100,000	100,000	520,000			
	TBD **9402**	EV Charging Stating (Fire Spt Lot)	13,650	13,650	-	-	-	-	-	-	-			
5187	TBD	Civic Center/Mound Solar Panel Installation	-	-	-	-	-	-	-	-	-			
5189	TBD	Urban Forest Master Plan	-	-	-	-	150,000	-	-	-	150,000			
			533,650	**163,650**	**370,000**	**102,700**	**250,000**	**100,000**	**100,000**	**100,000**	**1,022,700**			
Transportation & Traffic					**FY 23-24 Total:**	**$2,706,852**							**Total 5-Year $**	**30,710,351**
					$ 1,559,990	**$ 1,146,862**								
2008	**9102**	Fremont/Huntington (MAT) Mobility Active Tr	475,000	-	475,000	-	1,214,580	3,149,702	1,216,878	-	6,056,160			
2002	**9161**	North-South Corridor (Fair Oaks) ITS Deploym	788,483	200,000	588,483	640,365	4,662,358	4,662,358	-	-	10,553,563			
	TBD **9192**	Fair Oaks Traffic Signal Const	482,568	469,526	13,042	-	-	-	-	-	13,042			
	TBD **9278**	Fair Oaks ITS Project	-	-	-	-	-	-	-	-	-			
5129	9290	Grevelia Street and Fair Oaks Avenue	50,000	-	50,000	-	150,000	-	-	-	200,000			
5130	**9350**	Pedestrian Crossing Devices	200,000	-	200,000	-	122,624	-	-	-	322,624			
1512	**9351**	Rectangular Rapid Flashing Beacons (Mission	260,915	27,450	233,465	31,497	-	-	-	-	264,962			
	TBD New	Fremont/Huntington (MIP) Mobility Improver	-	-	-	475,000	1,025,000	4,500,000	4,000,000	-	10,000,000			
5131	TBD	Garfield Avenue and Monterey Road Traffic Si	-	-	-	-	100,000	300,000	-	-	400,000			
5132	TBD	Columbia Street Striping and Signals	-	-	-	-	300,000	-	-	-	300,000			
5133	TBD	Orange Grove Avenue Project	-	-	-	-	150,000	350,000	-	-	500,000			
5135	TBD	Citywide Mobility / Active Transport Plan Upd	-	-	-	-	150,000	-	-	-	150,000			
2007	**9311**	Fair Oaks SR-110 Interchange On/Off-Ramps	-	-	-	-	300,000	500,000	-	-	800,000			
5134	TBD	Mission-Merdian-El Centro Bollard System	-	-	-	-	-	50,000	200,000	-	250,000			
5136	TBD	Traffic Signal Controller & Cabinet Replaceme	-	-	-	-	-	300,000	300,000	300,000	900,000			
			2,256,966	**696,976**	**1,559,990**	**1,146,862**	**8,174,562**	**13,812,060**	**5,716,878**	**300,000**	**30,710,351**			

Water					FY 23-24 Total:	$2,883,000						
					$ 2,883,000	$ -					Total 5-Year $	25,713,000
5190	9300	Water Main Pipeline Repairs	2,000,000	-	2,000,000	-	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	6,000,000
5192	9348	Water Facility Site Improvements	88,000	-	88,000	-	50,000	250,000	250,000	250,000	250,000	888,000
5193	9349	Advanced Metering Infrastructure (AMI)	150,000	-	150,000	-	300,000	1,000,000	1,000,000	-	-	2,450,000
5110	9409	Westside Reservoir Design/Construction	550,000	25,000	525,000	-	2,000,000	7,000,000	6,000,000	-	-	15,525,000
5191	9408	Raymond & Bilikie Elevated Tanks Study & Imp	120,000	-	120,000	-	-	80,000	200,000	-	-	400,000
5194	Future	SCADA Upgrade	-	-	-	-	150,000	150,000	150,000	-	-	450,000
			2,908,000	25,000	2,883,000	-	3,500,000	9,480,000	8,600,000	1,250,000	1,250,000	25,713,000

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CIP by Funding Source

Project No.	Project Name	FY 2022-23 Projected	Carryover Balance Bdgt Balance	FY 2024 Additions	FY 2024
9033	Grevalia&Berkshire Pocket Park	51,255	825,000	-	825,000
9102	Fremont/Huntington MAT Project	-	475,000	-	475,000
9149	VoiP Phone System Installation	20,000	180,000	-	180,000
9157	Golf Course Netting Replacemen	19,407	730,593	-	730,593
9161	North-South Corridor ITS Dploy	200,000	588,483	640,365	1,228,848
9186	CD Permit Management Software	50,000	260,000	-	260,000
9187	CD Record Scan & Doc Managmnt	-	45,000	(45,000)	-
9188	City/Civic EV Charging System	100,000	250,000	102,700	352,700
9189	Arroyo Park EV Charging System	50,000	-	-	-
9192	Fair Oaks Traffic Signal Const	469,526	13,042	-	13,042
9203	Street Repairs - 2023	72,435	3,886,103	-	3,886,103
9206	825 Mission Yard Security Gate	-	160,000	-	160,000
9224	Citywide Facility Repair	33,729	116,271	250,000	366,271
9226	FD Front Bay Door Replacement	-	80,000	-	80,000
9229	PD Locker/Restroom Improvement	-	180,000	10,000	190,000
9230	PD Improvements	-	16,000	1,000	17,000
9231	PD Briefing Room Update	-	18,000	1,000	19,000
9232	PD1st Floor Inter Paint/Drywal	-	12,000	1,000	13,000
9242	War Memorial Audio/Vis. Equipm	-	50,000	(50,000)	-
9263	Pocket Park Construction	-	-	-	-
9264	ADA Sidewalk Repairs	25,000	296,723	111,059	407,782
9269	War Memorial HVAC Repairs	-	25,000	-	25,000
9273	Rec. Facilities Key System	-	75,000	(75,000)	-
9278	Fair Oaks ITS Project	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	50,000	-	50,000
9300	Ann. Water Main Repairs	-	2,000,000	-	2,000,000
9301	Library HVAC Repairs	5,000	20,000	234,100	254,100
9322	Library ADA Ramp, Light. & Imp	-	20,000	-	20,000
9348	Water Facil. Site Improvements	-	88,000	-	88,000
9349	Advanced Metering Infr. (AMI)	-	150,000	-	150,000
9350	Pedestrian Crossing Devices	-	200,000	-	200,000
9351	Rect. Rapid Flashing Beacons	27,450	233,465	31,497	264,962
9364	Rio Hondo LRS Alham, Wash Trtm	-	5,000	-	5,000
9402	EV Charging Station (MSRC)	13,650	-	-	
9404	Citywide Facilities Assessment/ Security Enh.	73,124	126,876	100,000	226,876
9405	Library Security Camera System	-	20,000	-	20,000
9407	CMMS/Work Order System/GIS	5,000	115,000	-	115,000
9411	Elevated Tanks-Raymond/Bilikie	-	120,000	-	120,000
9408	Sewer Sys. Rep., Rehab&Replace	25,000	475,000	-	475,000
9409	Westside Reservoir	25,000	525,000	-	525,000
9410	Climate Action Plan	-	120,000	-	120,000
	FD Diesel Exhaust System Replacement		-	50,000	50,000
	308 San Pascual Residence Improvements		-	30,000	30,000
	Agenda Management System		-	50,000	50,000
	City Website System & Design		-	60,000	60,000
	Library Facility Improvements		-	100,514	100,514
	Library Roof		-	291,781	291,781
	Library Master Plan		-	-	-
	Parks Master Plan		-	150,000	150,000
	Snake Trail Improvements		-	50,000	50,000
	Senior Center Flooring		-	60,000	60,000
	Arroyo Seco San Rafael & San Pascual Projects		-	437,500	437,500
	Huntington Drive Green Street		-	250,000	250,000
	City Hall Stormwater Project		500,000		500,000
	Fremont/Huntington MIP Project		-	475,000	475,000
	Totals	**$1,265,576**	**13,050,556**	**3,317,516**	**$16,368,072**

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Project No.	Project Name	101 General Fund	104 Street Improvement Program	105 Facil. & Equip. Replacement	108 SR 110 Gen Fund Reserve	207 Prop C
9033	Grevalia&Berkshire Pocket Park	-	-	-	-	-
9102	Fremont/Huntington MAT Project	-	-	-	-	-
9149	VoiP Phone System Installation	180,000	-	-	-	-
9157	Golf Course Netting Replacemen	-	-	-	-	-
9161	North-South Corridor ITS Dploy	-	-	-	70,474	-
9186	CD Permit Management Software	125,000	-	-	-	-
9187	CD Record Scan & Doc Managmnt	-	-	-	-	-
9188	City/Civic EV Charging System	250,000	-	-	-	-
9189	Arroyo Park EV Charging System	-	-	-	-	-
9192	Fair Oaks Traffic Signal Const	-	-	-	-	-
9203	Street Repairs - 2023	-	2,298,445	-	-	300,000
9206	825 Mission Yard Security Gate	-	-	160,000	-	-
9224	Citywide Facility Repair	-	-	366,271	-	-
9226	FD Front Bay Door Replacement	-	-	80,000	-	-
9229	PD Locker/Restroom Improvement	-	-	190,000	-	-
9230	PD Improvements	-	-	17,000	-	-
9231	PD Briefing Room Update	-	-	19,000	-	-
9232	PD1st Floor Inter Paint/Drywal	-	-	13,000	-	-
9242	War Memorial Audio/Vis. Equipm	-	-	-	-	-
9263	Pocket Park Construction	-	-	-	-	-
9264	ADA Sidewalk Repairs	-	-	-	-	-
9269	War Memorial HVAC Repairs	-	-	25,000	-	-
9273	Rec. Facilities Key System	-	-	-	-	-
9278	Fair Oaks ITS Project	-	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	-	-	-	-
9300	Ann. Water Main Repairs	-	-	-	-	-
9301	Library HVAC Repairs	-	-	109,263	-	-
9322	Library ADA Ramp, Light. & Imp	-	-	20,000	-	-
9348	Water Facil. Site Improvements	-	-	-	-	-
9349	Advanced Metering Infr. (AMI)	-	-	-	-	-
9350	Pedestrian Crossing Devices	-	-	-	-	-
9351	Rect. Rapid Flashing Beacons	-	-	-	-	-
9364	Rio Hondo LRS Alham, Wash Trtm	-	-	-	-	-
9402	EV Charging Station (MSRC)	-	-	-	-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-	226,876	-	-
9405	Library Security Camera System	-	-	20,000	-	-
9407	CMMS/Work Order System/GIS	-	-	-	-	-
9411	Elevated Tanks-Raymond/Bilikie	-	-	-	-	-
9408	Sewer Sys. Rep., Rehab&Replace	-	-	-	-	-
9409	Westside Reservoir	-	-	-	-	-
9410	Climate Action Plan	-	-	-	-	-
	FD Diesel Exhaust System Replacement	-	-	50,000	-	-
	308 San Pascual Residence Improvements	-	-	-	-	-
	Agenda Management System	50,000	-	-	-	-
	City Website System & Design	60,000	-	-	-	-
	Library Facility Improvements	-	-	43,221	-	-
	Library Roof	-	-	125,466	-	-
	Library Master Plan	-	-	-	-	-
	Parks Master Plan	-	-	-	-	-
	Snake Trail Improvements	-	-	-	-	-
	Senior Center Flooring	-	-	60,000	-	-
	Arroyo Seco San Rafael & San Pascual Proje	-	-	-	-	-
	Huntington Drive Green Street	-	-	-	-	-
	City Hall Stormwater Project	-	-	-	-	-
	Fremont/Huntington MIP Project	-	-	-	-	-
	Totals	**$665,000**	**$ 2,298,445**	**$ 1,525,097**	**$ 70,474**	**$300,000**

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Project No.	Project Name	210 Sewer	213 SB2 Planning Grant	214 Rogan HR5294 Grant	228 Housing Authority	230 Gas Tax
9033	Grevalia&Berkshire Pocket Park	-	-	-	-	-
9102	Fremont/Huntington MAT Project	-	-	-	-	-
9149	VoiP Phone System Installation	-	-	-	-	-
9157	Golf Course Netting Replacemen	-	-	-	-	-
9161	North-South Corridor ITS Dploy	-	-	1,087,899	-	-
9186	CD Permit Management Software	-	135,000	-	-	-
9187	CD Record Scan & Doc Managmnt	-	-	-	-	-
9188	City/Civic EV Charging System	-	-	-	-	-
9189	Arroyo Park EV Charging System	-	-	-	-	-
9192	Fair Oaks Traffic Signal Const	-	-	-	-	-
9203	Street Repairs - 2023	-	-	-	-	200,000
9206	825 Mission Yard Security Gate	-	-	-	-	-
9224	Citywide Facility Repair	-	-	-	-	-
9226	FD Front Bay Door Replacement	-	-	-	-	-
9229	PD Locker/Restroom Improvement	-	-	-	-	-
9230	PD Improvements	-	-	-	-	-
9231	PD Briefing Room Update	-	-	-	-	-
9232	PD1st Floor Inter Paint/Drywal	-	-	-	-	-
9242	War Memorial Audio/Vis. Equipm	-	-	-	-	-
9263	Pocket Park Construction	-	-	-	-	-
9264	ADA Sidewalk Repairs	-	-	-	-	-
9269	War Memorial HVAC Repairs	-	-	-	-	-
9273	Rec. Facilities Key System	-	-	-	-	-
9278	Fair Oaks ITS Project	-	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	-	-	-	-
9300	Ann. Water Main Repairs	-	-	-	-	-
9301	Library HVAC Repairs	-	-	-	-	-
9322	Library ADA Ramp, Light. & Imp	-	-	-	-	-
9348	Water Facil. Site Improvements	-	-	-	-	-
9349	Advanced Metering Infr. (AMI)	-	-	-	-	-
9350	Pedestrian Crossing Devices	-	-	-	-	-
9351	Rect. Rapid Flashing Beacons	-	-	-	-	-
9364	Rio Hondo LRS Alham, Wash Trtm	-	-	-	-	-
9402	EV Charging Station (MSRC)	-	-	-	-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-	-	-	-
9405	Library Security Camera System	-	-	-	-	-
9407	CMMS/Work Order System/GIS	57,500	-	-	-	-
9411	Elevated Tanks-Raymond/Bilikie	-	-	-	-	-
9408	Sewer Sys. Rep., Rehab&Replace	475,000	-	-	-	-
9409	Westside Reservoir	-	-	-	-	-
9410	Climate Action Plan	-	-	-	-	-
	FD Diesel Exhaust System Replacement	-	-	-	-	-
	308 San Pascual Residence Improvements	-	-	-	30,000	-
	Agenda Management System	-	-	-	-	-
	City Website System & Design	-	-	-	-	-
	Library Facility Improvements	-	-	-	-	-
	Library Roof	-	-	-	-	-
	Library Master Plan	-	-	-	-	-
	Parks Master Plan	-	-	-	-	-
	Snake Trail Improvements	-	-	-	-	-
	Senior Center Flooring	-	-	-	-	-
	Arroyo Seco San Rafael & San Pascual Proje	-	-	-	-	-
	Huntington Drive Green Street	-	-	-	-	-
	City Hall Stormwater Project	-	-	-	-	-
	Fremont/Huntington MIP Project	-	-	-	-	-
	Totals	**$532,500**	**$135,000**	**$1,087,899**	**$30,000**	**$200,000**

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Project No.	Project Name	233 Measure R Local	234 Measure M-MAT	236 Measure M - Local	237 RMRA - SB1	238 MSRC Grant
9033	Grevalia&Berkshire Pocket Park	-	-	-	-	-
9102	Fremont/Huntington MAT Project	-	475,000	-	-	-
9149	VoiP Phone System Installation	-	-	-	-	-
9157	Golf Course Netting Replacemen	-	-	-	-	-
9161	North-South Corridor ITS Dploy	-	-	-	-	-
9186	CD Permit Management Software	-	-	-	-	-
9187	CD Record Scan & Doc Managmnt	-	-	-	-	-
9188	City/Civic EV Charging System	-	-	-	-	102,700
9189	Arroyo Park EV Charging System	-	-	-	-	-
9192	Fair Oaks Traffic Signal Const	-	-	-	-	-
9203	Street Repairs - 2023	300,000	-	177,565	585,093	-
9206	825 Mission Yard Security Gate	-	-	-	-	-
9224	Citywide Facility Repair	-	-	-	-	-
9226	FD Front Bay Door Replacement	-	-	-	-	-
9229	PD Locker/Restroom Improvement	-	-	-	-	-
9230	PD Improvements	-	-	-	-	-
9231	PD Briefing Room Update	-	-	-	-	-
9232	PD1st Floor Inter Paint/Drywal	-	-	-	-	-
9242	War Memorial Audio/Vis. Equipm	-	-	-	-	-
9263	Pocket Park Construction	-	-	-	-	-
9264	ADA Sidewalk Repairs	-	-	-	-	-
9269	War Memorial HVAC Repairs	-	-	-	-	-
9273	Rec. Facilities Key System	-	-	-	-	-
9278	Fair Oaks ITS Project	-	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	-	-	-	-
9300	Ann. Water Main Repairs	-	-	-	-	-
9301	Library HVAC Repairs	-	-	-	-	-
9322	Library ADA Ramp, Light. & Imp	-	-	-	-	-
9348	Water Facil. Site Improvements	-	-	-	-	-
9349	Advanced Metering Infr. (AMI)	-	-	-	-	-
9350	Pedestrian Crossing Devices	-	-	-	-	-
9351	Rect. Rapid Flashing Beacons	-	-	26,497	-	-
9364	Rio Hondo LRS Alham, Wash Trtm	-	-	-	-	-
9402	EV Charging Station (MSRC)	-	-	-	-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-	-	-	-
9405	Library Security Camera System	-	-	-	-	-
9407	CMMS/Work Order System/GIS	-	-	-	-	-
9411	Elevated Tanks-Raymond/Bilikie	-	-	-	-	-
9408	Sewer Sys. Rep., Rehab&Replace	-	-	-	-	-
9409	Westside Reservoir	-	-	-	-	-
9410	Climate Action Plan	-	-	-	-	-
	FD Diesel Exhaust System Replacement	-	-	-	-	-
	308 San Pascual Residence Improvements	-	-	-	-	-
	Agenda Management System	-	-	-	-	-
	City Website System & Design	-	-	-	-	-
	Library Facility Improvements	-	-	-	-	-
	Library Roof	-	-	-	-	-
	Library Master Plan	-	-	-	-	-
	Parks Master Plan	-	-	-	-	-
	Snake Trail Improvements	-	-	-	-	-
	Senior Center Flooring	-	-	-	-	-
	Arroyo Seco San Rafael & San Pascual Proje	-	-	-	-	-
	Huntington Drive Green Street	-	-	-	-	-
	City Hall Stormwater Project	-	-	-	-	-
	Fremont/Huntington MIP Project	-	-	-	-	-
	Totals	**$300,000**	**$475,000**	**$204,062**	**$585,093**	**$102,700**

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Project No.	Project Name	239 Measure W	240 Measure M - MSP	245 Bike & Pedestrian Path	255 Capital Growth	260 CDBG
9033	Grevalia&Berkshire Pocket Park	-	-	-	-	-
9102	Fremont/Huntington MAT Project	-	-	-	-	-
9149	VoiP Phone System Installation	-	-	-	-	-
9157	Golf Course Netting Replacemen	-	-	-	-	-
9161	North-South Corridor ITS Dploy	-	-	-	70,474	-
9186	CD Permit Management Software	-	-	-	-	-
9187	CD Record Scan & Doc Managmnt	-	-	-	-	-
9188	City/Civic EV Charging System	-	-	-	-	-
9189	Arroyo Park EV Charging System	-	-	-	-	-
9192	Fair Oaks Traffic Signal Const	-	-	-	-	-
9203	Street Repairs - 2023	-	-	25,000	-	-
9206	825 Mission Yard Security Gate	-	-	-	-	-
9224	Citywide Facility Repair	-	-	-	-	-
9226	FD Front Bay Door Replacement	-	-	-	-	-
9229	PD Locker/Restroom Improvement	-	-	-	-	-
9230	PD Improvements	-	-	-	-	-
9231	PD Briefing Room Update	-	-	-	-	-
9232	PD1st Floor Inter Paint/Drywal	-	-	-	-	-
9242	War Memorial Audio/Vis. Equipm	-	-	-	-	-
9263	Pocket Park Construction	-	-	-	-	-
9264	ADA Sidewalk Repairs	-	-	-	-	407,782
9269	War Memorial HVAC Repairs	-	-	-	-	-
9273	Rec. Facilities Key System	-	-	-	-	-
9278	Fair Oaks ITS Project	-	-	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	50,000	-	-	-
9300	Ann. Water Main Repairs	-	-	-	-	-
9301	Library HVAC Repairs	-	-	-	-	-
9322	Library ADA Ramp, Light. & Imp	-	-	-	-	-
9348	Water Facil. Site Improvements	-	-	-	-	-
9349	Advanced Metering Infr. (AMI)	-	-	-	-	-
9350	Pedestrian Crossing Devices	-	200,000	-	-	-
9351	Rect. Rapid Flashing Beacons	-	-	-	-	-
9364	Rio Hondo LRS Alham, Wash Trtm	5,000	-	-	-	-
9402	EV Charging Station (MSRC)	-	-	-	-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-	-	-	-
9405	Library Security Camera System	-	-	-	-	-
9407	CMMS/Work Order System/GIS	-	-	-	-	-
9411	Elevated Tanks-Raymond/Bilikie	-	-	-	-	-
9408	Sewer Sys. Rep., Rehab&Replace	-	-	-	-	-
9409	Westside Reservoir	-	-	-	-	-
9410	Climate Action Plan	-	-	-	-	-
	FD Diesel Exhaust System Replacement	-	-	-	-	-
	308 San Pascual Residence Improvements	-	-	-	-	-
	Agenda Management System	-	-	-	-	-
	City Website System & Design	-	-	-	-	-
	Library Facility Improvements	-	-	-	-	-
	Library Roof	-	-	-	-	-
	Library Master Plan	-	-	-	-	-
	Parks Master Plan	-	-	-	-	-
	Snake Trail Improvements	-	-	-	-	-
	Senior Center Flooring	-	-	-	-	-
	Arroyo Seco San Rafael & San Pascual Proje	37,500	-	-	-	-
	Huntington Drive Green Street	250,000	-	-	-	-
	City Hall Stormwater Project	-	-	-	-	-
	Fremont/Huntington MIP Project	-	-	-	-	-
	Totals	**$292,500**	**$250,000**	**$ 25,000**	**$70,474**	**$407,782**

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Project No.	Project Name	275 Park Impact Fees	277 HSIP Grant	281 CA State Library Building Forward	295 Arroyo Seco Golf	500 Water
9033	Grevalia&Berkshire Pocket Park	825,000	-		-	-
9102	Fremont/Huntington MAT Project	-	-		-	-
9149	VoiP Phone System Installation	-	-		-	-
9157	Golf Course Netting Replacemen	-	-		730,593	-
9161	North-South Corridor ITS Dploy	-	-		-	-
9186	CD Permit Management Software	-	-		-	-
9187	CD Record Scan & Doc Managmnt	-	-		-	-
9188	City/Civic EV Charging System	-	-		-	-
9189	Arroyo Park EV Charging System	-	-		-	-
9192	Fair Oaks Traffic Signal Const	-	13,042		-	-
9203	Street Repairs - 2023	-	-		-	-
9206	825 Mission Yard Security Gate	-	-		-	-
9224	Citywide Facility Repair	-	-		-	-
9226	FD Front Bay Door Replacement	-	-		-	-
9229	PD Locker/Restroom Improvement	-	-		-	-
9230	PD Improvements	-	-		-	-
9231	PD Briefing Room Update	-	-		-	-
9232	PD1st Floor Inter Paint/Drywal	-	-		-	-
9242	War Memorial Audio/Vis. Equipm	-	-		-	-
9263	Pocket Park Construction	-	-		-	-
9264	ADA Sidewalk Repairs	-	-		-	-
9269	War Memorial HVAC Repairs	-	-		-	-
9273	Rec. Facilities Key System	-	-		-	-
9278	Fair Oaks ITS Project	-	-		-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	-		-	-
9300	Ann. Water Main Repairs	-	-		-	2,000,000
9301	Library HVAC Repairs	-	-	144,837	-	-
9322	Library ADA Ramp, Light. & Imp	-	-		-	-
9348	Water Facil. Site Improvements	-	-		-	88,000
9349	Advanced Metering Infr. (AMI)	-	-		-	150,000
9350	Pedestrian Crossing Devices	-	-		-	-
9351	Rect. Rapid Flashing Beacons	-	238,465		-	-
9364	Rio Hondo LRS Alham, Wash Trtm	-	-		-	-
9402	EV Charging Station (MSRC)	-	-		-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-		-	-
9405	Library Security Camera System	-	-		-	-
9407	CMMS/Work Order System/GIS	-	-		-	57,500
9411	Elevated Tanks-Raymond/Bilikie	-	-		-	120,000
9408	Sewer Sys. Rep., Rehab&Replace	-	-		-	-
9409	Westside Reservoir	-	-		-	525,000
9410	Climate Action Plan	-	-		-	-
	FD Diesel Exhaust System Replacement	-	-		-	-
	308 San Pascual Residence Improvements	-	-		-	-
	Agenda Management System	-	-		-	-
	City Website System & Design	-	-		-	-
	Library Facility Improvements	-	-	57,293	-	-
	Library Roof	-	-	166,315	-	-
	Library Master Plan	-	-		-	-
	Parks Master Plan	150,000	-		-	-
	Snake Trail Improvements	50,000	-		-	-
	Senior Center Flooring	-	-		-	-
	Arroyo Seco San Rafael & San Pascual Proje	-	-		-	-
	Huntington Drive Green Street	-	-		-	-
	City Hall Stormwater Project	-	-		-	-
	Fremont/Huntington MIP Project	-	-		-	-
	Totals	**$1,025,000**	**$251,507**	**$ 368,445**	**$730,593**	**$2,940,500**

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Project No.	Project Name	503 Water Efficiency	243 Measure R - MIP	101 Reserves
9033	Grevalia&Berkshire Pocket Park	-	-	-
9102	Fremont/Huntington MAT Project	-	-	-
9149	VoiP Phone System Installation	-	-	-
9157	Golf Course Netting Replacemen	-	-	-
9161	North-South Corridor ITS Dploy	-	-	-
9186	CD Permit Management Software	-	-	-
9187	CD Record Scan & Doc Managmnt	-	-	-
9188	City/Civic EV Charging System	-	-	-
9189	Arroyo Park EV Charging System	-	-	-
9192	Fair Oaks Traffic Signal Const	-	-	-
9203	Street Repairs - 2023	-	-	-
9206	825 Mission Yard Security Gate	-	-	-
9224	Citywide Facility Repair	-	-	-
9226	FD Front Bay Door Replacement	-	-	-
9229	PD Locker/Restroom Improvement	-	-	-
9230	PD Improvements	-	-	-
9231	PD Briefing Room Update	-	-	-
9232	PD1st Floor Inter Paint/Drywal	-	-	-
9242	War Memorial Audio/Vis. Equipm	-	-	-
9263	Pocket Park Construction	-	-	-
9264	ADA Sidewalk Repairs	-	-	-
9269	War Memorial HVAC Repairs	-	-	-
9273	Rec. Facilities Key System	-	-	-
9278	Fair Oaks ITS Project	-	-	-
9290	Grevelia/Fair Oaks Int. Imprv	-	-	-
9300	Ann. Water Main Repairs	-	-	-
9301	Library HVAC Repairs	-	-	-
9322	Library ADA Ramp, Light. & Imp	-	-	-
9348	Water Facil. Site Improvements	-	-	-
9349	Advanced Metering Infr. (AMI)	-	-	-
9350	Pedestrian Crossing Devices	-	-	-
9351	Rect. Rapid Flashing Beacons	-	-	-
9364	Rio Hondo LRS Alham, Wash Trtm	-	-	-
9402	EV Charging Station (MSRC)	-	-	-
9404	Citywide Facilities Assessment/ Security Enh	-	-	-
9405	Library Security Camera System	-	-	-
9407	CMMS/Work Order System/GIS	-	-	-
9411	Elevated Tanks-Raymond/Bilikie	-	-	-
9408	Sewer Sys. Rep., Rehab&Replace	-	-	-
9409	Westside Reservoir	-	-	-
9410	Climate Action Plan	120,000	-	-
	FD Diesel Exhaust System Replacement	-	-	-
	308 San Pascual Residence Improvements	-	-	-
	Agenda Management System	-	-	-
	City Website System & Design	-	-	-
	Library Facility Improvements	-	-	-
	Library Roof	-	-	-
	Library Master Plan	-	-	-
	Parks Master Plan	-	-	-
	Snake Trail Improvements	-	-	-
	Senior Center Flooring	-	-	-
	Arroyo Seco San Rafael & San Pascual Proje	100,000	-	300,000
	Huntington Drive Green Street	-	-	-
	City Hall Stormwater Project	200,000	-	300,000
	Fremont/Huntington MIP Project	-	475,000	-
	Totals	**$420,000**	**$475,000**	**$600,000**

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City Council

Fiscal Year 2023-24 Budget Snapshot

Overview

The City Council is the elected legislative body of the City. The City Council consists of a Mayor and four Councilmembers, each elected at large for four overlapping terms. The City Council represents the City's citizens, analyzes and approves all laws and policies, authorizes all expenditures through the budget, and directs the administration of the City government through the City Manager.

Notable Changes – Wages and Benefits

No significant changes to Wages and Benefits.

Notable Changes – Operations and Maintenance

Additional postage funding for District Mailings, Carry-Over of Discretionary Funds from prior Fiscal Years, and Funding for State of the City, Community Budget Sessions, and Strategic Planning Sessions.

Capital Outlay

No items budgeted for Capital Outlay.

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City Council / 101-1010-1011

Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	22,466	15,653	18,589	18,594	19,888	19,703
Operations & Maintenance	22,935	20,236	26,857	30,600	51,500	62,200
Capital Outlay	-	-	-	-	-	-
Total Expenses by Category	**45,401**	**35,890**	**45,446**	**49,194**	**71,388**	**81,903**
[101-1011] City Council	45,401	35,890	45,446	49,194	71,388	81,903
Total Expenses by Program	**45,401**	**35,890**	**45,446**	**49,194**	**71,388**	**81,903**

Authorized Positions

Jon Primuth, Mayor

Evelyn G. Zneimer, Mayor Pro Tem

Jack Donovan, Councilmember

Janet Braun, Councilmember

Michael A. Cacciotti, Councilmember

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Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	5,460	2,120	7,160	18,000	18,020	-
7010	000	Salaries - Temp / Part	16,460	12,880	10,680	-	1,500	18,000
7110	000	Workers Compensation	228	163	188	333	162	252
7170	000	FICA - Medicare	318	490	561	261	206	1,450
		<WAGES & BENEFITS>	22,466	15,653	18,589	18,594	19,888	19,703
8000	000	Office Supplies	-	-	-	-	-	-
8010	000	Postage	149	206	42	100	2,000	8,000
8020	000	Special Department Expense	4,640	1,404	5,119	2,000	4,000	12,000
8021	000	Discretionary Fund Program	9,490	15,376	12,588	20,000	20,000	33,700
8060	000	Dues & Memberships	150	3,200	-	500	500	500
8090	000	Conference & Meeting Expense	8,507	50	9,108	8,000	25,000	8,000
		<OPERATIONS & MAINTENANCE>	22,935	20,236	26,857	30,600	51,500	62,200
[101-1011] City Council Total			**45,401**	**35,890**	**45,446**	**49,194**	**71,388**	**81,903**

PERSONNEL SERVICES

7000 Regular Salaries

Provides funds for monthly stipend for members of the City Council. Elected South Pasadena officials are paid a $300 monthly stipend. Includes cell phone allowance. City Council members are subject to Medicare withholding and Workers Compensation coverage provided by the City.

OPERATIONS & MAINTENANCE

8010 Postage

Provides funds for postage meter charges and postage for mailing City Council mail, including special mailing lists for District Town Halls (Total $8,000).

8020 Special Department Expense

Provides funds for City Council business cards, promotional items, badges, plaques, nameplates, supplies, calendars, photography ($1,000). Provides funds for proclamation and certificate supplies ($500). Provides funds for special requests for City Council meetings and unanticipated department expenses incurred to fulfill requests by City Councilmembers ($500). As well as the Annual Commissioner Congress ($8,000). (Total $12,000)

8021 Discretionary Fund Program

Discretionary funds must be used for a public purpose benefiting the City. Each Councilmember is allotted $4,000. (Total $33,700).

8060 Dues/Memberships/Subscriptions

Provides funds for individual councilmember memberships in organizations ($500)

8090 Conference and Meeting Expense

Provides funds for City Council to attend conferences and meetings, including parking and mileage. Provides funds for meals and beverages for Regular and Special City Council Meetings, receptions including State of the City, and Mayor's Swearing-In, and Community Budget Sessions, State of the City. Provides funds for Strategic Planning Sessions: logistics, refreshments, supplies, recording. Provides funds for purchase of meeting-related presentation materials, accessories, and supplies for tablets and related devices ($8,000).

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City Manager

Fiscal Year 2023-24 Budget Snapshot

Overview

The City Manager is appointed by the City Council and serves as the Chief Administrative Officer, ensuring that the policies of the Mayor and City Council are executed effectively and efficiently. Specific areas of responsibility include oversight of seven operating departments, public information and public engagement, legislative tracking, following up on citizen concerns, providing recommendations to promote organizational efficiency and overseeing the development and presentation of the annual budget.

The City's Economic Development Division is housed under the City Manager's Office, and is the liaison to the business community, focused on efforts to strengthen and grow the local economy, and serves as a liaison to business affairs at City Hall. The Division oversees the communications and engagement efforts of the City, including marketing, branding social media and the City's website.

Notable Changes – Wages and Benefits

Due to organizational restructuring, City Manager has become its own department and is now separated from Management services. City Manager has 5 FTEs for Fiscal Year 2022-23. One part-time management intern has been added.

Notable Changes – Operations and Maintenance

Funding included for Annual Social Services and Social Justice Forum, Social Services Resource Guide, Executive Team Engagement, Veteran Events, mailings of State, Regional, and Legislative correspondence in line with the adopted Legislative Platform, GoGov Citywide Mobile App, Holiday Lighting Décor, and Guide to Doing Business brochure.

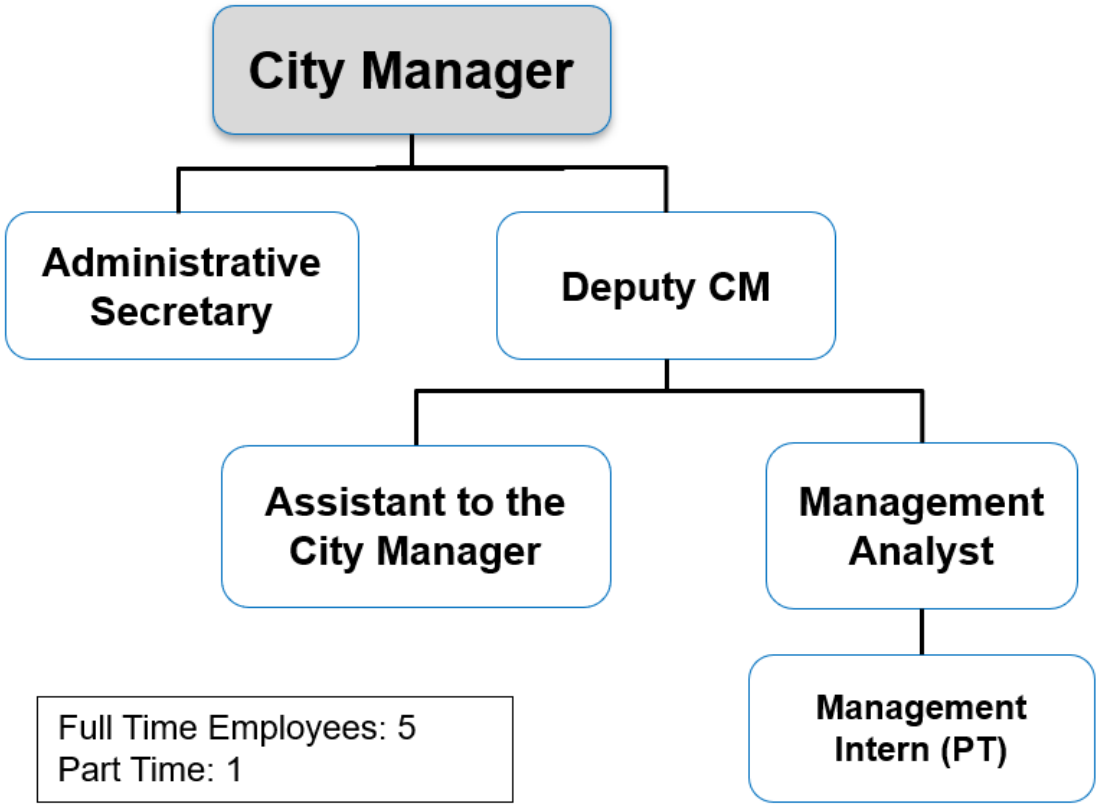
Capital Outlay

No items budgeted for Capital Outlay.

Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	1,350,983	1,363,498	1,670,242	896,731	881,155	1,059,376
Operations & Maintenance	271,386	321,158	250,626	416,608	347,438	325,910
Capital Outlay	-	-	-	-	-	-
Total Expenses by Category	**1,622,368**	**1,684,656**	**1,920,868**	**1,313,339**	**1,228,593**	**1,385,285**
[101-2011] City Manager	1,457,590	1,577,395	1,815,368	1,103,231	1,021,485	1,224,510
[101-2012] Economic Development	55,278	261	-	98,108	95,108	50,275
[220-2301] Community Promotion	109,500	107,000	105,500	112,000	112,000	110,500
Total Expenses by Program	**1,622,368**	**1,684,656**	**1,920,868**	**1,313,339**	**1,228,593**	**1,385,285**

Authorized Positions



City Manager / 101-2010-2011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	879,831	815,286	910,988	606,976	589,285	693,542
7010	000	Salaries - Temp / Part	96,744	219,067	179,156	35,000	20,819	35,128
7011	000	Salaries - PT Stipend	-	-	-	-	-	-
7020	000	Overtime	187	2,929	26,069	-	4,797	
7040	000	Holiday	8,103	14,082	10,090	-	-	8,847
7055	000	IOD - Non Safety	-	-	-	-	-	
7070	000	Leave Buyback	2,987	-	26,622	27,000	2,879	25,608
7100	000	Retirement	251,744	185,649	432,904	144,439	141,862	73,787
7100	010	CalPERS UAL				-	-	110,175
7108	000	Deferred Compensation	7,438	36,687	(23,868)	4,542	6,073	6,820
7110	000	Workers Compensation	12,017	12,311	13,586	11,569	10,418	8,081
7120	000	Disability Insurance	-	-	-	-	14,509	
7130	000	Group Health Insurance	63,472	51,707	62,786	53,112	62,414	73,170
7140	000	Vision Insurance	1,586	1,247	1,534	1,080	1,280	1,048
7150	000	Dental Insurance	5,025	4,432	5,282	4,050	4,107	3,911
7160	000	Life Insurance	745	592	719	446	624	515
7170	000	FICA - Medicare	15,630	17,509	18,375	8,517	16,088	12,744
7180	000	Car/Uniform Allowance	5,475	2,000	6,000	-	6,000	6,000
		<WAGES & BENEFITS>	1,350,983	1,363,498	1,670,242	896,731	881,155	1,059,376
8000	000	Office Supplies	5,640	4,428	21,283	10,000	10,000	10,000
8010	000	Postage	803	370	45	4,000	2,000	4,000
8020	000	Special Department Expense	7,615	1,630	13,813	20,800	13,812	8,500
8050	000	Printing/Duplicating	98	126	698	6,000	5,275	6,000
8060	000	Dues & Memberships	1,115	1,025	2,097	47,500	44,100	44,437
8090	000	Conference & Meeting Expense	2,088	494	15,143	16,750	15,143	17,198
8100	000	Vehicle Maintenance	1,965	1,498	2,041	750	-	-
8110	000	Equipment Maintenance	-	-	-	700	-	-
8150	000	Telephone	-	-	-	-	-	-
8170	000	Professional Services	45,221	77,806	77,336	40,000	40,000	40,000
8180	000	Contract Services	42,063	116,518	-	10,000	10,000	10,000
8200	000	Training Expense	-	-	-	-	-	-
8272	000	CM Emergency	-	10,000	12,670	50,000	-	25,000
		<OPERATIONS & MAINTENANCE>	106,608	213,897	145,126	206,500	140,330	165,135
[101-2011] City Manager Total			**1,457,590**	**1,577,395**	**1,815,368**	**1,103,231**	**1,021,485**	**1,224,510**

Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Provides the partial compensation for the City Manager, Deputy City Manager, Assistant to the City Manager, Management Analyst, and Administrative Secretary. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Provides compensation for non-salaried part-time employee (Management Intern) and partial compensation for non-salaried Interim City Manager and Interim Assistant City Manager.

7070 Leave Buyback
Provides funds to employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Ordinary office supplies for the City Manager's Office (City Manager, Deputy City Manager, Assistant to the City Manager, Management Analyst, Administrative Secretary and Management Intern), and meeting supplies. (Total $10,000)

8010 Postage
Provides funds for postal expenses for City mailings, including public notice mailings, legal printing of notices, and Legislative support/opposition letters. (Total $4,000)

8020 Special Department Expense
Provides funds for miscellaneous department supplies and services not considered office supplies, Executive Team engagement, , furniture, kitchen equipment, copier paper (for City Hall second floor), Annual Social Services and Social Justice Forum, Veteran Events, Social Services Working Group (food, supplies, table cloths, etc.) , and outreach (Social Services Resource Guide printing and annual revisions), and hosting gatherings with regional and partner agencies or elected dignitaries on-site. (Total $8,500)

8050 Printing and Duplication
Provides funds for the printing and duplication of materials, including City information brochures, foam boards and A Frames, translation services, printed surveys, electronic survey providers, brochures, stationary, and business cards, and name badges. (Total $6,000)

8060 Dues, Memberships, and Subscriptions
Provides funds for San Gabriel Valley City Manager's Association dues, San Gabriel Valley Council of Governments, International City Manager's Association, California City Management Foundation, Municipal Management Association of Southern California, City memberships in League of California Cities League of California Cities-LA County San Gabriel Valley Council of Governments, California

Contract Cities, Southern California Association of Governments, CAPIO, and subscriptions to newspapers and professional publications. (Total $44,437)

8090 Conference and Meeting Expense
Provides funds to attend professional and training meetings, conference registrations including the League of California Cities Annual Conference, League of California Cities City Manager's Conference, League of California Cities City Leaders Summit, San Gabriel Valley Economic Partnership (SGVEP) Legislative Action Day, SGVEP Economic Forecast Summit, Municipal Management Association of Southern California (MMASC) Annual Conference, MMASC Summer Session, MMASC Winter Session, San Gabriel Valley City Manager's Association Meetings, CAPIO, CalEd Intro to Economic Development, and International Shopping Centers Conference. (Total$17,198)

8170 Professional Services
Provides funds for consultant services, such as operational studies and other professional services ($20,000), and citywide operations ($20,000). (Total $40,000)

8180 Contract Services
Provides funds for City Manager Office to enter in contracts services for mission critical items (Total $10,000).

8272 City Manager Emergency Fund
Permits the City Manager to respond swiftly to emergency and unanticipated needs in any operational area of the City (Total $25,000).

Economic Development / 101-2020-2012

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8050	000	Printing/Duplicating	-	-	-	8,328	8,328	8,000
8060	000	Dues & Memberships	-	-	-	3,000	-	3,275
8190	000	Community Engagement	-	-	-	71,200	71,200	20,000
8220	000	Communications Spec. Dept Expense	125	261	-	7,180	7,180	19,000
8230	000	Communications Prof Services	55,153	-	-	8,400	8,400	-
		<OPERATIONS & MAINTENANCE>	55,278	261	-	98,108	95,108	50,275
[101-2012] Economic Development Total			**55,278**	**261**	**-**	**98,108**	**95,108**	**50,275**

OPERATIONS & MAINTENANCE

8050 Printing and Duplication

Funds the printing and duplication of materials, including Guide to Doing Business in South Pasadena ($2,000), business mailers ($1,000), informational brochures ($500), flyers and newsletters ($2,000), promotional street banners ($2,000) and translation services ($500) (Total $8,000)

8060 Dues and Memberships

Funds membership dues for the San Gabriel Valley Economic Partnership (Total $3,275).

8190 Community Engagement

Funds business networking events ($4,000), holiday lighting and décor ($15,000), and tabling at the community events for outreach ($1,000). (Total $20,000)

8220 Communications - Special Department Expense

Funds contract services including Constant Contact citywide email marketing tool, ($2,000), GoGov Citywide Annual App Fee ($15,000), and promotional materials for launch of new website ($2,000). (Total $19,000)

Community Promotion / 220-2010-2301

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8060	000	Dues & Memberships	1,500	1,500	-	-	-	-
8185	000	Chamber of Commerce	105,500	105,500	105,500	105,500	105,500	105,500
8255	000	Public Events Promotion	2,500	-	-	6,500	6,500	5,000
		<OPERATIONS & MAINTENANCE>	109,500	107,000	105,500	112,000	112,000	110,500
[220-2301] Community Promotion Total			**109,500**	**107,000**	**105,500**	**112,000**	**112,000**	**110,500**

OPERATIONS & MAINTENANCE

8185 Chamber of Commerce
Funds are allocated by contract with the South Pasadena Chamber of Commerce (Total $105,500). (Placeholder from FY22-23. Pending City Council Direction on funding level for FY23-24)

8255 Public Events Promotion
Public events promotion (Total $5,000).

Key Performance Indicators

The City Manager's Team is focused on improving the quality of life for residents, businesses and employees. With the move of Economic Development to the City Manager's Office, the City Manager's team is redefining community outreach and engagement, business support and service. A commitment to Strategic Plan goals and active legislative efforts ensure furthering the community's priorities while protecting and preserving quality of life in South Pasadena.

Public Engagement/ Community Outreach

Continue to establish and explore best practices in conducting community outreach, including:

- 150-300 new photos of the City, Departments and staff for marketing and documents for FY2023.
- 1,000 new followers across social media by the end of FY2023.
- Develop and launch new City website to the community.
- Work with Departments and Divisions to ensure community engagement is prioritized including use of surveys, workshops, input sessions and other engagement and engagement tools.

Economic Development

Continue to establish and explore best practices in Economic Development:

- Visit 100 businesses in the community.
- Explore enhanced branding plan for City's Downtown District.
- Continue hosting quarterly business networking events.
- Establish City Council sub-committee on Economic Development.
- Establish program to welcome new businesses to the City.

Establish and Prioritize Healthy Workplace Culture

- Establish City-wide internship and professional shadowing programs.
- Host quarterly Mid Manager's Meetings.
- Lead and bolster Employee Engagement Team (EET) and citywide efforts.
- Review and implement the USC Capstone Team Diversity, Equity and Inclusion Implementation Plan.

Social Services

Continue to prioritize providing Social Services outreach and resources to the community:

- Establish Veterans Census to plan for Veteran specific outreach.
- Host a Veteran's Appreciation Day by FY2023.

Legislation

- Establish Legislative Tracking program by FY2023.
- Continue to participate in and network with legislative partners

Management Services

Fiscal Year 2023-24 Budget Snapshot

Overview

Mission

The Management Services Department is committed to being a collaborative and innovative partner in delivering essential services to our internal and external customers in a way that is helpful, caring, and responsive. We accomplish this through the innovative use of skills, knowledge, technology, and an investment in human capital.

Core Values

- Teamwork
- Inclusivity
- Integrity
- Pride
- Transparency
- Stewardship
- Innovation
- Respect
- Wellness
- Attitude

Core Services

- **Management Services:** Innovation and Technology (IT), Grants Management, and Special Projects
- **Human Resources and Risk Management:** Human Resources Management, Recruitment, Employee Training, Labor Relations, Safety, and Risk Management
- **City Clerk:** Records Management, Elections, Boards, Commissions, and City Council Support

Notable Changes—Wages and Benefits

There is an increase in wages and benefits, as the Department is adding three full time positions (Senior Human Resources Analyst, Human Resources Analyst and Human Resources Specialist). It should be noted that the Senior Human Resources Analyst and Human Resources Analyst positions are reclassifications of two management analyst positions in the Human Resources Division.

Notable Change—Operations and Maintenance

For Fiscal Year 2023-2024, the City Clerk Division will be accounting for advertisement costs for all departments, and all innovation and technology items have also been moved to the Innovation and Technology funds.

Capital Outlay

Funds are included to begin to phase out end of life technology equipment citywide, and begin a replacement cycle to create and maintain effective operations.

Ongoing Initiatives, Goals, and Objectives

Innovation and Technology (IT)

- Modernize and maximize the business value and resiliency of technology services.
- Work with departments to identify ways technology can improve efficiency.
- Advance IT-managed service delivery by improving oversight and focusing on operational excellence.
- Secure the City's data and technology and improve our cyber security posture.
- Educate and train staff regarding possible cybersecurity threats by implementing a program to comprehensively train city technology users, provide baseline testing, and mitigate potential risks associated with phishing attacks.

Human Resources

- Continue to attract, develop, and retain a well-qualified and diverse workforce, and fill vacancies in a timely manner.
- Continue to seek and implement efficiencies that will improve the way we deliver services to employees and customer departments.
- Continue to offer citywide training and development opportunities and take full advantage of our new learning management system to link training to core competencies better.
- Continue employee engagement efforts, and develop a plan aimed at reducing employee turnover and increasing job satisfaction.

City Clerk

- Provide customers with accurate and thorough information and access to city council meetings and election resources.
- Embrace cutting-edge technology and industry best practices to increase efficiency, transparency, and accessibility.
  Adhere to state and local mandates and deadlines related to city government.
- Streamline public records act requests processing and implement a public records request management program.
- Improve the City's record retention practices and implement a comprehensive records management program.
- Work to provide all Commission and elected officials relevant training, including Brown Act and ethics training (AB 1234 and AB1661).

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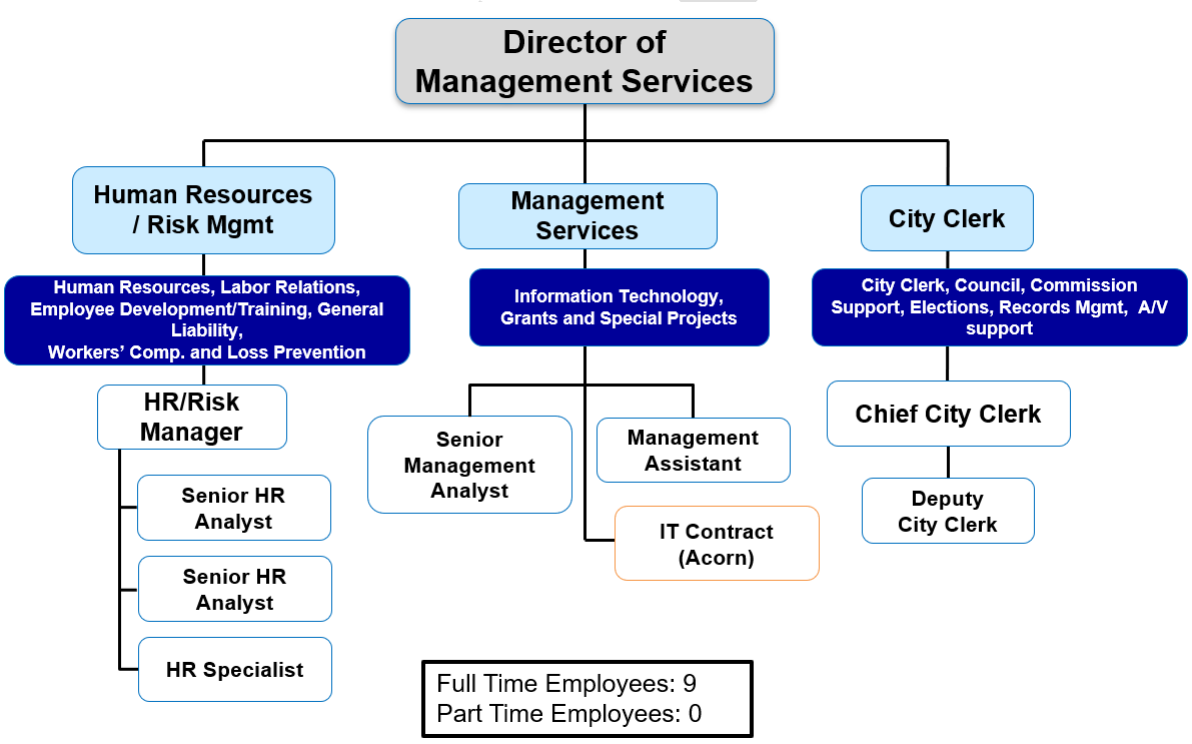
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	6,764	30,959	6,615	1,144,286	1,088,369	1,118,897
Operations & Maintenance	1,627,845	1,647,496	665,364	2,499,490	2,418,567	2,258,490
Capital Outlay	68,556	91,035	7,495	100,000	100,000	197,000
Total Expenses by Category	**1,703,165**	**1,769,490**	**679,474**	**3,743,776**	**3,606,936**	**3,574,387**
[101-2033] City Clerk	113,311	115,512	-	470,283	389,517	447,319
[101-1022] Elections	185,743	76,843	93,242	166,000	110,809	63,900
[101-2034] Human Resources	324,830	350,761	-	898,923	905,818	915,553
[101-2021] Transportation Planning	12,835	287	90	-	-	-
[101-2031] Management Services	-	-	6,615	480,230	415,995	496,105
[101-2032] Information Services	573,881	541,110	-	833,200	889,657	1,151,511
[101-2501] Legal Services	492,566	607,285	572,032	895,140	895,140	500,000
[105-3032] Information Services	-	77,691	7,495	-	-	-
Total Expenses by Program	**1,703,165**	**1,769,490**	**679,474**	**3,743,776**	**3,606,936**	**3,574,387**

Authorized Positions



Management Services / 101-2030-2031

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	5,730	243,499	200,724	170,781
7010	000	Salaries - Temp / Part	-	-	-	95,000	116,075	78,000
7011	000	Salaries - PT Stipend	-	-	-	-	-	-
7020	000	Overtime	-	-	-	5,000	-	
7040	000	Holiday	-	-	-	-	-	-
7055	000	IOD - Non Safety	-	-	-	-	-	-
7070	000	Leave Buyback	-	-	-	15,000	-	3,146
7100	000	Retirement	-	-	665	61,369	46,572	22,646
7100	010	CalPERS UAL	-	-		-	-	50,376
7108	000	Deferred Compensation	-	-	57	1,527	1,530	1,708
7110	000	Workers Compensation	-	-	80	4,229	2,042	2,392
7120	000	Disability Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	-	-	-	9,348	5,986	7,979
7140	000	Vision Insurance	-	-	-	415	117	153
7150	000	Dental Insurance	-	-	-	1,557	432	567
7160	000	Life Insurance	-	-	-	171	70	92
7170	000	FICA - Medicare	-	-	83	3,315	2,646	6,263
7180	000	Car/Uniform Allowance	-	-	-	-	-	-
		<WAGES & BENEFITS>	-	-	6,615	440,430	376,195	344,105
8000	000	Office Supplies	-	-	-	16,000	16,000	15,000
8010	000	Postage	-	-	-	300	300	300
8020	000	Special Department Expense	-	-	-	-	-	1,000
8050	000	Printing/Duplicating	-	-	-	2,000	2,000	500
8060	000	Dues & Memberships	-	-	-	2,000	2,000	700
8090	000	Conference & Meeting Expense	-	-	-	4,000	4,000	4,000
8100	000	Vehicle Maintenance	-	-	-	-	-	-
8110	000	Equipment Maintenance	-	-	-	500	500	-
8150	000	Telephone	-	-	-	-	-	-
8170	000	Professional Services	-	-	-	15,000	15,000	10,000
8180	000	Contract Services	-	-	-	-	-	120,000
8200	000	Training Expense	-	-	-	-	-	500
		<OPERATIONS & MAINTENANCE>	-	-	-	39,800	39,800	152,000
[101-2031] Management Services Total			**-**	**-**	**6,615**	**480,230**	**415,995**	**496,105**

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Budget Detail

PERSONNEL

7000 Salaries – Regular Employees
Funds the Management Services Director and Senior Management Analyst salaries.

7010 Salaries – Part-Time
Funds non-salaried part-time employees (Management Assistant) and temporary staff for special projects.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
General office supplies from Staples (per the City's contract with Staples) for the Management Services Department (Total $15,000).

8010 Postage
Provides funds for as-needed postal expenses for City mailings, including public notice mailings, and legal printing of notices (Total $300).

8020 Special Department Expense
Funds for department apparel for staff for community events and conference and training attendance (Total $1,000).

8050 Printing and Duplication
Provides funds for the printing and duplication of materials, including City information brochures for front counter (as-needed) for Departmental efforts (Total $500).

8060 Dues, Memberships, and Subscriptions
Provides funds for International City Manager's Association dues for Department Director and Senior Management Analyst ($400), and three staff memberships to the Municipal Management Association of Southern California ($300). (Total $700).

8090 Conference and Meeting Expense
Provides funds for travel and lodging for one staff member to attend the Municipal Management Association Southern California (MMASC) Annual Conference ($1,500), and funds for travel and lodging for one staff member to attend the International City Manager's Association ($2,500). (Total $4,000).

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8170 Professional Services
Provides funds for as-needed temporary staffing services ($5,000) and professional services for special projects, including consultant services for information technology and policy development ($5,000). (Total $10,000).

8180 Contract Services
Provides funds for City Hall Security (Total $120,000).

8200 Training Expense
Provides funds for training materials for staff hosted trainings for staff ($500).

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City Clerk / 101-2030-2033

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	20,633	-	195,943	118,166	182,655
7010	000	Salaries - Temp / Part	6,158	3,151	-	40,925	80,858	-
7020	000	Overtime	-	-	-	-	-	-
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	162	934	-	49,993	41,249	14,612
7100	010	CalPERS UAL	-	-	-	-	-	-
7108	000	Deferred Compensation	-	4,737	-	1,216	1,054	1,827
7110	000	Workers Compensation	72	195	-	3,625	1,381	1,984
7130	000	Group Health Insurance	-	600	-	28,386	6,433	29,820
7140	000	Vision Insurance	-	40	-	456	146	405
7150	000	Dental Insurance	-	150	-	1,710	542	1,510
7160	000	Life Insurance	-	17	-	188	99	198
7170	000	FICA - Medicare	372	503	-	2,841	1,684	2,648
		<WAGES & BENEFITS>	6,764	30,959	-	325,283	251,613	235,659
8000	000	Office Supplies	-	-	-	-	-	-
8010	000	Postage	185	252	-	500	83	750
8020	000	Special Department Expense	1,920	-	-	1,500	1,003	2,400
8040	000	Advertising	1,233	595	-	20,000	21,615	44,850
8050	000	Printing/Duplicating	238	61	-	500	538	1,000
8060	000	Dues & Memberships	1,739	264	-	1,000	1,000	800
8070	000	Mileage/Auto Allowance	-	-	-	500	264	500
8090	000	Conference & Meeting Expense	650	150	-	3,000	1,688	2,460
8095	000	Commissioners Congress	4,836	-	-	8,000	2,000	-
8110	000	Equipment Maintenance	44	-	-	2,000	66,675	-
8170	000	Professional Services	-	3,200	-	65,000	32,489	75,000
8180	000	Contract Services	93,776	79,501	-	42,000	2,550	83,200
8200	000	Training Expense	1,926	530	-	1,000	-	700
8300	000	Lease Payment	-	-	-	-	8,000	-
		<OPERATIONS & MAINTENANCE>	106,547	84,554	-	145,000	137,904	211,660
8520	000	Machinery & Equipment	-	-	-	-	-	-
		<CAPITAL OUTLAY>	-	-	-	-	-	-
[101-2033] City Clerk Total			**113,311**	**115,512**	-	**470,283**	**389,517**	**447,319**

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Budget Detail

PERSONNEL

7000 Salaries – Regular Employees
Funds the Chief City Clerk and Deputy City Clerk salaries

OPERATIONS & MAINTENANCE

8010 Postage
Provides funds for postal expenses for postage meter charges; and mailings to respond to public records requests, mail related to Fair Political Practices Commission filings, and other correspondence (Total $750).

8020 Special Department Expense
Provides funds for special department supplies and services to include special office supplies, such as special paper for documents (Resolutions, Minutes, and Ordinances), special binders, certificates, City pins, Commemorative coins, stationery, nameplates, name badges, table cloths for Special Joint Meetings, engraved plaque plates for dignitaries and elected officials City Council reorganization, and unanticipated department expenses incurred to fulfill requests by management/ elected officials (Total $2,400).

8040 Advertising
Provides funds for advisory body recruitment, publication of ordinances, ordinance summaries, and miscellaneous notices or display advertising for various departments (Total $44,850).

8050 Printing and Duplication
Provides funds for printing and duplication of documents by a duplication service company for offsite agenda packet printing, business cards, envelopes or for special projects (Total $1,000).

8060 Dues, Memberships, and Subscriptions
Provides funds for membership fees in city clerk organizations, subscriptions, books and publications (Total $800).

8070 Mileage Reimbursement
Provides for mileage reimbursement when a private vehicle is used to conduct City business (Total $500).

8090 Conference and Meeting Expense
Provides funds for conference registration and meeting expenses for three staff members in the City Clerk's Division to attend City Clerk meetings, conferences, and pertinent seminars (Total $2,460).

8170 Professional Services
Provides funds for audiovisual technical services and installation for broadcasting and web streaming Special and Regular City Council and Planning Commission

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meetings (Total $75,000).

8180 Contract Services
Provides funds for Public Records Request Act Management System annual subscription costs ($15,000) and Agenda Management Software annual subscription and implementation ($25,000). Provides funds for municipal codification services in print and on website with contingency funding if more than one code update is necessary or if new ordinances are extremely lengthy ($7,700). Includes funding for records retention policy services ($700), scanning and digitizing of all records citywide ($15,000), annual maintenance services for City's document management system ($10,000). Includes funding for records shredding and record storage keeping ($9,800). (Total $83,200)

8200 Training Expense
Provides funding for City Clerk webinar trainings offered by CCAC ($200) and training materials for staff-hosted trainings such as supplies, handouts, refreshments when necessary and other as-needed items for training ($500). (Total $700).

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Elections / 101-1020-1022

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8010	000	Postage	-	517	31	1,000	1,000	100
8020	000	Special Department Expense	-	5,000	2,950	5,000	1,343	-
8040	000	Advertising	3,668	5,000	200	5,000	2,183	2,300
8170	000	Professional Services	182,075	66,326	90,061	155,000	106,283	61,500
		<CAPITAL OUTLAY>	185,743	76,843	93,242	166,000	110,809	63,900
[101-1022] Elections Total			**185,743**	**76,843**	**93,242**	**166,000**	**110,809**	**63,900**

OPERATIONS & MAINTENANCE

8010 Postage
Provides funds for as needed postage for mailings, as they arise (Total $100).

8040 Advertising
Provides for funding for the voter outreach program advertisement through newspaper groups (Total $2,300).

8170 Professional Services
Provides funding for translation of election notices and election consulting services from selected firms and funding for election management services provided by the Los Angeles County Registrar-Recorder/County Clerk's Office for the General Municipal Election (Total $61,500).

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Human Resources / 101-2030-2034

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	-	247,824	189,523	315,854
7010	000	Salaries - Temp / Part	-	-	-	31,075	162,315	75,080
7011	000	Salaries - PT Stipend	-	-	-	-	-	
7020	000	Overtime	-	-	-	-	30,615	
7040	000	Holiday	-	-	-	-	-	-
7055	000	IOD - Non Safety	-	-	-	-	-	
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	-	-	-	52,738	45,625	31,290
7100	010	CalPERS UAL	-	-		-	-	37,944
7108	000	Deferred Compensation	-	-	-	1,166	1,953	3,159
7110	000	Workers Compensation	-	-	-	4,585	3,351	3,430
7120	000	Disability Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	-	-	-	34,618	20,073	63,957
7140	000	Vision Insurance	-	-	-	576	412	740
7150	000	Dental Insurance	-	-	-	2,160	1,321	2,768
7160	000	Life Insurance	-	-	-	238	201	332
7170	000	FICA - Medicare	-	-	-	3,593	5,174	4,580
7180	000	Car/Uniform Allowance	-	-	-	-	-	-
		<WAGES & BENEFITS>	-	-	-	378,573	460,561	539,134
8000	000	Office Supplies	-	-	-	-	-	-
8010	000	Postage	175	288	-	350	95	350
8020	000	Special Department Expense	11,728	2,039	-	38,000	27,572	34,500
8040	000	Advertising	7,540	7,140	-	7,000	33,970	10,000
8050	000	Printing/Duplicating	245	-	-	1,000	957	1,000
8060	000	Dues & Memberships	3,195	3,295	-	6,000	7,325	6,319
8090	000	Conference & Meeting Expense	46	280	-	8,000	9,897	7,250
8110	000	Equipment Maintenance	-	-	-	-	-	-
8160	000	Legal Service	242,001	173,286	-	165,000	43,506	130,000
8170	000	Professional Services	57,350	126,333	-	170,000	170,000	35,000
8180	000	Contract Services	-	-	-	105,000	151,427	142,000
8200	000	Training Expense	2,550	38,100	-	20,000	508	10,000
		<OPERATIONS & MAINTENANCE>	324,830	350,761	-	520,350	445,257	376,419
[101-2034] Human Resources Total			**324,830**	**350,761**	-	**898,923**	**905,818**	**915,553**

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Budget Detail

PERSONNEL

7000 Salaries – Regular Employees
Funds the Human Resources & Risk Manager and two Management Analyst position salaries

7010 Salaries – Part-Time
Funds non-salaried part-time employees and temporary staff for special projects.

OPERATIONS & MAINTENANCE

8010 Postage
Provides funds for postal expenses related to personnel activities (Total $350).

8020 Special Department Expense
Provides funds for special department expenses including city employee identification cards ($2,000), recruitment expenses ($3,000), new hire onboarding materials ($6,000) and employee engagement, retention and recognition activities ($23,500). (Total $34,500).

8040 Advertising
Provides funds for employment advertisement in various print and online resources and other advertisement outlets (Total $10,000).

8050 Printing and Duplication
Provides funds for the printing and duplication of employee onboarding handbooks ($700) and purchase of annual Employment Law update posters from the South Pasadena Chamber of Commerce ($300). (Total $1,000).

8060 Dues, Memberships, Subscriptions, and Books
Provides funds for membership in the Liebert, Cassidy & Whitmore San Gabriel Valley Employee Relations Consortium ($4,255), and professional memberships to professional Human Resources Associations (all the acronyms here) (total for these) (GRAND TOTAL $), Southern California Public Management Association – Human Resources for three staff members (SCPMA-HR) ($300), California Public Employers Labor Relations Association (CALPELRA) ($380), Public Agency Risk Managers Association (PARMA) ($700), Municipal Management Association of Southern California (MMASC) ($90), Southern California Public Labor Relations Council (SCPLRC) ($350), and Society of Human Resources Management (SHRM) ($244). (Total $6,319).

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8090 Conference and Meeting Expense
Provides funds for staff conference travel, lodging and transportation expenses ($3,500). Includes funding for registration to Risk Management Conference & Human Resources Academy CALPERLA Annual Conference, CalPERS Educational Forum, PARMA Annual Conference, and SCPMA-HR Annual Conference ($3,750). (Total $7,250)

8160 Legal Services
Provides funds for labor attorney services including services for labor contract negotiations, employee grievances, application of Personnel Rules and Regulations and administrative policies, negotiations of revised Personnel Rules and Regulations and related city policies, and litigation of personnel claims and cases (Total $130,000).

8170 Professional Services
Personnel related studies such as Employee Relations, and Risk Management Consultation Services ($35,000). (Total $35,000).

8180 Contract Services
Provides funds for pre-employment medical and psychological examinations and background checks/investigations ($12,000), Fitness for Duty medical examinations ($5,000), personnel investigations ($30,000), Employee Assistance Program services ($8,000), 457 Plan Consulting contract services ($15,000), Supplemental Insurance Plan (TASC) administration fee ($4,000), NEOGOV License Renewals for Insight, Performance Evaluation, Learn, and Onboard Modules ($30,000), testing materials for public safety recruitments ($2,000), ADA Sign Language & other ADA accommodation services ($3,000), Liability and Workers Compensation Actuarial expenses ($10,000), and as-needed temporary staffing services ($25,000). (Total $142,000).

8200 Training Expense
Provides funds for trainings such as risk management, labor relations, and employee safety and legal mandates and educational webinars, as well as mandatory training for staff, including materials to host such training sessions, duplication of handouts and other related expenses ($10,000).

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Legal Services / 101-2010-2501

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8160	000	Legal Service	492,566	607,285	572,032	895,140	895,140	500,000
		<OPERATIONS & MAINTENANCE>	492,566	607,285	572,032	895,140	895,140	500,000
[101-2501] Legal Services Total			**492,566**	**607,285**	**572,032**	**895,140**	**895,140**	**500,000**

OPERATIONS & MAINTENANCE

8160 Legal Services

Provides funds for contract City Attorney for a variety of services: attend meetings, including the City Council meetings and sessions, and to provide legal advice to City Council, City Manager, and staff (Total $500,000). (Placeholder pending new City Attorney contract in June 2023)

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Information Services / 101-2030-2032

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	-	106	-	1,000	1,000	1,000
8060	000	Dues & Memberships	-	-	-	200	330	475
8110	000	Equipment Maintenance	-	-	-	1,500	1,100	-
8150	000	Telephone	211,380	254,693	-	369,000	397,001	395,000
8170	000	Professional Services	216,983	206,352	-	220,000	290,454	301,000
8180	000	Contract Services	32,277	39,308	-	96,500	50,414	207,036
8300	000	Lease Payment	25,469	18,929	-	25,000	23,488	24,000
8301	000	Copier Usage Charges	19,216	8,378	-	20,000	25,871	26,000
		<OPERATIONS & MAINTENANCE>	505,325	527,766	-	733,200	789,657	954,511
8530	000	Computer Equipment	68,556	13,344	-	100,000	100,000	197,000
		<CAPITAL OUTLAY>	68,556	13,344	-	100,000	100,000	197,000
[101-2032] Information Systems Total			**573,881**	**541,110**	**-**	**833,200**	**889,657**	**1,151,511**

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Budget Detail

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Provides funds for as-needed computer peripherals, such as web cameras for video conferencing, headsets and speakers (Total $1,000).

8060 Dues & Memberships
Provides funds for memberships in professional organizations specific to information technology (IT) such as *MISAC*, MiCTA, and ISACA for access to educational presentations, technical instruction, and managerial training. (Total $475).

8150 Telephone
Provides funds for City-wide land lines ($275,000), Point-to-Point network services (internet) throughout City Facilities ($50,000), mobile device/cellular accounts for personnel including FirstNet for first responders ($70,000). (Total $395,000).

8170 Professional Services
Provides funds for Citywide managed IT support services for all departments ($288,000). Includes funds for managed phone support services for the City's current analog landlines ($13,000). (Total $301,000).

8180 Contract Services
Provides funds for annual cost of efiling through Netfile (5,000), Docusign subscription services citywide ($8,610), SSL renewal for domain ($900), opengov domain ($8,800), antivirus/ cybersecurity services ($20,000), city website hosting services ($12,000) and annual subscription costs for Microsoft Office 365 ($60,000). Also funds software subscriptions for other departments including: CiviPlus ($5,067), Springbrook ($34,650), Planetbids ($8,000), and Truepoint/Accela ($43,500). Includes Zoom subscription for the department ($509). (Total $207,036).

8300 Lease Payment
Monthly lease payments for twelve leased multifunction printers citywide (Total $24,000).

8301 Copier Usage Charges
Provides funds for copy and printing expenditures on the multifunction printers citywide (Total $26,000).

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CAPITAL OUTLAY

8530 Computer Equipment

Citywide workstation equipment replacement, including monitors, laptops, and desktop purchases to replace equipment that has reached end of life ($75,000). Network hardware replacement for equipment that has reached end of life and is in need of critical replacement ($42,000). Server Operating System (OS) rebuild of all end of life servers and migration to Azure cloud-based servers ($80,000). (Total $197,000)

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Key Performance Indicators

The Management Services Department oversees the Human Resources and Risk Management Division, the City Clerk's Division, and Information Services. The department is focused on effectively centralizing management of citywide grants and contracts, establishing and implementing the Grants Manual and Policy Document, hosting monthly grant meetings with all Departments to ensure compliance and provide training, providing secure and reliable technological infrastructure for the City by completing and implementing initiatives in the Technology Master Plan, and updating administrative policies.

FY 2023 Accomplishments

Human Resources Division:

- Implemented an Employee Recognition Program – Employee Excellence Awards
- Hosted a Benefit & Wellness Fair
- Completed a Benefits and Compensation Study
- Implemented an automated recruitment tracker to share with Departments as recruitments progress.
- Implemented a Personnel Requests component to budget development process.

City Clerk Division:

- Collaborated with the County of Los Angeles to successfully conduct the November 8, 2022, General Municipal Election
- Completed Advisory Body Appointments and Reappointments
- Implemented efficiencies by working to digitize and preserve vital City records.
- Began the process of upgrading the City's electronic record management system

Information Technology Division:

- Began the process of replacing aging technology equipment by creating and implementing an asset management system to track IT inventory and replacement cycles
- Implemented a mobile device management program to track and inventory city-issued cellular devices
- Worked with IT Consultant to develop a five-year budget/ program for the replacement of the City's aging technology and to plan for upcoming IT projects.
- Audited technology citywide in order to develop a replacement cycle
- Implemented a project to consolidate mobile phone lines
- Began the process of upgrading the City's aged analog phone system
- Migrated all City staff to the City's new collaboration tool Microsoft Office 365
- Consolidated the leasing of multifunction printers across all City Departments

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FY 2023 Key Performance Indicators Update

During the development of the Fiscal Year (FY) 2023 budget, the Management Services Department committed to working towards Key Performance Indicators (KPI). As reflected in the FY 23 accomplishments above, staff has done a commendable job at working towards meeting those KPIs.

City Clerk's Office

In FY 23, the City Clerk's Office made significant strides in enhancing customer service through innovation. The Division also experienced significant turnover and staffing challenges, which were addressed with the assistance of temporary staffing services. The turnover in staffing did cause delays in implementing projects, but it also allowed staff to analyze the path forward and create a plan. The City Clerk's Office is working closely with the City Manager's Office in procuring services for a new user-friendly website. A Request for Proposals (RFP) was issued by the CMO, and this project is expected to be completed in the next fiscal year. Along with the joint effort of procuring a new website, the Division began the selection process for the procurement of an agenda management program to streamline the agenda process and will be implementing the selected program in FY 2024. Core operations of the City Clerk Division, such as agenda processing, clerking city council meetings, and assisting commissions, continued without interruption this fiscal year. The Division worked closely with all commissions and the City Manager's Office to implement a Commissioner's/ Elected Official's Handbook to welcome and provide incoming elected officials with the tools and background information for their roles. The City Clerk's Office hosted AB1234 training for all elected officials and staff liaisons. The second annual Commissioners' Congress was also held this fiscal year. The Division successfully coordinated with Los Angeles County to hold the General Municipal Election in November 2022 and then held a reorganization ceremony for the outgoing and incoming elected officials. This fiscal year, the Division is in the process of completing the backlog of minutes for city council meetings, which consisted of over years' worth of meetings. To date, for FY 23, the City has received an unprecedented amount of public records requests. Since July 1, 2022, the city has received 469 requests, with less than 3 months remaining in FY 23. All but seven of those requests have been responded to and closed out.

Human Resources and Risk Management

In FY 23, the Human Resources and Risk Management Division experienced significant turnover and staffing challenges but has continued strong momentum in improving the organizational culture and building a strong employer brand to attract and retain top-caliber candidates. This fiscal year, the Human Resources Division made investments in employee development by purchasing a new learning management system (LMS) through NEOGOV. The implementation is well underway and is expected to be completed by the end of FY 23. Additionally, in efforts to enhance the employee experience, Human Resources will be revamping the employee onboarding process through the implementation of NEOGOV Onboard. The Human Resources Division kicked off the first Health and Wellness Fair and, through the Employee Engagement Team (E.E.T), had a successful summer BBQ, Halloween celebration, and holiday luncheon that also served as an opportunity to recognize staff and honor years of service to the City. The Division has proactively offered several training opportunities citywide through our partnership with LCW. On the Risk Management side, the Division is undergoing an internal review of our processes and procedures and working with our third-party administrators (TPAs) to improve communication flow and assess ways to increase efficiency in the claims process. On the Risk Management side, the Division worked closely with our Police Department partners to roll out

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Active Shooter training citywide Division has compiled a full accounting of our claim's history for the last two years and has begun efforts to identify high-risk areas for mitigation. For the FY 24 budget development process, HR developed Budget Instructions and forms for departments to request changes to their personnel structure and positions formally and have worked closely with the Finance Department during budget development.

Innovation and Technology (IT)

In FY 23, the Management Services Department (MSD) made great strides in internally assessing our Information Technology infrastructure and needs. In FY 23, the department invested significant funds in updating computers and workstations citywide and will continue this effort into FY 24. In collaboration with our managed service provider, the City's Technology Master Plan was updated to reflect better the needs of the City, and important new tools were implemented to improve transparency and understanding of the City's infrastructure. As part of the hybrid work program, MSD has increased the deployment of laptops and started to phase out older PCs. A significant effort was made to consolidate many mobile phone carrier accounts, which has led to cost savings and more accurate billing. A major investment in technology was made to transition the City to the cloud-based Office 365 system, and the implementation of that system is underway and is expected to be fully implemented by the end of FY 23. MSD also replaced our aging multi-function devices (MFDs) with new leased machines, which also resulted in cost savings for the City. By the end of FY 23, MSD hopes to wrap up demonstrations and review initial proposals for a new Voice Over IP system (VoIP), to replace our legacy landline phone system that is out of date and in serious need of upgrading. On the cybersecurity front, MSD hopes to implement a new training and mitigation tool citywide to educate and train staff on potential cybersecurity threats to our organization's security.

Grants and Contracts

The Department has worked to centralize the tracking and execution of contracts. The City Clerk's Office has been delegated the responsibility of continuing to build on initial efforts. The Department has a centralized contracts tracker and is in the process of issuing official city contract numbers to make tracking easier. Our Senior Management Analyst has also worked with different departments regarding grant reporting and compliance obligations.

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FY 2024 Key Performance Indicators

As the Department has developed, staff has had the opportunity to review the existing performance measures. New KPIs are listed below for FY 24 that better reflect organizational goals and priorities.

City Clerk

Records Management
Establish and implement a records Management program to account for and maintain citywide records by:
(Strategic Plan - 6d)

- Conducting a comprehensive inventory on all physical citywide records currently in storage.
- Implement and upgrade Laserfiche software and public portal to increase transparency, manage records, and increase public accessibility to City records.
- Seek imaging/scanning vendor to conduct a bulk scan of all documents into our Laserfiche program.
- Host staff training on records retention policy. *(Strategic Plan – 6h)*
- Host a "Records Clean Up Day" for city staff, to include review of physical and electronic records for destruction and storage.

Agenda Management
Establish and implement an Agenda Management Software and program to increase efficiency and productivity. *(Strategic Plan - 6d)*

- Acquire Agenda Management Software to decrease staff turnaround time due to the current process/workload.
- Host staff training on Agenda Management Software and new process. *(Strategic Plan – 6h)*
- Implement an Agenda portal on the City Website to increase public transparency in the agenda process and city business.
- Conduct an online survey via the city mobile app and city website for the public and staff to provide feedback on the new software. *(Strategic Plan – 6h and 6e)*

Public Records Request Management Software
Implement Public Records Request Software that manages requests and reduces review periods by automating workflows. *(Strategic Plan - 6d)*

- Acquire a Public Records Request Management Software to increase accountability, ensuring public transparency.
- Host staff training on PRR Management Software to assist in quick response times and easy navigating of the new program. *(Strategic Plan – 6h)*
- Implement a PRR portal on City Website to allow access to city records by the community.
- Conduct an online survey via the city mobile app and city website for the public and staff to provide feedback on the new software. *(Strategic Plan – 6h and 6e)*

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Human Resources and Risk Management:

Establish and Support Organizational Effectiveness (Strategic Plan – 6C) by:

- Development of comprehensive administrative policy manual. Review existing City Rules and Regulations to determine revisions needed. Will require consulting with attorney and labor groups.
- Auditing FT Employee Files within Springbrook on a quarterly basis for benefit accuracy.
- Hiring a consulting firm to conduct a functional job analysis to identify the essential functions of a job. Will need to create an RFP for consultative services.

Continue to support and promote the Employee Experience (EX) and City Workplace Culture (Strategic Plan – 6H) by:

- Increasing employee retention and reducing employee turnover by 15% by continuing efforts for employee engagement such as sending out an annual employee survey to gather feedback, sponsoring at least four employee engagement events, and highlighting employee contributions through awards and recognitions during one of those events.
- Revamping the performance evaluation process to include an update to our performance appraisal form and tracking mechanism in NEOGOV, with the goal of 100% of evaluations being issued timely to staff.

Risk Management (No strategic alignment available)

- Conduct a cost/coverage analysis of existing city insurance plans by comparing them with other insurance options available, such as increasing/decreasing self-insurance retention (SIR), pooling and/or excess coverage in time for insurance renewals.
- Provide quarterly loss data reports to Departments to strengthen partnership in mitigation efforts.
- Update City's Injury Illness and Prevention Plan (IIPP) to confirm with current OSHA requirements.

Recruitment (Strategic Plan – 6I)

- Implement NEOGOV Onboard to streamline the pre-employment phase, goal of reducing time to hire by 25%.
- Upgrade recruitment tracker to Infinity platform to automate tracking process and provide in real time reporting for Directors, identifying bottlenecks in the process.
- Implement new training opportunities through LEARN.
- Update recruitment advertisement materials to highlight our benefits better. Consult with neighboring cities for best practices & update our recruitment flyers.
- Attend (2) local career fairs to establish a City presence as an employer of choice.

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Information Technology
Continue to improve technology across Departments (Strategic Plan-6d) by:

- Implementing the first year of a three-year replacement cycle for technology hardware
- Completing the implementation and migration to Microsoft Office 365
- Implementing cybersecurity software/ program to assist in monitoring threats and educate staff on best practices to minimize risk.
- Upgrading the City's analog phone system to a modern digital phone system.
- Upgrade the City's end of life servers by October 2023.
- Upgrade the City's end of life networking equipment by December 2023.

Summary of Changes

Human Resources and Risk Management

- HR Division is adding a Human Resources Specialist to provide administrative and clerical support so that the Human Resources Analysts can focus on higher-level work and projects.
- Includes the reclassification of the two management analyst positions in the HR Division to Senior HR Analyst and HR Analyst
- Includes an increase in funds for employee engagement, retention, and recognition activities to support employee retention and wellness.
- Includes funds for employee onboarding packets
- Includes the completion of a Classification and Compensation study that was budgeted in FY 23 but not completed due to staff turnover

City Clerk Division

- Agenda Management Software to streamline agenda process
- Inclusion of advertising costs for Departments that do not budget for such costs

Information Technology

- IT Consultant costs budget increased in order to properly reflect the actual expenditures incurred through the firm for IT support
- Includes funds for the first year of a three-year plan of technology replacements
- Includes funds for membership to MiCTA, for access to IT contracts for City's use for piggy-backing in an effort to lessen the impact of costs for aging technology
- Includes annual subscription costs for Microsoft Office 365

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Finance

Fiscal Year 2022-23 Budget Snapshot

Overview

The Finance Department accounts for all City and Successor Agency expenditures, administers business licensing and water billing through third-party vendors, accounts for revenue collection, performs city wide accounting functions, including grant accounting, processes the biweekly payroll through a third-party vendor, prepares payment of all obligations for review and approval by the City Council, and sends out approved check warrants. In conjunction with, and subject to the independent certification of the City/Agency independent audit firm, the Department prepares the City's Annual Comprehensive Financial Report (ACFR). The Department also prepares annual reports for the State Controller and other State and Federal agencies. Under the direction of the City Manager, the Department prepares the City's annual budget.

The Finance Department oversees the utility billing function by utilizing a third-party vendor for the City's approximately 7,000 accounts for all water, refuse and sewer fees. The Department works with the City Treasurer, Finance Commission, and committees with respect to the various financial issues. As required by the Government Code, monthly investment reports are provided to the City Council summarizing investment holdings and rates of return on investments.

Notable Changes – Wages and Benefits

Overall, the full-time permanent salaries show an increase as the budget includes funds for a permanent full time Finance Director as well as a full year's cost of a full time Management Assistant position authorized by the City Council in FY 2022-23. Compared with FY 2022-23, part-time, temporary staff salaries show a decrease, due to the hiring of a full time Management Assistant and Accounting Technician I, versus the previous use of part-time interim and temporary staff.

Notable Changes – Operations and Maintenance

The Finance Department expects an increase in special departmental expenses and professional services. The Department will work with an outside vendor to conduct a Master Fee Study and Cost Allocation Study to update our fee schedules.

Capital Outlay

No items budgeted for Capital Outlay.

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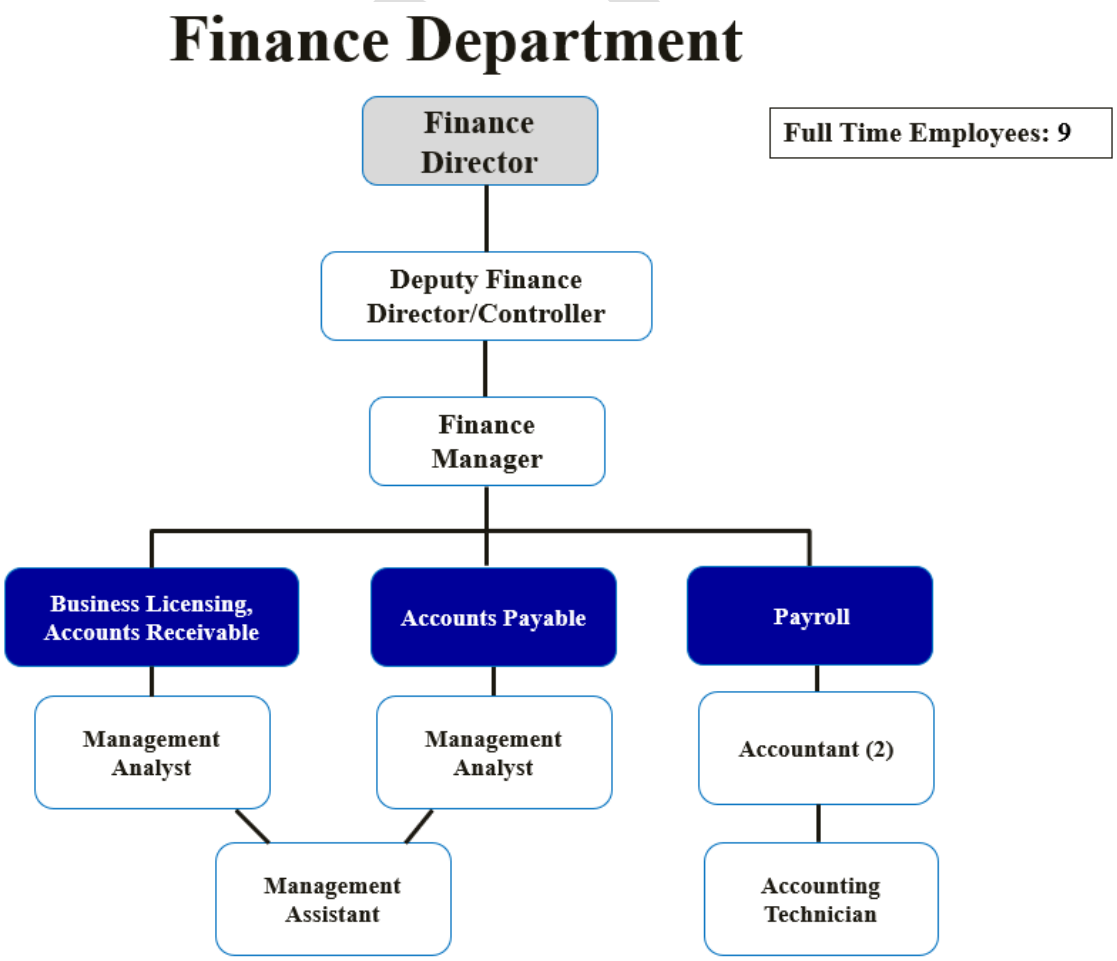
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	1,106,306	1,286,845	1,303,684	1,612,958	1,511,610	1,797,323
Operations & Maintenance	4,558,267	3,482,901	7,144,759	11,372,398	10,080,242	10,116,534
Capital Outlay	-	-	-	282,608	282,608	-
Total Expenses by Category	**5,664,573**	**4,769,746**	**8,448,443**	**13,267,964**	**11,874,460**	**11,913,857**
[101-3011] Finance	755,116	871,011	1,040,325	1,203,880	1,144,568	1,050,473
[101-3041] Non-Dept/Overhead	1,060,512	996,366	2,264,416	2,694,140	2,669,105	2,539,444
[103-2501] Insurance Services	2,941,009	2,167,385	4,276,759	2,596,111	4,686,289	3,566,267
[110-3011] OPEB Trust Fund	-	-	-	1,000	1,000	1,000
[206-XXXX] SLFRF Fund	-	-	-	5,830,000	2,560,519	3,498,717
[500-3012] Utility Billing	907,936	734,984	866,944	942,833	812,979	1,257,956
Total Expenses by Program	**5,664,573**	**4,769,746**	**8,448,443**	**13,267,964**	**11,874,460**	**11,913,857**

Authorized Positions



Finance / 101-3010-3011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	237,928	275,120	341,052	519,867	378,156	535,178
7010	000	Salaries - Temp / Part	23,008	144,195	194,660	48,071	89,406	-
7020	000	Overtime	1,648	1,669	5,529	2,050	5,970	-
7040	000	Holiday	4,358	6,582	6,357	6,780	-	4,540
7070	000	Leave Buyback	7,436	-	-	26,000	5,485	10,318
7100	000	Retirement	33,565	30,112	76,998	68,587	70,503	42,762
7100	010	CalPERS UAL	-	-		-	-	-
7108	000	Deferred Compensation	1,596	12,766	(9,466)	2,493	2,574	5,338
7110	000	Workers Compensation	3,508	4,961	6,422	8,229	4,674	5,966
7120	000	Disability Insurance	-	-	-	-	-	-
7122	000	Unemployment Insurance	7,613	3,003	-	-	-	-
7130	000	Group Health Insurance	30,664	38,869	30,933	39,761	39,599	73,147
7140	000	Vision Insurance	616	639	788	1,034	747	998
7150	000	Dental Insurance	2,216	2,505	3,078	3,879	2,798	3,736
7055	000	IOD - Non Safety	-	-	-	-	-	-
7160	000	Life Insurance	290	344	406	427	364	494
7170	000	FICA - Medicare	5,519	8,813	9,495	10,127	7,194	7,760
		<WAGES & BENEFITS>	359,966	529,578	666,251	737,305	607,471	690,237
8000	000	Office Supplies	7,765	890	7,108	9,000	6,081	9,330
8010	000	Postage	1,758	2,235	1,540	3,500	2,254	3,000
8020	000	Special Department Expense	21,400	73,639	120,258	72,648	92,361	140,551
8050	000	Printing/Duplicating	815	584	-	2,000	2,000	3,950
8060	000	Dues & Memberships	945	150	355	2,500	2,500	971
8070	000	Mileage/Auto Allowance	129	-	-	-	-	-
8090	000	Conference & Meeting Expense	-	225	665	5,000	6,319	6,793
8110	000	Equipment Maintenance	602	-	-	300	-	-
8170	000	Professional Services	226,568	192,842	221,516	86,877	114,406	91,725
8180	000	Contract Services	133,373	70,619	21,365	280,750	307,177	100,000
8200	000	Training Expense	1,796	249	1,266	4,000	4,000	3,916
		<OPERATIONS & MAINTENANCE>	395,151	341,433	374,074	466,575	537,097	360,236
[101-3011] Finance Total			**755,116**	**871,011**	**1,040,325**	**1,203,880**	**1,144,568**	**1,050,473**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Provides the compensation for the Finance Director, Deputy Finance Director/Controller, Finance Manager, Management Analyst (2), Accountants (2), Management Assistant, and Accounting Technician I. Refer to the Appendix for a detailed allocation list.

7020 Overtime
Covers the cost of overtime for non-management staff to assist with Finance Commission and other departmental needs.

7070 Leave Buyback
Provides funds to employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds for the purchase of miscellaneous supplies ($9,330).

8010 Postage
Funds for postal expenses for mailing information, checks and miscellaneous Department mailings (Total $3,000).

8020 Special Department Expense
Allocation of credit card charges and bank analysis fees (offset with revenue 101-0000-0000-5510) ($136,500), funding for compilation of the ACFR statistical section, and application costs for the GFOA CAFR award program ($2,130). Public Notice for Annual Budget 23 ($621). W-2, 1095-C, 1099 mailing and materials ($1,300) (Total $140,551)

8050 Printing and Duplication
Provides funds for the printing and duplication of draft and final budget ($3.950) and other miscellaneous information intended for public distribution from the Finance Department ($3,950).

8060 Dues, Memberships, Subscriptions, and Books
Provides funds for membership in the California Society of Municipal Finance Officers Association (CSMFO, $380), the Government Finance Officers Association (GFOA, $443). , and Municipal Management Association ($148). (Total $971)

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8090 Conference and Meeting Expense
Provides funds for attendance to GFOA/CSMFO conferences, Government Tax Seminar, CalPERS payroll training, Municipal Management Conference, and Springbrook Annual Conference ($6,793).

8110 Equipment Maintenance
N/A

8170 Professional Services
HdL sales tax, business license tax, and property tax audits ($29,150), State Controllers Report ($8,800), Debtbook (GASB 87 and GASB 96) ($8,775), Master Fee Schedule ($35,000), and Cost Allocation Schedule ($10,000) (Total $91,725)

8180 Contract Services
Provides funds for Temporary Staffing (Total $100,000)

8200 Employee Training
Provides funds for department training opportunities; includes funds for additional finance software training ($3,916).

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Non-Departmental Overhead / 101-3010-3041

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7131	000	Retiree Health Insurance	561,272	558,561	394,777	600,000	575,000	592,250
		<WAGES & BENEFITS>	561,272	558,561	394,777	600,000	575,000	592,250
8020	000	Special Department Expense	-	-	12,461	-	11,773	9,600
8060	000	Dues & Memberships	32,969	29,330	34,801	1,400	1,525	1,525
8140	000	Utilities	-	400,366	434,674	495,000	482,853	495,000
8170	000	Professional Services	43,643	134,326	130,104	214,640	214,640	135,000
8180	000	Contract Services	10,166	2,262	4,953	16,000	16,245	19,000
8191	000	Liability & Surety Bonds	251,782	(300,000)	1,080,000	1,190,000	1,190,000	1,110,000
8335	000	Property Tax Admin. Fee	160,681	171,522	172,646	177,100	177,069	177,069
		<OPERATIONS & MAINTENANCE>	499,240	437,805	1,869,638	2,094,140	2,094,105	1,947,194
[101-3041] Non-Dept/Overhead Total			**1,060,512**	**996,366**	**2,264,416**	**2,694,140**	**2,669,105**	**2,539,444**

PERSONNEL SERVICES

7131 Retirees Health Insurance
It is the City's obligation to fund retiree health benefits, as called for in each of the respective employee memorandums of understanding ($592,250).

OPERATIONS & MAINTENANCE

8020 Special Departmental Expense
CalPERS administration fee for medical health insurance ($9,600).

8060 Dues, Memberships, Subscriptions, and Books
Provides funds for City memberships in LAFCO ($1,525).

8140 Utilities
Citywide Water Utility Usage ($495,000)

8170 Professional Services
Provides funds for general fund portion of independent accounting services, including interim audits and preparation of annual Financial Report (FY 22-23 Audit $16,400) ACFR FY 22-23 ($13,600), a share of Morgan Stanley/Western Asset investment management services ($80,000), and OPEB Actuarial Services ($25,000) (Total $135,000)

8180 Contract Services
Provides funds for share of bank armored courier services ($19,000).

8191 Liability & Surety Bonds
General fund share of commercial liability insurance, automobile liability insurance for City vehicles, environmental liability insurance, and property insurance on City-owned facilities and buildings/contents, and surety and commercial crime bonds provide for City insurance protection for employees and officials. Total is $1,110,000. (Portions are allocated 30% to the Water Fund, and 10% to the Sewer Fund).

8335 Property Tax Admin Fee
LA County Fee for property tax calculation and administration ($177,069).

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Insurance Fund / 103-3010-2501

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	897,752	55,025	84,241	1,400,000	1,400,000	-
8161	000	Claims & Judgements - WC	728,256	1,365,034	1,821,509	341,966	1,514,116	554,000
8161	001	Claims & Judgements - GL	1,315,000	747,325	2,371,009	854,145	1,772,173	1,350,000
8162	000	Insurance Policy - WC	-	-	-	-	-	455,867
8162	001	Insurance Policy - GL	-	-	-	-	-	1,109,000
8170	000	Professional Services					-	97,400
		<OPERATIONS & MAINTENANCE>	2,941,009	2,167,385	4,276,759	2,596,111	4,686,289	3,566,267
103 - INSURANCE FUND TOTAL			2,941,009	2,167,385	4,276,759	2,596,111	4,686,289	3,566,267

OPERATIONS & MAINTENANCE

8161-000

Claims & Judgements – WC

Workers compensation premium through PRISM, formerly CSAC-EIA Estimated workers compensation settlements from self-insured plan and estimated adjustments based on actuarial study. The expenditures are recovered from various funds and departments based on staffing level and risk factors offsetting revenue account #103-0000-0000-5420-000 and insurance reimbursement from PRISM from revenue account #103-0000-0000-5410-000. (Total $554,000).

8161-001

Claims & Judgements – GL

General Liability premium through PRISM, formerly CSAC-EIA. Estimated general liability settlements from self-insured plan and estimated adjustments based on actuarial study. The expenditures are recovered from various funds and departments based on staffing level and risk factors offsetting revenue account #103-0000-0000-5420-000 and insurance reimbursement from PRISM from revenue account #103-0000-0000-5410-001. (Total $1,350,000).

8162-000

Insurance Policy - WC

Workers compensation premium through PRISM, formerly CSAC-EIA. Estimated workers compensation settlements from self-insured plan and estimated adjustments based on actuarial study. The expenditures are recovered from various funds and departments based on staffing level and risk factors offsetting revenue account #103-0000-0000-5420-000 and insurance reimbursement from PRISM from revenue account #103-0000-0000-5410-000. (Total $455,867).

8162-001

Claims & Judgements – GL

General Liability premium through PRISM, formerly CSAC-EIA. Estimated general liability settlements from self-insured plan and estimated adjustments based on actuarial study. The expenditures are recovered from various funds and departments based on staffing level and risk factors offsetting revenue account

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#103-0000-0000-5420-000 and insurance reimbursement from PRISM from revenue account #103-0000-0000-5410-001. (Total $1,109,000).

8170-000

Professional Services

Administrative fee for Carl Warren and Intercare. (Total $97,400).

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OPEB Trust Fund / 110-3010-3011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8170	000	Professional Services	-	-	-	1,000	1,000	1,000
		<OPERATIONS & MAINTENANCE>	-	-	-	1,000	1,000	1,000
110 - OPEB Trust Fund			-	-	-	1,000	1,000	1,000

OPERATIONS & MAINTENANCE

8170 Professional Services

Administrative fee (Total $1,000).

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SLFRF Fund / 206-XXXX-XXXX

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8170	000	Professional Services	-	-	-	87,402	-	-
[206-2032] Information Systems Total			**-**	**-**	**-**	**87,402**	**-**	**-**
8020	000	Special Department Expense	-	-	-	5,187,942	2,005,863	3,498,717
[206-3041] Non-Dept/Overhead Total			**-**	**-**	**-**	**5,187,942**	**2,005,863**	**3,498,717**
8170	000	Professional Services	-	-	-	70,000	70,000	-
8520	000	Machinery & Equipment	-	-	-	-	-	-
[206-4011] Police Total			**-**	**-**	**-**	**70,000**	**70,000**	**-**
8134	000	Safety Clothing/Equipment	-	-	-	152,048	152,048	-
8540	000	Automotive Equipment	-	-	-	282,608	282,608	-
[206-5011] Fire Total			**-**	**-**	**-**	**434,656**	**434,656**	**-**
8180	000	Contract Services	-	-	-	50,000	50,000	-
[206-8031] Community Services Total			**-**	**-**	**-**	**50,000**	**50,000**	**-**
		<OPERATIONS & MAINTENANCE>	-	-	-	5,830,000	2,560,519	3,498,717
206 - SLFRF FUND TOTAL			**-**	**-**	**-**	**5,830,000**	**2,560,519**	**3,498,717**

OPERATIONS & MAINTENANCE

8020 Special Department Expense

State and Local Fiscal Recovery Funds have been approved by Council to be allocated to the following projects: Library RFID Project ($160,000), Fire Air Utility Apparatus ($600,000), IT Master Plan ($100,000), Public Works Automatic Asphalt Truck ($300,000), and other Salaries and CIP ($2,338,717). (Total $3,498,717)

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Utility Billing / 500-3010-3012

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	135,727	132,182	159,819	209,383	246,472	386,094
7010	000	Salaries - Temp / Part	1,346	26,960	9,230	9,013	-	-
7020	000	Overtime	-	-	2,744	2,000	5,205	
7040	000	Holiday	869	1,627	1,935	1,578	-	1,163
7070	000	Leave Buyback	2,732	-	478	1,500	4,571	4,422
7100	000	Retirement	28,655	21,275	55,002	26,492	34,810	32,378
7100	010	CalPERS UAL				-	-	9,486
7108	000	Deferred Compensation	818	5,632	(4,399)	1,062	1,652	3,852
7110	000	Workers Compensation	1,639	1,716	2,075	3,874	2,036	4,285
7120	000	Disability Insurance	-	-	-	-	7,384	
7130	000	Group Health Insurance	10,163	6,083	11,237	15,051	20,881	63,306
7140	000	Vision Insurance	240	187	335	516	463	810
7150	000	Dental Insurance	817	786	1,358	1,935	1,735	3,027
7160	000	Life Insurance	108	98	172	213	226	416
7170	000	FICA - Medicare	1,954	2,159	2,670	3,036	3,705	5,598
		<WAGES & BENEFITS>	185,069	198,705	242,657	275,653	329,139	514,836
8000	000	Office Supplies	-	-	-	-	-	-
8010	000	Postage	15,302	24,779	31,527	50,000	23,135	50,000
8020	000	Special Department Expense	173,213	103,683	125,489	160,000	109,681	160,000
8032	000	Water Efficiency Fee Projects	9,057	47	-	-	-	-
8060	000	Dues & Memberships	-	-	-	-	-	424
8070	000	Mileage/Auto Allowance	-	-	-	-	-	-
8090	000	Conference & Meeting Expense	(100)	-	-	100	462	3,512
8110	000	Equipment Maintenance	602	-	-	18,000	-	18,000
8170	000	Professional Services	423,996	312,894	375,192	346,600	350,562	416,700
8180	000	Contract Services	8,817	2,895	99	-	-	-
8200	000	Training Expense	-	-	-	500	-	2,504
8350	000	Bad Debt Expense	-	-	-	-	-	-
8400	000	Overhead Allocation	91,981	91,981	91,981	91,980	-	91,980
		<OPERATIONS & MAINTENANCE>	722,867	536,279	624,288	667,180	483,840	743,120
[500-3012] Utility Billing Total			**907,936**	**734,984**	**866,944**	**942,833**	**812,979**	**1,257,956**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Provides the partial compensation for the Finance Director, Accounting Manager, Finance Manager, Management Analyst, and Accountant. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Temp/Part-time
Provide partial compensation for Management Analyst and Finance Director.

OPERATIONS & MAINTENANCE

8010 Postage
Provides funds for postal expenses related to water billing services and inserts ($50,000).

8020 Special Department Expense
Provides funds for payment of allocation of credit card charges and bank analysis fees ($160,000). (Offset by Transaction fee acct # 101-0000-0000-5510-000)

8060 Dues, Memberships, Subscriptions, and Books
Provides funds for membership in the California Society of Municipal Finance Officers Association (CSMFO, $145), the Government Finance Officers Association (GFOA, $157), and Municipal Management Association ($122). (Total $424)

8090 Conference and Meeting Expense
Share of annual CSMFO conference for the Finance Staff ($3,512).

8110 Equipment Maintenance
Provides funds for postage machine and copier lease/maintenance allocation ($2,000) and maintenance costs for Springbrook Software (Finance/Utility Billing systems $16,000). (Total $18,000)

8170 Professional Services
Provides ($338,100) toward contractual support service with Munibilling, the company that provides the Finance Department's utility billing processing. Also provides portion of annual city audit services, ($23,400), a share of the GASB 34 infrastructure assets valuation with Community Economic Solutions ($1,200) and investment management fees to Morgan Stanley and Western Asset ($54,000). (Total $416,700)

8200 Training
Provides funds for training seminars for Finance Department staff ($2,504).

8400 Overhead Allocation
Charges for administrative services provided by the General Fund ($91,980).

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Key Performance Indicators

The Finance Department is responsible for accounting, revenue, treasury, debt administration, payroll, budget, and purchasing functions. We strive to work efficiently and effectively. We are dedicated to providing our City Council, City Commissions, City Manager, City departments, employees, and diverse community with efficient and courteous service.

Accounting Management

The Finance Department completed their audit and financial report by February 2023 and filed the following reports in a timely manner: Annual Comprehensive Financial Report with an unmodified “clean” audit opinion, State Controller’s Report, State and Street Report, and Metro Audit. The Finance Department also produced 12 Treasurer’s Reports for City Council, issued 3,569 warrants in FY 21-22, issued 115 1099s for Calendar Year 2022, and approved 825 journal entries in FY 21-22.

Payroll

The Finance department has successfully moved the payroll task in house for FY 22-23. In FY 22-23, we distributed 269 w-2s and 162 1095-Cs to employees. Finance has 207 direct deposit participants and 63 deferred compensation participants. Our goal for FY 23-24 is to implement the Springbrook Employee Self Service portal. This will provide an additional level of transparency for employees as they can view their w-2s and bi-weekly paychecks online.

Revenue

The Finance Department is responsible for ensuring revenue is recorded in a timely manner. In FY 22-23, Finance issued 1,500 business licenses, reviewed over 2,400 bank deposits, and secured 162 filming/special events permits.

Enterprise Resource Planning Upgrade

Finance currently utilizes a software called Springbrook for its accounting needs and resources. We have placed a hold on moving this platform into the cloud as we navigate our options.

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City Treasurer

Fiscal Year 2023-24 Budget Snapshot

Overview

The City Treasurer is an elected position and is responsible for the management and oversight of the City's idle cash and its investments upon order of the City Council. The Treasurer receives and safely keeps City funds, provides overall investment management and strategy, administers the City's banking relationships, reports periodically to the City Council and the City's Finance Commission, and submits an annual investment policy to the City Council.

Notable Changes – Wages and Benefits

No significant changes to Wages and Benefits.

Notable Changes – Operations and Maintenance

No items budgeted for Operations and Maintenance.

Capital Outlay

No items budgeted for Capital Outlay.

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Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	9,211	8,444	9,993	8,752	8,752	9,239
Operations & Maintenance	-	-	-	-	-	-
Capital Outlay	-	-	-	-	-	-
Total Expenses by Category	**9,211**	**8,444**	**9,993**	**8,752**	**8,752**	**9,239**
[101-3021] City Treasurer	9,211	8,444	9,993	8,752	8,752	9,239
Total Expenses by Program	**9,211**	**8,444**	**9,993**	**8,752**	**8,752**	**9,239**

Authorized Positions

City Treasurer	1
Total	**1**

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City Treasurer / 101-3000-3021

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7010	000	Salaries - Temp / Part	8,472	7,766	9,178	8,472	8,472	8,472
7110	000	Workers Compensation	91	84	113	157	157	119
7170	000	FICA - Medicare	648	594	702	123	123	648
		<WAGES & BENEFITS>	9,211	8,444	9,993	8,752	8,752	9,239
[101-3021] City Treasurer Total			**9,211**	**8,444**	**9,993**	**8,752**	**8,752**	**9,239**

PERSONNEL SERVICES

7010 Salaries – Temp / Part

Funds monthly stipend of elected City Treasurer. The Treasurer's stipend is authorized by Government Code and City resolutions.

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Police

Fiscal Year 2022-23 Budget Snapshot

Overview

The Police Department provides a full range of law enforcement and crime deterrence services. Services include street patrol, traffic patrol, crime investigation and analysis, parking enforcement, and a community crime prevention program. Support services for sworn officers include training, records, property evidence, dispatch center, and administrative support. As a reflection of the community, the Police Department has enhanced its diversity by increasing the number of female police officers to three.

The South Pasadena Police Department is comprised of 34 sworn officers including Lieutenants, Sergeants, Corporals, Deputy Chief of Police and Chief of Police, 18 full-time non-sworn personnel and additional part-time non-sworn personnel including Police Cadets. The department is augmented with an additional four Reserve Officers and a volunteer Chaplain.

Notable Changes – Wages and Benefits

The Police Department intends to fill all vacancies and bring the level of staffing up to authorized strengths. The overtime exceeded expectations is due to unfilled vacancies, increased patrol for special assignments and COVID-19 related absences. In Fiscal Year 2022-23, the Police Department had an increase in overtime due to unfilled vacancies, and COVID-19 related absences.

Notable Changes – Operations and Maintenance

To become more sustainable and support the City's Green Action Plan, the Police Department is moving towards the electrification of its fleet of vehicles. The contract for crossing guards with All City Management was increased to reflect the return to in-person learning and a traditional school calendar.

Capital Outlay

The COPS Grant is funding the new Computer Aided Dispatch and Records Management System.

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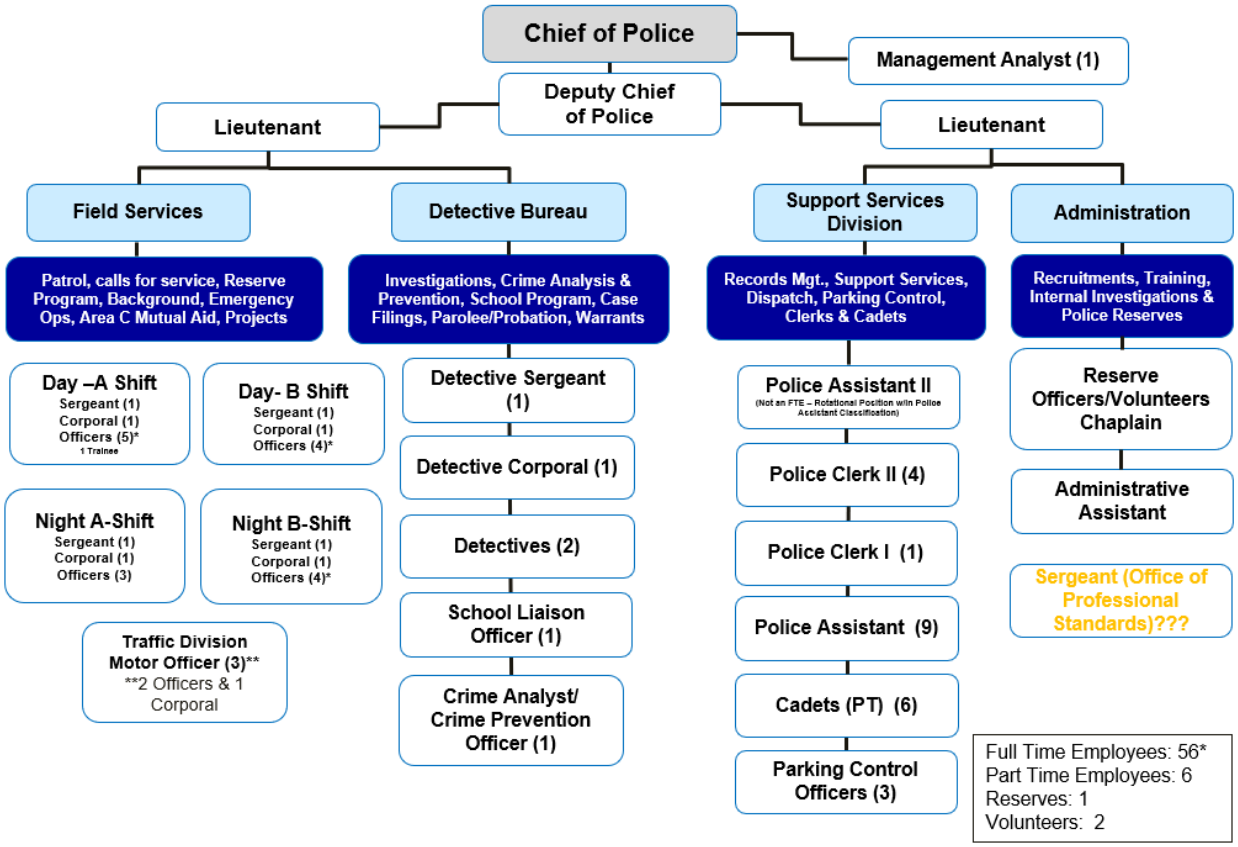
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	8,442,920	9,760,540	10,451,997	9,705,685	9,595,647	10,268,156
Operations & Maintenance	806,777	679,040	1,001,511	1,536,987	1,554,440	1,785,380
Capital Outlay	66,745	24,478	258,055	301,240	180,000	228,011
Total Expenses by Category	**9,316,441**	**10,464,058**	**11,711,564**	**11,543,912**	**11,330,087**	**12,281,547**
[101-4011] Police	9,171,740	10,400,998	11,384,907	11,032,589	11,020,087	11,512,034
[105-4011] Facilities & Equipment Replacement	42,645	-	(6,553)	263,000	120,000	531,502
[241-4011] Measure H	77,957	38,582	50,982	57,083	-	-
[270-4011] Police	-	-	20,100	10,000	10,000	10,000
[270-4015] Police Asset Forfeiture	-	-	-	50,000	50,000	50,000
[272-4018] Police State Grant - AB 3229	24,100	24,478	136,767	130,000	130,000	178,011
[274-4019] Homeland Security Grant	-	-	125,360	1,240	-	-
Total Expenses by Program	**9,316,441**	**10,464,058**	**11,711,564**	**11,543,912**	**11,330,087**	**12,281,547**

Authorized Positions



Police / 101-4010-4011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	4,482,814	4,606,792	4,525,275	4,943,712	4,333,032	5,196,021
7010	000	Salaries - Temp / Part	153,126	147,632	135,997	160,000	156,419	104,419
7020	000	Overtime	618,057	704,131	776,637	792,000	1,063,713	885,071
7030	000	Overtime - FLSA	3,796	6,687	4,548	-	-	-
7040	000	Holiday	245,815	268,676	236,230	200,000	235,611	226,708
7045	000	Overtime - Special (Movie) Detail	207,780	286,525	299,327	250,000	463,063	450,000
7050	000	Overtime - DUI Checkpoint	7,217	13,471	15,220	67,000	19,969	-
7060	000	IOD - Safety	5,957	-	72,711	76,200	227,897	-
7070	000	Leave Buyback	46,574	16,512	15,309	38,000	22,947	13,683
7100	000	Retirement	1,711,224	2,562,864	3,692,828	2,227,309	2,092,296	863,575
7100	010	CalPERS UAL				-	-	1,237,237
7108	000	Deferred Compensation	3,529	170,181	(163,016)	4,780	34,391	51,023
7110	000	Workers Compensation	218,990	239,059	233,362	228,697	232,716	202,168
7120	000	Disability Insurance	32,102	7,956	-	-	47,044	-
7122	000	Unemployment Insurance	-	2,825	-	-	-	-
7130	000	Group Health Insurance	449,722	499,806	374,850	477,314	474,728	890,760
7140	000	Vision Insurance	10,220	10,285	9,956	12,960	9,060	12,474
7150	000	Dental Insurance	33,914	35,053	34,086	48,600	32,965	45,209
7160	000	Life Insurance	4,799	4,864	4,817	5,346	4,489	5,643
7170	000	FICA - Medicare	85,626	90,990	88,029	71,684	95,139	84,165
7180	000	Car/Uniform Allowance	43,700	47,650	44,850	45,000	50,168	-
		<WAGES & BENEFITS>	8,364,963	9,721,958	10,401,015	9,648,602	9,595,647	10,268,156
8000	000	Office Supplies	28,120	28,677	29,451	29,000	29,000	29,000
8010	000	Postage	2,669	4,410	3,572	5,000	5,000	5,250
8020	000	Special Department Expense	64,022	42,603	57,002	64,500	64,500	84,500
8022	000	OTS Grant Expense	-	2,755	1,093	8,000	-	-
8034	000	K9 Expenses	8,436	8,154	8,944	9,000	8,758	9,000
8035	000	Narco K9 Expenses	4,332	3,770	1,460	-	-	-
8040	000	Advertising	60	-	-	-	-	-
8050	000	Printing/Duplicating	16,373	12,944	14,947	20,000	19,822	22,000
8060	000	Dues & Memberships	2,145	1,555	3,555	3,700	3,700	3,700
8090	000	Conference & Meeting Expense	2,213	400	1,241	8,000	8,000	8,000
8100	000	Vehicle Maintenance	75,887	45,933	76,441	130,000	130,000	81,000
8105	000	Fuel	63,769	65,031	79,255	120,000	85,000	65,000
8109	000	Equipment	-	14,702	21,650	25,000	25,000	25,000
8110	000	Equipment Maintenance	13,040	12,621	15,557	20,000	20,000	21,000
8120	000	Building Maintenance	-	-	-	-	-	-
8134	000	Safety Clothing/Equipment	30,105	15,419	18,636	30,000	30,000	35,000
8150	000	Telephone	-	-	-	-	-	-
8170	000	Professional Services	104,677	71,024	116,893	189,250	266,816	202,823
8180	000	Contract Services	353,111	309,161	459,320	652,037	651,344	575,105
8200	000	Training Expense	18,875	22,880	43,969	33,000	40,000	40,000
8210	000	Training Expense - POST Reimb.	18,944	17,002	28,424	30,000	30,000	30,000
8176	000	Reserves and Volunteers	-	-	-	7,500	7,500	7,500
		<OPERATIONS & MAINTENANCE>	806,777	679,040	981,411	1,383,987	1,424,440	1,243,878
8520	000	Machinery & Equipment	-	-	2,480	-	-	-
		<CAPITAL OUTLAY>	-	-	2,480	-	-	-
[101-4011] Police Total			**9,171,740**	**10,400,998**	**11,384,907**	**11,032,589**	**11,020,087**	**11,512,034**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds for all full-time, permanent sworn and civilian employees' salaries.

7010 Salaries – Temporary/Seasonal/Part-Time
Funds seasonal, temporary and other non-salaried part-time employees, including Police Cadets, compensation.

7020 Overtime
Covers the cost of overtime for non-management personnel. Overtime is used for duties that cause an employee to work beyond their scheduled end-of-shift, court appearances and court on-call status during off-duty hours, and overtime required to fill minimal staffing requirements. Overtime has increased due to COVID-19 related absences. Efforts will be made through negotiated agreements with the police officers' association to reduce nonessential overtime costs, however, overtime due to burglary suppression efforts will continue. The use of reserve officers whenever possible has kept these costs down. Total ($885,071).

7040 Holiday
Funds overtime compensation for employees required to work on Holidays. Total ($226,708).

7045 Overtime – Filming Detail
Funds the cost of overtime for providing security at filming locations. The City is reimbursed fully by the film companies for this overtime.

7050 Overtime – DUI Checkpoint
Funds overtime compensation for DUI checkpoint staffing.

7060 IOD – Safety
Funds Injury on Duty (IOD) overtime.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances ($13,683).

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds the purchase of Police report forms; Detective and Records case file folders, office stationery, miscellaneous office, kitchen and COVID-19 supplies. Total ($29,000).

8010 Postage
Provides funds for Police Department postal expenses. Vendors Pitney Bowes and

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FedEx. Total ($5,250).

8020 Special Department Expense
Provides for department supplies and services to include: Fingerprint supplies, emergency flares, and handheld radio batteries and purchase of three new radios ($40,000); Live-Scan ($3,500); Office equipment including office chairs ($1,000); Locker room refurbishment ($5,000); Community education programs to include: Teen Academy, Coffee with a Cop, Women's Self Defense, Citizen's Academy, Crime Prevention Materials ($26,500); Festival of Balloons expenses including radio, repeater and message board rentals ($1,000); and other miscellaneous expenditures ($7,500). Total ($84,500).

8034 K-9
Funds training, equipment, maintenance and veterinarian costs. Total ($9,000).

8050 Printing and Duplication
Provides funds for the printing and duplication of materials such as crime prevention brochures $4,000; parking, traffic citations, and parking permits; ($18,000); printing costs are expected to increase 10 to 15% this year. Total ($22,000).

8060 Dues, Memberships, Subscriptions and Books
Funds both memberships and training material. Includes memberships for the Los Angeles County Police Chiefs Association; the California Police Chiefs Association; the San Gabriel Valley Police Chiefs Association; the International Association of Chiefs of Police Chiefs; California Association of Property and Evidence; International Association for Property and Evidence Investigators; California Background Investigators Association; and the California Public Parking Association; subscription to the Pasadena Star News; and subscription service for various legal codes including Penal Code and Vehicle Code. Total ($3,700).

8090 Conference and Meeting Expenses
Provides funds for management training, conferences, transportation, and meeting expenses. This includes providing refreshments for local community and professional meetings of organizations such as the San Gabriel Valley Intelligence meetings and staff meetings ($2,500). Funds are allocated for the Chief of Police to attend certain annual professional meetings and conferences, including the annual conferences for the California Police Chiefs Association ($1,900); the Los Angeles County Police Chiefs Association ($600); and for other personnel to attend miscellaneous meetings and conferences ($3,000). Total ($8,000).

8100 Vehicle Maintenance and Operations
Provides funds for the maintenance, repairs, and operational costs for the Police vehicle fleet, routine maintenance and repairs 30,000); collision repairs ($20,000); tires ($10,000); vehicle washes ($3,000); and maintenance and repairs of emergency equipment and vehicle computers ($18,000). Total ($81,000).

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8105 Fuel
Funds fueling of patrol vehicles. Increased due to fuel cost increase. Total ($65,000).

8109 Equipment
Lethal and less lethal weapons, accessories, training supplies including ammunition, range maintenance, and repairs. Total ($25,000).

8110 Equipment Maintenance
Provides funds for the repair and maintenance of City-owned equipment, excluding police vehicles. This includes maintenance, calibration and repair of radar units, and maintenance and repair of office machines, police radios, video cameras, and other equipment ($15,000); Police station card reader system ($6,000). Total ($21,000).

8134 Safety Clothing/Equipment
Provides for the purchase of safety equipment and supplies for both sworn and civilian personnel, including uniforms for new employees ($9,000); ballistic body armor ($20,000); flashlights ($500); and other safety equipment and supplies ($5,500). Total ($35,000).

8170 Professional Services
Provides for outside services/retainers for specific needs such as: Arrestee blood alcohol tests ($2,000); sexual assault and victim exams ($2,000); arrestee medical treatment ($15,000); office computer and server maintenance ($45,000); medical, psychological, and background exams for employee candidates ($15,000); Pasadena Police Department crime scene evidence technician ($15,000); fingerprint tracing service ($9,000); SecureWorks annual subscription and other software/license fees ($39,516). Phoenix Group Information Systems city parking program management offset by revenue in Parking Citations account #4610-000, includes 5% increase ($60,307). Total ($202,823).

8180 Contract Services
Funds contracts that are provided for services such as: Pasadena Humane Society increased by 2% ($176,953); All City Management Crossing Guards ($228,642); inmate housing fees for Alhambra and Pasadena Police Departments ($28,080); ICI Glendale/Pasadena Radio frequencies ($20,000); CAD/RMS technical support ($9,785); Foothill Air Support Team increased by 14% ($35,700); LexisNexus database ($32,445.23); Flock Camera System ($30,000); Raftelis PD Assessment ($13,500). Total ($575,105).

8200 Training Expense
Funds training courses and training materials for Police Department employees that is not reimbursable by P.O.S.T. and the duty manual. Total ($40,000).

8210 P.O.S.T. Training Expense
Funds training courses and training materials required of police officers to retain

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or obtain P.O.S.T. certification. A portion of the training is P.O.S.T. reimbursable and goes back into the general fund. Total ($30,000).

8176 Reserves and Volunteers
Funds expenses associated with Volunteer Program and Police Reserve Officers to include uniforms maintenance and training. Total ($7,500).

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Facilities and Maintenance Equipment / 105-4010-4011

Budget Detail

8101	000	Vehicle Lease (PD)	-	-	-	143,000	120,000	531,502
		<OPERATIONS & MAINTENANCE>	-	-	-	143,000	120,000	531,502
8540	000	Automotive Equipment	42,645	-	(6,553)	120,000	-	-
		<CAPITAL OUTLAY>	42,645	-	(6,553)	263,000	120,000	531,502
[105-4011] Police Facilities & Equip. Repl. Total			**42,645**	**-**	**(6,553)**	**263,000**	**120,000**	**531,502**

OPERATIONS & MAINTENANCE

8101 Vehicle Lease (PD)
Five-year lease of police vehicles. The lease will provide 20 electric vehicles. The vehicle leasing costs will be budgeted annually. Total ($531,502).

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Measure H / 241-4010-4011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	8,698	4,531	1,002	-	-	-
7020	000	Overtime	53,144	22,433	45,230	53,144	-	-
7040	000	Holiday	3,939	-	-	3,939	-	-
7100	000	Retirement	5,816	2,543	1,274	-	-	-
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	-	5,635	-	-	-	-
7110	000	Workers Compensation	2,991	1,253	1,972	-	-	-
7130	000	Group Health Insurance	2,044	1,593	743	-	-	-
7140	000	Vision Insurance	75	43	18	-	-	-
7150	000	Dental Insurance	280	148	67	-	-	-
7160	000	Life Insurance	33	20	8	-	-	-
7170	000	FICA - Medicare	938	384	668	-	-	-
		<WAGES & BENEFITS>	77,957	38,582	50,982	57,083	-	-
[241-4011] Police Total			**77,957**	**38,582**	**50,982**	**57,083**	**-**	**-**

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Asset Forfeiture / 270-4010-4011/4015

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8200	000	Training Expense	-	-	20,100	10,000	10,000	10,000
		<OPERATIONS & MAINTENANCE>	-	-	20,100	10,000	10,000	10,000
8520	000	Machinery & Equipment	-	-	-	50,000	50,000	50,000
		<CAPITAL OUTLAY>	-	-	-	50,000	50,000	50,000
[270-4015] Police Asset Forfeiture Total			**-**	**-**	**20,100**	**60,000**	**60,000**	**60,000**

OPERATIONS & MAINTENANCE

8200 Training Expenses

Funds law enforcement training and education—training of investigators, sworn and non-sworn law enforcement personnel in any area necessary to perform official law enforcement duties, such as canine handler, narcotics, defensive tactics, criminal justice, language, constitutional law, accounting/finance, or forensics. Provided that the employees' regular duties require knowledge of these topics ($10,000).

CAPITAL OUTLAY

8520 Machinery & Equipment

Funds the costs associated with the purchase of law enforcement equipment for use by law enforcement personnel that supports law enforcement activities ($50,000).

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Police State Grant – AB 3229 / 272-4010-4018

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8022	000	OTS Grant Expenses	-	-	-	-	-	-
8180	000	Contract Services	-	-	-	-	-	-
8200	000	Training Expense	-	-	-	-	-	-
		<OPERATIONS & MAINTENANCE>	-	-	-	-	-	-
8520	000	Machinery & Equipment	24,100	24,478	136,767	130,000	130,000	178,011
		<CAPITAL OUTLAY>	24,100	24,478	136,767	130,000	130,000	178,011
[272-4018] Police State Grant - AB 3229 Total			**24,100**	**24,478**	**136,767**	**130,000**	**130,000**	**178,011**

CAPITAL OUTLAY

8520 Machinery & Equipment
Machinery & Equipment
Axon Enterprise Inc., digital storage and upgrading current equipment. Total ($178,011).

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Homeland Security Grant / 274-4010-4019

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8520	000	Machinery & Equipment	-	-	125,360	1,240		
		<CAPITAL OUTLAY>	-	-	125,360	1,240	-	-
[274-4019] Police Grant Total			**-**	**-**	**125,360**	**1,240**	**-**	**-**

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Key Performance Indicators

The South Pasadena Police Department meets the needs of the community by providing professional services to safeguard the city in crime prevention. Community outreach is accomplished by active patrols, educational programs, and social media through the City's website. The Key Performance Indicators (KPI) for the department demonstrate the need to quantify its information in a concise and articulate manner.

Computer Aided Dispatch and Record Management System (CAD/RMS)

- On March 22, 2022, the Motorola Flex System went into effect, bringing the South Pasadena Police Department into the 21st century of law enforcement.
- The Motorola Flex System has established a detailed base of statistics for 2022 and year-to-date for 2023. In January 2022, the FBI modified reporting standards for Part 1 Crimes to include specific identifiers within each category.
- The table below shows the forecasted Part 1 Crime numbers for 2023. It is predicted that crimes such as burglary and larceny will increase, though could be reduced with an increased law enforcement presence through hiring practices.

	2022	2023 (Through 03/30/23)	2023 (Forecasted)
Homicide	2	0	0
Rape	2	1	3
Robbery	9	2	6
Assault	126	22	66
Burglary	92	53	159
Larceny Theft	343	118	354
Grand Theft Auto	75	16	48
Arson	2	0	0

Recruit and Fill Vacant Police Department Sworn and Non Sworn Positions

- The Police Department has 55 authorized full-time positions, along with six (6) part-time employees, one (1) Reserve Police Officer, and two (2) volunteers.
- The Department currently has 13 unfilled positions, and due to nationwide challenges in law enforcement hiring, is planning to fill eight (8) of these vacant positions in FY 23-24.

	Authorized	Vacant	Filled	KPI Status
Sworn Officer	37	7	30	3
Police Assistant	9	1	8	1
Records Clerk	5	2	3	1
Management Analyst	1	0	1	0
Parking Control	3	1	2	1
Cadets	6	2	4	2

Increased Community Engagement

- Due to the covid-19 pandemic, many community events have been canceled or on hold since 2020.
- The Police Department is ramping up community engagement efforts to reach pre-pandemic levels for events and communication with stakeholder groups.
- For the FY 22-23, the Department took part in or held the following events: Open House, Coffee with the Chief, Neighborhood Watch Meetings, Eggstravaganza, Catalytic Converter Etching Events, and the Women's Self-Defense Class.

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Fire

Fiscal Year 2022-23 Budget Snapshot

Overview

The Fire Department provides for the protection of life, property, and the environment from the adverse effects of fires, medical emergencies, and hazardous conditions through progressive resource deployment. The Department offers Fire prevention programs and community education activities. The Fire Department provides emergency fire and life safety response services around the clock every day of the year.

Notable Changes – Wages and Benefits

Increases in wages and benefits are associated with increased retirement costs and health benefit costs.

Notable Changes – Operations and Maintenance

While there are no significant increases in Operations and Maintenance, some Operations and Maintenance costs have increased due to increases in the Consumer Price Index.

Capital Outlay

There are no proposed Capital Expenses for Fiscal Year 2023-24 Budget.

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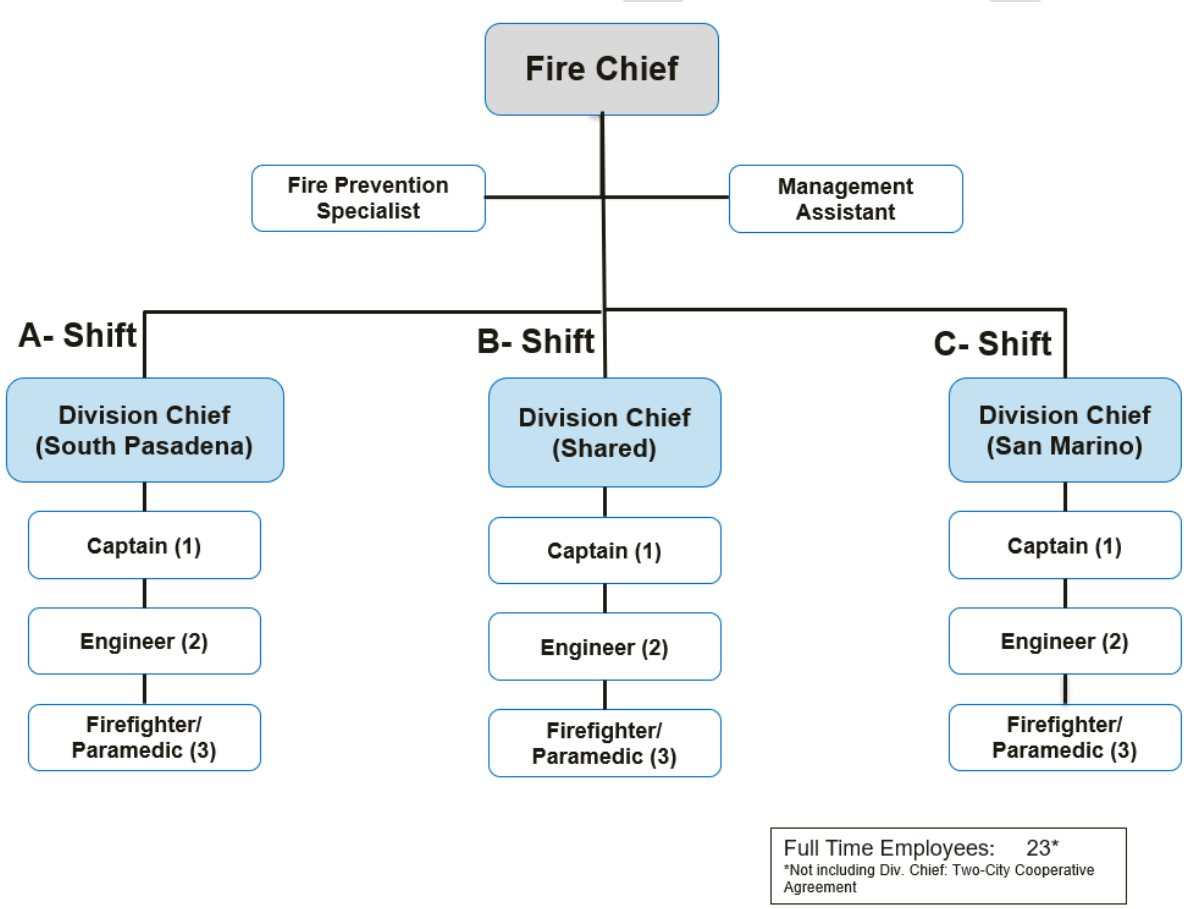
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	4,900,576	5,775,579	7,146,473	5,822,580	6,314,569	6,533,402
Operations & Maintenance	587,004	572,103	617,116	755,260	935,156	822,200
Capital Outlay	39,751	-	-	147,500	-	-
Total Expenses by Category	**5,527,332**	**6,347,681**	**7,763,589**	**6,725,340**	**7,249,725**	**7,355,602**
[101-5011] Fire	5,435,419	6,315,749	7,716,685	6,670,340	7,198,725	7,300,602
[101-5012] Emergency Preparedness	91,913	31,932	46,904	55,000	51,000	55,000
[105-5011] Facilities & Equipment Replacement	-	-	-	-	-	-
Total Expenses by Program	**5,527,332**	**6,347,681**	**7,763,589**	**6,725,340**	**7,249,725**	**7,355,602**

Authorized Positions



Full Time Employees: 23*
*Not including Div. Chief: Two-City Cooperative Agreement

Fire / 101-5010-5011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	2,174,539	2,458,937	2,313,836	2,478,360	2,864,782	2,745,719
7010	000	Salaries - Temp / Part	28,692	27,627	28,119	28,576	17,349	-
7020	000	Overtime	915,080	1,318,654	1,195,780	600,000	885,000	800,000
7030	000	Overtime - FLSA	32,593	36,518	31,822	97,000	50,000	98,000
7035	000	Overtime - Fire Strike	-	-	-	300,000	150,000	300,000
7040	000	Holiday	74,932	86,086	92,197	90,000	85,000	129,891
7045	000	Overtime - Special (Movie) Detail	114,254	134,178	175,185	100,000	140,000	100,000
7060	000	IOD - Safety	6,813	-	282,808	-	-	-
7065	000	Fitness	5,200	6,200	5,000	9,000	5,900	10,500
7070	000	Leave Buyback	23,388	-	-	50,000	26,112	34,214
7100	000	Retirement	969,679	941,079	2,489,658	1,378,154	1,306,933	538,397
7100	010	CalPERS UAL				-	-	1,024,111
7108	000	Deferred Compensation	5,447	110,601	(96,130)	5,034	23,706	26,898
7110	000	Workers Compensation	252,985	309,938	326,101	337,652	377,759	238,767
7122	000	Unemployment Insurance	7,783	4,419	-	-	-	
7130	000	Group Health Insurance	209,337	242,086	205,433	269,760	269,933	401,460
7140	000	Vision Insurance	4,084	4,551	4,678	5,280	4,766	5,143
7150	000	Dental Insurance	13,712	15,226	16,059	19,800	16,637	18,960
7160	000	Life Insurance	1,799	2,120	2,129	2,178	2,156	2,277
7170	000	FICA - Medicare	47,760	61,235	57,673	35,936	68,815	40,074
7180	000	Car/Uniform Allowance	12,500	16,125	16,125	15,850	19,721	18,992
		<WAGES & BENEFITS>	4,900,576	5,775,579	7,146,473	5,822,580	6,314,569	6,533,402
8000	000	Office Supplies	3,516	3,688	3,815	3,700	3,650	3,700
8010	000	Postage	779	1,061	733	1,000	800	1,100
8020	000	Special Department Expense	43,669	43,159	34,231	44,000	43,000	44,000
8024	000	Fire Strike Team Expense	-	-	2,193	15,000	15,000	15,000
8025	000	Medical Supplies	50,279	132,574	38,761	124,060	124,000	36,500
8026	000	Hazardous Materials	287	-	456	500	156	500
8027	000	Ground Emergency Medical Transport	-	-	28,206	34,000	30,000	10,000
8034	000	K9 Expenses	-	-	-	5,000	3,000	3,500
8050	000	Printing/Duplicating	1,031	1,249	1,000	2,500	2,500	500
8060	000	Dues & Memberships	1,498	1,225	1,025	2,000	1,950	1,500
8080	000	Books & Periodicals	2,369	840	-	2,000	1,900	2,000
8090	000	Conference & Meeting Expense	1,490	-	1,994	3,000	2,900	3,000
8100	000	Vehicle Maintenance	32,479	42,297	57,881	37,500	36,000	37,500
8105	000	Fuel	20,085	20,637	21,857	30,000	30,000	30,000
8110	000	Equipment Maintenance	11,093	10,222	19,998	11,000	10,500	11,000
8120	000	Building Maintenance	72,100	9,029	20,168	10,000	9,800	10,000
8134	000	Safety Clothing/Equipment	28,218	26,087	30,311	31,000	233,000	35,000
8170	000	Professional Services	36,216	23,385	26,387	42,000	40,000	152,000
8180	000	Contract Services	157,331	156,250	204,672	225,000	220,000	225,900
8183	000	Contract Services - Command Sharing	62,686	58,723	64,766	65,000	64,500	132,500
8200	000	Training Expense	9,367	9,745	11,757	12,000	11,500	12,000
		<OPERATIONS & MAINTENANCE>	534,493	540,170	570,213	700,260	884,156	767,200
8520	000	Machinery & Equipment	350	-	-	147,500	-	-
		<CAPITAL OUTLAY>	350	-	-	147,500	-	-
[101-5011] Fire Total			**5,435,419**	**6,315,749**	**7,716,685**	**6,670,340**	**7,198,725**	**7,300,602**

Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Funds fire administration, command/suppression personnel, and support staff.

7020 Overtime
Funds the cost of overtime for non-management personnel. Overtime is used for duties that cause an employee to work beyond their scheduled end-of-shift, and overtime required to fill minimal staffing requirements.

7035 Overtime-Fire Strike
Funds the cost of overtime for non-management personnel for out-of-area strike team responses.

7040 Holiday
Funds overtime compensation for employees required to work on Holidays.

7045 Overtime – Filming Detail
Funds the cost of overtime for providing security at filming locations. The City is reimbursed fully by the film companies for this overtime.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for the purchase of departmental office supplies; stationary, file dividers, boxes, clipboards, filing cabinets, workstation supplies, printer supplies, copy paper, (Staples Business Advantage $2,500); letterhead, envelopes, printing, (Cantu Graphics Inc. $500); other general office supplies, (Amazon Capital Services, Inc. $700). (Total $3,700).

8010 Postage
Provides funds for department Fire and Life Safety bulk mailings; inspection forms, paramedic subscription program correspondences, Federal and State Government mailings and postal expenses. (Total $1,100).

8020 Special Department Supplies
Provides funds for extraordinary department supplies and services including: unanticipated damaged of firefighting equipment, EMS Personal Protective Equipment, uniforms not identified in Safety Clothing and Equipment ($13,000); non-firefighting orientated equipment and station supplies, ($4,000); station and apparatus cleaning supplies ($4,500); linen services (CA Linen Services $6,500); department identification cards ($500); unanticipated repairs to front-line and

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reserve firefighting apparatus ($13,500). (Total $44,000).

8024 Fire Strike Team Expense
Funds the cost of out-of-area Strike Team responses including, but not limited to, fuel, hotel expenses, food, and other supplies (Total $15,000).

8025 Paramedic and Emergency Medical Services and Supplies
Provides funds for purchasing expendable medical supplies and equipment utilized during the delivery of paramedic and emergency medical services (Life Assist Inc. $20,000); expendable medical supplies including oxygen, (Airgas USA $4,000); intravenous fluids, and non-reusable medical devices, (Stericycle Inc. $500); defibrillator pads, and required pharmaceuticals, and other medical supplies, (Zoll Medical Corp. $12,000). (Total $36,500).

8026 Hazardous Materials
Provides funding for the purchase of hazardous materials inspection and compliance materials and disposal of non-medical hazardous waste, (Stericycle Inc. $500). (Total $500).

8027 Ground Emergency Medical Transport
Provides funds for participation in the State's Ground Emergency Medical Transport Program that enables the City to recover costs associated with the transportation of Medi-Cal patients. (Total $10,000).

8034 Accelerant Detection Canine
Provides funds for the purchase of supplies to support the department's accelerant detection canine ($1,000); veterinarian bills ($500); and annual recertification costs ($2,000). (Total $3,500).

8050 Printing and Duplicating
Provides for printing and duplication of fire prevention and brush abatement literature, public education materials, and disaster preparedness documentation, printing Inspection Notices, Brush Violation Notices (Cantu Graphics $250); fire prevention materials, (Alert-All Corp $250). (Total $500).

8060 Dues and Membership
Provides funds for membership in the Los Angeles Area Fire Chiefs Associations, ($700), Foothill Fire Chiefs and Training Officers Association, ($500); Regional Arson Strike Team, L.A. Area Fire Marshall's Association, National Fire Protection Association, ($300). (Total $1,500).

8080 Books and Training Materials
Provides funds to purchase fire codes, training manuals, educational videos/software, and professional development literature. (Total $2,000).

8090 Meeting and Conference Expense
Provides funds for conference attendance, meeting expenses, and transportation

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to two annual conferences hosted by the Los Angeles Area Fire Chiefs Association. (Total $3,000).

8100 Vehicle Maintenance
Provides funding to cover the operating expenses, repairs, and preventive maintenance of all department vehicles. Repairs include emergency/unscheduled repairs to front line apparatus, (Valley Power Systems $20,000, Emergency Vehicle Group $5,000); replace and service fire apparatus tires, (Parkhouse Tires $3,500); service and repair of Air Utility air compressor, (Air Compressed Specialist $4,000); replacement and service of apparatus batteries, (Interstate Batteries $2,000); repairs and service to utility truck and staff vehicles, (Jack's Auto Repair $3,000). (Total $37,500).

8105 Fuel
Provides fuel for fire apparatus ($20,000 Diesel fuel) and ($10,000 unleaded gasoline). Total ($30,000).

8110 Equipment Maintenance
Provides funds for the maintenance, repair, or replacement of department rescue saws, hydraulic extrication equipment, lighting equipment, technical rescue tools, and related emergency response equipment (LN Curtis $5,000, All-Star Fire Equipment $4,000 and Extreme Safety $2,000). (Total $11,000).

8120 Building Maintenance
Provides funds for cleaning supplies, maintenance, and minor repair of the fire station facility (Westlake Hardware $5,000 and Home Depot $3,000); routine repair and maintenance costs related to gasoline and diesel fuel distribution system ($2,000). (Total $10,000).

8134 Safety Clothing and Equipment
Provides funds to purchase and maintain Cal OSHA mandated personal protective equipment, structural firefighting gear, brush firefighting gear, self-contained breathing apparatus, and chemical protective suits (All-Star Fire Equipment $20,000, LN Curtis $10,000, Gall's $2,500 and Tom's Uniforms $2,500). (Total $35,000).

8170 Professional Services
Provides funds for contract services that provide mandated medical continuing education for paramedics and firefighters, emergency medical services program quality assurance (UCLA Regents/Medical Center $35,000); critical incident stress counseling and mental health services (Premier First Responders CISD $10,000); employee medical monitoring including bi-annual physicals, new employee physicals, communicable disease prevention training (St. George Occupational Health $3,500); Cal OSHA mandated respiratory protection annual testing ($3,500); comprehensive assessment of the Fire Department ($100,000). (Total $152,000).

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8180 Contract Services

Provides funds for comprehensive fire dispatching and emergency radio communications services from the Verdugo Dispatch Center ($165,000); third party paramedic services billing through Wittman Enterprises LLC ($50,000); software to support electronic paramedic patient forms from Digital EMS Solutions ($7,500); Software to support dispatch mobile computer terminals in fire apparatus (ESO Solutions $2,900); and software to support the electronic fuel pumps for fire apparatus from EJ Ward ($500). (Total $225,900).

8183 Contract Services – San Marino

Provides funds for comprehensive shared Fire Command Staff of one (1) shared Division Chief and associated equipment with the City of San Marino, ($130,000); training platform to support the shared agreement, (Target Solutions $2,500). (Total $132,500).

8200 Training Expense

Provides funds for mandated and specialized training necessary for the maintenance of technical firefighting, rescue skills, and paramedic recertification. Includes training for Department managers and supervisors in leadership and safety compliance issues. ($7,000); use of multi-agency Training Tower ($5,000). (Total $12,000).

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Emergency Preparedness / 101-5010-5012

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	52,511	31,932	46,904	40,000	36,000	29,500
8180	000	Contract Services	-	-	-	15,000	15,000	25,500
		<OPERATIONS & MAINTENANCE>	52,511	31,932	46,904	55,000	51,000	55,000
8520	000	Machinery & Equipment	14,530	-	-	-	-	-
8523	000	EOC Equipment	24,871	-	-	-	-	-
		<CAPITAL OUTLAY>	39,401	-	-	-	-	-
[101-5012] Emergency Preparedness Total			**91,913**	**31,932**	**46,904**	**55,000**	**51,000**	**55,000**

OPERATIONS & MAINTENANCE

8020 Special Department Expense

Provides funds for operational items such as EOC supplies and operations and disaster preparedness supplies (Direct TV $1,500, Satellite phones $2,000), EOC training for Department Directors and supplies to support EOC functionality ($3,500); Black Board Connect Mass Communication System (Blackboard Connect $17,500); supplies and equipment to support the City's Community Emergency Response Team ($5,000). (Total $29,500).

CAPITAL OUTLAY

8180 Contract Services

Provides funds for the updating of the City's Emergency Operations Plan and Local Hazard Mitigation Plan ($15,000); funds for managing hazardous vegetation on City owned vacant properties ($10,500). (Total $25,500).

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Key Performance Indicators

UNITS OF MEASURE

This is the most basic unit of measurement. Includes raw sources of data that measure productivity. Includes both inputs (number of requests, cases, applications, complaints, referrals received); and outputs (number of requests, cases, applications, complaints, referrals closed).

Total Response Time
- Fires
- EMS

Turnout Times
- Fires
- EMS

Number of Emergency Calls
- Fires
- EMS
- Service

Number of EMS Transports

Number of Mutual/Automatic Aid Responses
- Given
- Received

Number of Fire Prevention Inspections
- Company Field
- Mandated Occupancy Inspections
- Certificate of Occupancy (COO)/ New Business
- Brush Clearance

Number of Plan Checks
- Fire Sprinkler
- Fire Alarm
- Building

Training Hours

Leave Usage
- Sick
- Comp
- Worker's Comp/ IOD hours

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KEY PERFORMANCE INDICATORS

Measures that would indicate success in achieving your department's core missions. Measures of volume and efficiency. Targets successfully delivered.

- Reduction and Maintenance of Response Times consistent with NFPA 1710
- Reduction and Maintenance of Turnout Times consistent with NFPA 1710
- Compliance with DHS and Departmental EMS QA and QI Indicators and Standards
- Complete 100% of Company Field Inspections annually
- Complete 100% of Brush Clearance Inspections annually
- Complete Mandated Occupancy Inspections
- Complete COO / New Business Inspections within 5 days of request
- Complete Plan Checks
- Complete all required Training Hours annually
- Adequately manage sick leave usage
- Adequately manage worker's comp / IOD hours
- Conduct an appropriate number of Public Education events annually (measure through attendance, candy canes, pancakes, ticket sales, etc…)
- Increase attendance at events and education opportunities

OUTCOMES MEASUREMENT

Measures of success as seen from the perspective of the end user (a customer): reduced processing times, easier access, quicker response, successful resolution of problems. Indicators might include measures of health and happiness, economic improvements, etc.

- Response Time Reductions
- Reduction in plan check turn-around time
- Annual visit by Fire Company to businesses and apartments
- Fast processing of COO / New Business inspections
- Superbly trained and effective personnel
- Crew consistency, camaraderie, morale, enthusiasm
- Happy and large attendance at events and education opportunities

MEASURES OF CUSTOMER SATISFACTION

Identify three means by which you would propose to measure customer satisfaction.

- Community Surveys / Public Forums / Town Hall
- City Website
- Online Questionnaires / Surveys
- Community Events / Feedback
- Public Education Events / Feedback
- Social Media
- Comment Cards

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Public Works

Fiscal Year 2022-23 Budget Snapshot

Overview

The Public Works department is pleased to submit the Fiscal Year 23-24 budget proposal. The Public Works Department is comprised of four divisions: the Engineering Division, Operations & Maintenance Division, Environmental Services & Sustainability Division, and the Water Division.

The Engineering Division is responsible for:

- Interagency Coordination (METRO, Arroyo Verdugo Communities Joint Powers Authority, San Gabriel Valley Council of Governments, Federal Highway Administration, Caltrans, CalRecyle, LA County, and neighboring jurisdictions).
- Capital Improvement Projects, including design, plan review, construction management, and inspections.
- Grants administration, and contracts award and management.
- Transportation Programs and Traffic Operations, including Active Transportation and Intelligent Transportation Systems.
- Private Developments, plan reviews, right of way improvements' inspections, traffic, and environmental impact studies.
- Issuance of right of way encroachment permits.
- Supporting Public Works & Mobility and Transportation Infrastructure Commissions.

The Maintenance Division is responsible for:

- Parks and Urban Forest Management.
- Traffic Signals, Street Lights, and Facilities.
- Street and sidewalk maintenance, and traffic control setup for special events.
- Storm Drain and sewer system maintenance.
- Utility Coordination.

The Environmental Services & Sustainability Division is responsible for:

- Compliance of state mandates involving waste (including, but not limited to, AB1594, SB1383, AB1826, AB2048, AB827, AB939, etc.), water conservation (implementation of drought restrictions), emissions reductions (AB32, etc.), etc.
- Management of City's waste hauling and recycling contracts and services.
- Development, implementation, and management of water conservation programs including, but not limited to, rebates, assessments, workshops, education, and outreach.
- Coordination of sustainability events including, but not limited to, Earth Day events, Compost and Mulch Giveaways, Community Workshops/Meetings, etc.
- Working with City non-profit organizations to promote sustainability in the community and provide sustainability education.

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- Working with regional and state organizations such as San Gabriel Valley Council of Governments, San Gabriel Valley Mosquito and Vector Control District, Upper San Gabriel Valley Municipal Water District, Metropolitan Water District, California Department of Resources Recycling and Recovery (CalRecycle), Clean Power Alliance, on others.
- Implementation of the City's Green Action Plan (Green Plan) and Climate Action Plan (CAP) including, but not limited to, building electrification, plastics reduction, energy efficiency, leaf blower restriction, and carbon sequestration measures.
- National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) stormwater compliance.
- Supporting the Natural Resources & Environmental Commission.

The Water Division is responsible for:

- Water production, treatment, and distribution, delivering of safe, clean water to over 6,200 connections.
- Water infrastructure maintenance consists of eight water storage tanks, six pump stations, and approximately 80 miles of pipelines.
- Water resources planning and coordination for short and long-term reliable water supplies.

Notable Changes – Wages and Benefits

- Increases in Wages and Benefits due to cost-of-living increases and increases in retirement and health insurance. Through the last fiscal year, several positions were consolidated or created, including the Transportation Program Manager.
- Reorganization of the Public Works department divisions and positions.

Notable Changes – Operations and Maintenance

- Increases in professional and contract services to accommodate expected workload and cost increases.
- Increases in building maintenance budgets to accommodate necessary parks and facilities repairs, including HVAC systems.
- Increasing the allocation of expenditures to revenue accounts, including gas tax, Measure M, Measure R, and Measure W Safe Clean Water Program.

Capital Outlay

- Traffic Signals – Cabinet replacement or upgrades
- Street Maintenance – Operations & Maintenance Division Truck
- Water Distribution – Water Division Vehicle, forklift, and backhoe concrete breaker attachment
- Water Production – Valve Truck for preventative maintenance valve exercise program
- Water Efficiency – Vehicle refurbishment for environmental conservation promotion

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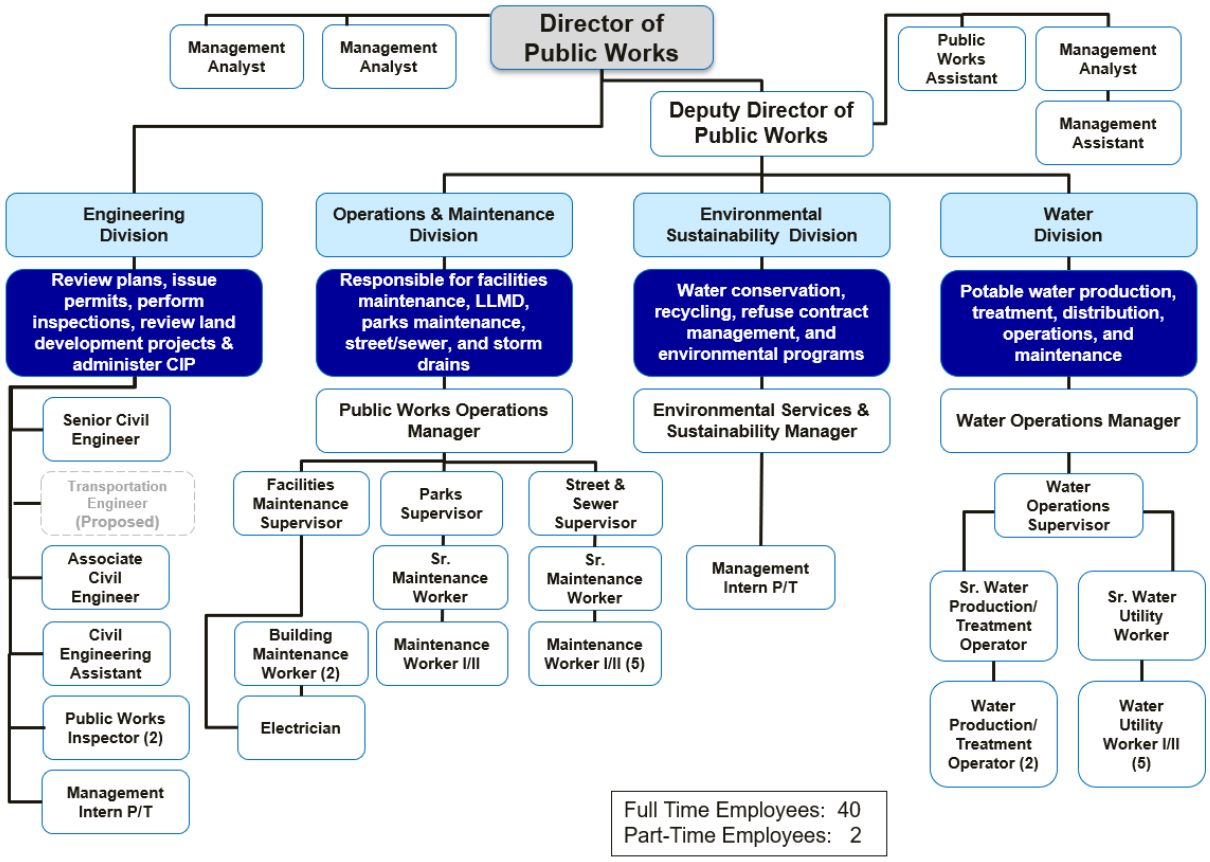
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	3,627,094	3,780,422	4,005,277	4,794,543	4,033,242	5,293,365
Operations & Maintenance	4,348,314	4,599,429	6,226,709	10,614,578	7,827,971	11,679,653
Capital Outlay	150,423	170,940	34,302	557,000	30,000	857,000
Other Expenses	85,801	-	22,810	-	-	-
Total Expenses by Category	**8,211,631**	**8,550,791**	**10,289,098**	**15,966,121**	**11,891,213**	**17,830,018**
[101-6011] PW Admin & Engineering	586,534	618,493	572,717	924,621	526,444	1,243,249
[101-6015] Environmental Services	54	653	55,009	304,980	140,241	207,480
[101-6410] Park Maintenance	497,591	476,793	581,680	1,086,294	504,755	975,901
[101-6601] Facilities Maintenance	799,206	826,985	901,702	1,171,959	907,533	1,344,778
[105-6011] PW Admin & Engineering	-	-	-	-	-	-
[207-6011] PW Admin & Engineering	38,641	40,199	62,240	-	-	-
[210-6501] Sewer Operations	620,795	575,992	830,975	1,191,366	836,150	1,240,680
[210-9990] Unfunded Liabilities	78,636	-	103,249	-	-	-
[210-9997] Unfunded Liabilities	7,165	-	(80,439)	-	-	-
[215-6115] Traffic Signals	142,427	162,424	276,512	393,000	363,000	401,000
[215-6118] Sidewalk Maintenance	-	-	-	-	-	-
[215-6201] Street Lighting	213,339	191,600	297,921	423,417	276,750	403,438
[215-6310] Street Trees	450,049	525,457	638,121	746,114	551,283	758,744
[215-6416] Median Strips	77,043	51,718	56,495	138,750	137,250	152,500
[218-2270] Clean Air Act	55,111	35,924	-	-	-	-
[230-6116] Street Maintenance	571,830	583,237	613,262	1,107,418	836,175	1,348,761
[232-6417] Prop "A" Park Maintenance	42,632	27,957	54,329	106,000	61,500	118,000
[233-6011] PW Admin & Engineering	-	-	-	71,376	44,927	128,472
[236-6011] PW Admin & Engineering	-	-	-	171,376	79,927	228,472
[238-6501] Sewer Operations	20,000	-	-	-	-	-
[239-6011] PW Admin & Engineering	87,452	42,555	94,695	290,270	285,608	313,138
[239-6011] PW Admin & Engineering	-	-	-	-	-	-
[249-6011] PW Admin & Engineering	-	10,745	301,052	-	-	-
[247-6011] PW Admin & Engineering	-	-	-	50,000	-	45,000
[277-6011] PW Admin & Engineering	270	-	-	-	-	-
[310-6501] Sewer Operations	-	0	-	-	-	-
[500-6710] Water Distribution	1,321,885	1,159,330	1,838,010	2,535,727	2,230,456	3,410,433
[500-6711] Water Production	2,522,747	3,142,676	3,006,811	5,043,057	3,935,020	5,145,531
[500-9990] Unfunded Liabilities	-	-	-	-	-	-
[503-6713] Water Efficiency	128,223	128,054	159,756	210,396	174,193	364,442
Total Expenses by Program	**8,261,631**	**8,600,791**	**10,364,098**	**15,966,121**	**11,891,213**	**17,830,018**

Authorized Positions



Public Works Administration / 101-6010-6011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	254,429	281,814	188,755	314,724	303,211	479,259
7010	000	Salaries - Temp / Part	15,716	19,665	17,651	22,000	15,725	31,247
7020	000	Overtime	305	2,637	3,829	7,000	2,001	-
7040	000	Holiday	5,113	13,506	4,970	-	-	-
7070	000	Leave Buyback	1,387	-	-	7,894	-	3,919
7100	000	Retirement	71,256	62,484	142,928	71,359	72,803	50,837
7100	010	CalPERS UAL				-	-	71,623
7108	000	Deferred Compensation	670	8,684	(7,481)	1,741	2,062	4,793
7110	000	Workers Compensation	4,194	4,018	2,914	7,914	3,573	6,120
7120	000	Disability Insurance	-	12,937	12,372	-	4,521	
7122	000	Unemployment Insurance	353	-	-	-	-	
7130	000	Group Health Insurance	27,072	31,470	18,888	22,197	25,103	68,466
7140	000	Vision Insurance	653	757	507	732	603	983
7150	000	Dental Insurance	2,394	2,831	1,891	2,745	2,322	3,908
7160	000	Life Insurance	294	344	253	302	316	455
7170	000	FICA - Medicare	4,899	4,692	4,492	4,563	4,776	9,340
		<WAGES & BENEFITS>	388,733	445,841	391,969	463,171	437,016	730,949
8000	000	Office Supplies	1,353	1,147	2,543	3,000	3,000	3,000
8010	000	Postage	817	617	975	2,000	500	2,000
8020	000	Special Department Expense	45,110	23,082	30,689	30,000	28,254	31,000
8040	000	Advertising	2,822	98	8,031	4,500	1,447	2,000
8050	000	Printing/Duplicating	8,949	4,517	3,572	7,500	1,452	7,500
8060	000	Dues & Memberships	3,081	847	-	2,250	900	4,400
8090	000	Conference & Meeting Expense	30	25	-	3,700	700	3,700
8100	000	Vehicle Maintenance	1,630	1,640	3,137	2,000	660	2,000
8105	000	Fuel	-	-	-	3,000	-	3,000
8110	000	Equipment Maintenance	-	-	-	-	-	-
8134	000	Safety Clothing/Equipment	-	-	-	1,500	1,500	1,500
8170	000	Professional Services	131,246	139,386	131,801	400,000	50,215	400,000
8180	000	Contract Services	2,763	1,294	-	-	-	50,000
8200	000	Training Expense	-	-	-	2,000	800	2,200
8300	000	Lease Payment	-	-	-	-	-	-
		<OPERATIONS & MAINTENANCE>	**197,801**	**172,652**	**180,747**	**461,450**	**89,428**	**512,300**
[101-6011] PW Admin & Engineering Total			**586,534**	**618,493**	**572,717**	**924,621**	**526,444**	**1,243,249**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Provides the partial compensation for Engineering Division & Administrative Staff. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds the cost of overtime for non-management staff attending commission meetings and, as authorized, official City events outside of regular office hours.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies ($3,000).

8010 Postage
Funds City mailings and overnight deliveries ($2,000).

8020 Department Expense
Provides funds for Public Works Engineering supplies and services including county assessor maps, and data updates ($4,000), expenditures related to promotional materials, event supplies, or other materials ($1,000), annual software subscriptions ($15,000), County Recorder recording fees ($1,000), State Water Resources Control Board Waste Discharge Fee ($4,000), San Gabriel Valley Council of Gov. program participation ($5,000), Annual AQMD Generator permit fee ($1,000). (Total $31,000)

8040 Advertising
Provides funds for advertising of legal notices, recruitment postings, and notices of various City activities. (Total $2,000)

8050 Printing and Duplication
Provides funds for the printing and duplication of materials, utility bill inserts, business cards, reprographic costs for oversized maps and plans, and costs for duplications of plans and specifications for bidding purposes. (Total $7,500)

8060 Dues, Memberships, Subscriptions, and Books
Provides funds for membership fees, dues, subscriptions, and publications of

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professional organizations such as the American Society of Civil Engineers (ASCE) ($2100) and the American Public Works Association (APWA) ($1,600), International City/County Management Association (ICMA) Membership ($200) as well as other professional organizations, and license certification renewal fees, books, and seminars ($500). (Total $4,400)

8090 Conference and Meeting Expense
Provides funds for conference registration and meeting expenses. (Total $3,700)

8100 Vehicle Maintenance and Operations
Provides funds for operating vehicles including routine maintenance services, smog certifications, and repairs. (Total $2,000)

8105 Fuel
Provides funds for operational fuel expenses. (Total $3,000)

8134 Safety Clothing/Equipment
Provides for the purchase of safety equipment including but not limited to safety boots ($750), and first-aid supplies ($750). (Total $1,500)

8170 Professional Services
Professional on-call engineering services ($181,000), Pavement & Concrete Management Program ($64,000), Geographic Information System (GIS) maintenance services ($5,000), Slow Streets Program Implementation ($150,000). (Total $400,000)

8180 Contract Services
Contract Services for Slow Streets Program Implementation ($50,000)

8200 Training Expense
Provides funds for training seminars, materials, and job-related training sessions for engineers, inspectors, and administrative staff, as well as books and manuals. (Total $2,200)

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Environmental Services / 101-6010-6015

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	(3,029)	136,348	37,784	56,167
7010	000	Salaries - Temp / Part	-	-	-	4,000	3,368	-
7070	000	Leave Buyback	-	-	-	-	-	980
7100	000	Retirement	-	-	49	19,616	16,372	6,249
7100	010	CalPERS UAL				-	-	10,002
7108	000	Deferred Compensation	-	-	4	348	363	562
7110	000	Workers Compensation	-	-	5	3,323	347	610
7120	000	Disability Insurance	-	-	-	-	-	-
7130	000	Group Health Insurance	-	-	-	14,343	1,180	7,914
7140	000	Vision Insurance	-	-	-	276	47	112
7150	000	Dental Insurance	-	-	-	1,035	176	421
7160	000	Life Insurance	-	-	-	114	23	50
7170	000	FICA - Medicare	-	-	6	1,977	482	814
		<WAGES & BENEFITS>	-	-	(2,965)	181,380	60,141	83,880
8010	000	Postage	-	-	-	5,000	2,500	5,000
8020	000	Special Department Expense	13,793	421	57,765	25,000	24,500	25,000
8040	000	Advertising	-	-	-	3,000	2,500	3,000
8050	000	Printing/Duplicating	-	-	-	15,000	10,000	15,000
8060	000	Dues & Memberships	-	-	-	-	-	-
8090	000	Conference & Meeting Expense	-	-	-	600	600	600
8140	000	Utilities	155	232	209	-	-	-
8170	000	Professional Services	35	-	-	75,000	40,000	75,000
8172	000	Professional Svcs. - Oil Recycling	(13,929)	-	-	-	-	-
8180	000	Contract Services	-	-	-	-	-	-
		<OPERATIONS & MAINTENANCE>	54	653	57,974	118,600	77,600	118,600
8500	000	Building & Improvements	-	-	-	-	-	-
		<CAPITAL OUTLAY>	-	-	-	-	-	-
[101-6015] Environmental Services Total			54	653	55,009	304,980	140,241	207,480

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Provides the partial compensation for the Environmental Services & Sustainability Division & Administrative Staff. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Environmental & Sustainability Intern, and other non-salaried part-time employees.

7020 Overtime
Covers the cost of overtime for non-management staff attending commission meetings and, as authorized, official City events outside of regular office hours.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8010 Postage
Funds City mailings and overnight deliveries ($5,000).

8020 Department Expense
Funds Environmental & Sustainability supplies and services including computer supplies, annual software subscriptions, cell phone service, supplies for the Natural Resources and Environmental Commission, promotional items related to environmental programs, and Climate/Green Action Plans implementation ($25,000).

8040 Advertising
Funds advertising of legal notices, promotional notices, recruitment postings, newspaper announcements, and notices of various City activities ($3,000).

8050 Printing and Duplication
Funds the printing and duplication of environmental & sustainability program materials, including banners, posters, flyers, door hangers, and City-wide mailings for thousands of locations ($15,000).

8090 Conference and Meeting Expense
Funds conference registration and meeting expenses ($600).

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8170 Professional Services

Funds the professional environmental & sustainability services and studies related to the implementation of the Climate Action Plan and Green Action Plan, and state, county, and local mandates such as Organic Waste Recycling requirements ($75,000).

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Park Maintenance / 101-6010-6410

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	99,273	105,806	120,337	151,858	116,093	101,744
7020	000	Overtime	714	2,695	1,673	2,000	2,811	-
7040	000	Holiday	2,573	5,514	2,967	-	-	2,902
7055	000	IOD - Non Safety	-	-	-	-	-	-
7070	000	Leave Buyback	37	-	-	2,000	-	1,539
7100	000	Retirement	25,562	22,940	53,745	40,077	37,338	10,992
7100	010	CalPERS UAL				-	-	16,478
7108	000	Deferred Compensation	239	4,941	(1,973)	82	896	1,013
7110	000	Workers Compensation	3,048	3,948	3,365	5,682	2,387	3,472
7120	000	Disability Insurance	-	1,794	-	-	1,747	-
7130	000	Group Health Insurance	12,781	15,228	11,177	19,966	12,615	26,874
7140	000	Vision Insurance	286	324	299	504	277	330
7150	000	Dental Insurance	1,071	1,213	1,118	1,890	1,036	1,234
7160	000	Life Insurance	120	137	132	208	125	149
7170	000	FICA - Medicare	1,393	1,746	1,764	2,202	1,717	1,475
		<WAGES & BENEFITS>	**147,098**	**166,287**	**194,602**	**226,469**	**177,040**	**168,201**
8000	000	Office Supplies	809	454	498	1,000	1,000	1,000
8020	000	Special Department Expense	32,175	15,261	14,548	28,000	15,000	56,200
8070	000	Mileage/Auto Allowance	-	-	-	500	-	500
8100	000	Vehicle Maintenance	1,551	1,032	1,500	1,500	500	7,000
8110	000	Equipment Maintenance	523	773	922	2,500	1,000	5,000
8140	000	Utilities	39,350	46,052	56,477	50,000	50,000	50,000
8170	000	Professional Services	25	-	10,000	170,000	50,215	15,000
8180	000	Contract Services	272,238	238,938	294,470	584,325	200,000	651,000
8200	000	Training Expense	98	34	-	2,000	-	2,000
8262	000	Graffitti Removal	3,724	7,962	8,664	20,000	10,000	20,000
		<OPERATIONS & MAINTENANCE>	**350,493**	**310,506**	**387,078**	**859,825**	**327,715**	**807,700**
[101-6410] Park Maintenance Total			**497,591**	**476,793**	**581,680**	**1,086,294**	**504,755**	**975,901**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Provides partial compensation for Operations & Maintenance Division related to Parks Maintenance & Administrative Staff. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds the cost of overtime for non-management staff performing emergency call outs and attending commission meetings.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies and expenses ($1,000).

8020 Special Department Expense
Provides for special division supplies and materials including irrigation controllers and sprinklers, fertilizer, and park maintenance supplies ($29,000), breakroom supplies ($200), Park repairs including fences, barriers, posts, gates, signs, and other equipment ($25,000), and office workstation equipment ($2,000). (Total $56,200)

8070 Mileage/Auto Allowance
Funds reimbursement funds for street maintenance related call outs ($500).

8100 Vehicle Maintenance
Provides funds for operational costs for parks vehicles including smog certifications, routine maintenance, and inspection services. (Total $7,000)

8110 Equipment Maintenance
Provides funds for the repair and maintenance of equipment including trencher, power washer, chainsaw, forklift, and other Parks equipment. ($5,000).

8140 Utilities
Provides funds for electrical service by Southern California Edison to City park facilities ($45,000), and Sothern California Gas ($5,000). (Total $50,000)

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8170 Professional Services
Provides funds for landscape architects, arborists, and other professional services related to the maintenance of the City parks and the equipment located at the parks, including soil and tissue sampling, arborist reports, and sports field consulting. (Total $15,000)

8180 Contract Services
Provides funds for partial cost of landscape contracted services to maintain the parks, City owned parcels, and playing fields, and including irrigation system repairs ($500,000). Also provides funds for gopher abatement ($20,000), the rental of an extended boom truck to access field lighting ($5,000), landscape services ($27,000), supplemental tree trimming and replacement ($50,000), sanitary scheduled cleaning for public park restrooms ($24,000), and additional labor for supplementary maintenance services ($25,000). (Total $651,000)

8200 Training Expense
Provides funds for training seminars, materials, and job-related training sessions for employees, as well as books and manuals ($500), as well as safety and OSHA related training expenses ($1,500). (Total $2,000)

8262 Graffiti Removal
Funds graffiti removal contract services ($20,000).

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Facilities Maintenance / 101-6010-6601

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	267,169	268,674	228,575	296,936	181,418	297,244
7020	000	Overtime	7,785	8,175	14,132	3,000	13,495	
7040	000	Holiday	8,164	13,740	8,135	-	199	7,938
7070	000	Leave Buyback	3,627	-	7,855	2,000	-	575
7100	000	Retirement	71,259	58,920	144,472	60,600	54,366	29,605
7100	010	CalPERS UAL				-	-	34,424
7108	000	Deferred Compensation	239	9,900	(7,233)	194	951	2,952
7110	000	Workers Compensation	11,495	12,079	11,798	8,767	7,472	11,568
7120	000	Disability Insurance	-	8,995	26,569	-	1,747	
7130	000	Group Health Insurance	42,611	46,089	34,082	43,800	34,590	83,376
7140	000	Vision Insurance	820	819	744	960	529	943
7150	000	Dental Insurance	3,062	3,061	2,779	3,600	1,981	3,532
7160	000	Life Insurance	386	387	351	396	229	411
7170	000	FICA - Medicare	3,988	4,178	4,082	4,306	2,755	4,310
		<WAGES & BENEFITS>	420,605	435,018	476,339	424,559	299,733	476,878
8000	000	Office Supplies	1,290	1,309	868	1,500	300	1,500
8020	000	Special Department Expense	31,543	38,782	30,691	65,000	34,000	32,000
8060	000	Dues & Memberships	-	-	-	700	700	700
8070	000	Mileage/Auto Allowance	-	-	-	700	-	700
8100	000	Vehicle Maintenance	767	1,605	4,593	10,500	300	12,000
8105	000	Fuel	-	-	-	15,000	15,000	15,000
8110	000	Equipment Maintenance	429	27	-	3,000	3,000	4,000
8120	000	Building Maintenance	35,337	50,248	21,954	120,000	35,000	197,000
8130	000	Small Tools	507	663	210	3,000	300	3,000
8132	000	Uniform Expense/Cleaning	827	1,202	883	2,000	600	3,500
8134	000	Safety Clothing/Equipment	1,106	1,685	473	2,100	2,100	40,000
8140	000	Utilities	144,258	167,144	197,848	240,000	246,000	247,000
8180	000	Contract Services	162,536	129,302	167,843	280,400	270,000	308,000
8200	000	Training Expense	-	-	-	1,500	500	1,500
		<OPERATIONS & MAINTENANCE>	378,601	391,968	425,362	745,400	607,800	865,900
8520	000	Machinery & Equipment	-	-	-	-	-	-
8530	000	Computer Equipment	-	-	-	2,000	-	2,000
		<CAPITAL OUTLAY>	-	-	-	**2,000**	-	**2,000**
[101-6601] Facilities Maintenance Total			**799,206**	**826,985**	**901,702**	**1,171,959**	**907,533**	**1,344,778**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds compensation for two full-time Building Maintenance Workers and partial compensation for Public Works Operations Manager, Facilities Maintenance Supervisor, Senior Civil Engineer, Associate Civil Engineer, Civil Engineering Assistant, Electrician, Management Analyst, and Maintenance Assistant. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds the cost of overtime for non-management staff performing emergency call outs after hours.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies and expenses. (Total $1,500)

8020 Special Department Expense
Provides for special department supplies ($5,000), breakroom supplies ($200), signage ($3,000), and other expenses for City facilities maintenance and repair supplies and services ($23,800). (Total $32,000)

8060 Dues/Memberships/Subscriptions
Provides funds for membership fees, dues, subscriptions and publications to professional organizations ($700).

8070 Mileage/Auto Allowance
Provides reimbursement funds for street maintenance related call outs. (Total $700)

8100 Vehicle Maintenance and Operations
Provides funds for operational costs for oil, tires, batteries, parts, repairs and routine maintenance, smog certification, and other inspections for the building maintenance worker's vehicles. (Total $12,000)

8105 Fuel
Funds operational fuel expenses ($15,000).

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8110 Equipment Maintenance
Provides funds for repair and maintenance of City owned equipment including forklift and power washer. (Total $4,000).

8120 Building Maintenance
Provides for building maintenance services and supplies. Maintenance and repair of air conditioning HVAC system ($100,000), elevator maintenance and repair ($18,000), cooling tank treatment ($6,000), Door and gate repairs, maintenance, locks/keys, and part replacements ($10,000), generator maintenance ($10,000), supplies including construction supplies, hardware, electrical/plumbing supplies, and parts ($40,000), Citywide fire alarm inspections and maintenance ($9,000), and urgent Facilities maintenance, repair, and restoration service response ($4,000). (Total $197,000)

8130 Small Tools
Funds replacement or purchase of worn or damaged hand and power tools ($3,000).

8132 Uniform Expenses
Provides for the purchasing of Uniforms, all functional City apparel and cleaning services. (Total $3,500)

8134 Safety Equipment & Supplies
Provides for the purchase of safety equipment and supplies such as safety boots ($1,500), First Aid wall units, rental and monthly check ($3,000), Eye Wash Stations maintenance ($9,700), City wide Fire Extinguisher monthly inspection ($25,000), weather/rain and other necessary safety gear for staff ($800). (Total $40,000)

8140 Utilities
Provides funds for electrical service by Southern California Edison to City facilities ($222,000) and Southern California Gas ($25,000) (Total $247,000).

8180 Contract Services
City wide Janitorial services for City buildings including twice a week day porter service ($200,000), CNG Station maintenance and repairs ($17,000), underground storage tank (UST) inspections, cleaning, and repair ($20,000), sump system maintenance and repair services ($2,500), contracted maintenance and repairs ($46,000), City Facility security systems ($10,000), pest control services ($6,000), additional labor for supplementary maintenance services ($6,500). (Total $308,000)

8200 Training Expenses
Provides funds for training seminars, materials, and job-related training sessions for employees as well as third party training expenses. (Total $1,500)

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Sewer Maintenance / 210-6010-6501

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	304,672	280,629	233,342	366,654	336,552	404,442
7010	000	Salaries - Temp / Part	1,574	7,599	-	18,953	6,735	-
7020	000	Overtime	3,355	3,917	3,839	5,000	7,530	
7040	000	Holiday	6,812	9,742	5,612	-	158	5,860
7070	000	Leave Buyback	4,130	-	1,736	8,000	1,371	7,361
7100	000	Retirement	76,096	59,317	146,625	75,606	79,017	40,855
7100	010	CalPERS UAL				-	-	50,013
7108	000	Deferred Compensation	881	10,138	(11,059)	1,554	2,148	4,022
7110	000	Workers Compensation	9,815	8,497	7,974	9,217	8,526	8,324
7120	000	Disability Insurance	-	2,985	3,093	-	3,495	
7130	000	Group Health Insurance	39,377	33,812	22,457	31,876	27,320	55,629
7131	000	Retiree Health Insurance	-	-	-	-	-	
7140	000	Vision Insurance	776	630	588	962	673	851
7150	000	Dental Insurance	2,890	2,341	2,081	3,609	2,363	3,118
7160	000	Life Insurance	401	320	302	397	351	419
7170	000	FICA - Medicare	4,530	4,238	3,875	5,316	4,989	5,864
9997	000	OPEB Expense	7,165	-	(80,439)	-		
9990	000	Pension Expense	78,636	-	103,249	-		
		<WAGES & BENEFITS>	541,110	424,165	443,275	527,144	481,228	586,758
8000	000	Office Supplies	600	864	605	1,000	1,000	1,000
8010	000	Postage	-	-	-	-	-	-
8020	000	Special Department Expense	13,561	21,477	60,791	36,300	30,000	34,300
8050	000	Printing/Duplicating	141	-	-	200	-	500
8060	000	Dues & Memberships	-	-	-	1,000	1,000	1,800
8070	000	Mileage/Auto Allowance	-	-	-	1,000	200	1,000
8090	000	Conference & Meeting Expense	-	-	-	800	-	800
8100	000	Vehicle Maintenance	6,073	4,584	3,411	25,000	5,000	26,000
8105	000	Fuel	-	-	-	15,000	15,000	15,000
8110	000	Equipment Maintenance	101	27	-	27,000	15,000	27,000
8120	000	Building Maintenance	-	-	316	2,000	600	5,000
8130	000	Small Tools	-	-	-	21,500	5,000	21,500
8132	000	Uniform Expense/Cleaning	614	970	567	1,400	1,000	3,500
8134	000	Safety Clothing/Equipment	311	495	473	3,000	1,500	3,500
8140	000	Utilities	-	-	-	-	-	2,000
8170	000	Professional Services	16,881	6,431	17,661	126,000	5,600	100,000
8180	000	Contract Services	15,882	-	77,332	132,000	5,000	140,000
8191	000	Liability & Surety Bonds	22,900	(30,000)	180,000	200,000	200,000	200,000
8200	000	Training Expense	595	332	332	2,000	-	2,000
8400	000	Overhead Allocation	69,022	69,522	69,022	69,022	69,022	69,022
		<OPERATIONS & MAINTENANCE>	146,680	74,703	410,511	664,222	354,922	653,922
8520	000	Machinery & Equipment	29,085	77,123	-	-	-	-
8540	000	Automotive Equipment	(10,279)	-	-	-	-	-
		<CAPITAL OUTLAY>	18,806	77,123	-	-	-	-
[210-6501] Sewer Operations Total			**706,596**	**575,992**	**853,785**	**1,191,366**	**836,150**	**1,240,680**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation for Public Works Director, Deputy Public Works Director, Public Works Operations Manager, Streets Supervisor, Senior Civil Engineer, Associate Civil Engineer, two Public Works Inspectors, Senior Maintenance Worker, five Maintenance Worker I/II positions, Public Works Assistant, two Management Analysts, and several positions in the City Manager, Management Services and Finance departments. Refer to the Appendix for a detailed allocation list. Additional 5% incentive for obtaining California Water Environment Association certification.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds overtime pay for after-hours emergency response to sewer main stoppages and repairs.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies ($1,000).

8020 Special Department Expense
Provides for special department supplies including fittings, jetting nozzles, manhole covers, sewer reel hoses, and other materials ($28,300), State Water Quality Control Board Sanitary Sewer Overflow Program fee ($3,500), and sewer related supplies and division expenses ($2,500). (Total $34,300)

8050 Printing/Duplicating
To provide funds for the printing and duplication of sewer related materials. (Total $500)

8060 Dues/Memberships/Subscriptions
Provides for membership to the California Water Environmental Association for division staff members. (Total $1,800)

8070 Mileage/Auto Allowance
Provides reimbursement funds for street maintenance related call outs. (Total $1,000)

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8090 Conference & Meeting Expense
Provides funds for conference registration and meeting expenses related to sewer related matters. (Total $800)

8100 Vehicle Maintenance
Provides funds for operational costs for oil, tires, batteries, parts, repairs, and routine maintenance and repairs of Sewer Division vehicles. (Total $26,000)

8105 Fuel
Funds operational fuel expenses ($15,000).

8110 Equipment Maintenance
Provides for repairs and maintenance of sewer related equipment including sewer main cleaning equipment, the vactor truck, line video equipment, and compressor trailer. (Total $27,000)

8120 Building Maintenance
Provides for maintenance of sewer division garage at the Service Facility. (Total $5,000).

8130 Small Tools
Funds replacement of worn or damaged hand and power tools ($21,500).

8132 Uniform Expenses
Provides for the purchase of Uniforms, all functional City apparel and cleaning services. (Total $3,500)

8134 Safety Equipment & Supplies
Provides for the purchase of safety equipment and supplies, including safety vests, goggles, gloves, and other miscellaneous items ($1,350), steel-toed boots ($750), and First Aid equipment ($1,400). (Total $3,500)

8140 Utilities
Provides for the purchase of CNG gas for CNG fleet vehicles (Total $2,000)

8170 Professional Services
Fats, Oils and Grease (FOG) Inspection and Compliance Program ($20,000). GIS system retainer services ($10,000), wastewater rate study ($40,000), and shared cost for Acorn Technology IT Services ($30,000). (Total $100,000)

8180 Contract Services
Sewer main video, cleaning, spill containment services ($100,000), Sewer Maintenance and repairs ($15,000), and supplemental contracted labor ($25,000). (Total $140,000)

8191 Liability Insurance & Surety Bonds and Property

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This account pays a 10% share of the City's self-insured costs, which goes to the Insurance Fund 105. The remaining portions are paid out of the General Fund (60%), Water Fund (25%), and LLMD (5%). (Total $200,000)

8200 Employee Training
Provides for training seminars and workshops related to sewer maintenance, including third party training. (Total $2,000)

8400 Overhead Allocation
Funds for administrative services provided by the General Fund ($69,022).

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Traffic Signals / 215-6010-6115

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	594	13,562	30,900	63,000	63,000	63,000
8140	000	Utilities	67,118	76,475	110,891	150,000	120,000	150,000
8180	000	Contract Services	74,714	72,387	118,798	150,000	150,000	158,000
		<OPERATIONS & MAINTENANCE>	142,427	162,424	260,590	363,000	333,000	371,000
8520	000	Machinery & Equipment	-	-	15,923	30,000	30,000	30,000
		<CAPITAL OUTLAY>	-	-	15,923	30,000	30,000	30,000
[215-6115] Traffic Signals Total			**142,427**	**162,424**	**276,512**	**393,000**	**363,000**	**401,000**

OPERATIONS & MAINTENANCE

8020 Department Supplies
Funds special and miscellaneous department supplies and services related to the maintenance of the City's traffic signals ($8,000); in-pavement crosswalk maintenance ($30,000); traffic signal systems upgrades ($25,000). (Total $63,000)

8140 Electricity
Provides funds for electrical service by Southern California Edison for traffic signal operations ($150,000).

8180 Contract Services
Provides funds for the contract services related to monthly inspection, maintenance, and testing of the traffic signal system ($105,000) and signal knockdown repairs ($40,000). Cost sharing for traffic signal at Orange Grove and SR110 ($11,000) and Orange Grove and Columbia ($2,000). (Total $158,000)

CAPITAL OUTLAY

8520 Machinery & Equipment
Funds traffic cabinet replacements or upgrades ($30,000).

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Street Lighting / 215-6010-6201

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	-	39,791	2,969	20,295
7020	000	Overtime	-	-	-	9,000	-	-
7040	000	Holiday	-	-	-	-	-	-
7055	000	IOD - Non Safety	-	-	-	-	-	-
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	-	-	-	5,263	3,494	1,624
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	-	-	-	56	25	203
7110	000	Workers Compensation	-	-	-	1,397	16	722
7120	000	Disability Insurance	-	-	-	-	-	-
7130	000	Group Health Insurance	-	-	-	3,375	213	7,866
7140	000	Vision Insurance	-	-	-	108	3	84
7150	000	Dental Insurance	-	-	-	405	10	315
7160	000	Life Insurance	-	-	-	45	1	35
7170	000	FICA - Medicare	-	-	-	577	20	294
		<WAGES & BENEFITS>	-	-	-	60,017	6,750	31,438
8000	000	Office Supplies	343	811	377	1,000	200	1,000
8020	000	Special Department Expense	26,480	18,848	22,008	50,000	50,000	65,500
8100	000	Vehicle Maintenance	834	2,128	1,091	7,500	5,000	7,500
8105	000	Fuel	-	-	-	7,500	-	7,500
8110	000	Equipment Maintenance	429	-	789	5,000	3,000	5,000
8130	000	Small Tools	268	-	-	1,500	600	1,500
8132	000	Uniform Expense/Cleaning	671	1,067	585	1,500	1,500	2,000
8134	000	Safety Clothing/Equipment	245	228	250	1,000	1,000	1,000
8140	000	Utilities	142,238	161,588	177,887	170,000	100,000	170,000
8170	000	Professional Services	4,440	6,930	4,934	17,400	8,700	10,000
8191	000	Liability & Surety Bonds	37,390	-	90,000	100,000	100,000	100,000
8200	000	Training Expense	-	-	-	1,000	-	1,000
		<OPERATIONS & MAINTENANCE>	213,339	191,600	297,921	363,400	270,000	372,000
[215-6201] Street Lighting Total			**213,339**	**191,600**	**297,921**	**423,417**	**276,750**	**403,438**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation for the Public Works Operations Manager, Facilities Maintenance Supervisor, Senior Civil Engineer, Electrician, and Civil Engineering Assistant. Refer to the Appendix for a detailed allocation list.

7020 Overtime
Funds overtime pay for after-hours emergency response to facility issues, and attendance at commission meetings.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies ($1,000).

8020 Special Department Expense
Provides for electric supplies, hardware, wiring, and LED Lighting (15,000), materials for signal knockdowns ($25,000), street light maintenance ($20,000), safety cones, stop signs and A-frames for traffic control assistance ($4,000), and expenses for co-sponsorship events ($1,500). (Total $65,500)

8100 Vehicle Maintenance and Operations
Provides funds for operational costs for oil, tires, batteries, parts, repairs and routine maintenance for Street Lighting Division vehicles, and annual certification of the boom trucks. (Total $7,500)

8105 Fuel
Funds operational fuel expenses ($7,500).

8110 Equipment Maintenance
Funds hydraulic repairs for boom truck and repair and maintenance of facilities equipment ($5,000).

8130 Small Tools
Funds replacement or purchase of worn or damaged hand and power tools ($1,500).

8132 Uniforms and Equipment
Provides for the purchase of Fire-Retardant Uniforms, and cleaning services. (Total $2,000)

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8134 Safety Equipment & Supplies
Provides for the purchase of safety equipment and supplies including safety equipment Clothing, fire retardant city apparel. (Total $1,000)

8140 Electricity
Funds the energy costs by Southern California Edison for the City streetlights ($170,000).

8170 Professional Services
Annual assessment review for the Lighting and Landscaping Assessment District. (Total $10,000)

8191 Liability Insurance & Surety Bonds and Property
Funds a 5% share of the City's self-insured costs, which goes to the Insurance Fund 103. The remaining portions are paid out of the General Fund (60%), Water Fund (25%), and Sewer (10%). (Total $100,000)

8200 Training Expense
Funds training seminars and workshops related to street lighting systems ($1,000).

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Street Tree Maintenance / 215-6010-6310

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	110,618	132,668	124,739	126,368	98,656	122,601
7020	000	Overtime	1,896	6,493	5,702	8,000	2,076	
7040	000	Holiday	4,032	7,065	3,951	-	-	3,950
7055	000	IOD - Non Safety	-	-	-	-	-	
7070	000	Leave Buyback	1,209	-	3,366	2,500	-	1,424
7100	000	Retirement	26,474	24,039	55,008	35,909	33,269	15,254
7100	010	CalPERS UAL				-	-	31,460
7108	000	Deferred Compensation	-	5,044	(4,904)	-	695	1,222
7110	000	Workers Compensation	4,610	5,728	4,876	5,039	2,579	3,519
7120	000	Disability Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	11,200	14,128	10,949	16,936	11,057	23,190
7140	000	Vision Insurance	329	376	344	432	266	376
7150	000	Dental Insurance	1,231	1,406	1,286	1,620	997	1,411
7160	000	Life Insurance	153	170	151	178	110	158
7170	000	FICA - Medicare	1,653	2,063	1,994	1,832	1,478	1,778
		<WAGES & BENEFITS>	163,405	199,179	207,461	198,814	151,183	206,344
8000	000	Office Supplies	423	520	365	700	100	700
8020	000	Special Department Expense	3,365	3,812	11,646	27,000	20,000	24,800
8040	000	Advertising	-	-	-	200	-	200
8060	000	Dues & Memberships	135	185	-	400	-	400
8070	000	Mileage/Auto Allowance	-	-	-	500	-	500
8090	000	Conference & Meeting Expense	-	-	-	200	-	500
8100	000	Vehicle Maintenance	3,360	6,266	7,456	11,000	7,500	11,000
8105	000	Fuel	-	-	-	5,000	-	5,000
8110	000	Equipment Maintenance	2,284	1,267	1,968	5,000	1,500	6,000
8130	000	Small Tools	266	142	2,178	5,000	4,000	7,000
8132	000	Uniform Expense/Cleaning	1,058	970	666	3,000	1,000	3,500
8134	000	Safety Clothing/Equipment	1,055	615	1,338	3,000	2,000	4,500
8140	000	Utilities						2,000
8170	000	Professional Services	14,500	14,500	15,000	25,500	25,500	25,500
8180	000	Contract Services	204,005	230,000	230,171	300,000	300,000	300,000
8181	000	In-Lieu Tree Planting	10,000	10,000	10,000	10,000	3,500	10,000
8184	000	Annual Tree Planting	(4,127)	8,000	74,871	150,000	35,000	150,000
8200	000	Training Expense	320	-	-	800	-	800
9181	000	Removal/Replacement Tree Program	50,000	50,000	75,000	-	-	-
		<OPERATIONS & MAINTENANCE>	286,644	326,278	430,661	547,300	400,100	552,400
[215-6310] Street Trees Total			**450,049**	**525,457**	**638,121**	**746,114**	**551,283**	**758,744**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds the partial compensation for the Parks Supervisor, Senior Maintenance Worker, Maintenance Worker I/II, Public Works Assistant, and Management Assistant. Refer to the Appendix for a detailed allocation list.

7020 Overtime
Funds overtime pay for after-hours emergency response to fallen trees, broken limbs, and attendance at commission meetings.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies ($700).

8020 Special Department Expense
Provides for supplies and materials including chain saw blades, blade sharpening, gloves, chipper blades ropes, sling and pulleys, electric equipment/batteries, work zone signs and cones, tree ties and tree wires, tree stakes, irrigation and other supplies ($24,800). (Total $24,800)

8040 Advertisements
Funds to publish ads for the tree regulations ($200).

8060 Dues/Memberships/Subscriptions
Funds dues for Parks Supervisor to be a Western International Society of Arboriculture (ISA) member ($400).

8070 Mileage/Auto Allowance
Funds reimbursement funds for street maintenance related call outs ($500).

8090 Conference & Meeting Expense
Provides funds for tree related conference registration and meeting expenses (Total $500).

8100 Vehicle Maintenance
Provides funds for operational costs for gas, diesel, oil, tires, batteries, parts, repairs for Street Tree Division vehicles (Total $11,000).

8105 Fuel
Funds operational fuel expenses. (Total $5,000)

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8110 Equipment Maintenance
Provides funds for repair and maintenance of City owned equipment. Equipment maintenance for chainsaw, trencher, chipper, fork lift and other equipment, and loader. (Total $6,000).

8130 Small Tools
Provides for replacement or purchase of worn or damaged hand and power tools. (Total $7,000).

8132 Uniforms and Equipment
Provides for the purchase of Uniforms, all functional City apparel and cleaning services ($3,500).

8134 Safety Equipment & Supplies
Provides for the purchase of safety equipment and supplies, including chaps and guards while using chain saws, helmets, and gloves ($2,500), safety boots ($500), First Aid supplies and monthly inspections ($1,500). (Total $4,500)

8140 Utilities
Provides for the purchase of CNG gas for CNG fleet vehicles (Total $2,000)

8170 Professional Services
Provides the cost of a miscellaneous tree studies and samplings, independent arborist reports, and certified arborist services as needed. (Total $25,500)

8180 Contract Services
Routine tree maintenance services rendered under contract for tree trimming, annual grid pruning, and removal of trees ($300,000).

8181 In-Lieu Tree Planting
Funds miscellaneous tree planting. The charges to this account are offset by residents paying for the cost of the trees into a revenue account ($10,000).

8184 Annual Tree Planting & Removal
Funds annual Citywide tree planting and removal ($150,000).

8200 Training
Funds attendance at classes, seminars and workshops related to tree care and management, and as required to maintain certifications and licenses ($800).

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Median Strips / 215-6010-6416

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	1,781	1,061	228	7,500	6,000	7,500
8180	000	Contract Services	75,263	50,657	56,267	131,250	131,250	145,000
		<OPERATIONS & MAINTENANCE>	77,043	51,718	56,495	138,750	137,250	152,500
[215-6416] Median Strips Total			**77,043**	**51,718**	**56,495**	**138,750**	**137,250**	**152,500**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Funds department supplies including sprinklers, valves, fittings and plumbing ($7,500).

8180 Contract Services
Provides partial cost of landscape services including landscape maintenance of street medians and City owned parcels. (Total $145,000)

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Street Maintenance / 230-6010-6116

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	293,972	311,472	299,001	506,222	428,735	653,521
7010	000	Salaries - Temp / Part	394	-	-	10,000	1,684	-
7020	000	Overtime	11,733	8,764	8,318	9,000	24,682	
7040	000	Holiday	9,487	15,356	8,578	-	1,151	9,075
7055	000	IOD - Non Safety	-	-	-	-	2,907	
7070	000	Leave Buyback	2,866	-	-	5,211	-	4,135
7100	000	Retirement	68,741	58,003	142,268	46,993	66,754	57,881
7100	010	CalPERS UAL				-	-	33,099
7108	000	Deferred Compensation	137	11,706	(14,399)	378	2,850	6,490
7110	000	Workers Compensation	12,121	12,547	12,319	19,254	14,472	21,374
7120	000	Disability Insurance	-	2,537	3,093	-	5,242	
7130	000	Group Health Insurance	34,482	38,812	28,817	66,413	43,140	120,837
7140	000	Vision Insurance	1,012	1,002	931	1,764	1,050	1,859
7150	000	Dental Insurance	3,780	3,706	3,330	6,615	3,737	6,419
7160	000	Life Insurance	478	471	441	728	527	896
7170	000	FICA - Medicare	4,504	4,756	4,678	7,340	6,145	9,476
		<WAGES & BENEFITS>	443,708	469,132	497,374	679,918	603,075	925,061
8000	000	Office Supplies	1,095	814	315	1,000	1,000	1,000
8020	000	Special Department Expense	84,240	64,185	93,001	120,000	120,000	120,300
8060	000	Dues & Memberships	-	-	-	1,500	-	500
8070	000	Mileage/Auto Allowance	-	-	-	1,500	100	1,500
8100	000	Vehicle Maintenance	7,903	9,420	6,187	26,000	26,000	28,400
8105	000	Fuel	-	-	-	20,000	20,000	10,000
8110	000	Equipment Maintenance	3,087	27	-	35,000	35,000	35,000
8130	000	Small Tools	-	3,058	-	6,000	1,000	6,000
8132	000	Uniform Expense/Cleaning	1,509	2,059	1,719	3,000	3,000	3,500
8134	000	Safety Clothing/Equipment	1,152	1,287	1,676	3,500	3,500	5,500
8140	000	Utilities						2,000
8170	000	Professional Services	10,000	-	945	3,000	3,000	3,000
8180	000	Contract Services	19,134	8,070	12,046	140,000	20,000	140,000
8200	000	Training Expense	-	-	-	2,000	500	2,000
		<OPERATIONS & MAINTENANCE>	128,122	88,920	115,888	362,500	233,100	358,700
8540	000	Automotive Equipment	-	25,185	-	65,000	-	65,000
		<CAPITAL OUTLAY>	-	25,185	-	65,000	-	65,000
[230-6116] Street Maintenance Total			**571,830**	**583,237**	**613,262**	**1,107,418**	**836,175**	**1,348,761**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation for Public Works Director, Deputy Public Works Director, Street Supervisor, Senior Maintenance Worker, Public Works Operations Manager, Senior Civil Engineer, Associate Civil Engineer, two Public Works Inspectors, Management Analyst, and five Maintenance Worker I/II positions. Refer to the Appendix for a detailed allocation list.

7010 Salaries Part-time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds overtime pay for after-hours emergency response.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds department office supplies ($500) and miscellaneous expense ($500). (Total $1,000)

8020 Special Department Expense
This account provides for Street maintenance equipment, street signage and products ($50,000), materials such as asphalt, sand, base, rushed aggregate, emulsion, and concrete, and backfill soil ($70,000), breakroom supplies ($300). (Total $120,300)

8060 Dues, Memberships, Subscriptions, and Books
This account provides funding for construction handbooks and standard drawings/specifications. (Total $500)

8070 Mileage/Auto Allowance
Provides reimbursement funds for street maintenance related call outs. (Total $1,500)

8100 Vehicle Maintenance
Provides funds for operational costs for tires, tune-ups, preventative maintenance, smog certification, and miscellaneous repairs and parts for Street Maintenance Division vehicles. (Total $28,400)

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8105 Fuel
Funds operational fuel expenses ($10,000).

8110 Equipment Maintenance
Provides funds for repair and maintenance of City owned equipment used by the Streets Division including loader tires, compressor, vibrating plates, forklift, message & arrow boards, and other machinery/equipment. (Total $35,000)

8130 Small Tools
Provides for replacement or purchase of worn or damaged hand and power tools including weed whackers, chain saws, gas powered trawler and demo hammer. (Total $6,000)

8132 Uniforms and Equipment
Provides for the purchase of Uniforms, all functional City apparel and cleaning services. (Total $3,500)

8134 Safety Equipment & Supplies
Provides for the purchase of safety equipment and supplies, including safety boots ($2,000), First Aid equipment ($1,400), and other safety supplies including vests, goggles, gloves, and other miscellaneous items ($2,100). (Total $5,500)

8140 Utilities
Provides for the purchase of CNG gas for CNG fleet vehicles (Total $2,000)

8170 Professional Services
Funds professional services for street and roadway related topics ($3,000).

8180 Contract Services
Provides for services rendered for street maintenance activities such as curb & gutter, sidewalk, and catch basin repair, striping and markings maintenance ($100,000), additional labor for supplementary maintenance services ($17,000), State Controller-Annual Street Reports ($3,000), Los Angeles County Public Works-Catch Basin Clean Out ($20,000). (Total $140,000)

8200 Training
Funds seminars and workshops related to street maintenance, signage and traffic control devices and methods ($2,000).

CAPITAL OUTLAY

8540 Vehicles and Equipment
Purchase an Operations & Maintenance Division Electric pickup truck (Total $65,000).

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Prop “A” Maintenance / 232-6010-6417

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	19,407	4,648	14,553	25,000	25,000	25,500
8110	000	Equipment Maintenance	7,009	-	854	11,000	-	11,000
8140	000	Utilities	1,050	6,292	10,501	20,000	11,500	31,500
8180	000	Contract Services	15,166	17,016	28,421	50,000	25,000	50,000
		<OPERATIONS & MAINTENANCE>	42,632	27,957	54,329	106,000	61,500	118,000
[232-6417] Prop "A" Park Maintenance Total			**42,632**	**27,957**	**54,329**	**106,000**	**61,500**	**118,000**

OPERATIONS & MAINTENANCE

8020 Special Department Expenses
Provides funds for Janitorial Supplies ($2,500), Ground Cover for Playgrounds ($13,000), parts for Playgrounds, fixtures for restrooms, and light fixtures ($10,000). Total ($25,500)

8140 Equipment Maintenance
Funds playground equipment maintenance for Garfield, Orange Grove, and Eddie Park ($11,000).

8140 Utilities
Funds utilities for the Arroyo Park restrooms, Garfield Park Restrooms and the Dog Park ($31,500).

8180 Contract Services
Funds janitorial services ($15,000), to unlock restrooms at Arroyo Park and Garfield parks ($5,000) and regular maintenance of the Dog Park, Garfield Park playground, Orange Grove Park playground, and Eddie Park playground ($15,000), Landscape Structure Design and Installation services ($15,000) . (Total $50,000)

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Measure R / 233-6010-6011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	-	60,078	7,471	59,310
7020	000	Overtime	-	-	-	-	-	
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	-	-	-	4,515	19,914	4,745
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	-	-	-	561	17,506	593
7110	000	Workers Compensation	-	-	-	1,038	15	644
7120	000	Disability Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	-	-	-	3,750	-	11,700
7140	000	Vision Insurance	-	-	-	120	-	120
7150	000	Dental Insurance	-	-	-	450	-	450
7160	000	Life Insurance	-	-	-	50	-	50
7170	000	FICA - Medicare	-	-	-	814	21	860
		<WAGES & BENEFITS>	-	-	-	71,376	44,927	78,472
8170	000	Professional Services	-	-	-	-	-	50,000
		<OPERATIONS & MAINTENANCE>	-	-	-	-	-	50,000
[233-6011] PW Admin & Engineering Total			-	-	-	**71,376**	**44,927**	**128,472**

PERSONNEL SERVICES

7000 Salaries – Regular Employees

Funds partial compensation for Transportation Engineer. Refer to the Appendix for a detailed allocation list.

OPERATIONS & MAINTENANCE

8170 Professional Services

Professional services related to transportation studies and evaluations. (Total $50,000)

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Measure M / 236-6010-6011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	-	-	-	60,078	7,471	59,310
7020	000	Overtime	-	-	-	-	-	
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	-	-	-	4,515	19,914	4,745
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	-	-	-	561	17,506	593
7110	000	Workers Compensation	-	-	-	1,038	15	644
7120	000	Disability Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	-	-	-	3,750	-	11,700
7140	000	Vision Insurance	-	-	-	120	-	120
7150	000	Dental Insurance	-	-	-	450	-	450
7160	000	Life Insurance	-	-	-	50	-	50
7170	000	FICA - Medicare	-	-	-	814	21	860
		<WAGES & BENEFITS>	-	-	-	71,376	44,927	78,472
8170	000	Professional Services	-	-	-	100,000	35,000	150,000
		<OPERATIONS & MAINTENANCE>	-	-	-	100,000	35,000	150,000
[236-6011] PW Admin & Engineering Total			-	-	-	**171,376**	**79,927**	**228,472**

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation for Transportation Engineer. Refer to the Appendix for a detailed allocation list.

OPERATIONS & MAINTENANCE

8170 Professional Services
Provides funding for implementation of the Neighborhood Traffic Management Program (NTMP) ($100,000), Professional services related to transportation studies and evaluations (50,000). (Total $150,000)

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Measure W – Safe Clean Water Act / 239-6010-6011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	27,500	17,438	15,444	25,857	21,556	39,578
7020	000	Overtime	-	191	206	-	67	
7040	000	Holiday	96	861	360	-	-	346
7070	000	Leave Buyback	12	-	-	-	-	490
7100	000	Retirement	3,377	2,319	5,006	6,404	6,007	4,044
7100	010	CalPERS UAL				-	-	5,001
7108	000	Deferred Compensation	239	1,204	(960)	210	176	396
7110	000	Workers Compensation	484	219	449	577	202	430
7120	000	Disability Insurance	-	1,794	-	-	874	
7130	000	Group Health Insurance	3,430	1,962	994	1,599	1,292	5,883
7140	000	Vision Insurance	56	40	28	48	30	76
7150	000	Dental Insurance	208	149	104	180	111	286
7160	000	Life Insurance	25	18	13	20	15	35
7170	000	FICA - Medicare	383	286	242	375	279	574
		<WAGES & BENEFITS>	35,811	26,481	21,886	35,270	30,608	57,138
8020	000	Special Department Expense	23,698	8,503	17,954	25,000	25,000	26,000
8170	000	Professional Services	26,314	5,517	42,523	135,000	135,000	135,000
8180	000	Contract Services	1,629	2,054	12,331	95,000	95,000	95,000
		<OPERATIONS & MAINTENANCE>	51,641	16,074	72,809	255,000	255,000	256,000
[239-6011] PW Admin & Engineering Total			**87,452**	**42,555**	**94,695**	**290,270**	**285,608**	**313,138**

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation of Public Works Director, Deputy Public Works Director, Senior Civil Engineer, and Associate Civil Engineer. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for Public Works Intern.

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Provides funds for annual NPDES storm drain permit ($11,000), implementation of the Enhanced Watershed Management Program (EWMP) ($15,000). (Total $26,000)

8170 Professional Services
Provides for the cost of professional services to achieve full compliance with the NPDES permit including NPDES consultant services ($35,000). Upper LA River Enhanced Watershed Management Program Development for MS4 Permit compliance ($25,000). Safe Clean Water (SCW) Annual Plan development and planning, professional and technical service for stormwater projects ($75,000). Total ($135,000)

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8180 Contract Services
Annual citywide catch basin cleaning services required for MS4 Permit compliance, catch basin protection and repair, trash capture inserts, and other stormwater related services. (Total $95,000)

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SGVCOG / 247-6010-6011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	-	-	-	50,000	-	45,000
		<OPERATIONS & MAINTENANCE>	-	-	-	50,000	-	45,000
247 - SGVCOG TOTAL			**-**	**-**	**-**	**50,000**	**-**	**45,000**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Funds to purchase temporary equipment for the Slow Streets Program. (Total $45,000)

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Water Distribution / 500-6010-6710

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	572,544	583,898	619,654	773,886	713,560	943,124
7010	000	Salaries - Temp / Part	2,361	31,658	-	-	4,001	-
7020	000	Overtime	23,295	36,597	40,443	45,000	53,331	
7040	000	Holiday	12,528	20,060	15,444	-	1,433	12,985
7055	000	IOD - Non Safety	-	-	-	-	-	
7070	000	Leave Buyback	6,041	-	-	1,196	-	4,107
7100	000	Retirement	126,277	116,670	282,956	192,199	188,757	101,928
7100	010	CalPERS UAL				-	-	157,293
7108	000	Deferred Compensation	2,028	24,689	(20,169)	2,748	5,052	9,316
7110	000	Workers Compensation	19,609	21,694	22,272	22,625	24,815	35,213
7120	000	Disability Insurance	-	1,392	2,062	-	2,621	
7130	000	Group Health Insurance	58,787	65,393	60,832	88,770	84,135	158,961
7131	000	Retiree Health Insurance	-	-	-	-	-	
7140	000	Vision Insurance	1,626	1,724	1,850	2,328	1,890	2,631
7150	000	Dental Insurance	5,092	5,875	6,347	8,730	6,617	9,698
7160	000	Life Insurance	723	727	803	960	852	1,188
7170	000	FICA - Medicare	8,617	9,680	9,910	11,221	12,128	13,675
		<WAGES & BENEFITS>	839,528	920,056	1,042,403	1,149,663	1,099,192	1,450,119
8000	000	Office Supplies	4,082	4,313	4,301	3,700	3,700	3,700
8010	000	Postage	-	127	12	200	-	400
8020	000	Special Department Expense	75,255	14,913	49,073	141,000	141,000	387,000
8050	000	Printing/Duplicating	292	66	404	3,500	3,000	3,500
8060	000	Dues & Memberships	238	-	-	700	700	10,700
8070	000	Mileage/Auto Allowance	964	616	1,754	2,500	2,500	2,500
8090	000	Conference & Meeting Expense	-	-	-	2,200	-	3,500
8100	000	Vehicle Maintenance	6,353	7,620	3,744	12,250	12,250	14,000
8105	000	Fuel	-	-	-	20,000	20,000	20,000
8110	000	Equipment Maintenance	9,807	9,224	1,378	10,000	10,000	15,000
8120	000	Building Maintenance	5,469	15,562	16,289	23,000	23,000	17,000
8130	000	Small Tools	1,991	4,902	394	10,000	10,000	10,000
8132	000	Uniform Expense/Cleaning	2,972	2,864	3,170	2,500	25,000	3,500
8134	000	Safety Clothing/Equipment	1,083	2,387	726	5,400	54,000	9,400
8140	000	Utilities	38,306	49,179	64,668	80,000	60,000	83,000
8150	000	Telephone	9,160	8,832	4,510	10,500	2,000	10,500
8170	000	Professional Services	16,422	19,963	10,150	164,500	50,000	184,500
8180	000	Contract Services	49,076	25,109	44,634	100,000	100,000	158,000
8191	000	Liability & Surety Bonds	106,089	(78,000)	450,000	490,000	490,000	490,000
8200	000	Training Expense	225	595	420	2,000	2,000	2,000
8229	000	Taxes	4,537	4,392	4,485	5,000	5,000	5,000
8400	000	Overhead Allocation	117,114	117,114	117,114	117,114	117,114	117,114
		<OPERATIONS & MAINTENANCE>	449,435	209,777	777,228	1,206,064	1,131,264	1,550,314
8530	000	Computer Equipment	-	-	-	-	-	-
8540	000	Automotive Equipment	-	-	-	180,000	-	410,000
8572	000	Meters	29,511	23,735	13,049	-	-	-
8573	000	Fire Hydrants	2,523	5,762	5,330	-	-	-
8574	000	Valves	889	-	-	-	-	-
		<CAPITAL OUTLAY>	32,923	29,496	18,379	180,000	-	410,000
[500-6710] Water Distribution Total			**1,321,885**	**1,159,330**	**1,838,010**	**2,535,727**	**2,230,456**	**3,410,433**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds compensation for six full-time employees, including Senior Water Utility Worker and five Water Utility Worker I/II and partial compensation of Public Works Director, Deputy Public Works Director, Water Operations Manager, two Public Works Inspectors, Senior Civil Engineer, Civil Engineering Assistant, Public Works Assistant, Electrician, two Management Analysts, and Management Assistant. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds overtime pay for after hours emergency response to water main and service connection leaks.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for office supplies ($800). (Total $3,700)

8010 Postage
Provides funds for postal expenses for City mailings, including postage machine lease payment ($400).

8020 Special Department Expense
Provides for underground service alert fees ($2,500), staff physical exams and Class B driver license renewals ($500), parts and supplies for water stock inventory, including fire hydrants, pipes, fitting, valves, copper, meters, gaskets ($210,000), backfill sand, base and asphalt, top soil ($17,500), hot tapping services, underground borrowing supplies, and backflow device testing and repair, and valve replacement ($41,500) , replacement of fire hydrants and installation expenses ($40,000), materials for the installation and repair of fire services ($40,000), workstation installations ($25,000), and inventory management system ($10,000). (Total $387,000)

8050 Printing and Duplication
Provides funds for the printing and duplication of materials, plans, and billing inserts. (Total $3,500)

8060 Dues, Memberships, Subscriptions, and Books
Purchase of new Water Distribution reference books and membership in SCWUA

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and AWWA ($700), and the San Gabriel Valley Water Association ($10,000). (Total $10,700)

8070 Mileage/Auto Allowance
Provides reimbursement funds for water related call outs. (Total $2,500)

8090 Conference & Meeting Expenses
Provides funds for the AWWA Conference and regional conference & meetings. (Total $3,500)

8100 Vehicle Maintenance
Provides funds for operational expenses such as oil, tires, batteries, parts, repairs, preventive and routine maintenance of division vehicles and smog certifications. (Total $14,000)

8105 Fuel
Provides funds for operational fuel expenses. (Total $20,000)

8110 Equipment Maintenance
Provides funds for repair and maintenance of City owned equipment including air hose supplies ($2,000) generator, ditch pumps, tapping machine, trench shoring systems, backhoe, compressor and miscellaneous electrical and pneumatic equipment ($8,000) and upgrade water line locator, leak detection devices, and pressure logger ($5,000). (Total $15,000)

8120 Building Maintenance
Provides for repairs to the facilities used by the Water Distribution Division and building supplies ($6,000) including automatic gate & garage door maintenance ($6,500), elevator maintenance at Garfield Reservoir ($4,500). (Total $17,000)

8130 Small Tools
Provides for replacement or purchase of worn or damaged hand and power tools, including purchase of electrical partner saw, generator ($5,000), pneumatic pumps ($3,000), and electrical pumps ($2,000). (Total $10,000)

8132 Uniforms and Equipment
Provides for purchase of Uniforms, all functional City apparel and cleaning services. (Total $3,500)

8134 Safety Equipment & Supplies
Provides for the purchase of personal protective equipment, including, safety vests, hard hats, ear plugs, gloves ($3,000), safety boots ($1,900), First Aid equipment ($500) and traffic control equipment including work zone signs, cones, and delineators ($4,000). (Total $9,400)

8140 Utilities
Provides funds for electrical service to Garfield Water Distribution Facility and all water sites by Southern California Edison ($80,000), CNG fuel ($3,000). (Total $83,000)

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8150 Telephone
Provides funds for telephone service to Garfield Water Distribution Facility and all water sites, including meter reading network service. (Total $10,500).

8170 Professional Services
Provides professional services to update the water GIS to include water services and meters ($20,000), Water Rate Study ($80,000) and hydraulic model analysis for development projects including fire flow ($30,000), and other professional services ($54,500). (Total $184,500)

8180 Contract Services
Provides contract services to repair and replace water mains, valves, fire hydrants, and water services ($100,000) Meter reading system and support services ($10,000), water meter bee removal services ($3,000), landscaping contract services for water facilities ($24,000), Janitorial Services ($11,000), and Citywide Cross Connection Program management ($10,000). (Total $158,000)

8191 Liability Insurance & Surety Bonds and Property
This account pays a 25% share of the City's self-insured costs which goes to the Insurance Fund 105. The remaining portions are paid out of the General Fund (60%), Sewer Fund (5%), and LLMD (10%). (Total $490,000)

8200 Training Expense
Provides training seminars and workshops related to water system distribution certification, such as American Water Works Association ($1,200), SCUWA staff training ($400), California Rural Water and State Water Resources Control Board operator certifications ($400). (Total $2,000)

8229 Taxes
Property taxes paid to Los Angeles County for Water facilities located outside of South Pasadena City boundaries (Total $5,000).

8400 Overhead Allocation
Charges for administrative services provided by the General Fund (Total $117,114).

CAPITAL OUTLAY

8540 Vehicles and Equipment
Purchase a replacement Water Division Vehicle and forklift (Total $410,000).

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Water Production / 500-6010-6711

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	386,293	369,595	321,220	400,919	293,016	163,884
7010	000	Salaries - Temp / Part	2,361	-	-	-	-	-
7020	000	Overtime	21,826	38,166	39,120	50,000	32,482	
7040	000	Holiday	8,255	11,503	9,544	-	4,098	8,767
7070	000	Leave Buyback	2,523	-	-	10,000	-	1,095
7100	000	Retirement	140,486	97,798	212,478	135,464	114,911	18,029
7100	010	CalPERS UAL				-	-	28,271
7108	000	Deferred Compensation	1,484	13,556	(11,349)	1,457	2,295	1,638
7110	000	Workers Compensation	12,786	13,769	13,737	13,296	11,836	6,033
7130	000	Group Health Insurance	38,372	36,343	26,026	31,170	31,582	22,350
7131	000	Retiree Health Insurance	-	-	-	-	-	
7140	000	Vision Insurance	972	937	780	1,176	650	351
7150	000	Dental Insurance	3,927	3,795	3,198	4,410	2,618	1,456
7160	000	Life Insurance	436	425	389	485	317	163
7170	000	FICA - Medicare	5,591	6,001	5,582	5,813	4,846	2,376
		<WAGES & BENEFITS>	625,312	591,888	620,725	654,190	498,653	254,414
8000	000	Office Supplies	1,758	1,025	1,377	1,500	1,500	1,500
8010	000	Postage	-	65	12	200	-	400
8020	000	Special Department Expense	(2,773)	23,120	20,990	42,700	42,700	146,600
8040	000	Advertising	(279)	-	-	-	-	-
8050	000	Printing/Duplicating	449	-	-	2,000	2,000	2,000
8060	000	Dues & Memberships	2,223	2,373	2,443	5,600	5,600	5,600
8070	000	Mileage/Auto Allowance	130	259	60	600	-	600
8080	000	Books & Periodicals	-	-	-	500	500	500
8100	000	Vehicle Maintenance	3,363	597	120	5,000	5,000	6,000
8110	000	Equipment Maintenance	11,863	4,660	-	236,000	236,000	231,000
8120	000	Building Maintenance	199	496	-	10,500	10,000	10,500
8130	000	Small Tools	371	-	989	1,000	1,000	1,000
8132	000	Uniform Expense/Cleaning	1,706	2,014	1,610	2,500	2,500	2,500
8134	000	Safety Clothing/Equipment	-	1,197	718	800	800	2,950
8140	000	Utilities	3,317	5,986	2,230	7,000	7,000	7,000
8150	000	Telephone	-	-	-	1,200	-	1,200
8152	000	Pumping Power	533,536	692,436	684,049	835,000	750,000	935,000
8170	000	Professional Services	135,176	128,616	141,858	355,000	255,000	210,000
8180	000	Contract Services	136,563	417,062	221,640	1,085,000	600,000	1,150,000
8200	000	Training Expense	110	-	-	1,500	1,500	1,500
8231	000	Water Purchases - Resale	281,237	345,861	466,942	310,000	310,000	310,000
8233	000	Watermaster Charges	559,565	716,542	635,780	1,000,000	1,000,000	1,350,000
8400	000	Overhead Allocation	205,267	205,267	205,267	205,267	205,267	205,267
		<OPERATIONS & MAINTENANCE>	1,873,780	2,547,577	2,386,087	4,108,867	3,436,367	4,581,117
8520	000	Machinery & Equipment	-	-	-	-	-	-
8530	000	Computer Equipment	3,040	3,211	-	20,000	-	20,000
8540	000	Automotive Equipment	20,616	-	-	260,000	-	290,000
		<CAPITAL OUTLAY>	23,656	3,211	-	280,000	-	310,000
[500-6711] Water Production Total			**2,522,747**	**3,142,676**	**3,006,811**	**5,043,057**	**3,935,020**	**5,145,531**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds compensation for three full time employees, including Senior Water Production/Treatment Operator, and two Water Production/Treatment Operators, and partial compensation for Public Works Director, Deputy Public Works Director, Water Operations Manager, Senior Civil Engineer, Civil Engineering Assistant, Public Works Assistant, Electrician, two Management Analysts, and Management Assistant. Refer to the Appendix for a detailed allocation list.

7010 Salaries – Part-Time
Funds partial compensation for seasonal, Public Works Intern, and other non-salaried part-time employees.

7020 Overtime
Funds overtime pay for afterhours emergency response to water production problems and for coverage during vacations, sick leave and other extended employee absences.

7040 Holiday
Funds employees whose work rotation falls on holidays.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for office supplies and miscellaneous expenses. (Total $1,500)

8010 Postage
Provides funds for postal expenses for City mailings. (Total $400)

8020 Special Department Expense
Provides for special and miscellaneous department supplies and services including: salt for sodium hypochlorite generation at Wilson, Garfield, and Graves Reservoir ($23,400), chlorine analyzer solution and other water quality chemistry supplies($19,000), turbine oil ($1,000), backwash tank rentals ($3,000), chemical pipe supplies ($2,500), and parts and supplies ($2,500), SCADA DSL line at Wilson and Garfield Reservoir ($3,000), State Water Resources Control Board administration fees ($45,000), San Gabriel Basin Water Quality Authority administrative fee ($47,000), and staff physical exams and Class B driver license renewals ($200). (Total $146,600)

8050 Printing and Duplication
Provides funds for the printing and duplication of materials such as the annual

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Consumer Confidence Report and water system maps. (Total $2,000)

8060 Dues, Memberships, Subscriptions
Provides funds for City membership fees and dues for the American Water Works Association. (Total $5,600)

8070 Mileage/Auto Allowance
To provide reimbursement for water related call outs. (Total $600)

8080 Books, Videos, Magazines, and Recordings
Provides funds for the purchase of reference books and manuals from AWWA. (Total $500)

8100 Vehicle Maintenance and Operations
Provides funds for operational expenses such as gas, oil, tires, batteries, parts, repairs, preventive and routine maintenance of division vehicles and smog certifications. (Total $6,000)

8110 Equipment Maintenance
Provides funds for pump maintenance and emergency services ($149,000), water softener ($3,000), generator services ($3,000), chlorine equipment maintenance ($25,000), valve & pump maintenance ($10,000), compressor maintenance ($5,000), Nitrate Analyzer Maintenance ($36,000). (Total $231,000)

8120 Building Maintenance
Provides funds to repair HVAC, painting, electrical maintenance, and gate maintenance at water facilities. (Total $10,500)

8130 Small Tools
Provides for replacement or purchase of worn or damaged hand and power tools. (Total $1,000)

8132 Uniforms and Equipment
Provides for the purchase of Uniforms, all functional City apparel and cleaning services. (Total $2,500)

8134 Safety Equipment & Supplies
Provides for the purchase of personal protective equipment, safety equipment and supplies including safety boots ($750), First Aid equipment ($1,500), gloves, hard hats, vest, ear plugs ($200), chemical resistant PPE ($500). (Total $2,950).

8140 Utilities
Provides for electric service to water system facilities used by the Water Production Division other than power for pumping (Total $7,000).

8150 Telephone
Provides telephone service to water system facilities (Total $1,200).

8152 Pumping Power
This account provides funds for electrical and energy charges associated with

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operating wells and booster pumps. (Total $935,000)

8170 Professional Services
Provides for professional services such as water quality testing including water quality monitoring city wide and at the Wilson & Graves Wellhead treatment systems ($65,000), security services at elevated tanks and reservoirs ($3,000), consultant services for preparation of the annual Consumer Confidence Report and Water Audit, and as needed consulting services for water production ($60,000), SCADA system maintenance ($12,000), and water quality and treatment cost reduction study ($70,000). (Total $210,000)

8180 Contract Services
Granular activated carbon media replacement for Wilson Wellhead Treatment system and Graves Treatment system ($950,000), Graves Reservoir Ion exchange generation salt ($75,000), weed abatement and reservoir tree maintenance ($15,000), and waste brine treatment & disposal ($110,000). (Total $1,150,000)

8200 Training Expense
Provides for AWWA training seminars and workshops related to water supply and production to maintain required state certification of operators (Total $1,500).

8231 Water Purchases – Resale
This account provides funds to purchase water from the City of Pasadena ($45,000), Cal American Water ($5,000), and MWD purchase through Upper San Gabriel Valley Water District supplement the City's well production ($260,000). (Total $310,000).

8233 Watermaster Charges
This account provides the funds to pay for extraction of groundwater from the Main San Gabriel Basin within the City's water rights, excess extraction premiums beyond the adjudicated rights, and for fees for the cleanup of the ground water basin. (Total $1,350,000)

8400 Overhead Allocation
Charges for administrative services provided by the General Fund. (Total $205,267)

CAPITAL OUTLAY

8530 Computer Equipment
Provide replacement computer equipment for the Water Division Supervisory Control and Data Acquisition (SCADA) system. (Total $20,000)

8540 Vehicles and Equipment
Purchase a Water Division Valve Truck to implement a preventative maintenance valve exercise program. (Total $290,000)

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Water Efficiency Projects / 503-6010-6713

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	66,122	57,146	73,135	38,180	50,408	88,901
7010	000	Salaries - Temp / Part	-	3,243	8,281	1,000	20,328	22,729
7020	000	Overtime	-	2,950	2,684	-	235	
7040	000	Holiday	1,584	2,644	1,607	-	-	1,531
7070	000	Leave Buyback	-	-	-	-	-	548
7100	000	Retirement	26,130	19,866	40,069	6,096	8,572	8,194
7100	010	CalPERS UAL				-	-	6,481
7108	000	Deferred Compensation	234	2,987	(2,426)	108	709	885
7110	000	Workers Compensation	881	910	1,140	857	1,271	1,409
7130	000	Group Health Insurance	10,756	10,923	8,552	4,029	13,983	29,895
7140	000	Vision Insurance	151	140	127	72	151	305
7150	000	Dental Insurance	455	520	470	270	706	1,200
7160	000	Life Insurance	69	79	76	30	85	134
7170	000	FICA - Medicare	933	966	1,305	554	2,321	3,028
		<WAGES & BENEFITS>	107,314	102,376	135,019	51,196	98,768	165,242
8000	000	Office Supplies	600	66	-	2,000	700	2,000
8010	000	Postage	-	-	154	2,500	2,500	2,500
8020	000	Special Department Expense	395	5,465	161	25,000	12,500	25,000
8032	000	Water Efficiency Fee Projects	19,256	20,147	24,412	125,000	57,000	125,000
8060	000	Dues & Memberships	-	-	-	2,500	525	2,500
8070	000	Mileage/Auto Allowance	153	-	10	200	200	200
8090	000	Conference & Meeting Expense	504	-	-	2,000	2,000	2,000
		<OPERATIONS & MAINTENANCE>	20,909	25,678	24,737	159,200	75,425	159,200
8540	000	Automotive Equipment	-	-	-	-	-	40,000
		<CAPITAL OUTLAY>	-	-	-	-	-	40,000
[503-6713] Water Efficiency Total			**128,223**	**128,054**	**159,756**	**210,396**	**174,193**	**364,442**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Funds partial compensation of Environmental & Sustainability Manager. Refer to the Appendix for a detailed allocation list.

7020 Overtime
Funds the cost of overtime for non-management staff attending City Council and commission meetings and, as authorized, official City events outside of regular office hours.

7010 Salaries – Part-Time
Funds compensation for a part time intern to assist in processing water conservation program permits.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for department office supplies ($2,000).

8010 Postage
Provides funds for postal related expenses for environmental newsletters and documents. (Total $2,500)

8020 Special Department Expense
Provides funds water conservation and sustainability supplies and services including, but not limited to, computer supplies, annual software subscriptions ($350), expenditures related to promotional materials, event supplies, or other materials ($2,650), Expenditures related to printing, document production, flyers, bill inserts, door hangers, custom items, and other media, marketing, or materials used for events, meetings, programs, outreach, and community classes related to water conservation education ($22,000). (Total $25,000)

8032 Water Efficiency Fee Projects
Provides funds for water conservation and efficiency programs such as residential and commercial water audits, contributing matching funds towards Metropolitan Water District rebate programs and establishing City water rebate programs and services. (Total $125,000)

8060 Dues, Memberships, Subscriptions, and Books
Water Conservation related memberships, including American Water Works Association (AWWA) and California Water Efficiency Partnership (CalWEP) (Total $2,500).

8070 Mileage Reimbursement
Provides funds for mileage reimbursement to water conservation, environmental and sustainability events (Total $200).

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8090 Conference and Meeting Expense
Provides funds for attending conferences and meetings related to water conservation, environmental and sustainability (Total $2,000).

CAPITAL OUTLAY

8540 Automotive Equipment
Refurbishment of vehicle for promoting environmental conservation ($40,000)

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Key Performance Indicators

The Public Works Department is committed to improving public engagement and community access to project and program information in Fiscal Year 2023-2024. In addition to completing a department reorganization and recruitment of critical positions, Public Works will implement quarterly newsletters and website project updates to communicate its many endeavors to City stakeholders.

Public Works Administration & Engineering

- Fulfillment of up to 2,000 service requests annually.
- Process 500 permits for encroachment, excavation, tree replacement, etc.

Water & Sewer Infrastructure

- Produce sufficient water for South Pasadena, approximately 4,000 acre-feet annually.
- Replace 50-100 meters, 10-12 fire hydrants, and 5-8 water service lines annually.
- Remove and replace up to 1,000 linear feet (LF) of water main pipelines.
- Collect 6,200 meter readings monthly.
- Perform at least 10 area leak detection inspections to identify and repair leaks
- Monthly sewer inspection and maintenance program.

Street & Sidewalk Maintenance

- Track repair and replacement of City sidewalks, curbs, and gutters.
- Track repair of street potholes.
- Track replacement of damaged asphalt.

Street/Median Trees & Parks Maintenance

- Plant 80-100 trees annually.
- Increase outreach and education programs regarding landscape & trees maintenance to quarterly.

Facilities & Street Lights

- LED light conversion for up to 50 street, park, and field lights annually.

Environmental Programs & Sustainability

- Increase water conservation rebate programs utilization by 25%.
- Provide 3 demonstrations and 2 citywide utility bill inserts/mailings promoting electric leaf blowers.

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Customer Service and Response

- Provide responses to customers within 1 business days, and status updates on service requests with 10 business days.
- Respond to emergencies, including water service/main break leaks within 1 hour.
- Quarterly Updates on programs and projects.

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Community Development

Fiscal Year 2022-23 Budget Snapshot

Overview

The Community Development Department is comprised of five divisions: Planning, Building and Safety, Community Improvement, Housing, and Film and Art. Staff in Community Development supports the Planning Commission, Cultural Heritage Commission, Design Review Board and Public Art Commission. The Planning staff administers the City's Zoning Code including land use and development regulations, processes land use permits, and undertakes long range land use planning. The Building staff enforces construction standards to safeguard life, health, and property by reviewing building plans for code compliance, issuing building permits, and performing construction inspections. The Community Improvement (code enforcement) staff works with property owners to secure compliance with the municipal code regarding property maintenance and operations. The Housing Division focuses on developing affordable housing policies and implementing strategies to improve housing opportunities for all income levels. Additionally, the Housing staff helps to monitor and implement the Housing Element programs. The department is also home to the South Pasadena Film Office which coordinates all filming activity in the City.

Notable Changes – Wages and Benefits

There is an increase in overall wages and benefits due to additional staffing needed in the department. A full-time Management Assistant position is being requested to help manage the department's four commissions and provide additional administrative assistance to the Housing Division. Additionally, this budget proposes to convert the part-time Community Improvement position to full-time to help with the code cases and to respond to various new City codes and State laws such as the ban on gas powered leaf blowers, and AB 838 tenant health and safety complaints.

Notable Changes – Operations and Maintenance

There is a significant increase in professional services to contract planning firms and consultants to assist with the implementation of the housing programs in the State mandated 6th Cycle Housing Element Update 2021-2029. During this fiscal year the department will be making significant zoning code amendments and finalize the General Plan and Downtown Specific Plan updates, among other department priorities. In addition, the budget for Professional Services includes an extensive work plan including:

- Zoning Code amendments;
- Tenant Protection Programs;
- Cultural Heritage Ordinance update; and
- Department organizational and operational assessment.

Capital Outlay

Improvements to the Housing Authority owned property (308 San Pasqual) are needed within the fiscal year including reroof, septic tank inspection and potential pumping, and kitchen rehabilitation.

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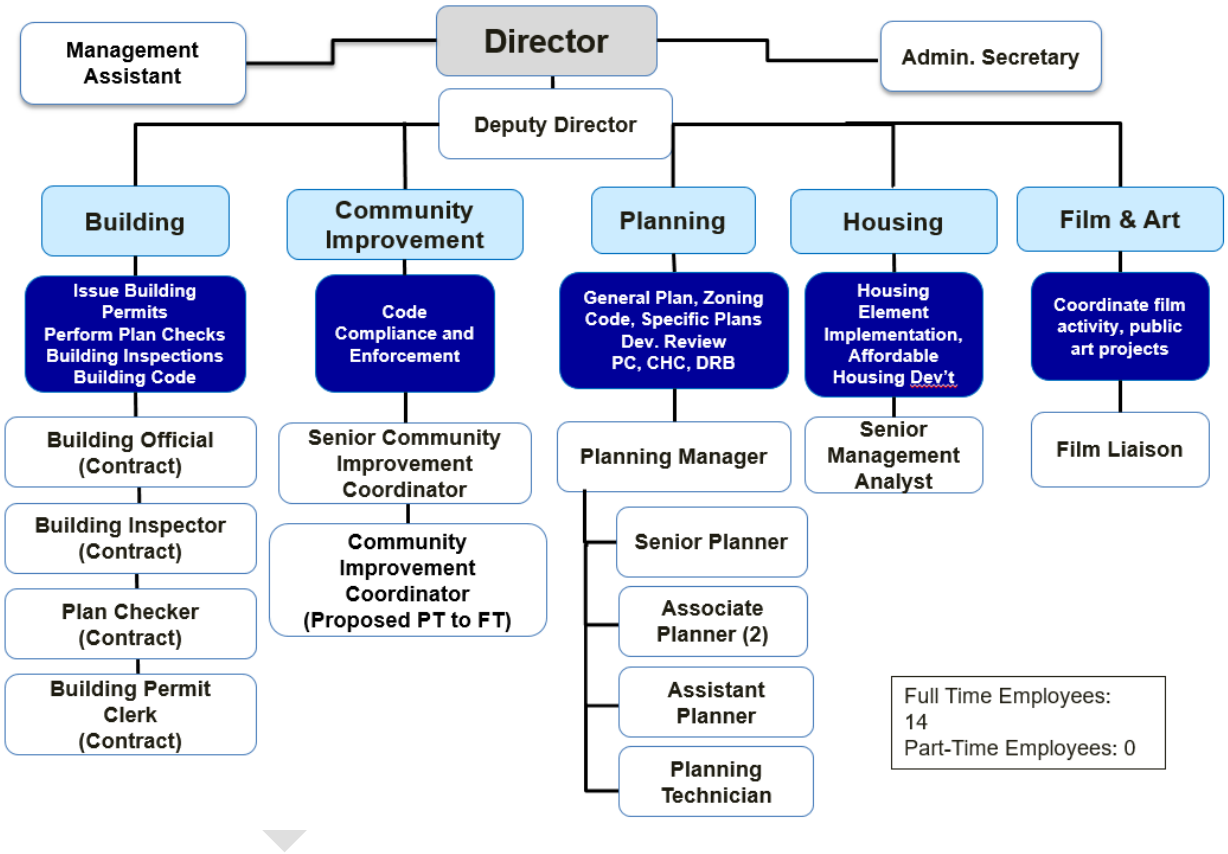
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	826,247	1,108,800	1,304,611	1,601,385	1,573,629	2,032,844
Operations & Maintenance	1,052,408	721,329	1,124,402	2,032,514	1,485,700	2,135,581
Capital Outlay	-	-	-	-	-	-
Total Expenses by Category	**1,878,655**	**1,830,130**	**2,429,014**	**3,633,899**	**3,059,329**	**4,168,425**
[101-7011] Community Development	1,876,257	1,819,769	2,428,641	3,622,199	3,047,629	4,152,225
[105-7011] Facilities & Equipment Replacement	(12,802)	-	-	-	-	-
[228-7220] Housing Authority	15,199	10,361	373	11,700	11,700	16,200
Total Expenses by Program	**1,878,655**	**1,830,130**	**2,429,014**	**3,633,899**	**3,059,329**	**4,168,425**

Authorized Positions



Community Development / 101-7010-7011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	497,128	672,364	713,825	1,049,544	1,018,571	1,324,573
7010	000	Salaries - Temp / Part	90,558	142,722	103,634	109,000	144,120	78,763
7020	000	Overtime	2,828	1,041	3,742	30,000	24,070	15,000
7040	000	Holiday	4,591	14,192	8,755	-	-	7,229
7070	000	Leave Buyback	7,988	-	15,859	8,000	-	9,496
7100	000	Retirement	156,654	144,519	390,914	241,120	249,121	133,667
7100	010	CalPERS UAL				-	-	161,675
7108	000	Deferred Compensation	1,192	34,217	(24,752)	3,005	7,145	13,228
7110	000	Workers Compensation	7,114	9,415	9,067	22,266	13,081	16,082
7120	000	Disability Insurance		13,337	2,653	-	-	-
7122	000	Unemployment Insurance	6,620	1,360	-	-	-	-
7130	000	Group Health Insurance	35,293	54,223	60,861	109,893	88,315	232,380
7140	000	Vision Insurance	904	1,319	1,416	2,640	1,971	2,983
7150	000	Dental Insurance	3,223	4,915	5,406	9,900	7,611	11,150
7160	000	Life Insurance	450	668	665	1,089	995	1,386
7170	000	FICA - Medicare	11,704	14,508	12,569	14,928	18,630	25,232
		<WAGES & BENEFITS>	826,247	1,108,800	1,304,611	1,601,385	1,573,629	2,032,844
8000	000	Office Supplies	2,588	470	6,472	19,431	20,000	20,000
8010	000	Postage	3,830	6,769	2,639	6,000	15,000	15,000
8020	000	Special Department Expense	2,140	8,173	4,358	5,500	6,000	6,122
8040	000	Advertising	6,082	-	250	74,205	58,000	10,000
8050	000	Printing/Duplicating	4,049	10,526	10,644	15,000	15,000	11,000
8060	000	Dues & Memberships	475	25,400	12,050	33,000	20,000	15,009
8090	000	Conference & Meeting Expense	415	275	50	6,500	6,500	27,075
8100	000	Vehicle Maintenance	1,535	2,032	2,554	1,000	1,000	1,000
8110	000	Equipment Maintenance	1,434	-	-	1,500	1,500	-
8170	000	Professional Services	455,467	293,955	235,396	432,500	430,000	1,187,000
8180	000	Contract Services	563,495	351,629	849,618	1,394,678	900,000	794,500
8200	000	Training Expense	-	380	-	6,000	500	3,000
8257	000	Boards & Commissions	-	-	-	500	500	4,675
8260	000	Public Art	8,500	11,360	-	25,000	-	25,000
		<OPERATIONS & MAINTENANCE>	1,050,010	710,968	1,124,030	2,020,814	1,474,000	2,119,381
[101-7011] Community Development Total			**1,876,257**	**1,819,769**	**2,428,641**	**3,622,199**	**3,047,629**	**4,152,225**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Funds compensation for the Planning & Community Development Director, Deputy Director, Planning Manager, three Associate Planners, one Assistant Planner, one Film Liaison, one Community Improvement Coordinator, one Senior Management Analyst, one Administrative Secretary and one new Planning Counter Technician.

7010 Salaries – Part-Time
Funds compensation for seasonal, temporary, and other non-salaried part-time employees. Includes additional staffing to process Planning Department backlog.

7020 Overtime
Funds compensation for overtime duty for department staff.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Funds regular office supplies ($20,000).

8010 Postage
Funds postal expenses for department mailings related to development and construction projects, housing, community improvement as well as public hearing notices. ($15,000).

8020 Special Department Expense
Provides funds for department promotional items for community events; miscellaneous department supplies such as: furniture ($500), commissioner nameplate and badges ($500), Code Enforcement equipment and PPE for Community Improvement inspections ($1,500); staff development ($1,500), promotional items for the community ($1,000) and department literature ($500). Includes additional technology to accommodate virtual meetings and online community outreach ($622). ($6,122).

8040 Advertising
Funds for advertising of non-legal public notices such as hillside notices (Total $10,000).

8050 Printing and Duplication
Funds the printing and duplication of materials for building permit forms, inspection forms, and job inspection cards ($2,500). As well as materials for various boards and commissions (Flyers, brochures, foam boards, etc.) ($1,500). Additionally, this category funds graphic design ($2,000) and documents specific to the General

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Plan and Downtown Specific Plan ($5,000). ($11,000).

8060 Dues, Memberships, Subscriptions, and Books
Funds membership fees, dues, subscriptions and publications of professional organizations and continuing education materials, including California Planning & Development Report ($238), American Planning Association ($2,560), California Association of Code Enforcement ($720), International Council of Building Officials and California Preservation Foundation ($500), NAHRO/SCANPH ($550), and Film Liaisons in California Statewide ($300). Additionally, this category funds the annual San Gabriel Valley Regional Housing Trust ($10,141) ($15,009).

8090 Conference and Meeting Expense
Funds conference registration, and meeting/travel expenses, including the annual conference of the California Chapter of the American Planning Association ($3,750), National American Planning Association ($2,355), California Association of Code Enforcement Officers ($1,400), Southern California Association of Non-Profit Housing (SCANPH) ($950), CA Preservation Foundation Annual Conf. ($590), NAHRO Annual Conference ($750) and related travel expenses ($17,280). (Total $27,075).

8100 Vehicle Maintenance
Funds operational costs for gas, oil change, and regular maintenance of department vehicle. ($1,000).

8170 Professional Services
Provides funding for consultant services and other services related to planning and housing (including Strategic Plan priorities).Implementation of Housing Element programs; tenant protection programs (i.e. occupancy inspection program) ($400,000), Cultural Heritage Ordinance update ($200,000), General Plan and the Downtown Specific Plan consultant (150,000), removal of racially specific covenants ($100,000), ballot measure and height limit study ($100,000) and IHO in-lieu fee study ($23,000)As well as the historic resource evaluations ($64,000), General Plan and the Downtown Specific Plan (i.e. maps and data, etc. $125,000) ($5, offset by deposits), and the department organizational and operational assessment ($25,000) This list does not include all Strategic Plan priorities or grant funded projects etc. (Total $1,187,000).

8180 Contract Services
Provides for building inspection, building official, building clerk building permit issuance and plan checking services provided under contract by Transtech ($750,000). This category also funds emergency fencing and window and door board ups for Community Improvement ($7,000), code enforcement administrative citation hearings and collections ($4,500). Aerial Maps ($5,000) and land use based maps & database ($28,000) (Total $794,500)

8200 Employee Training
Funds required trainings such as CEQA ($200), historic preservation training seminars ($200), ICC EduCode Training ($900), APA Planning Academy ($200) ILG and LAEDC seminars ($1,500) ($3,000).

8257 Board & Commissions
Funds required training in historic preservation for the Cultural Heritage Commission and CEQA and land use training for Planning Commission. This category also funds attendance at the SPPF Gala ($4,675).

8260 Public Art
Funds professional services related to public art program. ($25,000).

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Housing Authority / 228-7200-7220

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8120	000	Building Maintenance	4,075	262	-	500	500	5,000
8121	000	Utility Credit - Arroyo House	800	1,100	1,000	1,200	1,200	1,200
8180	000	Contract Services	10,324	8,283	-	10,000	10,000	10,000
8182	000	Property Tax - Leased Property		716	(628)	-	-	-
		<OPERATIONS & MAINTENANCE>	15,199	10,361	373	11,700	11,700	16,200
228 - HOUSING AUTHORITY TOTAL			**15,199**	**10,361**	**373**	**11,700**	**11,700**	**16,200**

OPERATIONS & MAINTENANCE

8120 Building Maintenance
Funds minor building maintenance of Arroyo House ($5,000).

8121 Utility Credit – Arroyo House
Funds credit of $100 per month for the Arroyo House per the lease agreement ($1,200).

8180 Contract Services
Funds to contract with for landlord/tenant assistance and fair housing ($10,000).

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Key Performance Indicators

The Community Development Department strives to provide excellent customer service by efficiently managing workload and thereby reducing processing times, building plan check approvals, and permit issuance.

Administration
Encourage interdepartmental collaboration to improve entitlement applications and public information regarding development projects; continue to improve department processes; and finalize objective development standards to streamline development application process.

- Assist City Manager's Office with regular updates for the citywide newsletter
- Conduct interdepartmental development coordination meetings: 6
- Conduct a department organizational and operational assessment
- Conduct community outreach efforts including informational workshops or study sessions related to housing programs, Downtown Specific Plan, and General Plan Update: 4

Planning & Building
Reduce processing time for discretionary applications and building plan check by implementing the electronic permitting system.

- Process discretionary applications (PC, CHC, DRB): 35
- Process administrative (by-right) applications (DRB/CHC Chair Review, Staff Review): 90
- Process ADU applications: 55

Community Improvement
Respond to code complaints by investigating, opening cases when appropriate, and driving cases toward a successful resolution.

- Prioritize all incoming cases as Level 1 (imminent health and safety hazards such as dangerous and unstable structures), Level 2 (significant code violations including substandard housing conditions), or Level 3 (other code violations such as overgrown vegetation and blight):
  - Investigate all Level 1 cases by the end of the next business day
  - Investigate all Level 2 cases within five business days
  - Investigate all Level 3 cases within ten business days
- Work with the Housing Division to respond to tenant habitability complaints
- Provide quarterly reports to City Council on community improvement activities

Film & Art
Process film applications efficiently while eliminating impacts to residents and neighborhoods. Work closely with the Public Art Commission to promote public art projects and programs.

- Minimum film permits: 175

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- Provide quarterly reports to City Council on film activity

Housing

The Housing Division will be responsible for tracking the implementation of the 6th Cycle Housing Element housing programs, track affordable units, and conduct community outreach efforts related to housing programs.

- Develop and propose new tenant protection programs
- Develop affordable housing opportunities including Caltrans vacant properties and Housing Authority owned site at 1503-1507 El Centro Street

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Library

Fiscal Year 2022-23 Budget Snapshot

Overview

The Library Department is a community anchor and a resource and learning hub. It is a welcoming place for people of all ages, walks of life and socioeconomic backgrounds. People visit the Library to study, work, relax, and recharge. It is a place where people learn about their community, connect with their neighbors, and expand their horizons. The Library provides resources in a variety of formats to meet the information and learning needs of a diverse population. It supports reading readiness, literacy, lifelong learning, recreation, and professional development with its collections, programs, and services. The Library is open 7 days a week, for a total of 58 hours. In the first three-quarters of Fiscal Year 2022-23 the Library issued more than 2,000 new library cards, and an average of 14,285 patrons came through the doors every month. Borrowing is close to pre-pandemic levels, averaging 28,600 checkouts a month. Librarians at our reference desks helped around 80 patrons each day and presented programs attended by more than 7,700 people.

Fiscal Year 2022-2023 was a banner year at the Library. We saw library operations return to normal as the impacts of COVID-19 receded, and the Library Special Tax, which provides approximately 20% of the Library's budget, was renewed by 86.65% of the voters, and will continue until terminated by a majority vote of the electorate. A robust strategic planning process engaged the community and staff and resulted in a plan that will guide library programs and services for the next five years, as well as inform decisions about the allocation of human and fiscal resources. The plan outlines many exciting goals related to operations, the facility, technology, and services.

The Library's goals for Fiscal Year 2023-2024 are tied to the strategic plan and include implementing a Radio Frequency Identification (RFID) system that will improve customer self-service options and collection management, implementing a module for the Integrated Library System (ILS) that will streamline the acquisition of library materials, and securing funding from the California State Library for critical infrastructure and life-safety improvements to the facility.

Notable Changes – Wages and Benefits

The Library is not requesting any new positions or changes to positions for Fiscal Year 2023-24.

Notable Changes – Operations and Maintenance

The budget includes funding to enable librarians to attend The American Library Association's annual conference, which will be held in San Diego.

Capital Outlay

Funds have been designated to paint, re-carpet and replace the furniture in the teen area, as well as to replace the curbside book drops on Oxley Street.

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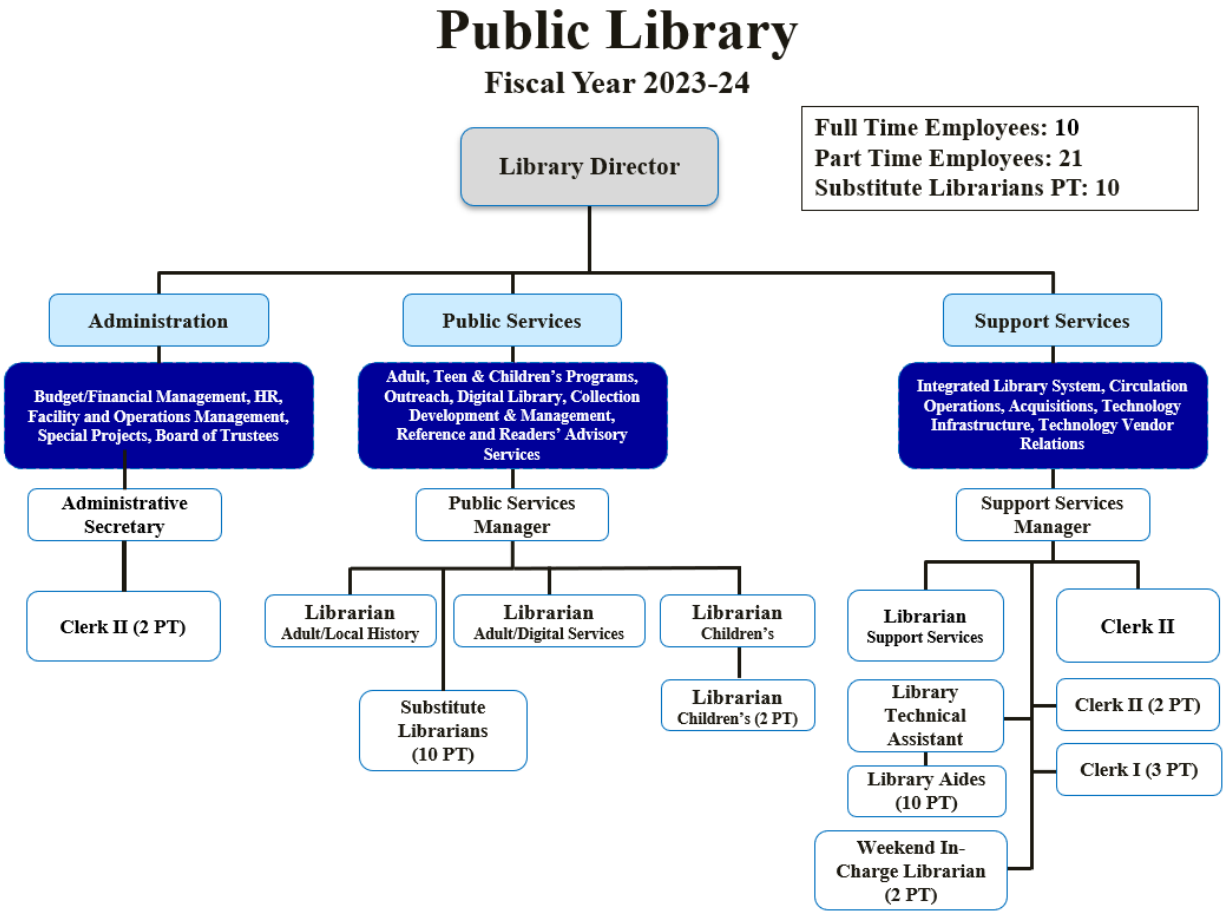
Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	1,213,859	1,335,189	1,544,306	1,539,490	1,482,862	1,810,839
Operations & Maintenance	310,714	248,738	284,301	336,900	328,165	341,395
Capital Outlay	1,112	24,442	10,525	55,900	55,900	59,000
Total Expenses by Category	**1,525,685**	**1,608,369**	**1,839,131**	**1,932,290**	**1,866,927**	**2,211,234**
[101-8011] Library	1,525,685	1,608,369	1,839,131	1,932,290	1,866,927	2,211,234
Total Expenses by Program	**1,525,685**	**1,608,369**	**1,839,131**	**1,932,290**	**1,866,927**	**2,211,234**

Authorized Positions



Library / 101-8010-8011

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	599,212	707,712	727,965	818,664	792,451	904,837
7010	000	Salaries - Temp / Part	240,771	250,634	252,424	342,000	318,426	360,000
7020	000	Overtime	147	155	519	1,000	199	-
7040	000	Holiday	12,789	23,432	13,727	2,000	1,855	13,598
7070	000	Leave Buyback	17,016	-	-	18,000	5,965	18,553
7100	000	Retirement	226,060	190,818	446,798	191,378	202,505	100,577
7100	010	CalPERS UAL				-	-	153,309
7108	000	Deferred Compensation	1,422	31,618	(28,545)	1,387	4,630	8,947
7110	000	Workers Compensation	10,480	11,479	12,623	15,145	13,652	19,762
7120	000	Disability Insurance	-	-	-	-	-	-
7122	000	Unemployment Insurance	1,055	1,029	-	-	-	-
7130	000	Group Health Insurance	74,545	84,889	83,898	104,280	102,713	154,200
7140	000	Vision Insurance	1,460	1,610	1,800	2,400	1,657	2,174
7150	000	Dental Insurance	5,454	6,022	7,034	9,000	6,804	7,840
7160	000	Life Insurance	788	899	866	990	857	990
7170	000	FICA - Medicare	22,660	24,892	25,197	33,246	31,147	66,051
		<WAGES & BENEFITS>	1,213,859	1,335,189	1,544,306	1,539,490	1,482,862	1,810,839
8000	000	Office Supplies	5,359	6,359	7,297	6,500	6,500	7,500
8010	000	Postage	1,820	1,738	1,118	1,500	1,500	2,200
8020	000	Special Department Expense	20,681	15,160	30,645	20,000	20,000	22,500
8030	000	Library Periodicals	10,604	6,715	6,959	7,000	6,750	7,100
8031	000	Electronic Resources	29,292	20,619	20,433	20,000	20,000	20,000
8040	000	Advertising	1,076	1,287	204	1,000	800	-
8050	000	Printing/Duplicating	1,963	1,480	3,989	3,500	3,500	4,500
8060	000	Dues & Memberships	4,104	4,060	4,106	4,200	3,245	5,400
8070	000	Mileage/Auto Allowance	117	-	-	100	-	100
8080	000	Books & Periodicals	95,474	70,843	86,375	105,000	105,000	110,000
8083	000	E-Books	35,393	33,288	32,648	35,000	35,000	36,000
8085	000	City-wide Reading Program	-	-	-	1,000	1,000	-
8090	000	Conference & Meeting Expense	200	-	100	2,000	1,000	6,845
8110	000	Equipment Maintenance	2,789	405	1,389	3,000	3,000	3,000
8120	000	Building Maintenance	9,469	24,552	4,294	5,000	5,000	6,250
8140	000	Utilities	-	-	-	-	-	-
8151	000	CENIC WiFi Expenses	6,218	5,646	12,241	11,500	10,870	11,500
8155	000	Rental/Lease	-	-	-	-	-	450
8170	000	Professional Services	4,375	2,625	6,611	34,600	30,000	10,000
8180	000	Contract Services	81,432	51,941	64,700	73,000	73,000	84,050
8200	000	Training Expense	-	1,820	199	1,500	500	2,500
8257	000	Boards & Commissions	348	200	992	1,500	1,500	1,500
		<OPERATIONS & MAINTENANCE>	310,714	248,738	284,301	336,900	328,165	341,395
8500	000	Building & Improvements	-	15,962	5,882	38,900	38,900	10,000
8520	000	Machinery & Equipment	695	4,151	2,837	15,000	15,000	49,000
8521	000	Mach. & Equip. - Library Ops. Study	-	3,150	-	-	-	-
8530	000	Computer Equipment	417	1,179	1,806	2,000	2,000	-
		<CAPITAL OUTLAY>	1,112	24,442	10,525	55,900	55,900	59,000
[101-8011] Library Total			**1,525,685**	**1,608,369**	**1,839,131**	**1,932,290**	**1,866,927**	**2,211,234**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Provides compensation for a full-time staff of ten positions. These include 1 Library Director; 1 Public Services Manager, 1 Support Services Manager, 2 Adult Services Librarians, 1 Support Services Librarian, 1 Children's Librarian, 1 Administrative Secretary, 1 Library Technical Assistant, and 1 Library Clerk II.

7010 Wages - Seasonal and Part-Time Employees
Covers the compensation of part-time library staff members who are paid hourly rates, including passport services clerk and Community Room rental staffing, which are offset by fee income.

7020 Overtime
Provides compensation for any overtime use throughout the year, at one and one-half times the regular salary or wage. Overtime is very sparingly used to compensate non-exempt professional staff when program preparations, meetings, etc. require them to work beyond a regular 8-hour work day.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for the purchase of paper, stationery, rolls for receipt printers, folders, notepads, cash register and mailing supplies, toner, business cards, name badges, and general office supplies. (Total $7,500)

8010 Postage
Covers postage fees for correspondence, grant applications, invitations, overdue material notifications, and inter-library loan items lent or returned to their owning institutions. (Total $2,200)

8020 Special Department Expense
Funds the purchase of barcodes, security strips, CD and DVD cases and sleeves, supplies for children's programs, book trucks, archival supplies, book jackets, mending tape, display racks, and other miscellaneous provisions. Also provides funds for collection development resources for staff, performers' fees, special event insurance for Library programs, and software that supports the provision of services and resources to the public. (Total $22,500)

8030 Periodicals
Provides funds for hard copy magazine and English and foreign language newspaper subscriptions, including the *South Pasadena Review, South Pasadenan, Pasadena Star-News*, *Los Angeles Times,* and many others. (Total $7,100)

8031 Digital Resources
Provides funds for the purchase or licensing of digital resources, which are

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remotely available 24/7. Resources include encyclopedias, streaming films, resources for readers, and interactive and foreign language e-books for kids. (Total $20,000)

8050 Printing and Duplication
Provides funds for the printing and duplication of brochures, promotional bookmarks, magnets, posters, library card applications, and a variety of other printed materials for the public. (Total $4,500)

8060 Dues and Memberships
Supports membership to the California Library Association, the Califa libraries consortium, Southern California Library Cooperative, American Library Association, and other professional organizations. Memberships provide discounted pricing on selected resources, continuing education, professional development, and networking opportunities. (Total $5,400)

8070 Mileage Reimbursement
Addresses mileage reimbursement when a staff member's private vehicle is used to conduct City business. Used mostly to compensate staff for attending required meetings and to support the training and continuing education of staff members at off-site workshops, meetings, and training sessions. (Total $100)

8080 Books/DVDs/CDs
Provides funds for the purchase and outsourced physical processing of books, music and audiobook CDs, and DVDs and Blu-rays. Annual circulation of materials exceeds 250,000. (Total $110,000)

8083 E-Books
Provides funds for the purchase of circulating digital books and digital audiobooks for children, teens, and adults. Annual circulation of digital books and audiobooks exceeds 28,000. (Total $36,000)

8090 Conference and Meeting Expense
Provides funds for conference and meeting travel expenses and registration fees for staff. The American Library Association annual conference will be held in San Diego in Fiscal Year 2023-2024. ($6,845)

8110 Equipment Maintenance
Includes funds for maintenance of automated external defibrillator units, maintenance of miscellaneous library equipment, and repairs to library security gates. (Total $3,000)

8120 Building Maintenance
Provides funds for elevator permit, miscellaneous emergency janitorial, plumbing, electrical, and other service and repairs, supplies related to building maintenance, funds for exterior steam cleaning and interior furniture cleaning, and for automated ADA door repairs. (Total $6,250)

8151 CENIC Wi-Fi Expenses
Provides funding for the out-of-pocket cost of high capacity, high speed

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broadband connectivity for public and staff Wi-Fi. The Library receives California Teleconnect Fund (CTF) and Federal Communications Commission Schools and Libraries Program E-Rate reimbursements for a portion of this amount. Also includes $700 for SonicWall security for Wi-Fi router. (Total $11,500)

8155 Rental/Lease
Funds for postage meter lease. (Total $450)

8170 Professional Services
Includes $8,000 administering the Library Special Tax, including preparing and submitting the tax roll, and $2,000 for graphic design services. (Total $10,000)

8180 Contract Services
Provides $450 for security alarm maintenance, $1,100 for fire alarm system maintenance, $1,725 for emergency lighting system maintenance, and $3,500 for theft detection system and self-check kiosk maintenance. Includes $24,250 for cataloging records subscription, $2,400 for library asset recovery service, $2,325 for a book/CD/DVD ordering platform, $2,000 for a public computer reservation and printing system, and $46,800 for Integrated Library System product licensing, off-site hosting, and services. (Total $84,050)

8200 Training Expense
Provides funds for training materials, seminars, webinars, and job-related training sessions for library staff. (Total $2,500)

8257 Boards/Commissions
Funds for Library Board of Trustees' attendance at the annual California public library advocates workshop and the California Library Association annual conference, as well as design, printing, honoraria, and other expenses of the Trustees' Annual Volunteer Recognition event. (Total $1,500)

CAPITAL OUTLAY

8500 Building Improvements
Funds for installation of new Library patio tables and for Teen Room improvements. ($10,000)

8520 Machinery & Equipment
New ADA accessible exterior book drops and funds for Teen Room furniture. ($49,000)

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Key Performance Indicators

The Library's main focus in the new fiscal year is to begin to meet the goals laid out in the Library's new Strategic Plan for the years 2023-2027.

Having filled the new full-time position in the Support Services Division late in fiscal year 2022-2023, we will be continuing to refine roles and responsibilities in the Division, and to document and revise the division's policies, procedures and workflows.

Special projects for 2023-2024 include converting the Library to a Radio Frequency Identification (RFID) collection management and security system, and pursuing grant funding from the California State Library for critical infrastructure improvements.

Outreach

- Add 700 people to the Library's e-newsletter recipient list
- Conduct 10 SPUSD and private school class visits at the start of the school year
- Give 4 off-site presentations about Library programs and services to community groups

Operations

- Review and revise 4 administrative policies
- Add 7,000 new items to the collection
- Rent the Community Room 20 times

Programs & Services

- Exceed 14,000 visitors per month on average
- Lend 25,000 items per month on average
- Present at least 8 programs for adults, such as book discussions, author talks, hands-on crafting, concerts, and films
- Exceed program attendance of 8,000 individuals annually

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Community Services

Fiscal Year 2022-23 Budget Snapshot

Overview

The Community Services Department is pleased to submit the Fiscal Year 2023-24 budget proposal. The Community Services Department provides services within four divisions: Senior Division, Recreation Youth Division, Community Transit, and Community Services Division.

The following is a synopsis of the fiscal year for the Community Services Department.

The Senior Citizens Center, a multi-purpose facility, provides older adults with educational, social, physical, nutritional, and emotional services and city special events such as the Memorial Day Celebration. On-site meals, classes, and programs have resumed in person. Home-delivered meals continue to serve seniors residing within city limits.

The Recreation and Youth Division operates out of the Orange Grove Recreation Center and coordinates recreational classes for children and adults, after-school and summer child care, Facility and Park reservation, and city events such as Concerts in the Park, Eggstravaganza, Spooktacular, and Breakfast with Santa.

The Community Transit operates the Dial a Ride Program, which offers essential services for seniors, including rides to medical appointments, grocery stores, financial institutions, and social gatherings provided by the City. The Division has experienced an increase in ridership since the pandemic. A full-time Management Analyst and Management Assistant were hired to fill vacant positions. A new All-Electric 14 Passenger Van was purchased and is in operation. The Division will undergo an analysis of the Dial-A-Ride program.

The Community Services Division provides general department oversight plus budget and grant administration, park improvements, community liaison activities, and contract management of the Arroyo Seco Golf Course (Golf Course), Arroyo Seco Racquet Club, San Pascual Stables, South Pasadena Batting Cages, Ironworks Museum, and Tower Venture Cellular. All agreements have been fully executed with new contract terms except for the Golf Course which the agreement is on a month-to-month. The Golf Course completed a Market Support and Financial Analysis which is under review by City Council. An assessment of the Department was conducted by a consultant and recommendations will be implemented in FY 2023-2024. The Department implemented a new registration software called CivicPlus which will enhance the registration and reservation processes.

The staff supports the Community Services Commission, Festival of Balloons, South Pasadena Tournament of Roses Committee, and Recreation Leased Facilities Ad Hoc Committee.

Notable Changes – Wages and Benefits

The Community Services Department is requesting two position changes for Fiscal Year 2023-2024 as follows:

1. Upgrade a part-time Community Services Coordinator to one full-time Community Services Coordinator
2. Combine two part-time Management Aides to one full-time Management Aide
3. Complete a Compensation Compaction Study on the two Community Services Supervisor positions

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Notable Changes – Operations and Maintenance

Senior Center:

- Upgrade the lobby, library, and staffing furniture
- Quarterly outreach mailers for senior programs

Administration:

- Installment of a new park sign at the Nature Park
- Install new alarm system at Ironworks Museum
- Annual maintenance fee for CivicPlus Software

Recreation:

- Replacement of all park signage such as park rules sign and gazebo area signage
- Painting of Camp Med room
- Purchase new kid size furniture for Camp Med

Dial-A-Ride

- Hire consultant to complete an Assessment of the Division

Capital Outlay

Construction of Berkshire and Grevelia Pocket Parks - see CIP (Park Impact Fees).

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Budget Summary

EXPENDITURE SUMMARY	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
Wages & Benefits	1,298,385	1,000,618	1,371,016	1,659,435	1,586,141	2,105,054
Operations & Maintenance	1,449,933	1,401,947	1,818,635	2,177,730	2,112,460	2,170,899
Capital Outlay	(13,807)	66,516	-	176,600	169,999	-
Total Expenses by Category	**2,734,511**	**2,469,081**	**3,189,651**	**4,013,765**	**3,868,600**	**4,275,953**
[101-8021] Senior Services	330,809	202,374	237,957	431,985	390,480	540,765
[101-8031] Community Services	172,667	217,223	276,302	356,440	421,305	466,119
[101-8032] Recreation and Youth Services	656,232	323,135	835,939	783,405	818,737	1,090,949
[105-8031] Facilities & Equipment Replacement	-	-	-	-	-	-
[205-2210] Prop "A" Administration	7,529	13,204	12,902	15,631	17,070	27,139
[205-8024] Transit Planning	119,202	143,026	86,928	345,835	323,541	198,220
[205-8025] Dial-A-Ride	216,748	159,057	177,792	432,588	330,643	670,209
[207-2260] Prop "C" Administration	5,140	6,602	4,491	6,698	6,871	-
[207-8025] Dial-A-Ride	209,979	236,178	207,582	301,087	233,378	2,866
[226-2029] Mission Meridian Public Garage	8,987	9,650	9,052	15,000	9,100	15,000
[260-8023] CDBG Senior Nutrition Prog	31,026	62,980	65,950	26,281	-	19,599
[275-6410] Park Maintenance	-	18,050	15,035	-	-	-
[295-8032] Recreation and Youth Services	0	(39,500)	50,508	-	30,218	-
[295-8041] General Administration	336,413	447,861	504,874	462,381	478,971	467,656
[295-8042] Golf Course Maintenance	376,387	378,623	423,131	483,470	471,692	502,590
[295-8043] Range	60,252	143,203	162,405	207,994	194,444	182,475
[295-8044] Golf Shop	79,003	128,569	103,494	126,570	125,700	79,050
[295-8045] Food Service	124,137	18,846	15,308	18,400	16,450	13,316
Total Expenses by Program	**2,734,511**	**2,469,081**	**3,189,651**	**4,013,765**	**3,868,600**	**4,275,953**

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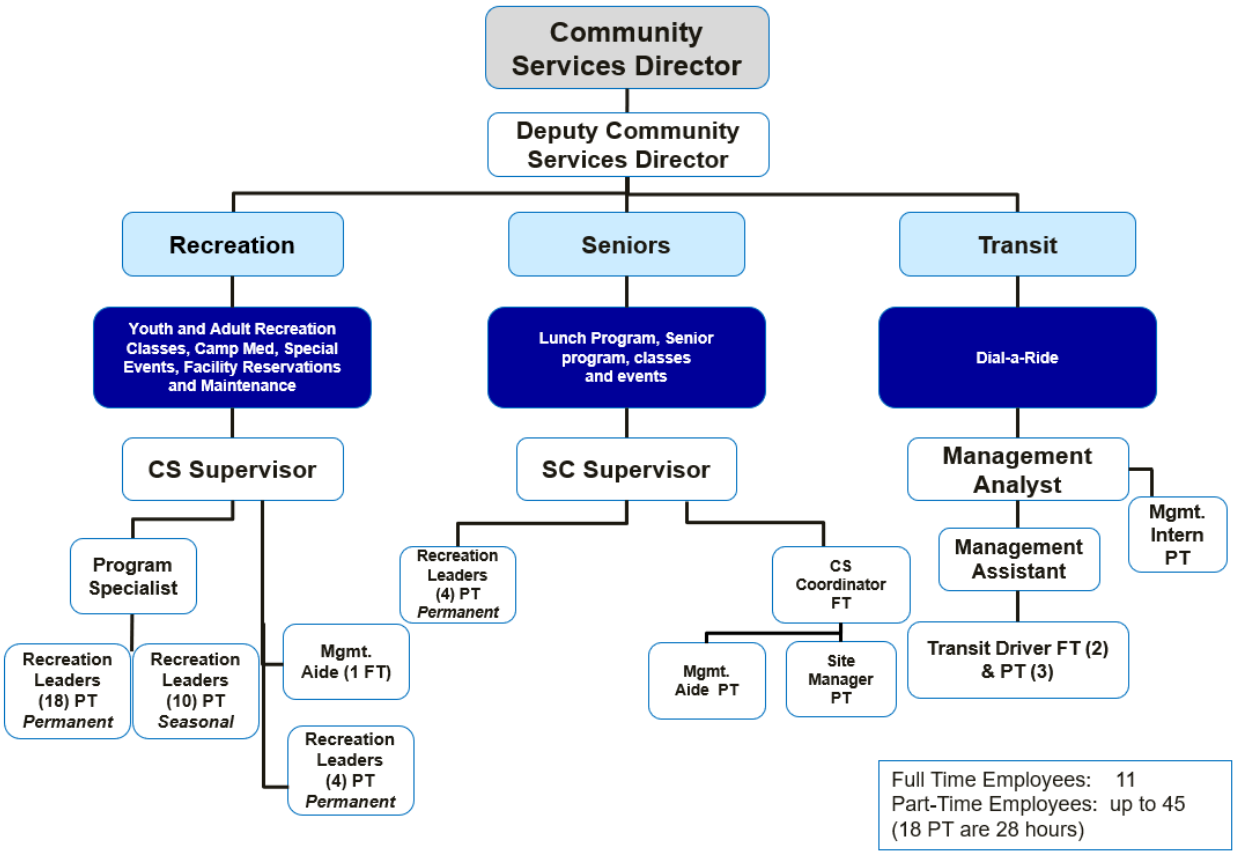
Authorized Positions



Senior Services / 101-8030-8021

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	84,518	61,759	33,741	82,164	75,981	144,975
7010	000	Salaries - Temp / Part	92,552	86,307	107,644	160,000	135,482	170,278
7020	000	Overtime	-	-	-	-	-	2,000
7070	000	Leave Buyback	-	-	-	2,100	-	2,193
7100	000	Retirement	27,224	21,180	50,302	6,610	17,503	11,598
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	826	732	178	822	745	1,450
7110	000	Workers Compensation	2,031	1,575	1,640	3,399	2,476	2,910
7122	000	Unemployment Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	13,380	7,805	4,290	8,580	8,580	30,900
7140	000	Vision Insurance	240	140	82	240	165	405
7150	000	Dental Insurance	900	525	305	900	610	1,510
7160	000	Life Insurance	99	58	50	99	99	198
7170	000	FICA - Medicare	4,740	4,352	3,430	1,191	5,759	11,511
		<WAGES & BENEFITS>	226,509	184,433	201,662	266,105	247,400	379,928
8000	000	Office Supplies	2,910	1,306	2,685	3,000	3,000	3,000
8010	000	Postage	467	1,343	1,914	3,000	3,000	2,500
8020	000	Special Department Expense	9,419	2,480	14,698	32,657	30,100	30,700
8040	000	Advertising	294	-	-	2,800	2,000	3,780
8050	000	Printing/Duplicating	1,934	209	160	4,500	2,500	4,500
8060	000	Dues & Memberships	180	-	90	760	760	1,030
8090	000	Conference & Meeting Expense	-	-	625	4,000	2,000	2,000
8110	000	Equipment Maintenance	215	220	-	3,500	2,500	3,500
8120	000	Building Maintenance	1,642	152	451	3,300	3,000	2,300
8140	000	Utilities	-	-	-	-	-	-
8150	000	Telephone	-	-	-	-	-	-
8170	000	Professional Services	-	-	-	-	-	-
8180	000	Contract Services	64,707	9,078	1,837	66,003	60,000	71,267
8200	000	Training Expense	-	-	25	500	420	800
8264	000	Special Events	1,642	93	2,390	17,000	16,500	17,000
8267	000	Classes	12,894	-	11,143	22,400	17,000	16,000
8300	000	Lease Payment	219	1,043	276	2,460	300	2,460
		<OPERATIONS & MAINTENANCE>	96,523	15,925	36,295	165,880	143,080	160,837
8520	000	Machinery & Equipment	5,372	2,016	-	-	-	-
8530	000	Computer Equipment	2,405	-	-	-	-	-
		<CAPITAL OUTLAY>	7,777	2,016	-	-	-	-
[101-8021] Senior Services Total			**330,809**	**202,374**	**237,957**	**431,985**	**390,480**	**540,765**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Funds compensation for Community Services Supervisor.

7010 Wages – Seasonal/Part-Time Employees
Provides funds for Senior Services Division Part-Time Staff: Management Aide (1 x18 hours), Site Manager (1 x 28 hours), and Recreation Leaders (2 x 28 hours and 3 x 18 hours)

7070 Leave Buyback
Funds staff that opt to sell back hours of their leave balance.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Office Supplies ($3,000) Total ($3,000)

8010 Postage
Monthly senior newsletter ($1,800), Senior Center Membership renewal notices ($500), and special event advertising ($200). Total ($2,500)

8020 Special Department Expenses
Volunteer recognition program ($1,800), yearly lectures ($2,400), yearly film discussion ($1,800), health and resource fair ($3,500), senior center event supplies ($2,500), Home Delivery meal program supplies ($2,500), reception furniture ($4,500), coffee service ($2,700), cleaning supplies ($2,000), volunteer mileage ($1,000), furniture for staff office ($4,000), and staff uniforms ($2,000). Total ($30,700)

8040 Advertising
Promote senior services and events such as four newspaper advertisements ($1,000), two street banners ($2,130), and a Public Hearing notice for lunch program ($650). Total ($3,780)

8050 Printing & Duplication
Print monthly senior newsletter ($3,000), business envelopes ($900), and printing event flyers ($600). Total ($4,500)

8060 Dues, Memberships & Subscriptions
California Parks and Recreation Society (CPRS) annual membership for Community Services Coordinator and Community Services Supervisor ($315), Municipal Management Association of Southern California (MMASC) annual membership ($200) for Community Services Supervisor and Coordinator, National Recreation and Park Association for Supervisor ($115), Netflix's subscription

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($240) for Senior Cinema Program and Canva ($160). Total ($1,030)

8090 Conference & Meeting Expenses
Community Services Supervisor to attend CPRS annual conference in March 2024 (Palm Springs). Total ($2,000)

8110 Equipment Maintenance
Annual kitchen equipment maintenance ($3,000) and kitchen fire suppression system ($500). Total ($3,500)

8120 Building Maintenance
Pressure washing of Senior Center entry ($500), cleaning of stainless steel surfaces in the kitchen three times a year ($1,000), cleaning of drapes ($600), and fire extinguishers ($200). Total ($2,300)

8180 Contract Services
Fire and security system ($1,250), first aid and AED services ($4,200), and senior meals not covered by Community Block Grant (CDBG) (Contract catering of senior nutrition program is $85,134. CDBG provides partial funding. The revenue estimate from serving approximately 18,500 meals is approximately ($65,817). Total ($71,267)

8200 Training Expenses
Staff training. Total ($800)

8264 Special Events & Excursions
Senior excursions ($4,000), funds for 12 special events ($6,000), entertainment for 12 special events ($6,000), and Memorial Day Program ($1,000). Total ($17,000)

8267 Classes
Payments to independent contract instructors for quarterly senior leisure classes at the senior center Instructors are generally reimbursed 80% of their total class revenue. The City retains 20%. Based on prior years, it is estimated that senior leisure classes will generate $20,000 next year. 80% of which is paid to independent contract instructors. Total ($16,000)

8300 Lease Payment
Postage meter lease. Total ($2,460)

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Community Services / 101-8030-8031

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	130,683	125,581	154,652	147,928	176,560	244,468
7010	000	Salaries - Temp / Part	756	-	841	10,500	-	10,500
7020	000	Overtime	(579)	-	-	-	-	
7040	000	Holiday	-	6,446	5,114	-	-	3,034
7070	000	Leave Buyback	-	-	-	2,000	-	3,989
7100	000	Retirement	39,326	30,577	76,257	52,913	53,471	28,439
7100	010	CalPERS UAL				-	-	50,114
7108	000	Deferred Compensation	1,404	5,868	(4,150)	1,140	1,747	2,445
7110	000	Workers Compensation	1,630	1,349	1,830	2,705	2,159	2,764
7122	000	Unemployment Insurance	96	15,449	-	-	-	
7130	000	Group Health Insurance	8,401	10,857	9,860	8,580	13,747	19,785
7140	000	Vision Insurance	161	117	174	240	200	329
7150	000	Dental Insurance	597	433	718	900	863	1,292
7160	000	Life Insurance	95	70	103	99	122	198
7170	000	FICA - Medicare	2,343	1,915	2,367	2,120	2,670	3,545
		<WAGES & BENEFITS>	184,913	198,662	247,767	229,125	251,538	370,903
8000	000	Office Supplies	999	779	1,034	1,000	1,000	1,000
8010	000	Postage	-	-	646	650	600	650
8020	000	Special Department Expense	3,893	6,218	12,887	16,015	14,800	8,261
8040	000	Advertising	-	-	-	150	-	1,000
8050	000	Printing/Duplicating	98	-	-	12,200	11,082	6,000
8060	000	Dues & Memberships	555	555	650	700	705	705
8090	000	Conference & Meeting Expense	-	-	793	2,000	1,500	2,000
8110	000	Equipment Maintenance	435	200	4,307	7,300	7,300	4,100
8120	000	Building Maintenance	1,625	4,700	1,575	26,000	24,000	12,500
8140	000	Utilities	-	221	40	-	-	-
8170	000	Professional Services	(4,191)	-	-	-	-	-
8180	000	Contract Services	5,747	5,557	5,889	10,750	58,230	8,450
8200	000	Training Expense	50	-	-	250	250	250
8264	000	Special Events	-	-	576	50,000	50,000	50,000
8300	000	Lease Payment	126	330	138	300	300	300
		<OPERATIONS & MAINTENANCE>	9,338	18,561	28,536	127,315	169,767	95,216
8510	000	San Pascual Stables LLC CIF	(21,584)	-	-	-		-
		<CAPITAL OUTLAY>	(21,584)	-	-	-	-	-
[101-8031] Community Services Total			**172,667**	**217,223**	**276,302**	**356,440**	**421,305**	**466,119**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Compensation for Community Services Director (75%) and Deputy Director (25%)

7010 Wages – Seasonal/Part-Time Employees
Funds Recreation Leaders for Building Reservations.

7070 Leave Buyback
Funds employees who opt to sell back hours of their leave balances.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Office paper, computer supplies, meeting supplies, and miscellaneous supplies. Total ($1,000)

8010 Postage
Mailing of general information on recreation and facility rental programs, community outreach for special projects, and special events. Total ($650)

8020 Special Department Expense
Department promotional materials ($500), Community Garden Caltrans lease payment ($100), department staff shirts ($400), key duplication ($200), Memorial Garden boulder engraving ($300), Tables, Chairs and Caddy for the lower level of War Memorial ($2,000), Department Special Event supplies ($1,000) Special Community Meeting Supplies ($500) LED Projector ($500), and licensing fees for concerts for SESAC ($875), BMI ($350), ASCAP ($355) All Track ($331), Global Music Rights ($850). Total ($8,261)

8040 Advertising
Newspaper advertisement ($600), Social Media Boosts ($400). Total ($1,000)

8050 Printing and Duplication
Facility and Park Brochure (6,000). Total ($6,000)

8060 Dues, Memberships & Subscriptions
Provides funds for the California Parks and Recreation Society annual membership for Agency Membership CPRS, Deputy Director CPRS membership. Total ($705)

8090 Conference & Meeting Expenses
Provide funds for the Community Services Director and Deputy Director to attend the CPRS annual conference. Total ($2,000)

8110 Equipment Maintenance
War Memorial Building semi-annual range hood cleaning ($1,000), annual maintenance of fire suppression equipment at War ($850) Annual Maintenance

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of Appliances @ War and Senior Center ($2,250). Total ($4,100)

8120 Building Maintenance
Provides for War Memorial Building wood floor resurfacing and waxing ($5,500), repairs and cleaning services at the War Memorial Building, Youth House, and Eddie Park House ($3,500), Cleaning of Drapes - WMB ($2,000), Carpet cleaning lower level at War ($1,500). Total ($12,500)

8180 Contract Services
Provides funds for the security & fire alarm for Youth House ($1,300), fire alarm at War Memorial Building ($2,200), security Alarm at War Memorial Building ($1,200), Fire and security at Eddie Park ($2,000), Security and Fire Alarm for Ironworks Museum ($1,700), servicing of facility kitchen appliances ($1,250). Total ($8,450)

8200 Training Expense
Job-related training seminars and materials. Total ($250)

8264 Special Events
Festival of Balloons/Fourth of July fireworks show, parade, and party in the park. Total ($50,000)

8300 Lease Payment
Provides partial funds for annual postage meter. Total ($300)

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Recreation and Youth Services / 101-8030-8032

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	112,688	89,537	129,512	145,584	114,442	200,239
7010	000	Salaries - Temp / Part	267,842	83,074	277,459	300,000	375,667	446,962
7020	000	Overtime	7,650	-	3,740	2,500	1,956	2,500
7040	000	Holiday	874	3,189	2,353	-	2,526	2,347
7070	000	Leave Buyback	1,504	-	-	1,500	-	2,193
7100	000	Retirement	45,471	35,089	96,881	11,712	20,470	16,019
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	475	3,535	(2,901)	822	997	2,002
7110	000	Workers Compensation	4,580	2,006	4,703	3,223	5,014	10,774
7122	000	Unemployment Insurance	-	-	-	-	-	
7130	000	Group Health Insurance	10,850	6,922	10,639	11,100	11,100	33,420
7140	000	Vision Insurance	303	265	343	480	329	569
7150	000	Dental Insurance	915	864	1,271	1,800	1,510	2,410
7160	000	Life Insurance	143	140	197	198	198	297
7170	000	FICA - Medicare	20,055	5,273	19,746	2,111	22,889	37,096
		<WAGES & BENEFITS>	473,350	229,894	543,942	481,030	557,099	756,830
8000	000	Office Supplies	2,147	372	2,291	2,500	2,350	2,500
8010	000	Postage	-	500	250	1,250	900	1,250
8020	000	Special Department Expense	1,699	536	1,981	5,000	5,500	5,200
8040	000	Advertising	248	138	-	2,800	-	2,800
8050	000	Printing/Duplicating	-	-	6	1,200	-	2,400
8060	000	Dues & Memberships	250	-	555	600	523	1,195
8090	000	Conference & Meeting Expense	900	-	1,938	2,000	2,000	2,500
8110	000	Equipment Maintenance	-	-	-	850	250	850
8120	000	Building Maintenance	-	-	18,595	20,550	-	20,450
8180	000	Contract Services	29,899	6,685	8,038	27,225	23,525	23,004
8200	000	Training Expense	30	-	-	500	-	800
8264	000	Special Events	29,957	1,455	29,577	51,350	42,850	56,800
8267	000	Classes	94,950	80,987	198,170	130,000	130,000	149,000
8268	000	Camp Services	21,791	2,261	27,118	49,140	47,050	57,960
8269	000	Teen Center	885	120	3,271	7,150	6,480	7,150
8300	000	Lease Payment	126	187	207	260	210	260
		<OPERATIONS & MAINTENANCE>	182,882	93,241	291,997	302,375	261,638	334,119
[101-8032] Recreation and Youth Services Total			**656,232**	**323,135**	**835,939**	**783,405**	**818,737**	**1,090,949**

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Budget Detail

PERSONNEL SERVICES

7000 Regular Salaries
Compensation for the Youth Services Supervisor, Program Specialist and Management Aide.

7010 Wages – Seasonal/Part-Time Employees
Provides funds for Recreation Division Recreation Leaders.

7020 Overtime
Funds compensation for hours worked beyond normal workweek.

7070 Leave Buyback
Funds staff that opt to sell back hours of their leave balance.

OPERATIONS & MAINTENANCE

8000 Office Supplies
Office paper, computer, and miscellaneous office supplies ($2,500). Total ($2,500)

8010 Postage
Event promotion and advertising ($250), and quarterly promotional class mailers ($1000). Total ($1,250)

8020 Special Department Expense
Cleaning supplies ($400), replacement of basketball court nets ($100), staff uniform ($2,000), and replenishment of first aid kits for special events ($200) special events equipment ($2,500). Total ($5,200)

8040 Advertising
Newspaper advertisements ($2,800). Total ($2,800)

8050 Printing and Duplication
Quarterly Class & Program Guide promotional flier. Total ($2,400)

8060 Dues, Memberships & Subscriptions
CPRS annual membership ($300) MMASC annual membership ($200) NRPA annual Membership ($295) and Annual Membership ($200) for Community Services Supervisor and Program Specialist and Subscriptions for Disney Plus ($200). Total ($1,195)

8090 Conference and Meeting Expense
CPRS annual conference registration and travel in Southern California for Community Services Supervisor and Program Specialist. Total ($2,500)

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8110 Equipment Maintenance
Office equipment maintenance. Total ($850)

8120 Building Maintenance
Provides for supplemental cleaning and minor building repairs at the Orange Grove Recreation Center ($2,200), key duplication ($100), Park Signage ($7,650) Painting of Camp Med ($10,500). Total ($20,450)

8180 Contract Services
Portable toilet service at the SkatePark ($8,104), fire alarm and security system service for Recreation Center ($1,900), and Skate Park repairs ($13,000). Total ($23,004)

8200 Training Expense
Provides funds for staff training. Total ($800)

8264 Special Events
Spring Eggstravaganza ($6,000), three Movies in the Park ($10,800), two Shakespeare in the Park ($5,000), Halloween ($5,000), Breakfast with Santa ($5,000), five Summer Concerts in the Park Series ($25,000). Total ($56,800)

8267 Classes
Payments to independent contract instructors for the quarterly tot, youth, and adult leisure classes within the Recreation Division. Instructors are generally reimbursed 65% of their total class revenue. The City retains 35%. Based upon prior years, it is estimated that leisure classes will generate $230,000 next year. 65% of which is paid to independent contract instructors. Total ($149,000)

8268 Camp Med
Camp Med school year and summer program supplies and trips; field trips ($12,900). Camp med supplies and activities ($6,000), Snacks ($6,000), Summer pool usage ($2,550), Program supplies ($3,500), Purchase Outdoor Recreation Games ($1,885), Camp Med t-shirts ($4,000), First aid supplies ($2,000), California Parks and Recreation training for part-time staff ($2,000), Purchase new furniture kids-size ($3,000), Provides funds for required First Aid/CPR training for staff ($1,800), Internet ($1,800), Monthly special events ($1,000), Parent Night ($1,500), Annual licensing for MPLC & BMI ($910), Purchase new game cubbies ($600), Carpet cleaning ($1,800), printing for Camp Med program ($600) Staff sweatshirts for After-School ($1,500), Volunteen Shirts ($500), Annual When2Work staff scheduling system($400) streaming serves subscription ($515), and provides funds to promote Camp Med after school care and summer programs ($1,200). Total ($57,960)

8269 Teen Center
The operation of the teen center during the school year. Program supplies and activities ($1,000), snacks ($1,000), purchase advertisements ($250), first aid supplies ($100), board games ($250), guest speakers ($1,000), special events such as Halloween, holiday and end of the year programs ($250), and staff training ($150). Provide Youth and Government supplies, speakers, and trips ($3,150). Total ($7,150)

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8300 Lease Payment
Postage machine lease. Total ($260)

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Prop "A" – Local Transit Administration / 205-2010-2210

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	4,990	6,516	6,142	10,637	12,225	17,905
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	2,441	2,265	6,152	3,849	3,834	2,374
7100	010	CalPERS UAL				-	-	5,282
7108	000	Deferred Compensation	12	303	61	106	122	179
7110	000	Workers Compensation	13	61	67	197	119	194
7130	000	Group Health Insurance	50	455	355	601	554	858
7140	000	Vision Insurance	1	5	7	17	11	16
7150	000	Dental Insurance	4	20	27	63	39	61
7160	000	Life Insurance	1	3	4	7	6	10
7170	000	FICA - Medicare	17	80	87	154	159	260
		<WAGES & BENEFITS>	7,529	9,708	12,902	15,631	17,070	27,139
8060	000	Dues & Memberships	-	3,495	-	-	-	-
		<OPERATIONS & MAINTENANCE>	-	3,495	-	-	-	-
[205-2210] Prop "A" Administration Total			**7,529**	**13,204**	**12,902**	**15,631**	**17,070**	**27,139**

PERSONNEL SERVICES

7000 Salaries – Regular Employees

Funds the partial compensation for the Community Services Director. Refer to the Appendix for a detailed allocation list

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Prop "A" – Transit Planning / 205-8030-8024

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	6,434	11,817	14,577	22,793	20,318	26,858
7100	000	Retirement	5,232	4,723	13,326	8,247	7,533	3,561
7100	010	CalPERS UAL				-	-	7,922
7108	000	Deferred Compensation	25	778	145	228	203	269
7110	000	Workers Compensation	27	117	158	422	199	292
7130	000	Group Health Insurance	107	920	864	1,287	930	1,287
7140	000	Vision Insurance	2	11	18	36	18	25
7150	000	Dental Insurance	8	41	68	135	66	91
7160	000	Life Insurance	2	7	11	15	11	15
7170	000	FICA - Medicare	37	153	207	331	265	389
		<WAGES & BENEFITS>	11,873	18,568	29,375	33,494	29,542	40,709
8020	000	Misc. Supplies - Parking	2,915	2,915	-	8,200	3,500	10,700
8060	000	Dues & Memberships	7,912	2,425	6,187	8,500	8,500	13,170
8061	000	HOA Dues	14,645	20,762	15,572	32,041	32,000	32,041
8120	000	Building Maintenance	-	-	-	3,000	1,000	3,000
8180	000	Contract Services	68,116	33,496	33,583	74,000	74,000	88,600
8250	000	Bus Pass Subsidy	13,740	360	2,212	10,000	5,000	10,000
		<OPERATIONS & MAINTENANCE>	107,328	59,957	57,553	135,741	124,000	157,511
8520	000	Machinery & Equipment	-	64,500	-	-	-	-
8540	000	Automotive Equipment	-	-	-	176,600	169,999	-
		<CAPITAL OUTLAY>	-	64,500	-	176,600	169,999	-
[205-8024] Transit Planning Total			**119,202**	**143,026**	**86,928**	**345,835**	**323,541**	**198,220**

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Budget Detail

PERSONNEL SERVICES

7000 Salaries – Regular Employees
Provides partial compensation for the Community Services Director(20%). Refer to the Appendix for a detailed allocation list.

OPERATIONS & MAINTENANCE

8020 Misc. Supplies - Parking
Provides funds for supplies and Maintenance of the Mission Meridian Parking Garage ($2,000), Signage ($2,000), internet connection for parking meters ($1,100), Maintenance of parking permit machines ($3,100) and custodial services ($2,500). Total ($10,700)

8060 Dues & Memberships
Provides funds for a portion of membership to the Southern California Association of Governments (SCAG) ($3,000), Arroyo Verdugo JPA ($6,670), San Gabriel Valley COG ($3,500). Total ($13,170)

8061 Property Owners' Association Dues
Provides funds for the transit portion of the Mission Meridian Village Parking Garage's Property Owners' Association dues. Total ($32,041)

8120 Building Maintenance
Safety improvements, fencing around stairwells, graffiti removal. Total ($3,000)

8180 Contract Services
Buses for City excursions ($38,000) Janitorial Services for the Mission Meridian Village Parking Garage by Athens ($10,350) Provide funds for bus stops maintenance costs ($40,250). Total ($88,600)

8250 Bus Pass Subsidy
Provides a portion of LTR "A" – Local Return Funds to subsidize 50% of the cost of monthly MTA passes for elderly and disabled South Pasadena residents. Total ($10,000)

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Prop "A" – Dial A Ride / 205-8030-8025

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	83,131	80,297	78,442	193,173	181,058	275,655
7010	000	Salaries - Temp / Part	82,964	28,063	42,295	137,358	50,350	97,022
7020	000	Overtime	117	17	618	5,000	1,872	5,000
7040	000	Holiday	2,493	3,814	1,297	-	148	2,035
7055	000	IOD - Non Safety	-	-	-	-	-	
7070	000	Leave Buyback	-	-	-	1,500	-	-
7100	000	Retirement	21,773	17,576	40,579	56,339	56,821	30,222
7100	010	CalPERS UAL				-	-	47,190
7108	000	Deferred Compensation	-	4,313	(4,323)	-	1,325	2,757
7110	000	Workers Compensation	2,536	1,286	1,398	4,675	2,708	4,374
7120	000	Disability Insurance	-	3,029	-	-	-	
7130	000	Group Health Insurance	18,000	17,459	13,200	28,335	28,541	47,070
7140	000	Vision Insurance	480	471	400	660	562	768
7150	000	Dental Insurance	900	842	1,205	2,475	1,960	2,795
7160	000	Life Insurance	198	198	165	272	247	371
7170	000	FICA - Medicare	4,156	1,692	2,510	2,801	5,049	11,419
		<WAGES & BENEFITS>	216,748	159,057	177,785	432,588	330,643	526,679
8000	000	Office Supplies	-	-	-	-	-	4,000
8010	000	Postage	-	-	-	-	-	650
8020	000	Special Department Expense	-	-	-	-	-	9,300
8040	000	Advertising	-	-	-	-	-	1,000
8050	000	Printing/Duplicating	-	-	-	-	-	2,000
8060	000	Dues & Memberships	-	-	-	-	-	1,500
8090	000	Conference & Meeting Expense			-	-	-	2,000
8100	000	Vehicle Maintenance	-	-	-	-	-	61,000
8105	000	Fuel	-	-	7	-	-	5,000
8132	000	Uniform Expense/Cleaning	-	-	-	-	-	2,500
8140	000	Utilities	-	-	-	-	-	3,000
8170	000	Professional Services	-	-	-	-	-	30,000
8180	000	Contract Services	-	-	-	-	-	18,932
8200	000	Training Expense	-	-	-	-	-	2,000
8300	000	Lease Payment	-	-	-	-	-	648
		<OPERATIONS & MAINTENANCE>	-	-	7	-	-	143,530
[205-8025] Dial-A-Ride Total			**216,748**	**159,057**	**177,792**	**432,588**	**330,643**	**670,209**

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Budget Detail

PERSONNEL SERVICES

7000 Full-Time Salaries
Provides partial compensation for the Deputy Director of Community Services, (75%) Management Analyst, Management Assistant, two (2) full-time Transit Drivers.

7010 Part-Time
Provides funds for three (3) part-time Transit Drivers and one (1) Management Intern

7020 Overtime
Funds overtime pay for after-hours relating to transit ($5,000).

OPERATIONS & MAINTENANCE

8000 Office Supplies
Office and miscellaneous supplies. Total ($4,000)

8010 Postage
Postal expenses for Dial-a-Ride promotional mailers. Total ($650)

8020 Special Department Expense
Minor equipment for vans ($5,300), DMV pull notice program, and DMV physicals- for drivers, and random drug testing ($1,500) Office furniture ($2,500) . Total ($9,300)

8040 Advertising
Newspaper Advertising. Total ($1,000)

8050 Printing/Duplicating
Forms, fliers, and mailers. Total ($2,000)

8060 Dues & Memberships
Provides funds for the purchase of a membership for The Community Transportation Association of America (CTAA) ($700), California Parks and Recreation Society ($600) and Municipal Management Association of Southern California ($200). Total ($1,500)

8090 Conference& Meeting Expenses
Provides funds for the Federal Transit Administration Annual Drug and Alcohol Program National Conference ($1,000), CPRS conference (1,000). Total ($2,000)

8100 Vehicle Maintenance
Provides funds for repair and maintenance of two E450 (electric), one 2016 F250 CNG utility vehicle, and one 2012 MV-1 vans ($36,000), CNG Station repairs and

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monthly maintenance ($10,000) and van and vehicle cleaning ($15,000). Total ($61,000)

8105 Fuel
Fuel to operate Community Transit vehicles 3 CNG vehicles. Total ($5,000)

8132 Uniform Maintenance
Provides for the purchase and replacement of uniforms and jackets. Total ($2,500)

8140 Utilities
Provides funds for electricity required to charge Plug-in Electric Vehicle (E450 passenger bus). Total ($3,000).

8170 Professional Services
Transit Assessment (. Total $30,000)

8180 Contract Services
Annual Maintenance for data management system ($14,932) Verizon Wi-Fi Jetpack data plan ($1,000), Acorn Technology ($3,000). Total ($18,932)

8200 Employee Training
Provides funds for training seminars, materials, and job-related training sessions. Total ($2,000)

8300 Lease Payment
Provides funds for postage machine lease. Total ($648)

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Prop "C" – Local Transit Administration / 207-2010-2260

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	4,052	4,833	1,116	4,559	4,840	-
7070	000	Leave Buyback	-	-	-	-	-	-
7100	000	Retirement	1,046	1,116	2,881	1,649	1,596	-
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	5	216	49	46	48	-
7110	000	Workers Compensation	5	43	54	84	53	-
7130	000	Group Health Insurance	21	318	289	257	238	-
7140	000	Vision Insurance	0	4	6	7	5	-
7150	000	Dental Insurance	2	14	22	27	17	-
7160	000	Life Insurance	1	2	4	3	3	-
7170	000	FICA - Medicare	7	56	70	66	70	-
		<WAGES & BENEFITS>	5,140	6,602	4,491	6,698	6,871	-
[207-2260] Prop "C" Administration Total			**5,140**	**6,602**	**4,491**	**6,698**	**6,871**	**-**

*In FY 2023/24, all expenditures shifted to Public Works.

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Dial-A-Ride / 207-2010-8025

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
7000	000	Salaries - Permanent	121,801	134,529	83,643	151,608	114,536	-
7020	000	Overtime	5,090	-	148	5,000	2,131	
7040	000	Holiday	2,734	5,648	2,536	-	-	2,866
7070	000	Leave Buyback	511	-	-	2,500	-	-
7100	000	Retirement	27,689	22,984	58,119	12,197	16,229	-
7100	010	CalPERS UAL				-	-	-
7108	000	Deferred Compensation	-	5,362	(5,197)	-	649	-
7110	000	Workers Compensation	1,822	1,951	1,665	3,783	1,278	-
7130	000	Group Health Insurance	9,300	20,382	9,720	15,000	8,270	-
7140	000	Vision Insurance	285	165	190	480	233	-
7150	000	Dental Insurance	1,060	610	482	1,800	888	-
7160	000	Life Insurance	149	99	49	198	97	-
7170	000	FICA - Medicare	1,882	1,964	1,739	2,198	1,668	-
		<WAGES & BENEFITS>	172,323	193,693	153,092	194,764	145,978	2,866
8000	000	Office Supplies	1,425	921	277	2,000	2,000	-
8010	000	Postage	-	-	230	650	650	-
8020	000	Special Department Expense	1,188	2,044	5,415	7,000	7,000	-
8040	000	Advertising	-	-	-	1,000	-	-
8050	000	Printing/Duplicating	329	136	33	2,000	250	-
8060	000	Dues & Memberships	165	625	1,000	1,500	700	-
8090	000	Conference & Meeting Expense	-	-	1,026	1,000	350	-
8100	000	Vehicle Maintenance	15,737	24,686	30,554	61,000	55,000	-
8105	000	Fuel	3,161	952	3,250	5,000	4,500	-
8132	000	Uniform Expense/Cleaning	-	-	1,314	2,000	1,000	-
8140	000	Utilities	-	-	-	3,000	-	-
8180	000	Contract Services	15,525	12,866	11,185	16,275	15,000	-
8200	000	Training Expense	-	-	-	2,000	500	-
8300	000	Lease Payment	126	256	207	1,898	450	-
		<OPERATIONS & MAINTENANCE>	37,656	42,485	54,490	106,323	87,400	-
[207-8025] Dial-A-Ride Total			**209,979**	**236,178**	**207,582**	**301,087**	**233,378**	**2,866**

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Mission Meridian Public Garage / 226-2010-2029

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	824	-	1,815	5,000	1,700	5,000
8060	000	Dues & Memberships	8,163	9,650	7,237	10,000	7,400	10,000
8170	000	Professional Services	-	-	-	-	-	-
		<OPERATIONS & MAINTENANCE>	8,987	9,650	9,052	15,000	9,100	15,000
[226-2029] Mission Meridian Public Garage Total			**8,987**	**9,650**	**9,052**	**15,000**	**9,100**	**15,000**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Funds for supplies and maintenance of the Mission Meridian Parking Garage. Total ($5,000)

8060 Property Owners' Association (POA) Dues
Funds a portion of the Mission Meridian Parking Garage's POA dues. Total ($10,000).

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CDBG Senior Nutrition Program / 260-8030-8023

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8180	000	Contract Services	31,026	62,980	65,950	26,281	-	19,599
		<OPERATIONS & MAINTENANCE>	31,026	62,980	65,950	26,281	-	19,599
[260-8023] CDBG Senior Nutrition Prog Total			**31,026**	**62,980**	**65,950**	**26,281**	-	**19,599**

OPERATIONS & MAINTENANCE

8180 Contract Services

Provides funds for contract catering of the senior nutrition program of $85,134. Community Development Block Grant covers $19,599 of the contract in grant funds, while the General Fund provides $65,535 through the Senior Center budget. The revenue estimates just over $50,875 from serving approximately 18,500 meals. Overall, the City subsidizes $14,660 for the nutrition program. (Total $19,599)

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Recreation and Youth Services / 295-8030-8032

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8180	000	Contract Services	0	(39,500)	50,508	-	30,218	-
		<OPERATIONS & MAINTENANCE>	0	(39,500)	50,508	-	30,218	-
[295-8032] Recreation and Youth Services Total			**0**	**(39,500)**	**50,508**	**-**	**30,218**	**-**

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Arroyo Seco Golf – Administration / 295-8040-8041

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8000	000	Office Supplies	5,654	8,224	4,853	7,200	5,600	6,600
8010	000	Postage	189	392	163	-	178	200
8020	000	Special Department Expense	58,888	86,302	81,440	93,155	89,000	88,655
8040	000	Advertising	920	1,009	2,292	3,600	3,600	2,400
8120	000	Building Maintenance	10,626	10,184	13,036	25,500	18,500	24,300
8140	000	Utilities	9,419	5,865	6,504	6,610	6,600	7,495
8150	000	Telephone	9,138	7,812	8,412	9,000	9,000	10,632
8160	000	Legal Service	-	-	-	-	-	-
8170	000	Professional Services	72,400	139,500	172,987	101,996	101,000	101,996
8180	000	Contract Services	122,788	132,102	139,581	149,000	179,000	151,048
8191	000	Liability & Surety Bonds	40,530	50,403	69,529	60,000	60,000	67,800
8229	000	Taxes	833	1,039	975	1,040	1,213	1,250
8300	000	Lease Payment	5,028	5,028	5,103	5,280	5,280	5,280
		<OPERATIONS & MAINTENANCE>	336,413	447,861	504,874	462,381	478,971	467,656
[295-8041] General Administration Total			**336,413**	**447,861**	**504,874**	**462,381**	**478,971**	**467,656**

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Budget Detail

OPERATIONS & MAINTENANCE

8000 Office Supplies
Provides funds for the purchase of office paper, computer supplies, meeting supplies, and miscellaneous supplies. Total ($6,600)

8010 Postage
Postage for mailings. Total ($200)

8020 Special Department Expense
Credit card, bank fees & charges ($57,600) computer services ($29,400) membership dues ($480) and licensing fee ($1,175). Total ($88,655)

8040 Advertising
Promotions and ads for Golf Course. Total ($2,400)

8120 Building Maintenance
Maintenance and Janitorial Supplies ($22,800) Burglar alarm ($1,500). ($24,300)

8140 Utilities
Funds for Water ($4,270), Gas and Electricity $3,225. Total ($7,495)

8150 Telephone
Telephone and Internet services. Total ($10,632)

8170 Professional Services
Administrative fee ($98,000 a year) and consultant fees $3,996 a year. Total ($101,996)

8180 Contract Services
Compensation for Manager and Starter. Total ($151,048)

8191 Liabilities and Surety Bonds
Liability Insurances. Total. ($67,800)

8229 Taxes
Property taxes. Total ($1,250)

8300 Lease Payment
Equipment and Lease payments. Total ($5,280)

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Arroyo Seco Golf – Course Maintenance / 295-8040-8042

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	44,642	63,333	67,441	13,500	33,892	18,400
8100	000	Vehicle Maintenance	7,822	7,090	11,056	24,150	12,000	31,800
8120	000	Building Maintenance	11,050	14,233	35,334	82,900	81,000	96,800
8130	000	Small Tools	-	322	12,734	3,600	5,500	10,200
8132	000	Uniform Expense/Cleaning	6,218	6,586	8,100	7,200	7,200	9,600
8140	000	Utilities	61,549	39,955	64,064	70,000	61,000	67,700
8150	000	Telephone	1,027	1,028	1,155	1,200	1,100	1,200
8180	000	Contract Services	244,079	246,075	223,249	280,920	270,000	266,890
		<OPERATIONS & MAINTENANCE>	376,387	378,623	423,131	483,470	471,692	502,590
[295-8042] Golf Course Maintenance Total			**376,387**	**378,623**	**423,131**	**483,470**	**471,692**	**502,590**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Supplies ($10,200), and license and permits ($1,800) and training ($400), trees, shrubs and flowers (6,000). Total ($18,400)

8100 Vehicle Maintenance
Repairs to vehicles and carts ($16,000) oil and gas ($15,800). Total ($31,800)

8120 Building Maintenance
Maintenance ($30,300) fertilizer seed and chemicals ($50,000) sand gravel and top ($6,000) and course irrigation repairs ($10,500). Total ($96,800)

8130 Small Tools
Purchase hand tools and lawn equipment. Total ($10,200)

8132 Uniform Maintenance
Uniform cleaning. Total ($9,600)

8140 Utilities
Funds for electricity. Total ($67,700)

8150 Telephone
Funds for telephone. Total ($1,200)

8180 Contract Services
Compensation for maintenance staff. Total ($266,890)

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Arroyo Seco Golf – Driving Range / 295-8040-8043

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	16,309	28,163	27,438	39,800	27,000	42,200
8120	000	Building Maintenance	4,151	6,676	11,420	7,200	7,200	10,800
8132	000	Uniform Expense/Cleaning	-	287	-	750	-	750
8180	000	Contract Services	39,792	108,078	123,548	160,244	160,244	128,725
		<OPERATIONS & MAINTENANCE>	60,252	143,203	162,405	207,994	194,444	182,475
[295-8043] Range Total			**60,252**	**143,203**	**162,405**	**207,994**	**194,444**	**182,475**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Range balls and mats ($38,000) and supplies ($4,200). Total ($42,200)

8120 Building Maintenance
Maintenance of range, netting, and irrigation. Total ($10,800)

8132 Uniform Maintenance
Uniform cleaning. Total ($750)

8180 Contract Services
Compensation for maintenance staff and starters. Total ($128,725)

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Arroyo Seco Golf – Shop / 295-8040-8044

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	1,614	4,174	2,169	6,900	5,500	4,200
8132	000	Uniform Expense/Cleaning	1,159	2,718	3,663	-	1,200	3,000
8180	000	Contract Services	76,230	121,678	97,662	119,670	119,000	71,850
		<OPERATIONS & MAINTENANCE>	79,003	128,569	103,494	126,570	125,700	79,050
[295-8044] Golf Shop Total			**79,003**	**128,569**	**103,494**	**126,570**	**125,700**	**79,050**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
Clothing, gloves, and other supplies. Total ($4,200)

8132 Uniform Maintenance
Uniform cleaning. Total ($3,000)

8180 Contract Services
Compensation for Starter. Total ($71,850)

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Arroyo Seco Golf – Food and Beverage / 295-8040-8045

Budget Detail

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8020	000	Special Department Expense	17,263	2,025	2,109	2,825	2,750	1,500
8120	000	Building Maintenance	6,259	4,557	2,615	4,200	2,700	1,200
8130	000	Small Tools	489	2,708	-	-	-	-
8132	000	Uniform Expense/Cleaning	-	-	-	-	-	-
8180	000	Contract Services	100,126	9,556	10,584	11,375	11,000	10,616
		<OPERATIONS & MAINTENANCE>	124,137	18,846	15,308	18,400	16,450	13,316
[295-8045] Food Service Total			**124,137**	**18,846**	**15,308**	**18,400**	**16,450**	**13,316**

OPERATIONS & MAINTENANCE

8020 Special Department Expense
License and permits. Total ($1,500)

8120 Building Maintenance
Maintenance. Total ($1,200)

8180 Contract Services
Compensation for restaurant staff. Total ($10,616)

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Key Performance Indicators

The Community Services Department is responsible for providing the community with recreational, cultural, and social programs for people of all ages in a safe and well-maintained facility. The department has three divisions comprising Senior, Recreation, and Transit Divisions. We facilitate special events, leisure classes, and senior services including lifelong learning, Dial-A-Ride and Nutrition Program, facility and gazebo reservations, after school and summer camps, and more. The Community Services Department builds a strong sense of community to improve the quality of life for all residents.

Administration

- Construction of Berkshire and Grevelia pocket parks
- Plan and implement the entire Festival of Balloons / Fourth of July event
- Establish a Memo of Understanding with the American Youth Soccer Association (AYSO)
  and South Pasadena Little League (SPLL)
- Collaborate with the South Pasadena Unified School District to update the Joint Use Agreement
- Continually seek innovative and creative ways to connect with the public while applying a strategic approach to all communication efforts
  - Identify and utilize technologies to directly communicate with participants in programming (*will be completed through CivicRec*)

Recreation

- Improve outreach of special events by partnering with additional local organizations
- Increase summer Camp Med enrollment by 15% from Summer 2022
- Increase online registration participation by 10% with the implementation of CivicRec
- Establish a Quarterly customer satisfaction survey at the conclusion of each program
- Re-establish the Volunteen Program for teens 13 -16 years of age

Senior Services

- Increase followers on the Senior Center Facebook page by 5% by the end of FY 2023-2024
- Improve Senior Center outreach by establishing a quarterly flyer to distribute through City billing
- Increase Senior Center Membership by 5%
- Host *What to do About Mom and Dad* seminar by partnering with local older adult advocates to increase awareness of aging matters and services
- Host three culturally diverse events at the Senior Center by the end of FY2023-2024
- Re-introduce volunteer program following the pandemic shutdown

Transit Division

- Assessment of Transit Division
- Establish a referral program to increase ridership
- Increase marketing strategies for the Dial-A-Ride service

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Successor Agency – CRA Debt Service / 227-7200-7211

What is CRA?

Community Redevelopment Agency (CRA) has been Los Angeles' public partner in housing, commercial, neighborhood and economic development. CRA is dedicated to revitalizing, refurbishing, and renewing economically underserved areas of Los Angeles. CRA's main task is to lend a hand-to investors willing to take risks for a more vibrant city, to neighborhood resident with renewed aspirations for their communities, and to those in need who strive to take part in the city's growing prosperity. CRA helps increase the supply of housing for low income and moderate-income families, provide infrastructure for commercial and industrial development and create jobs necessary to maintain acceptable levels of employment.

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
8170	000	Professional Services	-	3,693	3,693	-	3,693	4,000
8330	000	Debt Service - Principal	-	-	-	165,000	165,000	175,000
8331	000	Debt Service - Interest	55,222	48,050	40,800	31,500	31,500	21,600
		<OPERATIONS & MAINTENANCE>	55,222	51,743	44,493	196,500	200,193	200,600
[227-7211] CRA Debt Service Total			**55,222**	**51,743**	**44,493**	**196,500**	**200,193**	**200,600**
227 - SUCCESSOR AGENCY TO CRA TOTAL			**55,222**	**51,743**	**44,493**	**196,500**	**200,193**	**200,600**

Redevelopment Obligations Trust / 927-9800-9811

Acct	Tsk	Account Title	Actual 2019/20	Actual 2020/21	Actual 2021/22	Budgeted 2022/23	Estimated 2022/23	Proposed 2023/24
		Proceeds to Successor Agency	-	-	-	-	196,500	196,600
		<OPERATIONS & MAINTENANCE>	-	-	-	-	196,500	196,600
927 - REDEV. OBLIGATIONS TRUST			**-**	**-**	**-**	**-**	**196,500**	**196,600**

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Full-Time Authorized Positions

	2019/20	2020/21	2021/22	2022/23	Proposed 2023/24
City Manager					
City Manager	1	1	1	1	1
Deputy City Manager	0	0	1	1	1
Assistant to the City Manager	1	1	1	1	1
Management Analyst	0	0	1	1	1
Executive Assistant	1	1	0	0	0
Administrative Secretary	0	0	1	1	1
Total Funded Positions	3	3	5	5	5
Management Services					
Management Services Director	0	0	1	1	1
Chief City Clerk	1	1	1	1	1
Human Resources Manager	1	1	0	0	0
Human Resources/Risk Manager	0	0	1	1	1
Principal Mgt. Analyst	2	2*	0	0	0
Sr. Management Analyst	0	0	1	1	1
Management Analyst	2	2	2	2	0
Deputy City Clerk	1	1	1	1	1
Management Assistant	0	0	0	0	0
Sr. Human Resource Analyst	0	0	0	0	1
Human Resource Analyst	0	0	0	0	1
Human Resource Specialist	0	0	0	0	1
Total Funded Positions	7	5	7	7	8
Frozen Positions*		2			
Finance Department					
Finance Director	1	1	1	1	1
Deputy Finance Director/Controller	0	0	0	0	1
Assistant Finance Director	0	0	0	0	0
Principal Management Analyst	0	0	0	0	0
Finance Manager	1	1	1	1	1
Accounting Manager	1	1	1	1	0
Accountant	0	1	1	2	2
Management Analyst	0	0	0	2	2
Payroll Coordinator	0	0	0	0	0
Filming Liaison	0	0	0	0	0
Management Assistant	1	1	2	0	1
Accounting Technician	1	1	0	0	1
Senior Account Clerk	0	0	0	0	0
Total Funded Positions	5	6	6	7	9

DRAFT

	2019/20	2020/21	2021/22	2022/23	Proposed 2023/24
Police Department					
Police Chief	1	1	1	1	1
Deputy Chief of Police	0	1	1*	1	1
Police Captain	2	0	0	0	0
Police Lieutenant	0	2	2	2	2
Police Sergeant	7	5	5	5	6
Corporal	5	6	6	6	6
Police Officer	21	21*	21*	21	21
Management Analyst	0	1	1	1	1
Senior Clerk	1	0	0	0	0
Support Services Assistant	1	0	0	0	0
Police Clerk I	0	0	0	0	1
Police Clerk II	4	4	4	4	4
Police Assistant II (Rotational)	0	1	1	1	1
Police Assistant	8	8	8	8	9
Parking Control Officer	3	3	3	3	3
Administrative Secretary	1	0	0	0	1
Total Funded Positions	54	51	51	53	57
Frozen Positions*		2	2		
Fire Department					
Fire Chief	1	1	1	1	1
Division Chief	2	2	2	2	2
Fire Prevention Specialist	0	1	1	1	1
Fire Captian	3	3	3	3	3
Fire Engineer	6	6	6	6	6
Firefighter/Paramedic	9	9	9	9	9
Management Assistant	0	0	0	0	1
Total Funded Positions	21	22	22	22	23
Public Works					
Administrative/Engineering Division					
Public Works Director	1	1	1	1	1
Deputy Public Works Director	1	1	1	1	1
Deputy Director Water & Sustainability	1	1	1	0	0
Principal Engineer	0	0	0	0	1
Senior Civil Engineer	0	0	1	1	1
Associate Civil Engineer	1	1	1	1	1
Civil Engineering Assistant	1	1	1	1	1
Public Works Assistant	1	1	1	1	1
Public Works Inspector	1	1	2	2	2
Management Analyst	0	0	0	2	2
Management Assistant	1	1	1	1	1
Transportation Manager	0	0	0	0	1
Transportation Engineer	0	0	0	1	1*

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	2019/20	2020/21	2021/22	2022/23	Proposed 2023/24
Public Works cont					
Operations & Maintenance Division					
Public Works Operation Manager	1	1	1	1	1
Facilities and Parks Supervisor	0	0	0	0	1
Parks Supervisor	1	1	1	1	1*
Facilities Maintenance Supervisor	1	1	1	1	1*
Street & Sewer Supervisor	1	1	1	1	1
Electrician	1	1	1	1	1
Senior Maintenance Worker	2	2	2	2	3
Building Maintenance Worker	2	2	2	2	2
Maintenance Worker I/II	5	5	5	6	6
Environmental Sustainability Division					
Environmental & Sustainability Manager	0	0	0	1	1
Water Conservation Analyst	1	1	1	0	0
Management Analyst	0	0	0	0	1
Water Division					
Water Operations Manager	1	1	1	1	1
Water Operations Supervisor	0	0	0	0	1
Senior Water Utility Worker	1	1	1	1	1
Senior Water Production/Treatment Operator	1	1	1	1	1
Water Production/Treatment Operator	2	2	2	2	2
Water Utility Worker I/II	5	5	5	5	5
Total Funded Positions	33	33	35	38	41
Frozen Positions*					3
Community Development					
Community Development Director	1	1	1	1	1
Deputy Community Development Director	0	0	1	1	1
Planning Manager	0	0	1	1	1
Senior Management Analyst/Housing	0	0	0	1	1
Principal Management Analyst	2	2	1	0	0
Senior Planner	1	0	0	0	0
Associate Planner	0	1	3	3	3
Assistant Planner	0	1	1	1	1
Senior Community Improvement Coordinator	0	0	0	0	1
Community Improvement Coordinator	1	1	1	1	1
Film Liaison	1	1	1	1	1
Management Assistant (Planning Counter Tech)	0	0	0	1	1
Administative Secretary	1	1	1	1	1
Permit Counter Technician	0	0	0	0	1
Total Funded Positions	7	8	11	12	14
Library					
Library Director	1	1	1	1	1
Asst. Dir. Of Library Arts & Culture	1	1*	0	0	0
Public Services Manager	1	1	1	1	1
Support Services Manager	1	1	1	1	1

DRAFT

	2019/20	2020/21	2021/22	2022/23	Proposed 2023/24
Library cont					
Librarian	3	3	3	4	4
Library Technical Assistant	1	1	1	1	1
Library Clerk I	1	1	1	0	0
Library Clerk II	0	0	0	1	1
Administrative Secretary	1	1	1	1	1
Total Funded Positions	10	9	9	10	10
Frozen Positions*		1			
Community Services					
Community Services Director	1	1	1	1	1
Deputy Community Services Director	0	0	1	1	1
Senior Services Supervisor	1	1	1	1	1
Youth Services Supervisor	1	1	1	1	1
Management Analyst	1	1	1	1	1
Management Assistant	0	1	1	1	1
Community Services Coordinator	1	1	1	0	1
Management Aide	1	0	0	0	1
Program Specialist	1	1	1	1	1
Transportation Driver	2	2	2	2	2
Total Funded Positions	9	9	10	9	11
Total Full-Time Authorized Positions	149	146	156	163	178

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Part-Time Authorized Positions

	FY 2023/24 Max 18 Hours	FY 2023/24 Max 28 Hours
City Manager		
Management Intern		1
Management Services		
Management Assistant		1
Police Department		
Police Cadets	3	3
Public Works		
Public Works Intern	2	
Management Intern	1	
Community Development		
Code Enforcement Officer		1
Management Assistant	1	
Library		
Librarian In-Charge	1	1
Substitute Librarians	9	1
Librarians - Children	2	
Clerk II - Administration	2	
Clerk II - Support Services	2	
Clerk I - Support Services	3	
Library Aides	10	
Community Services		
Management Aide		1
Site Mgr - Seniors		1
Recreation Leader	16	15
Recreation Leader - Seniors	3	1
Transit Driver		3
Management Intern		1
Camp Director		1
Grand Total Part-Time	***55***	***31***

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Position Distribution by Funding Source

Department/Position	101 General	205 Prop A	207 Prop C	233 Meas R	236 Meas M	210 Sewer	215 LLMD	239 Meas W	230 Gas Tax	500 Water	503 WaterE	Total
City Manager												
Asst. to the CM	0.85	-	-	-	-	0.05	-	-	-	0.10	-	1.00
Management Analyst	0.85	-	-	-	-	0.05	-	-	-	0.10	-	1.00
City Manager	0.85	-	-	-	-	-	-	-	-	0.10	0.05	1.00
Deputy City Manager	0.85	-	-	-	-	-	-	-	-	0.10	0.05	1.00
Admin Secretary	1.00	-	-	-	-	-	-	-	-	-	-	1.00
City Manager Total	4.40	-	-	-	-	0.10	-	-	-	0.40	0.10	5.00
Management Services												
Mgmt Services Director	0.93	-	-	-	-	0.07	-	-	-	-	-	1.00
Human Resource Analyst	0.85	-	-	-	-	-	-	-	-	0.15	-	1.00
Sr. Managment Analyst	0.80	-	-	-	-	-	-	-	-	0.20	-	1.00
HR & Risk Manager	0.80	-	-	-	-	-	-	-	-	0.20	-	1.00
Deputy City Clerk	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Chief City Clerk	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Sr. Human Resource Analyst	0.85	-	-	-	-	-	-	-	-	0.15	-	1.00
Human Resource Specialist	0.85	-	-	-	-	-	-	-	-	0.15	-	1.00
Management Services Total	7.08	-	-			0.07	-	-	-	0.85	-	8.00
Finance Department												
Finance Director	0.68	-	-	-	-	0.12	-	-	-	0.20	-	1.00
Deputy Finance Director/Controller	0.68	-	-	-	-	0.12	-	-	-	0.20	-	1.00
Management Analyst	0.45	-	-	-	-	0.05	-	-	-	0.50	-	1.00
Management Analyst	0.60	-	-	-	-	0.05	-	-	-	0.35	-	1.00
Finance Manager	0.68	-	-	-	-	0.12	-	-	-	0.20	-	1.00
Accountant	1.00	-	-	-	-	0.10	-	-	-	0.90	-	2.00
Management Assistant	0.45	-	-	-	-	0.05	-	-	-	0.50	-	1.00
Accounting Technician I	0.45	-	-	-	-	0.05	-	-	-	0.50	-	1.00
Finance Total	4.99	-	-	-	-	0.66	-	-	-	3.35	-	9.00
Police Department												
Police Chief	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Deputy Police Chief	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Lieutenant	2.00	-	-	-	-	-	-	-	-	-	-	2.00
Police Sergeant (Office of Prof. Stds)	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Sergeant	5.00	-	-	-	-	-	-	-	-	-	-	5.00
Corporal	6.00	-	-	-	-	-	-	-	-	-	-	6.00
Police Officer	21.00	-	-	-	-	-	-	-	-	-	-	21.00
Management Analyst	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Clerk II	4.00	-	-	-	-	-	-	-	-	-	-	4.00
Police Clerk I	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Assistant II (Rotational)	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Assistant	9.00	-	-	-	-	-	-	-	-	-	-	9.00
Parking Control Officer	3.00	-	-	-	-	-	-	-	-	-	-	3.00
Administrative Secretary	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Police Department Total	57.00	-	-	-	-	-	-	-	-	-	-	57.00
Fire Department												
Fire Chief	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Division Chief	2.00	-	-	-	-	-	-	-	-	-	-	2.00
Fire Prevention Specialist	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Fire Captian	3.00	-	-	-	-	-	-	-	-	-	-	3.00
Fire Engineer	7.00	-	-	-	-	-	-	-	-	-	-	7.00
Firefighter/Paramedic	8.00	-	-	-	-	-	-	-	-	-	-	8.00
Management Assistant	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Fire Department Total	23.00	-	-	-	-	-	-	-	-	-	-	23.00
Public Works												
Director of PW	0.50	-	-	-	-	0.20	-	0.05	0.05	0.20	-	1.00
Principal Engineer	0.50	-	-	-	-	0.20		0.05	0.05	0.20	-	1.00
Associate Civil Engineer	0.30	-	-	-	-	0.20	-	0.05	0.30	0.15	-	1.00
Building Maintenance Worker	2.00	-	-	-	-	-	-	-	-	-	-	2.00
Electrician	0.75	-	-	-	-	-	-	-	-	0.25	-	1.00
Facilities and Parks Supervisor	0.65	-	-	-	-	-	0.35	-	-	-	-	1.00
Envir. & Sustain. Mgr	0.80	-	-	-	-	-	-	-	-	-	0.20	1.00
Maintenance Wkr. I/II	-	-	-	-	-	0.20	-	-	1.80	-	-	2.00
Management Assistant	0.50	-	-	-	-	0.20	-	0.05	0.05	0.20	-	1.00
Public Works Asst.	0.50	-	-	-	-	0.10	0.20	-	-	0.20	-	1.00
Public Works Inspector	0.20	-	-	-	-	0.10	-	-	1.60	0.10	-	2.00
Senior Maintenance Wkr	1.15	-	-	-	-	-	0.85	-	-	-	-	2.00
Senior Maintenance Wkr.	-	-	-	-	-	0.90	-	-	0.10	-	-	1.00

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Department/Position	101 General	205 Prop A	207 Prop C	233 Meas R	236 Meas M	210 Sewer	215 LLMD	239 Meas W	230 Gas Tax	500 Water	503 WaterE	Total
Public Works cont												
Sr. Wtr Prod Treat Oper	-	-	-	-	-	-	-	-	-	1.00	-	1.00
Street Supervisor	-	-	-	-	-	0.10	-	-	0.90	-	-	1.00
Water Prod/Treatmnt Oper	-	-	-	-	-	-	-	-	-	2.00	-	2.00
Water Utility Worker I/II	-	-	-	-	-	-	-	-	-	5.00	-	5.00
Senior Water Utility Worker	-	-	-	-	-	-	-	-	-	1.00	-	1.00
Wtr Operations Mgr	-	-	-	-	-	-	-	-	-	1.00	-	1.00
Wtr Operations Supervisor	-	-	-	-	-	-	-	-	-	1.00	-	1.00
Operations Manager	0.60	-	-	-	-	-	0.40	-	-	-	-	1.00
Engineering Assistant	0.30	-	-	-	-	0.20	-	0.05	0.30	0.15	-	1.00
Maintenance Wkr II	-					0.30			2.70			3.00
Maintenance Wkr I	-	-	-	-	-	0.10	-	-	0.90	-	-	1.00
Management Analyst	-	-	-	-	-	-	-	-	-	-	1.00	1.00
Senior Civil Engineer	0.30	-	-	-	-	0.20	0.05	0.05	0.20	0.20	-	1.00
Transportation Planning Mgr	-	-	-	0.50	0.50	-	-	-	-	-	-	1.00
Deputy Director	0.50	-	-	-	-	0.20	-	0.05	0.05	0.20	-	1.00
Management Analyst	1.20	-	-	-	-	0.30	-	-	0.05	0.40	0.05	2.00
Public Works Total	10.75	-	-	0.50	0.50	3.50	1.85	0.35	9.05	13.25	1.25	41.00
Community Development												
Community Develop Dir	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Film Liaison	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Deputy Comm Dev Director	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Admin Secretary	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Planning Manager	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Associate Planner	3.00	-	-	-	-	-	-	-	-	-	-	3.00
Sr. Community Improv. Coord.	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Community Improv. Coord.	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Senior Management Analyst	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Assistant Planner	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Management Assistant	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Planning Counter Technician	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Community Development Total	14.00	-	-	-	-	-	-	-	-	-	-	14.00
Library												
Library Director	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Public Services Manager	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Support Services Manager	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Library Technical Assitant	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Librarian	4.00	-	-	-	-	-	-	-	-	-	-	4.00
Library Clerk II	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Administrative Secretary	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Library Total	10.00	-	-			-	-	-	-	-	-	10.00
Community Services Department												
Community Services Director	0.75	0.25	-	-	-	-	-	-	-	-	-	1.00
Deputy Comm Svcs Director	0.25	0.75	-	-	-	-	-	-	-	-	-	1.00
Community Services Supervisor	2.00	-	-	-	-	-	-	-	-	-	-	2.00
Management Aide	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Management Analyst	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Management Assistant	-	1.00	-	-	-	-	-	-	-	-	-	1.00
Program Specialist	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Community Services Coordinator	1.00	-	-	-	-	-	-	-	-	-	-	1.00
Transportation Driver	-	2.00	-	-	-	-	-	-	-	-	-	2.00
Community Services Total	7.00	4.00	-	-	-	-	-	-	-	-	-	11.00
Total Full-Time Authorized Positions	**138.22**	**4.00**	**-**	**0.50**	**0.50**	**4.33**	**1.85**	**0.35**	**9.05**	**17.85**	**1.35**	**178.00**

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Glossary of Budget Terms

APPROPRIATION
An authorization by the City Council to make expenditures/expenses and to incur obligations for a specific purpose within a specific time frame.

ASSESSED VALUATION
A dollar value placed on real estate or other property by the County of Los Angeles as a basis for levying property taxes.

AUDIT
A view of the City's accounts by internal audit staff or an independent auditing firm to substantiate fiscal year-end funds, salaries, reserves, and cash on hand.

BEGINNING/ENDING (UNAPPROPRIATED) FUND BALANCE
Unencumbered resources available in a fund from the prior/current fiscal year after payment of the prior/current fiscal year's expenditures/expenses. This is not necessarily cash on hand.

BOND
Capital raised by a City by issuing a written promise to pay a specific sum of money (called the face value or principal amount) at a specific date or dates in the future, together with periodic interest at a special rate. The most common types of bonds are General Obligation, Revenue and Special Tax bonds.

BUDGET
A fiscal plan of financial operation listing an estimate of proposed applications or expenditures/expenses and the proposed means of financing them for a particular time period. The budget is "Proposed" until it has been approved by the City Council. South Pasadena's budget covers one fiscal year, from July 1 through June 30.

CAPITAL IMPROVEMENT
A permanent addition to the City's assets, including the design, construction or purchase of land, buildings or facilities, or major renovations.

CAPITAL IMPROVEMENT PROGRAM
A financial plan of proposed capital improvement projects with single- and multiple-year capital expenditures/expenses.

CAPITAL OUTLAY
A budget appropriation category which budgets all equipment having a unit cost of more than $1,000 and which has an estimated useful life of over one year.

CAPITAL PROJECTS
Physical structural improvements with a cost of $5,000 or more and which have an estimated useful life of one year or more. Examples include a new park, building modifications or water system construction and improvements.

CITY MANAGER'S BUDGET MESSAGE
A general discussion of the budget and related financial issues.

DEBT SERVICE
Payment of the principal and interest on an obligation resulting from the issuance of bonds and notes.

DEBT SERVICE REQUIREMENTS
The amount of money required for paying principal and interest on outstanding debt and required contributions to accumulate monies for future retirement of term bonds.

DEFICIT
An excess of expenditures or expenses over revenues (resources).

DEPARTMENT
An organizational unit comprised of divisions and programs. It is the basic unit of service responsibility that encompasses a broad mandate of related activities.

DIVISION
A sub-section within a department which

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furthers the objectives of the City Council by providing specific services or a product. Divisions are comprised of one or more programs.

ENCUMBRANCE
A legal obligation to pay funds, the expenditure/expense of which has not yet occurred. An encumbrance ceases when the obligation is paid or is otherwise terminated. Technically, encumbrances lapse at year's end and require Council action to re-appropriate funds to cover any remaining encumbrances.

ENTERPRISE FUND
A type of fund established for the total costs of those governmental facilities and services that are operated in a manner similar to private enterprises. Enterprise fund activities are entirely or predominately self-supporting. The City has three enterprise funds.

EXPENDITURE
The actual spending of governmental funds set aside by an appropriation.

EXPENSE
The actual spending of proprietary funds (Enterprise and Internal Service Fund types) set aside by an appropriation.

FISCAL YEAR
A twelve-month period of time to which a budget applies. South Pasadena's fiscal year is July 1 through June 30.

FUND
An independent fiscal and accounting entity used to record all financial transactions related to the specific purpose for which the Fund was created.

FUND BALANCE
The amount of financial resources available for use. Similar to retained earnings, this represents the excess of all prior year's operating surpluses and deficits. This includes cash on hand, and current assets less current liabilities.

GENERAL FUND
The primary fund of the City, it is used to account for all revenues and expenditures of the City not legally restricted as to use. The fund is used to account for the cost of the City's general operations. Examples of departments financed by the General Fund include the City Council, Police, Fire, and general government activities.

GOVERNMENTAL FUND
A type of fund that records revenues and expenditures of typical government activities. This fund type includes General, Special Revenue, Debt Service and Capital Project funds.

GRANT
Contributions, gifts of cash, or other assets from another governmental entity to be used or expended for a specific purpose, activity or facility. An example is the Community Development Block Grant (CDBG) provided by the Federal Government.

INTERFUND TRANSFERS
Monies transferred from one fund to another. Such money is transferred to finance the operations of another fund or to reimburse the fund for certain expenditures/expenses.

MATERIALS, SUPPLIES AND SERVICES
Expenditures/expenses for materials, supplies, and services which are ordinarily consumed within a fiscal year and which are not included in departmental inventories.

MUNICIPAL CODE
A book that contains the City Council approved ordinances currently in effect. The Code defines City policy with respect to areas such as planning, etc.

OBJECTIVES
The expected results or achievements of a budgeted activity.

OPERATING BUDGET
The annual appropriation of funds for on-

going program costs, including salaries and benefits, services and supplies, debt service, capital outlay, and capital improvements.

ORDINANCE
A formal legislative enactment by the City Council that has the full force and effect of law within City boundaries unless preempted by a higher form of law. An ordinance has a higher legal standing than a resolution.

PROGRAM
A sub-section of a division which provides specific services or a product; a program is the smallest unit of service. There may be one or more programs within a division.

RESERVE
An account used to record a portion of the fund balance as legally segregated for a specific use.

RESOLUTION
A special order of the City Council. A resolution has a lower legal standing than an ordinance.

RETAINED EARNINGS
The amount of financial resources available for use in an Enterprise fund. Similar to "Fund Balance", it represents the excess of all prior years' surpluses and deficits.

REVENUES
An amount received by the City from taxes, fees, permits, licenses, interest, intergovernmental sources and other sources during the fiscal year.

SALARIES, WAGES and EMPLOYEE BENEFITS
Budgeted expenditure categories that generally account for full time and part time employees, overtime expenses, and all employee benefits, such as medical and dental insurance and retirement benefits.

SPECIAL REVENUE FUNDS
This fund type collects revenues that are restricted by the City, County, State or Federal Government as to how the City might spend them.

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Description of Funds

General Fund

101-General Fund – The General Fund is the primary operating fund of the City. The General Fund accounts for all financial resources except those required to be accounted for in another fund. That is, it is assumed that all of the City's activities are reported in the General Fund unless there is a compelling reason to report an activity in some other fund type. Generally Accepted Accounting Principles (GAAP) prescribe that a government report only one general fund.

There are at least three compelling reasons to account for a particular activity in some type of fund other than the General Fund:

- GAAP Requirements. In certain instances, GAAP require the use of another fund type. Examples of such requirements are found in reporting for resources that are required to be held in trust for employee pension plans, other postemployment benefit plans, or other employee benefit plans. The City does not have such plans.
- Legal Requirements. There may be legal requirements that a certain fund type be used to account for a given activity. Most special revenue sources that are legally restricted to expenditure for specified purposes (Capital Growth Fund, grants, local return of Proposition A and C, CDBG, Gas Taxes, etc.) fall into this accounting category.
- Financial Administration. The demands of sound financial administration may require the use of a fund other than the General Fund. For example, the City has found it appropriate to account for the Parking and Business Improvement Tax, and Mission Meridian Public Garage in this manner.

Internal Service Funds

Internal service funds account for activities that provide goods or services to other funds, departments, or agencies of the primary government and its component units, or to other governments, on a cost-reimbursement basis. Funds included are:

103-Insurance Fund – To provide resources for general liability and workers' compensation insurance claims.

Special Revenue Funds

Special revenue funds account for the proceeds of specific revenue sources that are legally restricted to expenditures for specified purposes. Funds included are:

201-MTA Pedestrian Improvement Fund – To account for MTA grants used for the Fair Oaks/Mission pedestrian improvement projects which include pedestrian accessibility, widened bikeways, landscaping, lighting modification and aesthetics.

205-Proposition "A" Local Return Fund – To account for all revenues and expenditures associated with the one-half cent sales tax approved by Proposition A in 1980. All revenues of this fund must be expended for transportation-related items as established by the Los Angeles County Transportation Commission.

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206-State and Local Recovery Fund (SLRF) – To account for all revenues and expenditures associated with this State fund.

207-Proposition "C" Local Return Fund – To account for all revenues and expenditures associated with the one-half cent sales tax approved by Proposition C in 1990. All revenues of this fund must be expended for transportation-related items as established by the Los Angeles County Transportation Commission.

209-Carlyle Library Bequest – Carlyle donation

208-TEA/Metro Fund – To account for all revenues and expenditures associated with the TEA/Metro Fund. All revenues of this fund must be expended for transportation-related items.

211-CTC Traffic Improvement Grant Fund – To account for state and federal funding of street and intersection improvements relieving congestion at our busiest intersections.

215-Street Lighting and Landscaping Fund – To account for the costs associated with the City's street lighting and median landscaping programs. These costs are deemed to benefit all property owners who are assessed their proportionate share of the costs. These assessments are placed on the property tax bill and collected and remitted to the City by the County of Los Angeles.

217-Public, Education, and Government Fund – To account for revenues and expenditures used for public education and government access charges that the City's cable franchise collects. Monies in this fund must be used to purchase equipment related to the production of public education and government access television.

218-Clean Air Act Fund – To account for revenues and expenditures expended for air quality improvement projects as established by the South Coast Air Quality Management District.

220-Business Improvement Tax (BIT) Fund – To account for business improvement tax returns collected by the City for specified purposes within the Parking and Business Improvement Area: (1) decoration of any public place, (2) promotion of public events; (3) furnishing of music; (4) general promotion of retail trade activities.

223-Gold Line Mitigation Fund – To account for the MTA's funding for the improvements to the Gold Line Mission Street Station.

226-Mission Meridian Public Garage Fund – To account for the revenues and expenditures of the Mission Meridian Public Garage.

228-Housing Authority Fund – To account for the revenues and expenditures for the City of South Pasadena Housing Authority.

230-State Gas Tax Fund – To account for all state gas tax related revenues and expenditures, including street repair, reconstruction and maintenance. State law requires these gasoline taxes to be used to maintain the City's street and highway system.

232-County Park Bond – To account for the revenues and expenditures for the County Park Bond related improvements.

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233-Measure R Fund – To account for all revenues and expenditures associated with the one-half cent sales tax approved by Measure R in 2009. All revenues of this fund must be expended for transportation-related items as established by the Los Angeles County Transportation Commission.

234-LACMTA Measure M MAT Grant Fund – To account for all revenues and expenditures associated with the one-half cent sales tax approved by Measure M in 2016. All revenues of this fund must be expended for transportation-related items eligible under the Metro Active Transportation, Transit and First/Last Mile (MAT) Program.

236-Measure M Fund – To account for all revenues and expenditures associated with the one-half cent sales tax approved by Measure M in 2016. All revenues of this fund must be expended for transportation-related items as established by the Los Angeles County Transportation Commission.

238-MSRC Grant Fund – To account for the revenues and expenditures for the Mobile Source Air Pollution Reduction Review Committee projects.

245-Bike and Pedestrian Paths Fund – To account for the revenues and expenditures for bike and pedestrian facilities improvements funded by the State of California Transportation Development Act.

247-SGVCOG Grant Fund – To account for the revenues and expenditures to implement the Slow Streets Program funded by San Gabriel Valley Slower, Safer Street Program.

248-BTA Grant Fund – To account for the revenues and expenditures for the Bicycle Transportation Account (BTA) grant funded by the Los Angeles County Metropolitan Transportation Authority. This grant was awarded to fund two projects from the City's Bicycle Master Plan: the Mission Street Green Sharrow Lane Project and the South Pasadena Bicycle Parking Project.

249-Open Streets Grant Fund – To account for the revenues and expenditures for the open streets grant funded by the Los Angeles County Metropolitan Transportation Authority. The goals of the Open Streets Grant Program is to provide opportunities for 1) riding transit, walking and riding a bike, possibly for the first time, 2) to encourage future mode shift to more sustainable transportation modes, and for 3) civic engagement to foster the development of multi-modal policies and infrastructure at the city/community level.

255-Capital Growth Requirement Fund – To account for fees paid to the City for building development to be applied towards the costs of public facilities improvements.

260-Community Development Block Grant (CDBG) Fund – To account for the revenues and expenditures for Community Development Block Grant projects.

270-Asset Forfeiture Fund – To account for proceeds received from forfeiture in narcotics investigations allocated for law enforcement activities.

272, 273 & 274-Federal and State Public Safety Grant Funds – To account for the operations of various federal and state grants, including COPS grants, and Homeland Security grants.

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275- Park Impact Fees Fund – To account for the proceeds of a development fee used for the purpose of park facilities improvements and related expenditures.

277- Highway Safety Improvement Program Grant (HSIP) Fund – To account for revenues and expenditures related to street improvements funded by the grant.

Enterprise Funds

An enterprise fund may be used to report any activity for which a fee is charged to external users for goods or services. GAAP also require the use of an enterprise fund for any activity whose principal external revenue sources are used as the sole leverage for issuance of debt; if the cost of providing services must legally be recovered through fees or charges; or if the government's policy is to establish activity fees or charges designed to recover the cost of providing service.

210 & 310-Sewer Fund – To account for the provision of sewer construction, maintenance and operation services to residents of the City.

295-Arroyo Seco Golf Course Fund – To account for revenues and expenses relating to the Golf Course.

500-Water Utility Enterprise Fund – To account for all the activities and operations of the Utility. The Utility has several functioning wells (in neighboring San Gabriel and San Marino), three functioning reservoirs, and maintains miles of water lines and transmission lines.

505-2016 Water Revenue Bonds Fund – To account for proceeds from the2016 Water Bond issuance. Proceeds from the bonds are to be used solely for water capital projects, and funds will be transferred over to the Water Fund as project expenses are drawn down.

550-Public Financing Authority Fund – To account for debt service and related expenses of the 2013 Water Bond issuance.

Capital Projects Funds

Governments often find it useful to report major capital acquisition and construction separately from their ongoing activities. Separate reporting enhances an understanding of the government's capital activities, and it helps to avoid the distortions in financial resources trend information that can arise when capital and operating activities are mixed.

104-Street Improvements Program Fund – To account for capital expenditures related to street improvements projects.

105-Facilities and Equipment Replacement Fund - To account the replacement costs of City vehicles and equipment.

108-SR110 General Fund Reserve Fund - To account for the capital expenditures related to improvement of transportation systems.

327-2000 Tax Allocation Bonds Fund – To account for capital expenditures for improvements

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funded by the bonds formerly held by the Successor Agency to the Community Redevelopment Agency.

Fiduciary Funds

A fiduciary fund is used in governmental accounting to report on assets held in trust for others. When financial statements are prepared for fiduciary funds, they are presented using the economic resources measurement focus and the accrual basis of accounting.

110-OPEB Trust Fund – Reserves to off-set future other post-employment benefit costs

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Financial Policies

Fiscal Year 2023-24

FORTHCOMING

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Basis of Budget Accounting

The City of South Pasadena's accounting records are maintained in full accordance with Generally Accepted Accounting Principles (GAAP), as established by the Governmental Accounting Standards Board (GASB).

The budget basis refers to when revenues and expenditures are recognized in the City's accounts. Our annual budget is prepared on the same basis as the City's Annual Comprehensive Financial Report (ACFR).

The modified accrual basis is followed in all governmental funds (General, Special Revenue, Debt Service and Capital). Under the modified accrual basis of accounting – wherein the measurement focus is placed on current financial resources rather than a determination of net income – revenues are recognized when they become measurable and available. The reported fund balance provides an indication of available, spendable resources. Expenditures are recognized generally when the related liability is incurred.

Enterprise Funds are accounted for using the accrual basis of accounting. This is an economic resources measurement focus. Revenues are recognized when they are earned, and expenses are recognized when incurred. The accrual basis focuses on net income, and the operating statements provide an indication of the economic net worth of the fund. For budgetary purposes, however, the reported fund balance is a calculation of liquid or near-liquid cash assets (current assets minus current liabilities).

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ATTACHMENT 2
Budget Changes

Change in Revenue from Draft 1 to Draft 2 to Draft 3

Row Labels	Proposed FY 2023-24	Fund	Account #	Sum of Change
5/4/2023	Estimated 2022-23	101	101-0000-0000-4000-000	(658,630.00)
			101-0000-0000-4010-000	325,444.00
		206	206-0000-0000-5073-000	(3,029,618.00)
	Estimated 2022-23 Total			**(3,362,804.00)**
5/4/2023 Total				**(3,362,804.00)**
5/16/2023	Estimated 2022-23	101	101-0000-0000-4000-000	325,444.00
			101-0000-0000-4010-000	(325,444.00)
			101-0000-0000-4200-000	(57,657.00)
			101-0000-0000-4200-002	92,000.00
		103	103-0000-0000-9911-000	1,489,285.00
		108	108-0000-0000-9911-000	338,483.00
		209	209-0000-0000-5071-000	(2,800,000.00)
		215	215-0000-0000-9911-000	383,079.00
		227	227-0000-0000-9911-000	196,500.00
		310	310-0000-0000-9911-000	425,808.00
		500	505-0000-0000-9911-000	2,448,838.00
		550	550-0000-0000-9911-000	557,388.00
	Estimated 2022-23 Total			**3,073,724.00**
	Proposed 2023-24	101	101-0000-0000-4200-000	(122,086.00)
			101-0000-0000-4200-002	(16,000.00)
			101-0000-0000-9911-000	4,693.00
		238	238-0000-0000-5071-014	(246,925.00)
		260	260-0000-0000-5075-049	(111,059.00)
		281	281-0000-0000-5071-000	(368,445.00)
		310	310-0000-0000-9911-000	425,808.00
		400	400-0000-0000-9911-000	16,128,868.00
		500	505-0000-0000-9911-000	2,501,050.00
		550	550-0000-0000-9911-000	529,276.00
	Proposed 2023-24 Total			**18,725,180.00**
5/16/2023 Total				**21,798,904.00**
Grand Total				**18,436,100.00**

	Draft #1 5/1-5/4 City Council		Draft #2 5/16/23 Finance Commission		Difference	
	Estimated FY 2022/23	Proposed FY 2023/24	Estimated FY 2022/23	Proposed FY 2023/24	Estimated FY 2022/23	Proposed FY 2023/24
General Fund Revenue Summary	36,289,783	39,390,238	36,622,969	39,390,238	(333,186)	-
Other Funds	24,790,758	33,303,870	27,820,376	33,303,871	(3,029,618)	(1)
	61,080,541	**72,694,108**	**64,443,345**	**72,694,109**	**(3,362,804)**	**(1)**

	Draft #2 5/16/23 Finance Commission		Draft #3 5/30/23 City Council		Difference	
	Estimated FY 2022/23	Proposed FY 2023/24	Estimated FY 2022/23	Proposed FY 2023/24	Estimated FY 2022/23	Proposed FY 2023/24
General Fund Revenue Summary	36,622,969	39,390,238	36,588,626	39,523,631	34,343	(133,393)
Other Funds	30,663,257	52,893,565	27,623,876	34,034,993	3,039,381	18,858,572
	67,286,226	**92,283,803**	**64,212,502**	**73,558,624**	**3,073,724**	**18,725,179**

City of South Pasadena
Budget Changes by Account # - Operating Revenue
FY 2023-24 Budget
From May 1, 2023 Onwards

Account #	Fund	Columns to Update Estimated FY 2022-23 or Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
101-0000-0000-4000-000	101	Estimated 2022-23	13,425,000	14,083,630	(658,630)	Property Taxes Secured Based on HdL projections	5/4/2023
101-0000-0000-4010-000	101	Estimated 2022-23	416,300	90,856	325,444	Property Taxes Unsecured Based on HdL projections	5/4/2023
206-0000-0000-5073-000	206	Estimated 2022-23	-	3,029,618	(3,029,618)	Updated balance as $3m of SLFRF was received in July 2022	5/4/2023
209-0000-0000-5071-000	209	Estimated 2022-23	-	2,800,000	(2,800,000)	Add revenue for Carlyle Library bequest	5/16/2023
260-0000-0000-5075-049	260	Proposed 2023-24	296,723	407,782	(111,059)	Added in revenue from CDBG approved April 2023	5/16/2023
238-0000-0000-5071-014	238	Proposed 2023-24	-	102,700	(102,700)	City / EV Charging System MSRC Grant Funds	5/16/2023
238-0000-0000-5071-014	238	Proposed 2023-24	-	144,225	(144,225)	MSRC Grant Tesla Model Y Down Payment and Lease	5/16/2023
281-0000-0000-5071-000	281	Proposed 2023-24	-	368,445	(368,445)	New Grant for Library roof and facilities repair	5/16/2023
101-0000-0000-9911-000	101	Proposed 2023-24	4,693	-	4,693	Removed transfers	5/16/2023
103-0000-0000-9911-000	103	Estimated 2022-23	1,489,285	-	1,489,285	Removed transfers	5/16/2023
108-0000-0000-9911-000	108	Estimated 2022-23	338,483	-	338,483	Removed transfers	5/16/2023
215-0000-0000-9911-000	215	Estimated 2022-23	383,079	-	383,079	Removed transfers	5/16/2023
227-0000-0000-9911-000	227	Estimated 2022-23	196,500	-	196,500	Removed transfers	5/16/2023
310-0000-0000-9911-000	310	Proposed 2023-24	425,808	-	425,808	Removed transfers	5/16/2023
400-0000-0000-9911-000	400	Proposed 2023-24	16,128,868	-	16,128,868	Removed transfers	5/16/2023
310-0000-0000-9911-000	310	Estimated 2022-23	425,808	-	425,808	Removed transfers	5/16/2023
505-0000-0000-9911-000	500	Proposed 2023-24	2,501,050	-	2,501,050	Removed transfers	5/16/2023
505-0000-0000-9911-000	500	Estimated 2022-23	2,448,838	-	2,448,838	Removed transfers	5/16/2023
550-0000-0000-9911-000	550	Proposed 2023-24	529,276		529,276	Removed transfers	5/16/2023
550-0000-0000-9911-000	550	Estimated 2022-23	557,388		557,388	Removed transfers	5/16/2023
101-0000-0000-4000-000	101	Estimated 2022-23	14,083,630	13,758,186	325,444	Updated values provided by HdL	5/16/2023
101-0000-0000-4010-000	101	Estimated 2022-23	90,856	416,300	(325,444)	Updated values provided by HdL	5/16/2023
101-0000-0000-4200-000	101	Estimated 2022-23	2,891,664	2,949,321	(57,657)	Updated values provided by HdL	5/16/2023
101-0000-0000-4200-000	101	Proposed 2023-24	2,850,235	2,972,321	(122,086)	Updated values provided by HdL	5/16/2023
101-0000-0000-4200-002	101	Estimated 2022-23	3,114,000	3,022,000	92,000	Updated values provided by HdL	5/16/2023
101-0000-0000-4200-002	101	Proposed 2023-24	3,105,000	3,121,000	(16,000)	Updated values provided by HdL	5/16/2023

Date of change	5/4/2023

Sum of Change			Column Labels			
Row Labels	**Department**	**Division**	**Estimated 2022-23**	**Proposed 2023-24**	**(blank)**	**Grand Total**
General	**City Manager**	City Manager	242,015			242,015
		Economic Development	(89,108)			(89,108)
	Community Development	Community Development		(10,000)		(10,000)
	Community Services	Community Services	(51,500)	(22,314)		(73,814)
		Recreation and Youth Services	(5,500)	21,723		16,223
		Senior Services		(2,000)		(2,000)
	Finance	Finance Department		6,130		6,130
		Non-Department Overhead	1,574,720	(77,250)		1,497,470
	Fire	Fire		(50,000)		(50,000)
	General Fund Reserve	General Fund Reserve	40,000	400,000		440,000
	Library	Library		(24,211)		(24,211)
	Management Services	City Clerk		8,200		8,200
		Human Resources	10,205			10,205
		Information Services		7,991		7,991
		Legal Services	(262,681)			(262,681)
		Management Services	(39,800)	(31,705)		(71,505)
	Misc Transfers	(blank)	(1,489,285)			(1,489,285)
	Police	Police		(21,945)		(21,945)
	Public Works	Enviromental Services		(10,669)		(10,669)
		Facilities Maintenance	(16,200)	(4,400)		(20,600)
		Park Maintenance	(50,215)			(50,215)
		Public Works Administration	(2,500)	64,013		61,513
General Total			**(139,849)**	**253,564**		**113,715**
Other	**City Manager**	Community Promotion	(112,000)	(105,500)		(217,500)
	Community Services	Arroyo Seco Golf – Food and Beverage		21,084		21,084
		Prop "A" - Local Transit Administration		(1,587)		(1,587)
		Prop “A” – Dial A Ride		(86,126)		(86,126)
		Prop “A” – Transit Planning		(2,380)		(2,380)
		Prop “C” – Dial A Ride		81,126		81,126
	Finance	Utility Billing		(5,640)		(5,640)
	Library	Library		2,800,000		2,800,000
	Public Works	Measure W - Safe Clean Water Act		(5,334)		(5,334)
		Sewer Maintenance	(89,222)	(21,162)		(110,384)
		Street Maintenance	(232,100)	(5,334)		(237,434)
		Street Tree Maintenance		(2,000)		(2,000)
		Water Distribution	(142,114)	(41,338)		(183,452)
		Water Efficiency		(40,000)		(40,000)
		Water Production	5,187,733			5,187,733
Other Total			**4,612,297**	**2,585,808**		**7,198,105**
(blank)	**(blank)**	(blank)			-	-
(blank) Total					-	-
Grand Total			**4,472,448**	**2,839,372**	-	**7,311,820**

	Draft #1 5/1-5/4 City Council		Draft #2 5/16/23 Finance Commission		Difference	
	Revenue	**Expenditures**	**Revenue**	**Expenditures**	**Revenue**	**Expenditures**
FY 2022/23	61,080,541	65,888,478	64,443,345	61,416,031	(3,362,804)	4,472,447
FY 2023/24	72,694,109	88,599,692	72,694,109	85,760,321	-	2,839,371

Date of change	5/16/2023
Proposed FY 2023-24	Proposed 2023-24

Row Labels	Department	Division	Sum of Change
General	**City Manager**	City Manager	923
	Community Development	Community Development	(13,800)
		Community Development	13,496
	Community Services	Community Services	4,266
		Recreation and Youth Services	3,450
		Senior Services	2,765
	Finance	Finance Department	3,939
	Fire	Fire	53,207
	Library	Library	(5,778)
	Management Services	City Clerk	30,049
		Human Resources	2,162
		Management Services	(5,408)
	Police	Police	348,171
	Public Works	Enviromental Services	1,903
		Facilities Maintenance	31,203
		Park Maintenance	26,637
		Public Works Administration	7,881
General Total			**505,066**
Other	**Community Development**		4,000
	Community Services	Prop "A" - Local Transit Administration	(610)
		Prop “A” – Dial A Ride	395
		Prop “A” – Transit Planning	(914)
	Finance	Utility Billing	3,990
	Police	Facilities and Maintenance Equipment	(165,502)
	Public Works	Measure W - Safe Clean Water Act	952
		Sewer Maintenance	4,885
		Street Lighting	13,249
		Street Maintenance	11,908
		Street Tree Maintenance	17,929
		Water Distribution	6,026
		Water Efficiency	24,627
		Water Production	(301)
	Capital Projects		147,300
Other Total			**67,935**
Grand Total			**573,001**

	Draft #2 5/16/23 Finance Commission		Draft #3 5/30/23 City Council		Difference	
	Revenue	Expenditures	Revenue	Expenditures	Revenue	Expenditures
FY 2022/23	64,443,345	61,416,031	63,879,316	61,416,031	564,029	-
FY 2023/24	72,694,109	85,760,321	73,558,624	85,187,318	(864,515)	**573,003**

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	778,808	589,285		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	-	20,819		Update to reflect management intern	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	-	4,797		Update to reflect staff overtime	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	187,487	141,862		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	8,026	6,073		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	13,768	10,418		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	82,488	62,414		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	1,691	1,280		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	5,427	4,107		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	825	624		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2010-2011	City Manager	Estimated 2022-23	21,263	16,088		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	City Manager	101-2020-2012	Economic Development	Estimated 2022-23	6,000	8,328		Pulled up GL and funds have been used this FY for this account	5/4/2023
	City Manager	101-2020-2012	Economic Development	Estimated 2022-23		71,200		Pulled up GL and funds have been used this FY for this account	5/4/2023
	City Manager	101-2020-2012	Economic Development	Estimated 2022-23	-	7,180		Pulled up GL and funds have been used this FY for this account	5/4/2023
	City Manager	101-2020-2012	Economic Development	Estimated 2022-23	-	8,400		Pulled up GL and funds have been used this FY for this account	5/4/2023
	City Manager	220-2010-2301	Community Promotion	Estimated 2022-23		105,500		Pulled up GL and funds have been used this FY for this account	5/4/2023
220	City Manager	220-2010-2301	Community Promotion	Proposed 2023-24		105,500		Use prior year budget until Council provides direction	5/4/2023
	City Manager	220-2010-2301	Community Promotion	Estimated 2022-23	-	6,500		Pulled up GL and funds have been used this FY for this account	5/4/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	-	10,000		Advertising - notice neighboring prop owners of projects	5/4/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	-	2,000		Provides compensation for hours worked beyond normal	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	232,255	240,553		Update Community Service Directors Salary Schedule	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	-	10,500		Need part-time staff for this division	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	26,820	27,920		Update Community Service Directors Salary Schedule	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	47,992	50,114		Update Community Service Directors Salary Schedule	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	2,323	2,406		Update Community Service Directors Salary Schedule	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	2,631	2,721		Update Community Service Directors Salary Schedule	5/4/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	3,368	3,488		Update Community Service Directors Salary Schedule	5/4/2023
	Community Services	101-8030-8031	Community Services	Estimated 2022-23	-	1,500		Update current expenses	5/4/2023
	Community Services	101-8030-8031	Community Services	Estimated 2022-23	-	50,000		Was missed with original draft	5/4/2023
101	Community Services	101-8030-8032	Recreation and Youth Services	Proposed 2023-24	-	2,500		Provides compensation for hours worked beyond normal workweek	5/4/2023
101	Community Services	101-8030-8032	Recreation and Youth Services	Proposed 2023-24	61,320	37,096		Updated calculation for FICA	5/4/2023
	Community Services	101-8030-8032	Recreation and Youth Services	Estimated 2022-23		5,500		Update current expenses	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	16,277	17,383		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	2,158	2,305		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	4,987	5,282		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	163	174		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	177	189		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	236	252		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	24,415	26,075		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	3,237	3,458		Update Community Service Directors Salary Schedule	5/4/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	7,480	7,922		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	244	261		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	265	283		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8024	Prop "A" – Transit Planning	Proposed 2023-24	354	378		Update Community Service Directors Salary Schedule	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	206,931	275,655		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24		5,000		In narratives but didn't flow to Budget detail	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	24,724	30,222		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	2,069	2,757		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	3,628	4,374		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	43,470	47,070		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	603	768		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	2,185	2,795		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	272	371		Personnel Update - See attached worksheet	5/4/2023
205	Community Services	205-8030-8025	Prop "A" – Dial A Ride	Proposed 2023-24	10,423	11,419		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	68,724	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	5,498	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	687	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	746	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	3,600	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	165	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	610	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	99	-		Personnel Update - See attached worksheet	5/4/2023
207	Community Services	207-8030-8025	Prop "C" – Dial A Ride	Proposed 2023-24	996	-		Personnel Update - See attached worksheet	5/4/2023
295	Community Services	295-8030-8045	Arroyo Seco Golf – Food and Beverage	Proposed 2023-24	31,700	10,616		Draft had incorrect amount	5/4/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	1,395	971		Allocate partial expenses to water fund	5/4/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	10,055	6,793		Allocate partial expenses to water fund	5/4/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	6,360	3,916		Allocate partial expenses to water fund	5/4/2023
	Finance	101-3010-3041	Non-Department Overhead	Estimated 2022-23	3,583,391	2,094,105		Formula error caught and corrected	5/4/2023
	Finance	101-3010-3041	Non-Department Overhead	Estimated 2022-23	660,434	575,000		Made correction to the calculation	5/4/2023
101	Finance	101-3010-3041	Non-Department Overhead	Proposed 2023-24	540,000	592,250		Made correction to the calculation	5/4/2023
101	Finance	101-3010-3041	Non-Department Overhead	Proposed 2023-24	110,000	135,000		Add in OPEB Actuarial Services by Bartel	5/4/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	-	424		Allocate partial expenses to water fund	5/4/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	300	3,512		Allocate partial expenses to water fund	5/4/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	500	2,504		Allocate partial expenses to water fund	5/4/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	82,500	132,500		Contract Services - San Marino (surplus funds from end of FY	5/4/2023
	General Fund Reserve		General Fund Reserve	Estimated 2022-23	40,000	-			5/4/2023
	General Fund Reserve		General Fund Reserve	Proposed 2023-24	400,000	-			5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	883,799	901,091		Update Library Directors Salary Schedule	5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	96,336	98,629		Update Library Directors Salary Schedule	5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	149,295	153,309		Update Library Directors Salary Schedule	5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	8,737	8,910		Update Library Directors Salary Schedule	5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	19,582	19,770		Update Library Directors Salary Schedule	5/4/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	65,746	65,997		Update Library Directors Salary Schedule	5/4/2023
	Library		Library	Proposed 2023-24	2,800,000	-		Spend down of bequest	5/4/2023
	Management Services	101-2010-2501	Legal Services	Estimated 2022-23	632,459	895,140		Current expenses are higher than estimated	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	163,617	165,804		Update Management Services Directory Salary Schedule	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	49,504	78,000		Added retiree helping through December 2023	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	21,696	21,986		Update Management Services Directory Salary Schedule	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	50,128	50,376		Update Management Services Directory Salary Schedule	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	1,636	1,658		Update Management Services Directory Salary Schedule	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	2,314	2,338		Update Management Services Directory Salary Schedule	5/4/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	6,159	6,597		Added retiree helping through December 2023	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	16,000		Pulled up GL and funds have been used this FY for this account	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	300		Pulled up GL and funds have been used this FY for this account	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	2,000		Pulled up GL and funds have been used this FY for this account	5/4/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	2,000		Pulled up GL and funds have been used this FY for this account	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	4,000		Pulled up GL and funds have been used this FY for this account	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	500		Pulled up GL and funds have been used this FY for this account	5/4/2023
	Management Services	101-2030-2031	Management Services	Estimated 2022-23	-	15,000		Pulled up GL and funds have been used this FY for this account	5/4/2023
101	Management Services	101-2030-2032	Information Services	Proposed 2023-24	215,027	207,036		Removed 2nd docusign expense and moved Zoom expense from 8060 to 8180	5/4/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	8,850	44,850		Move Expense for Outlook Newspaper from 8170 to 8180	5/4/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	111,000	75,000		Move Expense for Outlook Newspaper from 8170 to 8180	5/4/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	83,200	75,000		Update to correct amount	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	168,482	189,523		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	37,919	162,315		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	30,615		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	231,641	45,625		Formula error caught and corrected	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	198,550	1,953		Formula error caught and corrected	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	3,351		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	20,073		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	412		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	1,321		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	201		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	-	5,174		Moved HR personnel incorrectly allocated in original estimation	5/4/2023
	Management Services	101-2030-2034	Human Resources	Estimated 2022-23	4,173	170,000		Current expenses are higher than estimated	5/4/2023
	Misc Transfers			Estimated 2022-23	721,562	2,210,847		Adjust transfers due to CIP	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	5,561,902	5,612,851		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	915,858	920,014		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	54,682	55,191		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	217,279	217,843		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	868,440	890,760		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	12,234	12,474		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	44,309	45,209		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	5,544	5,643		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	87,226	87,980		Personnel Update - See attached worksheet	5/4/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	58,546	-		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	530,593	485,874		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	54,847	51,270		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	5,306	4,859		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	6,677	6,192		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	81,858	68,466		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	1,127	983		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	4,448	3,908		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	515	455		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	10,084	9,436		Personnel Update - See attached worksheet	5/4/2023
	Public Works	101-6010-6011	Public Works Administration	Estimated 2022-23	47,715	50,215		Update current expenses	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	50,368	57,821		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	5,761	6,357		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	504	578		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	547	628		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	5,682	7,914		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	88	112		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	331	421		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	40	50		Personnel Update - See attached worksheet	5/4/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	730	838		Personnel Update - See attached worksheet	5/4/2023
	Public Works	101-6010-6410	Park Maintenance	Estimated 2022-23	-	50,215		PY $132k, CY est 50k, Budget is $400k, should we estimate	5/4/2023
	Public Works	101-6010-6601	Facilities Maintenance	Estimated 2022-23	-	700		Updated estimated costs	5/4/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	-	700		Didn't flow into Budget Draft but was discussed and approved	5/4/2023
	Public Works	101-6010-6601	Facilities Maintenance	Estimated 2022-23	-	15,000		Update fuel expenses	5/4/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	36,300	40,000		Additional installation of new units of Cintas Eye Wash Stations and monthly services so they may stay compliant with OSHA	5/4/2023
	Public Works	101-6010-6601	Facilities Maintenance	Estimated 2022-23	-	500		Estimate training costs	5/4/2023
	Public Works	500-6010-6711	Water Production	Estimated 2022-23		205,267	(205,267)	Update current expenses	5/4/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		120,000	(120,000)	Update current expenses	5/4/2023
	Public Works	500-6010-6710	Water Distribution	Estimated 2022-23		117,114	(117,114)	Update current expenses	5/4/2023
	Public Works	210-6010-6501	Sewer Maintenance	Estimated 2022-23		69,022	(69,022)	overhead allocation estimate	5/4/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	-	40,000	(40,000)	Didn't flow into Budget Draft but was discussed and approved by CM in budget meeting	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		35,000	(35,000)	Update current expenses	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		26,000	(26,000)	Update current expenses	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		20,000	(20,000)	Update current expenses	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		20,000	(20,000)	Update current expenses	5/4/2023
	Public Works	500-6010-6710	Water Distribution	Estimated 2022-23		20,000	(20,000)	Update current expenses	5/4/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	-	20,000	(20,000)	Didn't flow into Budget Draft but was discussed and approved	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	393,780	408,851	(15,071)	Personnel Update - See attached worksheet; update Management Services Directory Salary Schedule	5/4/2023
	Public Works	210-6010-6501	Sewer Maintenance	Estimated 2022-23		15,000	(15,000)	Update fuel expenses	5/4/2023
	Public Works	500-6010-6711	Water Production	Estimated 2022-23		7,000	(7,000)	Update current expenses	5/4/2023
	Public Works	500-6010-6710	Water Distribution	Estimated 2022-23		5,000	(5,000)	Update current expenses	5/4/2023
	Public Works	210-6010-6501	Sewer Maintenance	Estimated 2022-23	1,000	5,600	(4,600)	Current expenses are higher than estimated	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	51,165	55,629	(4,464)	Personnel Update - See attached worksheet; update	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	36,678	40,405	(3,727)	Personnel Update - See attached worksheet	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	659,940	663,666	(3,727)	Personnel Update - See attached worksheet	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		3,500	(3,500)	Update current expenses	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		3,000	(3,000)	Update current expenses	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		3,000	(3,000)	Update current expenses	5/4/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	-	2,000	(2,000)	Didn't flow into Budget Draft but was discussed and approved	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	39,925	41,140	(1,214)	Personnel Update - See attached worksheet; update	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	119,721	120,837	(1,116)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	4,767	5,883	(1,116)	Personnel Update - See attached worksheet	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		1,000	(1,000)	Update current expenses	5/4/2023
	Public Works	210-6010-6501	Sewer Maintenance	Estimated 2022-23		600	(600)	Current expenses are higher than estimated	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		500	(500)	Update current expenses	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	58,382	58,680	(298)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	3,800	4,098	(298)	Personnel Update - See attached worksheet	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	5,710	5,928	(219)	Personnel Update - See attached worksheet; update	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	2,938	3,118	(180)	Personnel Update - See attached worksheet; update	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	8,244	8,408	(164)	Personnel Update - See attached worksheet; update	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	3,916	4,066	(151)	Personnel Update - See attached worksheet; update	5/4/2023
	Public Works	230-6010-6116	Street Maintenance	Estimated 2022-23		100	(100)	Update current expenses	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	9,569	9,623	(54)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	532	586	(54)	Personnel Update - See attached worksheet	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	803	851	(48)	Personnel Update - See attached worksheet; update	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	6,374	6,419	(45)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	241	286	(45)	Personnel Update - See attached worksheet	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	21,770	21,811	(40)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	398	439	(40)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	367	404	(37)	Personnel Update - See attached worksheet	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	6,554	6,592	(37)	Personnel Update - See attached worksheet	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	399	419	(20)	Personnel Update - See attached worksheet; update	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	1,847	1,859	(12)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	64	76	(12)	Personnel Update - See attached worksheet	5/4/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	891	896	(5)	Personnel Update - See attached worksheet	5/4/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	30	35	(5)	Personnel Update - See attached worksheet	5/4/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	13,738	13,675	63	Personnel Update - See attached worksheet	5/4/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	50,381	50,013	368	Personnel Update - See attached worksheet; update	5/4/2023
	Public Works	500-6010-6711	Water Production	Estimated 2022-23	6,000,000	600,000	5,400,000	Update to correct amount	5/4/2023
	Capital Projects		Capital Projects	Estimated 2022-23	-	170,000		Erroneously missed, should be $170,000	5/16/2023
400	Capital Projects	400-9000-XXXX		Proposed 2023-24	16,128,868	15,981,568		Adjust transfers due to CIP	5/16/2023
101	City Manager	101-2010-2011	City Manager	Proposed 2023-24	111098	110,175		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	1335226.32	1,324,573		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	-	15,000		Added Overtime for staff who are not exempt	5/16/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	134760.1446	133,667		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	13334.8392	13,228		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	16217.15	16,082		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	163028	161,675		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	25386.18786	25,232		Personnel Update - See attached worksheet	5/16/2023
101	Community Development	101-7010-7011	Community Development	Proposed 2023-24	795,700	794,500		$1,200 parking permit vending machine moved to Comm Services	5/16/2023
278	Community Development	278-7010-7011		Proposed 2023-24	4000	-		Erroneously entered, should be $0	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	145660	144,975		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	11653	11,598		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	1457	1,450		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	2918	2,910		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	17,383	17,905		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	2,305	2,374		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	174	179		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	189	194		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-2010-2210	Prop "A" - Local Transit Administration	Proposed 2023-24	252	260		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8024	Prop “A” – Transit Planning	Proposed 2023-24	26,075	26,858		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8024	Prop “A” – Transit Planning	Proposed 2023-24	3,458	3,561		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8024	Prop “A” – Transit Planning	Proposed 2023-24	261	269		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8024	Prop “A” – Transit Planning	Proposed 2023-24	283	292		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8024	Prop “A” – Transit Planning	Proposed 2023-24	378	389		Personnel Update - See attached worksheet	5/16/2023
205	Community Services	205-8030-8025	Prop “A” – Dial A Ride	Proposed 2023-24	47,585	47,190		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	11521	11,511		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8021	Senior Services	Proposed 2023-24	5,000	3,000		Remove one-time purchase of iPads for class registration	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	240553	244,468		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	27920	28,439		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	2406	2,445		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	2721	2,764		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	3488	3,545		Personnel Update - See attached worksheet	5/16/2023
101	Community Services	101-8030-8031	Community Services	Proposed 2023-24	17,100	8,261		Removed replacement of refrigerators ($5,000), remove microwave ($1,100), remove new fridge at Eddie Park ($1,200), remove park sign ($2,000)	5/16/2023
101	Community Services	101-8030-8032	Recreation and Youth Services	Proposed 2023-24	58,250	56,800		Removed walk/bike to school ($1,450)	5/16/2023
101	Community Services	101-8030-8032	Recreation and Youth Services	Proposed 2023-24	4,500	2,500		Remove one-time purchase of iPads for class registration	5/16/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	538,709	535,178		Personnel Update - See attached worksheet	5/16/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	43,044	42,762		Personnel Update - See attached worksheet	5/16/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	5373.3042	5,338		Personnel Update - See attached worksheet	5/16/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	6004.1405	5,966		Personnel Update - See attached worksheet	5/16/2023
101	Finance	101-3010-3011	Finance Department	Proposed 2023-24	7811.28021	7,760		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	389477.56	386,094		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	32785.10096	32,378		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	3885.598	3,852		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	4321.469	4,285		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	5647.42462	5,598		Personnel Update - See attached worksheet	5/16/2023
500	Finance	500-3010-3012	Utility Billing	Proposed 2023-24	9565	9,486		Personnel Update - See attached worksheet	5/16/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	2787439.52	2,745,719		Personnel Update - See attached worksheet	5/16/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	545254.1	538,397		Personnel Update - See attached worksheet	5/16/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	27314.8	26,898		Personnel Update - See attached worksheet	5/16/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	242373.87	238,767		Personnel Update - See attached worksheet	5/16/2023
101	Fire	101-5010-5011	Fire	Proposed 2023-24	40678.75704	40,074		Personnel Update - See attached worksheet	5/16/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	901091	904,837		Personnel Update - See attached worksheet	5/16/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	98629	100,577		Personnel Update - See attached worksheet	5/16/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	8910	8,947		Personnel Update - See attached worksheet	5/16/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	19770	19,762		Personnel Update - See attached worksheet	5/16/2023
101	Library	101-8010-8011	Library	Proposed 2023-24	65997	66,051		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	165804	170,781		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	21986	22,646		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	1658	1,708		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	2338	2,392		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2031	Management Services	Proposed 2023-24	6597	6,263		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	216948	182,655		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	17356	14,612		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	2169	1,827		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	2356	1,984		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	3146	2,648		Personnel Update - See attached worksheet	5/16/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
101	Management Services	101-2030-2033	City Clerk	Proposed 2023-24	75,000	83,200		Add in funds for municipal codification services in print and on	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	311,868	315,854		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	31,518	31,290		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	38,262	37,944		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	3,119	3,159		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	3,387	3,430		Personnel Update - See attached worksheet	5/16/2023
101	Management Services	101-2030-2034	Human Resources	Proposed 2023-24	10,266	4,580		Personnel Update - See attached worksheet	5/16/2023
105	Police	105-4010-4011	Facilities and Maintenance Equipment	Proposed 2023-24	366,000	531,502		Calculations based off of Staff Report for Tesla	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	5,612,851	5,196,021		Personnel Update - See attached worksheet	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	75,278	104,419		Correction to PD part-time staff missed	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	920,014	863,575		Personnel Update - See attached worksheet	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	55,191	51,023		Personnel Update - See attached worksheet	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	217,843	202,168		Personnel Update - See attached worksheet	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	575,105	695,105		Update for City Hall Security contract	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	1,237,622	1,237,237		Personnel Update - See attached worksheet	5/16/2023
101	Police	101-4010-4011	Police	Proposed 2023-24	87,980	84,165		Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	163,424	163,884	(460)	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	17,968	18,029	(61)	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	35,203	35,213	(10)	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	2,370	2,376	(7)	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	6,028	6,033	(5)	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	1,634	1,638	(5)	Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	404.046	396	8	Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	438.7945	430	9	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	9,327	9,316	11	Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	485873.9	479,259		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	51269.5204	50,837		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	4858.739	4,793		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	6191.664	6,120		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	72222	71,623		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6011	Public Works Administration	Proposed 2023-24	9435.55175	9,340		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	57820.7	56,167		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	6357.16384	6,249		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	578.207	562		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	627.933	610		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	10085	10,002		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6015	Enviromental Services	Proposed 2023-24	838.40015	814		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	124777.44	101,744		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	12834.97934	10,992		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	1242.936	1,013		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	4529.911	3,472		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	34712	34,424		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	16616	16,478		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6410	Park Maintenance	Proposed 2023-24	1809.27288	1,475		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	324116.85	297,244		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	31754.61216	29,605		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	3220.9125	2,952		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	12802.6645	11,568		Personnel Update - See attached worksheet	5/16/2023
101	Public Works	101-6010-6601	Facilities Maintenance	Proposed 2023-24	4699.694325	4,310		Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	585.8667	574	12	Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	5,043	5,001	42	Personnel Update - See attached worksheet	5/16/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	4066	4,022	44	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	6,535.00	6,481	54	Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	4098.12192	4,044	54	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	13,738	13,675	63	Personnel Update - See attached worksheet	5/16/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	5928	5,864	64	Personnel Update - See attached worksheet	5/16/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	8408	8,324	84	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	6591.5725	6,490	101	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6201	Street Lighting	Proposed 2023-24	318	203	115	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	9623.159929	9,476	147	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	1375.422	1,222	154	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6201	Street Lighting	Proposed 2023-24	461.276175	294	167	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	1,104.85	885	220	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	2000.37534	1,778	223	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6711	Water Production	Proposed 2023-24	28,507	28,271	236	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	31,723	31,460	263	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	33,376	33,099	277	Personnel Update - See attached worksheet	5/16/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	41140	40,855	285	Personnel Update - See attached worksheet	5/16/2023

				Columns to Update					
				Estimated FY 2022-23 or					
Fund #	Department	Fund-Dept-Div	Division	Proposed FY 2023-24	Original Amount	Updated Amount	Change	Reason	Date of change
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	102,227	101,928	299	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	1,717.26	1,409	308	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	3,346.40	3,028	319	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	21810.7255	21,374	437	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6201	Street Lighting	Proposed 2023-24	1,251	722	529	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	4224.754	3,519	705	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	58680.24824	57,881	800	Personnel Update - See attached worksheet	5/16/2023
239	Public Works	239-6010-6011	Measure W - Safe Clean Water Act	Proposed 2023-24	40404.6	39,578	827	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6201	Street Lighting	Proposed 2023-24	2,545	1,624	921	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	16482.96379	15,254	1,228	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	158,610	157,293	1,317	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	9,951.85	8,194	1,758	Personnel Update - See attached worksheet	5/16/2023
500	Public Works	500-6010-6710	Water Distribution	Proposed 2023-24	947,470	943,124	4,346	Personnel Update - See attached worksheet	5/16/2023
210	Public Works	210-6010-6501	Sewer Maintenance	Proposed 2023-24	408851	404,442	4,409	Personnel Update - See attached worksheet	5/16/2023
230	Public Works	230-6010-6116	Street Maintenance	Proposed 2023-24	663666.202	653,521	10,146	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6201	Street Lighting	Proposed 2023-24	31,812	20,295	11,517	Personnel Update - See attached worksheet	5/16/2023
215	Public Works	215-6010-6310	Street Tree Maintenance	Proposed 2023-24	137956.92	122,601	15,356	Personnel Update - See attached worksheet	5/16/2023
503	Public Works	503-6010-6713	Water Efficiency	Proposed 2023-24	110,870.37	88,901	21,969	Personnel Update - See attached worksheet	5/16/2023
	Transfers		Transfers	Estimated 2022-23	2,210,847			Removed transfers	5/16/2023

ATTACHMENT 3

Position Control Report

City of South Pasadena
Proposed Position Report as of
Thursday, May 25, 2023

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
				CITY COUNCIL				
1	1010	1011	City Council	Council Member	Braun, Janet	Filled	FT	1.00
2	1010	1011	City Council	Council Member	Cacciotti, Michael	Filled	FT	1.00
3	1010	1011	City Council	Council Member	Donovan, John Jr.	Filled	FT	1.00
4	1010	1011	City Council	Mayor	Primuth, Jon	Filled	FT	1.00
5	1010	1011	City Council	Mayor Pro Tem	Zneimer, Evelyn	Filled	FT	1.00
								5.00
				CITY TREASURER				
6		3021	City Treasurer	City Treasurer		Filled	FT	1.00
								1.00
				CITY MANAGER'S OFFICE				
7	2010	2011	City Manager	Assistant to the City Manager	Binns, Tamara	Filled	FT	1.00
8	2010	2011	City Manager	Management Analyst	Jerejian, Mary	Filled	FT	1.00
9	2010	2011	City Manager	City Manager	Chaparyan, Arminé	Filled	FT	1.00
10	2010	2011	City Manager	Deputy City Manager	Megerdichian, Domenica	Filled	FT	1.00
11	2010	2011	City Manager	Administrative Secretary	Solorzano, Tiara	Filled	FT	1.00
12	2010	2011	City Manager	Management Intern	Vacant	Vacant	PT	0.50
								5.50
				FINANCE				
13	3010	3011	Finance	Management Analyst	Pinto, Stephanie	Filled	FT	1.00
14	3010	3011	Finance	Management Analyst	Alvarez, Esteban	Filled	FT	1.00
15	3010	3011	Finance	Finance Manager	Trinh, Albert	Filled	FT	1.00
16	3010	3011	Finance	Accountant	Sargsyan, Ani	Filled	FT	1.00
17	3010	3011	Finance	Accountant	Vacant	Vacant	FT	1.00
18	3010	3011	Finance	Deputy Finance Director	Tran, Hsiulee	Filled	FT	1.00
19	3010	3011	Finance	Director of Finance	Vacant	Vacant	FT	1.00
24	3010	3011	Finance	Management Assistant	Vacant	Vacant	FT	1.00
25	3010	3011	Finance	Accounting Technician I	Vacant	Vacant	FT	1.00
								9.00
				MANAGEMENT SERVICES				
275	2030	2033	Human Resources & Risk Mgmt	Human Resource Specialist	Vacant	Vacant	FT	1.00
27	2030	2033	City Clerk	Deputy City Clerk	Perez, Mark	Filled	FT	1.00
28	2030	2033	City Clerk	Chief City Clerk	Vacant	Filled	FT	1.00
29	2010	2011	Human Resources & Risk Mgmt	Human Resources & Risk Manager	Varela, Belinda	Filled	FT	1.00
30	2010	2011	Management Services	Senior Management Analyst	Medina, Alma	Filled	FT	1.00
32	2010	2011	Management Services	Management Services Director	Frausto-Ramirez, Luis	Filled	FT	1.00
33	2010	2011	Human Resources & Risk Mgmt	Human Resource Analyst	Avena, Annette	Filled	FT	1.00
35	2010	2011	Human Resources & Risk Mgmt	Management Assistant	Vacant - Aguilar, Diana	Vacant	PT	0.50
36	2010	2011	Human Resources & Risk Mgmt	Senior Human Resource Analyst	Vacant - Chiu, Jeannie	Vacant	FT	1.00

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
								8.50
				POLICE DEPARTMENT				
37	4010	4011	Police Department	Police Sergeant	Abdalla, Anthony	Filled	FT	1.00
38	4010	4011	Police Department	Police Corporal	Borrello, Tyler	Filled	FT	1.00
39	4010	4011	Police Department	Police Corporal	Carrillo, Gilberto	Filled	FT	1.00
40	4010	4011	Police Department	Parking Control Officer	Diaz, Patricia	Filled	FT	1.00
41	4010	4011	Police Department	Police Sergeant	Dubois, Andrew	Filled	FT	1.00
42	4010	4011	Police Department	Police Assistant	Fierro, Antony	Filled	FT	1.00
43	4010	4011	Police Department	Police Officer	Giron-Garrido, Elias	Filled	FT	1.00
44	4010	4011	Police Department	Police Officer	Godoy, Nicholas	Filled	FT	1.00
45	4010	4011	Police Department	Police Officer	Gutierrez, Issac	Filled	FT	1.00
46	4010	4011	Police Department	Police Officer	Vacant	Filled	FT	1.00
47	4010	4011	Police Department	Police Officer	Holland, Jeffrey	Filled	FT	1.00
48	4010	4011	Police Department	Police Lieutenant	Jacobs, Thomas	Filled	FT	1.00
49	4010	4011	Police Department	Police Officer	Kim, Timothy	Filled	FT	1.00
50	4010	4011	Police Department	Police Officer	Lee, Richard	Filled	FT	1.00
51	4010	4011	Police Department	Police Corporal	Manukian, Avick	Filled	FT	1.00
52	4010	4011	Police Department	Police Clerk II	Mendez, Laura	Filled	FT	1.00
53	4010	4011	Police Department	Police Assistant	Munoz, Samantha	Filled	FT	1.00
54	4010	4011	Police Department	Police Assistant	Pacheco, Cynthia	Filled	FT	1.00
55	4010	4011	Police Department	Police Officer	Pech, Carlos	Filled	FT	1.00
56	4010	4011	Police Department	Police Officer	Perez, Christopher	Filled	FT	1.00
57	4010	4011	Police Department	Police Sergeant	Phillips, Craig	Filled	FT	1.00
58	4010	4011	Police Department	Police Clerk II	Ramirez, Jose	Filled	FT	1.00
59	4010	4011	Police Department	Police Assistant	Sandoval, Sharae	Filled	FT	1.00
60	4010	4011	Police Department	Police Lieutenant	Robledo, Shannon	Filled	FT	1.00
61	4010	4011	Police Department	Police Sergeant	Ronnie, Matthew	Filled	FT	1.00
62	4010	4011	Police Department	Police Sergeant	Vacant	Vacant	FT	1.00
63	4010	4011	Police Department	Police Assistant	Russell, Diana	Filled	FT	1.00
64	4010	4011	Police Department	Police Corporal	Sanchez, Michael	Filled	FT	1.00
65	4010	4011	Police Department	Police Officer	Sandoval, Fernando	Filled	FT	1.00
66	4010	4011	Police Department	Police Officer	Smith, Michael	Filled	FT	1.00
67	4010	4011	Police Department	Police Chief	Solinsky, Brian	Filled	FT	1.00
68	4010	4011	Police Department	Deputy Police Chief	Vacant	Vacant	FT	1.00
69	4010	4011	Police Department	Police Officer	Valdez, Catalina	Filled	FT	1.00
70	4010	4011	Police Department	Police Corporal	Wise, Randy	Filled	FT	1.00
71	4010	4011	Police Department	Police Corporal	Vacant	Vacant	FT	1.00
72	4010	4011	Police Department	Police Officer	Wong, Daren	Filled	FT	1.00
73	4010	4011	Police Department	Police Cadet	Sze, Gary	Filled	PT	0.50
74	4010	4011	Police Department	Police Cadet	Sze, Ricky	Filled	PT	0.50
75	4010	4011	Police Department	Police Officer	Zamora, Patrick	Filled	FT	1.00

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
76	4010	4011	Police Department	Police Assistant II	Zavala, Jeanette	Filled	FT	1.00
77	4010	4011	Police Department	Police Officer	Calderon, David	Filled	FT	1.00
78	4010	4011	Police Department	Police Assistant	Vacant	Vacant	FT	1.00
79	4010	4011	Police Department	Parking Control Officer	Valdiviez, Jared	Filled	FT	1.00
80	4010	4011	Police Department	Parking Control Officer	Vacant	Vacant	FT	1.00
81	4010	4011	Police Department	Police Assistant	Lee, Rachel	Filled	FT	1.00
82	4010	4011	Police Department	Police Assistant	Corona, Valerie	Filled	FT	1.00
83	4010	4011	Police Department	Police Clerk II	Ochoa, Nelly	Filled	FT	1.00
84	4010	4011	Police Department	Police Clerk II	Vacant	Vacant	FT	1.00
85	4010	4011	Police Department	Police Officer	Gramajo, Ederson	Filled	FT	1.00
86	4010	4011	Police Department	Police Officer	Roppo, Christina	Filled	FT	1.00
87	4010	4011	Police Department	Police Officer	Vacant	Vacant	FT	1.00
88	4010	4011	Police Department	Police Officer	Vacant	Vacant	FT	1.00
89	4010	4011	Police Department	Police Officer	Vacant	Vacant	FT	1.00
90	4010	4011	Police Department	Police Officer	Vacant	Vacant	FT	1.00
91	4010	4011	Police Department	Management Analyst	Wehrle, Alison	Filled	FT	1.00
92	4010	4011	Police Department	Police Cadet	Rodriguez, Esther	Filled	PT	0.50
268	4010	4011	Police Department	Police Cadet	Vacant	Vacant	PT	0.50
269	4010	4011	Police Department	Police Cadet	Vacant	Vacant	PT	0.50
270	4010	4011	Police Department	Police Cadet	Vacant	Vacant	PT	0.50
276	4010	4011	Police Department	Sergeant (Office of Professional Standards)	Vacant	Vacant	FT	1.00
279	4010	4011	Police Department	Police Clerk I	Vacant	Vacant	FT	1.00
277	4010	4011	Police Department	Police Assistant	Vacant	Vacant	FT	1.00
281	4010	4011	Police Department	Adminstrative Secretary	Vacant	Vacant	FT	1.00
								60.00
				FIRE DEPARTMENT				
93	5010	5011	Fire Department	Fire Engineer	Corrao, Anthony	Filled	FT	1.00
94	5010	5011	Fire Department	Fire Captain	Dunn, Daniel Jr.	Filled	FT	1.00
95	5010	5011	Fire Department	Fire Engineer	Furtado, Justin	Filled	FT	1.00
96	5010	5011	Fire Department	Fire Engineer	Hill, Kevin	Filled	FT	1.00
97	5010	5011	Fire Department	Firefighter / Paramedic	Hoyos, Jorge	Filled	FT	1.00
98	5010	5011	Fire Department	Fire Captain	Larkin, Michael	Filled	FT	1.00
99	5010	5011	Fire Department	Fire Engineer	McLellan, Scott	Filled	FT	1.00
100	5010	5011	Fire Department	Fire Engineer	Miller, Justin	Filled	FT	1.00
101	5010	5011	Fire Department	Fire Engineer	Vacant	Vacant	FT	1.00
102	5010	5011	Fire Department	Firefighter / Paramedic	Papadakis, John	Filled	FT	1.00
103	5010	5011	Fire Department	Fire Captain	Porraz, Anthony	Filled	FT	1.00

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
104	5010	5011	Fire Department	Fire Chief	Riddle, Paul	Filled	FT	1.00
105	5010	5011	Fire Department	Fire Division Chief	Szenczi, Christopher	Filled	FT	1.00
106	5010	5011	Fire Department	Firefighter / Paramedic	Tregenza, Adam	Filled	FT	1.00
107	5010	5011	Fire Department	Fire Division Chief	Zanteson, Eric	Filled	FT	1.00
108	5010	5011	Fire Department	Firefighter / Paramedic	Nugent, Jonathan	Filled	FT	1.00
109	5010	5011	Fire Department	Firefighter / Paramedic	Carson, Colin	Filled	FT	1.00
110	5010	5011	Fire Department	Fire Inspector	Rodriguez, Eduardo	Filled	FT	1.00
111	5010	5011	Fire Department	Management Assistant	Vacant	Vacant	FT	1.00
112	5010	5011	Fire Department	Firefighter / Paramedic	Vazquez, Sarabia	Filled	FT	1.00
113	5010	5011	Fire Department	Firefighter / Paramedic	Tobias, Jacob	Filled	FT	1.00
114	5010	5011	Fire Department	Firefighter / Paramedic	Benites, Samuel	Filled	FT	1.00
115	5010	5011	Fire Department	Firefighter / Paramedic	Anderson, Devon	Filled	FT	1.00
								23.00
				PUBLIC WORKS				
116	6010	6011	Public Works	Associate Civil Engineer	Barakazyan, Tatevik	Filled	FT	1.00
117	6010	6011	Public Works	Public Works Assistant	DeWitt, Leaonna	Filled	FT	1.00
118	6010	6011	Public Works	Public Works Inspector	Garcia, Dan	Filled	FT	1.00
119	6010	6011	Public Works	Public Works Operations Manager	Peguero, Catrina	Filled	FT	1.00
120	6010	6011	Public Works	Management Analyst	Salazar-Martin, Reyna	Filled	FT	1.00
121	6010	6011	Public Works	Deputy Public Works Director	Tesfaye, Anteneh	Filled	FT	1.00
122	6010	6011	Public Works	Envir. & Sustain. Manager	Kasparian, Arpe	Filled	FT	1.00
123	6010	6011	Public Works	Director of Public Works	Gerber, Harold	Filled	FT	1.00
124	6010	6011	Public Works	Public Works Inspector	Ursua, Steven	Filled	FT	1.00
125	6010	6011	Public Works	Management Analyst	Jimenez, Mark	Filled	FT	1.00
126	6010	6011	Public Works	Management Assistant	Vacant	Vacant	FT	1.00
127	6010	6011	Public Works	Management Intern	Stepanian, Melanis	Filled	PT	0.50
128	6010	6011	Public Works	Senior Civil Engineer	Korkis, Hasmik	Filled	FT	1.00
129	6010	6011	Public Works	Intern	Shin, William	Filled	PT	0.50
130	6010	6011	Public Works	Intern	Dennis, Grace	Filled	PT	0.50
131	6010	6011	Public Works	Civil Engineering Assistant	Quizon, Ma Ariane	Filled	FT	1.00
132	6010	6011	Public Works	Transportation Engineer	Vacant	Frozen	FT	1.00
133	6010		Public Works	Parks Supervisor	Vacant	Frozen	FT	1.00
134	6010		Public Works	Facilities Maintenance Supervisor	Vacant	Frozen	FT	1.00
278	6010		Public Works	Facilities and Parks Supervisor	Vacant	Vacant	FT	1.00
135	6010		Public Works	Electrician	Vacant	Vacant	FT	1.00
136	6010		Public Works	Maintenance Worker I/II	Vacant	Vacant	FT	1.00
137	6010		Public Works	Maintenance Worker I/II	Vacant	Vacant	FT	1.00
138	6010		Public Works	Maintenance Worker II	Herrera, Adam	Filled	FT	1.00
139	6010		Public Works	Maintenance Worker II	Ibarra, Luis	Filled	FT	1.00

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
140	6010		Public Works	Street Supervisor	Munoz, Edward	Filled	FT	1.00
141	6010		Public Works	Maintenance Worker I	VanZandt, Maizon	Filled	FT	1.00
142	6010		Public Works	Senior Maintenance Worker	Vargas, Ruben	Filled	FT	1.00
143	6010		Public Works	Senior Maintenance Worker	Arriola, Richard	Filled	FT	1.00
271	6010		Public Works	Senior Maintenance Worker	Vacant	Vacant	FT	1.00
144	6010		Public Works	Maintenance Worker II	Rodriguez, Timothy	Filled	FT	1.00
145	6010		Public Works	Building Maintenance Worker	Houlemard, Stephen	Filled	FT	1.00
146	6010		Public Works	Building Maintenance Worker	Hernandez, Ricardo	Filled	FT	1.00
147	6010		Public Works	Senior Water Utility Worker	Almeda, Jose	Filled	FT	1.00
148	6010		Public Works	Senior Water Production/Treatment Operator	Vacant	Vacant	FT	1.00
149	6010		Public Works	Water Production/Treatment Operator	Bardales, Luis	Filled	FT	1.00
150	6010		Public Works	Water Utility Worker II	Cipres, Jose	Filled	FT	1.00
151	6010		Public Works	Water Utility Worker I	Garcia, Ryan	Filled	FT	1.00
152	6010		Public Works	Water Utility Worker II	Machado, Kelvin	Filled	FT	1.00
153	6010		Public Works	Water Utility Worker II	Morales, Felipe	Filled	FT	1.00
154	6010		Public Works	Water Production/Treatment Operator	Palmieri, Lorenzo	Filled	FT	1.00
155	6010		Public Works	Water Utility Worker I	Villalobos, Edgar	Filled	FT	1.00
156	6010		Public Works	Water Operations Manager	Magana, Victor	Filled	FT	1.00
272	6010		Public Works	Water Operations Supervisor	Vacant	Vacant	FT	1.00
273	6010		Public Works	Management Analyst	Vacant	Vacant	FT	1.00
274	6010		Public Works	Principal Engineer	Vacant	Vacant	FT	1.00
267	6010		Public Works	Transportation Manager		Filled	FT	1.00
								45.50
				COMMUNITY DEVELOPMENT				
157	7010	7011	Community Development	Film Liaison	Aguado, Joan	Filled	FT	1.00
158	7010	7011	Community Development	Community Development Director	Frausto-Lupo, Angelica	Filled	FT	1.00
159	7010	7011	Community Development	Planning Manager	Chang, Matt	Filled	FT	1.00
160	7010	7011	Community Development	Associate Planner	Madrid, Braulio	Filled	FT	1.00
161	7010	7011	Community Development	Associate Planner	Robles, Sandra	Filled	FT	1.00
162	7010	7011	Community Development	Community Improvement Coordinator	Vacant	Vacant	FT	1.00
266	7010	7011	Community Development	Senior Community Improvement Coordinator	Mandala, Christopher	Filled	FT	1.00
163	7010	7011	Community Development	Administrative Secretary	Estrada, Lillian	Filled	FT	1.00
164	7010	7011	Community Development	Associate Planner	Vacant	Vacant	FT	1.00
165	7010	7011	Community Development	Interim Management Assistant	Dolphin, Evelyn	Filled	PT	0.50
166	7010	7011	Community Development	Assistant Planner	Goldberg, Mackenzie	Filled	FT	1.00
167	7010	7011	Community Development	Senior Management Analyst	Demarest, Leah	Filled	FT	1.00
168	7010	7011	Community Development	Deputy Community Development Director	Becker, Alison	Filled	FT	1.00
169	7010	7011	Community Development	Code Enforcement Officer	Vacant	Frozen	PT	0.50
280	7010	7011	Community Development	Management Assistant	Vacant	Vacant	FT	1.00
170	7010	7011	Community Development	Permit Counter Technician	Martinez, Jose	Filled	FT	1.00

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
								15.00
				LIBRARY				
171	8010	8011	Library	Library Director	Billings, Cathy	Filled	FT	1.00
172	8010	8011	Library	Sub Librarian	Chen, Lewis	Filled	PT	0.50
173	8010	8011	Library	Sub Librarian	Vacant	Vacant	PT	0.50
174	8010	8011	Library	Library Clerk II	Callahan, Curtis	Filled	FT	1.00
175	8010	8011	Library	Administrative Secretary	Faye, Sean	Filled	FT	1.00
176	8010	8011	Library	Librarian PT	Finder, Cynthia	Filled	PT	0.50
177	8010	8011	Library	Library Aide I	Grafton, Andrew	Filled	PT	0.50
178	8010	8011	Library	Librarian PT	Johnson, Peter	Filled	PT	0.50
179	8010	8011	Library	Typist Clerk I	Lopez, William	Filled	PT	0.50
180	8010	8011	Library	Sub Librarian	Clark, Chelsea	Filled	PT	0.50
181	8010	8011	Library	Typist Clerk II	Palmer, Ann	Filled	PT	0.50
182	8010	8011	Library	Typist Clerk II	Vacant	Vacant	PT	0.50
183	8010	8011	Library	Librarian PT	Pibel, Ann	Filled	PT	0.50
184	8010	8011	Library	Librarian PT	McGowen, Catherine	Filled	PT	0.50
185	8010	8011	Library	Typist Clerk I	Zelenak, Kerri	Filled	PT	0.50
186	8010	8011	Library	Sub Ref. Librarian	Salz, Adrienne	Filled	PT	0.50
187	8010	8011	Library	Typist Clerk II	Soto, Suzanne	Filled	PT	0.50
188	8010	8011	Library	Lib Pub / Support Svc Mgr	Posner, Barbara	Filled	FT	1.00
189	8010	8011	Library	Lib Pub / Support Svc Mgr	Wong, Maida	Filled	FT	1.00
190	8010	8011	Library	Library Technical Assist	Grama, Darryl	Filled	FT	1.00
191	8010	8011	Library	Substitute Librarian	Armacost, Anne	Filled	PT	0.50
192	8010	8011	Library	Librarian - Local Hist.	Radbill, Olivia	Filled	FT	1.00
193	8010	8011	Library	Library Aide I	Nakakura, Michael	Filled	PT	0.50
194	8010	8011	Library	Librarian	Neeb, Judy	Filled	FT	1.00
195	8010	8011	Library	Typist Clerk I	Patlan, Andrea	Filled	PT	0.50
196	8010	8011	Library	Typist Clerk II	Porras, Krysten	Filled	PT	0.50
197	8010	8011	Library	Library Aide I	Vacant	Vacant	PT	0.50
198	8010	8011	Library	Sub Librarian	Afaro, Alejandra	Filled	PT	0.50
199	8010	8011	Library	Sub Librarian	Cheng Ku, Leticia	Filled	PT	0.50
200	8010	8011	Library	Librarian	Vacant	Vacant	FT	1.00
201	8010	8011	Library	Library Aide I	Serrano, Cindy	Filled	PT	0.50
202	8010	8011	Library	Library Aide I	Heinze, Jacqueline	Filled	PT	0.50
203	8010	8011	Library	Library Aide I	Arinaga, Karla	Filled	PT	0.50
204	8010	8011	Library	Library Aide I	Guerrero, Rosemary	Filled	PT	0.50
205	8010	8011	Library	Substitute Librarian	Nguyen, Kimberly	Filled	PT	0.50
206	8010	8011	Library	Librarian - Substitute	Bowley, Cathleen	Filled	PT	0.50
207	8010	8011	Library	Library Aide I	Catt, Nicholas	Filled	PT	0.50
208	8010	8011	Library	Library Aide I	Vacant	Vacant	PT	0.50
209	8010	8011	Library	Library Aide I	Vacant	Vacant	PT	0.50
210	8010	8011	Library	Librarian - Substitute	Vacant	Vacant	PT	0.50
211	8010	8011	Library	Librarian	Mendoza, Alexis	Filled	FT	1.00

Page 2 of 9

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
								25.50
				COMMUNITY SERVICES				
212	8030	8025	Community Services	Trans Driver	Friezer, Sean	Filled	FT	1.00
213	8030	8025	Community Services	Trans Driver	Flores-Etkin, Claudia	Filled	FT	1.00
214	8030	8025	Community Services	Trans Driver P.T.	Navarro, Juan	Filled	PT	0.50
215	8030	8025	Community Services	Trans Driver P.T.	Recinos-Macedo, Esdras	Filled	PT	0.50
216	8030	8025	Community Services	Trans Driver P.T.	Vacant	Vacant	PT	0.50
217	8030	8031	Community Services	Community Services Director	Pautsch, Shelia	Filled	FT	1.00
218	8030	8021	Community Services	Recreation Leader	Salas, Maria	Filled	PT	0.50
219	8030	8021	Community Services	Community Services Supervisor	Snyder, Melissa	Filled	FT	1.00
220	8030	8021	Community Services	Management Assistant	Tracey, Melinda	Filled	FT	1.00
221	8030	8021	Community Services	Site Manager	Smith, Jonathan	Filled	PT	0.50
222	8030	8021	Community Services	Management Intern	Tallon, Gabriel	Filled	PT	0.50
223	8030		Community Services	Recreation Leader	Aguirre, Sebastian	Filled	PT	0.50
224	8030		Community Services	Recreation Leader I	Arreola, Moises	Filled	PT	0.50
225	8030		Community Services	Rec Leader	Corona, Eric	Filled	PT	0.50
226	8030		Community Services	Management Analyst	Vacant	Vacant	FT	1.00
227	8030		Community Services	Community Services Coordinator	Faulmino, Katrina	Filled	FT	1.00
228	8030		Community Services	Management Aide	Guidos, Jennifer	Filled	PT	0.50
229	8030		Community Services	Recreation Leader	Hernandez, Dina	Filled	PT	0.50
230	8030		Community Services	Recreation Leader	Hogge, Abigail	Filled	PT	0.50
231	8030		Community Services	Rec Leader I	How, Kimberly	Filled	PT	0.50
232	8030		Community Services	Deputy Community Services Director	Hakobian, Christine	Filled	FT	1.00
233	8030		Community Services	Recreation Leader	Montoya, Christian	Filled	PT	0.50
234	8030		Community Services	Recreation Leader	Miranda, Lucia	Filled	PT	0.50
235	8030		Community Services	Rec Leader	Miranda, Angelica	Filled	PT	0.50
236	8030		Community Services	Recreation Leader	Rodgers, Rebekah	Filled	PT	0.50
237	8030		Community Services	Recreation Leader	Sanchez, Esthy	Filled	PT	0.50
238	8030		Community Services	Community Services Supervisor	Wilcox, Nathalie	Filled	FT	1.00
239	8030		Community Services	Recreation Leader	Guevara, Lauren	Filled	PT	0.50
240	8030		Community Services	Recreation Leader	Cortez, Nicolas	Filled	PT	0.50
241	8030		Community Services	Recreation Leader	Negrete, Bailey	Filled	PT	0.50
242	8030		Community Services	Recreation Leader	Reynolds, Megan	Filled	PT	0.50
243	8030		Community Services	Recreation Leader	Jenkins, Sara	Filled	PT	0.50
244	8030		Community Services	Recreation Leader	Hamilton, Jack	Filled	PT	0.50
245	8030		Community Services	Recreation Leader	Escalera, Luz	Filled	PT	0.50
246	8030		Community Services	Recreation Leader	Enoch, Jelani	Filled	PT	0.50
247	8030		Community Services	Recreation Leader	Pollard, Sebastian	Filled	PT	0.50
248	8030		Community Services	Recreation Leader	Hood, Thomas	Filled	PT	0.50
249	8030		Community Services	Recreation Leader	Rogers, Ariel	Filled	PT	0.50
250	8030		Community Services	Program Specialist	Bell, Jordan	Filled	FT	1.00
251	8030		Community Services	Recreation Leader	Zamora, Elijah	Filled	PT	0.50

Budgeted Authorized Positions	Department	Division	Department Name	Position Title	Incumbent	Position Status	Full-Time or Part- Time	FTE
252	8030		Community Services	Recreation Leader	Zavala, Diego	Filled	PT	0.50
253	8030		Community Services	Recreation Leader	Panameno, Michael	Filled	PT	0.50
254	8030		Community Services	Recreation Leader	Hood, Branden	Filled	PT	0.50
255	8030		Community Services	Recreation Leader	Concepcion, Victoria	Filled	PT	0.50
256	8030		Community Services	Recreation Leader	Silva, Sidney	Filled	PT	0.50
257	8030		Community Services	Recreation Leader	Quezada, Zackary	Filled	PT	0.50
258	8030		Community Services	Recreation Leader	Campos, Crystal	Filled	PT	0.50
259	8030		Community Services	Management Aide	Diaz, Melissa	Filled	FT	1.00
260	8030		Community Services	Management Aide	Vacant	Frozen	PT	0.00
261	8030		Community Services	Recreation Leader	Powell, Syria	Filled	PT	0.50
262	8030		Community Services	Recreation Leader	Vacant	Vacant	PT	0.50
263	8030		Community Services	Recreation Leader	Vacant	Vacant	PT	0.50
264	8030		Community Services	Recreation Leader	Solis, Angel	Filled	PT	0.50
265	8030		Community Services	Recreation Leader	How, Brandon	Filled	PT	0.50
								32.00
				Full Time Filled				147.00
				Full Time Vacant				37.00
				Total Full Time				**187.00**
					Vacancy Factor			**19.79%**
				Part Time Filled				35.50
				Part Time Vacant				7.00
				Total Part Time				**43.00**
281				**Total Positions:**				**230.00**

ATTACHMENT 4

Master Fee Schedule

Fee No.	Fee Title	Adopted Fee FY23	Proposed Fee (Includes CPI Increase of 5.1%)
CITY CLERK			
1	Duplication - FPPC Regulations	$0.10	$0.10
2	Digital Records Duplication (Formerly: Duplication - CD/DVD)	$17.00	$17.00
3	Duplication - Photocopy	$0.10	$0.10
4	Filing Fees - Candidates Nominations (Per CA Election Code Section 10228)	$25.00	$25.00
5	Filing Fees - Initiative Petition (Per CA Election Code 9103 (b))	$200.00	$200.00
COMMUNITY SERVICES			
	CAMP MED FEES:		
6	Camp Med - Five Day Rate - 1st Child - Resident	$169.00	$178.00
7	Camp Med - Five Day Rate - Each Additional Child - Resident	$157.00	$165.00
8	Camp Med - Five Day Rate - 1st Child - Non-Resident	$189.00	$199.00
9	Camp Med - Five Day Rate - Each Additional Child - Non-Resident	$178.00	$187.00
10	Camp Med - Three Day Rate	$104.00	$109.00
11	Camp Med - Three Day Rate - Each Additional Child	$99.00	$104.00
12	Camp Med After School - Five Day Rate - 1st Child	$101.00	$106.00
13	Camp Med After School - Five Day Rate - Each Additional Child	$96.00	$101.00
14	Camp Med - Late Fee After First 5 Minutes - per minute	$3.30	$3.50
	FIELD AND OPEN SPACE RENTAL FEES:		
	Garfield / Arroyo Park:		
15	Sport Fields -- Non-Profit (Less than 50% contributor) (per hr)	$57.00	$60.00
16	Sports Fields -- Non-Profit (Contributor) (per hr)	$0.00	$0.00
17	Sport Fields - Resident (per hr.)	$45.00	$47.00
18	Sports Field - Non-Resident (per hr)	$57.00	$60.00
19	Gazebo Rental - Resident (4 hr block)	$90.00	$95.00
20	Gazebo Rental - Non-Resident (4 hr block)	$134.00	$141.00
21	Picnic Areas -- Deposit for Groups > 50 Persons resident	$50.00	$53.00
22	Picnic Areas -- Deposit for Groups > 50 Persons non-resident	$61.00	$64.00
23	Tennis Courts -- Sports Teams -- OG & Garfield Parks - Per Hour	$56.00	$59.00
24	Tennis Courts -- Instructions -- OG & Garfield Parks - Per Hour	$56.00	$59.00
	OG Rec Center Rental Fees:		
25	Security Deposit	$280.00	$294.00
26	Non-Profit (per hr)	$33.00	$35.00
27	Resident (per hr)	$33.00	$35.00
28	Non-Resident (per hr)	$45.00	$47.00
29	Youth Groups - local (up to 2 hrs)	$11.00	$12.00
	Eddie Park House Rental Fees:		
30	Security Deposit	$280.00	$294.00
31	Non-Profit (per hr)	$101.00	$106.00
32	Resident (per hr)	$90.00	$95.00
33	Non-Resident (per hr)	$112.00	$118.00
34	Event (4 hr block) Resident Only	$169.00	$178.00
35	Youth Groups - local (up to 2 hrs)	$11.00	$12.00
	Garfield Youth House Rental Fees:		
36	Security Deposit	$280.00	$294.00
37	Non-Profit (per hr)	$78.00	$82.00
38	Resident (per hr)	$68.00	$71.00
39	Non-Resident (per hr)	$112.00	$118.00
40	Event (4 hr block) Resident Only	$169.00	$178.00
41	Youth Groups - local (up to 2 hrs)	$11.00	$12.00
	War Memorial Rental Fees:		
42	Security Deposit	$561.00	$590.00
43	War Memorial -- Non-Profits (per hr)	$124.00	$130.00
44	War Memorial -- Resident (per hr)	$112.00	$118.00
45	War Memorial -- Non-Resident (per hr)	$146.00	$153.00
46	War Memorial -- Non-Profits -- Prime Time	$197.00	$207.00
47	War Memorial -- Resident / Local Business (per hr) -- Prime Time	$185.00	$194.00
48	War Memorial -- Non-Resident (per hr) -- Prime Time	$219.00	$230.00
49	War Memorial -- Lower Floor -- Non-Profits (per hr)	$96.00	$101.00
50	War Memorial -- Lower Floor -- Resident (per hr)	$84.00	$88.00
51	War Memorial -- Lower Floor -- Non-Resident (per hr)	$112.00	$118.00
52	War Memorial - Use of Kitchen (per event / use)	$56.00	$59.00
53	War Memorial - Use of Kitchen - Prime Time	$169.00	$178.00

	Senior Center Rental Fees:		
54	Security Deposit	**$280.00**	**$294.00**
55	Main Room - Non-Profits (per hr)	**$101.00**	**$106.00**
56	Main Room - Resident (per hr)	**$90.00**	**$95.00**
57	Main Room - Non-Resident (per hr)	**$112.00**	**$118.00**
58	Conference Room -- Non- Profits (per hr)	**$33.00**	**$35.00**
59	Conference Room -- Resident / Local Business (per hr)	**$33.00**	**$35.00**
60	Conference Room -- Non-Resident (per hr)	**$45.00**	**$47.00**
61	Kitchen Use (per event / use)	**$56.00**	**$59.00**
	Senior Center Programs:		
62	Hot Meals - Senior 55 & Over / Disabled Persons	**$2.75**	**$3.00**
63	Hot Meals - Persons Under 55	**$5.00**	**$5.00**
64	Home Delivered Meals - Senior 55 & Over / Disabled Persons	**$3.00**	**$3.50**
65	Senior Center Membership - single person Over 55	**$25.00**	**$25.00**
66	Senior Center Membership - couples Over 55	**$35.00**	**$35.00**
67	Computer Lab Printing	**$0.20**	**$0.20**
68	Leisure Classes - Seniors	**Varies**	**Varies**
69	Coffee	**$1.00**	**$0.50**
	Dial-A-Ride Fees:		
70	Senior Resident (Registered) 55>	**$0.50**	**$0.50**
71	Disabled Resident (Registered)	**$0.50**	**$0.50**
72	Caregiver	**$0.00**	**$0.00**
73	MTA Bus Pass - Senior 62 & Over	**$10.00**	**$10.00**
74	MTA Bus Pass - Disabled Persons	**$10.00**	**$10.00**
	Miscellaneous Fees:		
75	Breakfast with Santa Event	**$23.00**	**$24.00**
76	Spring Family Event - Presale	**$11.00**	**$12.00**
77	Spring Family Event - Day of Event	**$17.00**	**$18.00**
78	Booth Rental - All Facilities - per booth	**$56.00**	**$59.00**
79	Event -Vendor/Catering Booth - per vendor/ booth	**$112.00**	**$118.00**
80	Leisure Classes	**Varies**	**Varies**
81	Refund Processing Fee	**$21.00**	**$22.00**
82	Staff (Rental)	**$45.00**	**$47.00**
83	Additional Staff (Alcohol)	**$45.00**	**$47.00**
Community Development			
	Building Fees:		
84	Building Permit & Plan Check	**See LA County Fee Schedule**	**See LA County Fee Schedule**
	Film Permit Fees:		
85	Still photography - Per Day	**$149.00**	**$157.00**
86	Motion Picture Photography - Per Day	**$595.00**	**$625.00**
87	Student Films/ Public Service Announcements/ Educational Films - Per Day	**$23.00**	**$24.00**
88	Handheld Video Crew with less than 20 people - Per Day	**$149.00**	**$157.00**
	Location / Hourly Fees:		
89	Still Photography / Handheld Video Crew - On Public Right-Of-Way - Per Hour	**$84.00**	**$88.00**
90	Student Filming On Public Right-of-way - per hour	**$17.00**	**$18.00**
91	Street or Lane Closure - Per Hour	**$169.00**	**$178.00**
92	Streets/Sidewalks/Alleys as Principal Site - Per Hour	**$169.00**	**$178.00**
93	City Parking Lots - Per Hour	**$169.00**	**$178.00**
94	City Building (Four Hour Minimum)/City Park - Per Hour	**$198.00**	**$208.00**
95	Police (Eight Hour Minimum) - per hour	**$95.00**	**$95.00**
96	Police Vehicles - per hour	**$23.00**	**$24.00**
97	Fire (Eight Hour Minimum) - per hour	**$95.00**	**$95.00**
98	Traffic Control Plan Review - per review	**$126.00**	**$132.00**
99	Cancellation Fee	**$112.00**	**$118.00**
	Use Permits:		
100	Conditional Use Permit	**$3,925.00**	**$4,125.00**
101	Temporary Use Permit (non-profit)	**$258.00**	**$271.00**
102	Temporary Use Permit	**$517.00**	**$543.00**
103	CUP Modification	**$2,804.00**	**$2,947.00**

104	CUP with First Variance	$5,048.00	$5,305.00
105	Parking Use Permit	$1,978.00	$2,079.00
106	Administrative Use Permit	$1,745.00	$1,834.00
	Maps:		
107	Tentative Parcel Map	$4,164.00	$4,376.00
108	Tentative Tract Map	$11,291.00	$11,867.00
109	Final Parcel / Tract Map Review	$6,201.00	$6,517.00
	Design Review:		
110	Single Family Residence*	$2,239.00	$2,353.00
111	Commercial - Single Sign	$1,777.00	$1,868.00
112	Commercial - Sign Program	$2,725.00	$2,864.00
	Multi Family:		
113	3-8 Units	$3,359.00	$3,530.00
114	9-16 Units	$4,478.00	$4,706.00
115	17-50 Units	$5,038.00	$5,295.00
116	51-100 Units	$5,598.00	$5,883.00
117	101 Units or More	$6,717.00	$7,060.00
	Commercial:		
118	less than 2,000 sq ft	$2,244.00	$2,358.00
119	2,001 - 10,000 sq ft	$4,486.00	$4,715.00
120	10,000 + sq ft	$6,730.00	$7,073.00
	Cultural Heritage Commission Fees:		
121	Cultural Hert. Comm. - Landmark Review	$1,683.00	$1,769.00
	C.H.C. Cert. of Approp. (incl. Demo)		
122	Single-Family*	$1,683.00	$1,769.00
	Multi-Family:		
123	3-8 Units	$3,365.00	$3,537.00
124	9-16 Units	$4,486.00	$4,715.00
125	17-50 Units	$6,730.00	$7,073.00
126	51-100 Units	$7,851.00	$8,251.00
127	101 Units or More	$10,095.00	$10,610.00
	Commercial:		
128	less than 2,000 sq ft	$3,365.00	$3,537.00
129	2,001 - 10,000 sq ft	$5,608.00	$5,894.00
130	10,000 + sq ft	$10,095.00	$10,610.00
131	Chair Review	$992.00	$1,043.00
132	Historic Resource Evaluation	$475.00	$499.00
	Environmental Fees:		
	Flat Fees:		
133	Negative Declaration Filing	$317.00	$333.00
134	Mitigation Monitoring Inspection & Administrative Fee	Actual Cost	Actual Cost
135	Categorical Exemption (CEQA) - Filing	$158.00	$166.00
	Deposit-Based Fees:		
136	Initial Environmental Study	$5,608.00	$5,894.00
137	EIR	$28,041.00	$29,471.00
	Appeals:		
138	Appeals (To Planning Commission or City Council) - Single Family*	$1,121.00	$1,178.00
139	Appeal - Other Uses**	$2,244.00	$2,358.00
140	Appeal Continuance	$336.00	$353.00
	Deposits:		
141	Zoning Text & Map Amendments	$11,216.00	$11,788.00
142	Specific Plan Application	$11,216.00	$11,788.00
143	General Plan Amendment	$22,433.00	$23,577.00
144	Specific Plan Amendment	$22,433.00	$23,577.00
145	Development Agreement Review	$11,216.00	$11,788.00
146	Planned Development	$11,216.00	$11,788.00
	Other Planning Applications:		
147	Zoning Code Admin Modification	$1,275.00	$1,340.00
148	Zoning Code Interpretation	$1,030.00	$1,083.00
149	Application Withdrawl	$1,979.00	$2,080.00
150	Lot Line Adjustment / Parcel Merger / Certificate of Compliance	$2,244.00	$2,358.00
151	Hillside Development Review	$2,244.00	$2,358.00
152	Hillside Development Review with Variance	$3,365.00	$3,537.00
153	Variance - First	$3,701.00	$3,890.00
154	Variance - Each Additional	$2,611.00	$2,744.00

155	Vacation Easements, Alleys, Street	$1,978.00	$2,079.00
156	Discretionary Time Extension Request	$3,009.00	$3,162.00
157	Covenants	$613.00	$644.00
158	Mills Act Contract	$2,244.00	$2,358.00
	Miscellaneous Fees:		
159	Public Noticing Fee (Does Not Include Material / Mailing Costs)	$320.00	$336.00
160	Garage/Yard Sale Permit	$11.00	$12.00
161	Temporary Banners - Per Banner, Per Permit	$56.00	$59.00
162	Zoning - Written Analysis of Conformance	$790.00	$830.00
163	Zoning Verification Letter	$119.00	$125.00
164	Zoning Clearance for Business License Review	$70.00	$74.00
165	Re-Review - Per hour	$173.00	$182.00
166	Pre-Application Meeting	$336.00	$353.00
167	Planning Inspection Per Hour	$173.00	$182.00
168	Changes / Modifications to Approved Plans (initiated by Applicant) - Single Family*	$561.00	$590.00
169	Changes / Modifications to Approved Plans (initiated by Applicant) - All Other Uses**	$2,244.00	$2,358.00
170	Administrative Citation (per Municipal Code)	$561.00	$590.00
	Surcharges:		
171	General Plan Maintenance Fee (Percentage of Building Permit Fee)	15%	15%
172	Technology Surcharge (percentage applied to fire, building, engineering, and planning permits)	10%	10%
FINANCE			
	Miscellaneous Fees:		
173	NSF Check Fee (CA Civil Code Section 1719)	$25.00	$25.00
174	Credit Card Transaction Fee (Percentage of Transaction Cost)	0.25%	3%
FIRE			
	Fire Emergency Medical Services:		
175	Advance Life Support	$2,299.00	LA County Rate
176	Basic Life support	$1,533.00	LA County Rate
177	Treat No Transport	$547.00	$547.00
178	Other EMS Fees	LA County Fee	LA County Fee
179	Paramedic Program - Residential	$90.00	$95.00
180	Paramedic Program - Residential (6 months or less)	$45.00	$47.00
181	Paramedic Program - Business	$101.00	$106.00
182	Paramedic Program - Business (6 months or less)	$50.00	$53.00
	Standby Fees:		
183	Engine Company - (Use or Standby)	$634.00	$666.00
184	Ambulance	$384.00	$404.00
185	Chief Officer Per Hr. - With 2 Hr. Min.	$255.00	$268.00
	Sprinkler Plan Check and Inspection:		
	Residential		
186	New	$577.00	$606.00
187	Remodel	$411.00	$432.00
	Commercial		
	New:		
188	0 - 10,000 sq ft.	$676.00	$710.00
189	10,000 - 25,000 sq ft.	$890.00	$935.00
190	25,000 - 50,000 sq ft.	$1,417.00	$1,489.00
191	50,000+ sq ft.	$1,679.00	$1,765.00
	Remodel/T.I.:		
192	0 - 5,000 sq ft.	$552.00	$580.00
193	5,000 - 10,000 sq ft.	$774.00	$813.00
194	10,000 - 25,000 sq ft.	$1,153.00	$1,212.00
195	25,000+ sq ft.	$1,417.00	$1,489.00
196	Sprinkler - Extra Plan Check/ Site Visit - per check / visit	$131.00	$138.00
	Fire Alarms:		
	New: (# of Devices) - Commercial		
197	1 - 25 Devices	$354.00	$372.00
198	26-50 Devices	$510.00	$536.00
199	51-100 Devices	$577.00	$606.00
200	100+ Devices - Per Device	$1,103.00	$1,159.00

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	Remodel/ T.I.: Commercial		
201	1-5 Systems	**$288.00**	**$303.00**
202	6-15 Systems	**$379.00**	**$398.00**
203	16-50 Systems	**$510.00**	**$536.00**
204	50+ Systems	**$708.00**	**$744.00**
205	New Residential (Single Family)*	**$222.00**	**$233.00**
206	Remodel Residential (Single Family)*	**$157.00**	**$165.00**
207	Extra Plan Check/Site Visits	**$131.00**	**$138.00**
208	Hydrostatic Test and Alarm Test	**$131.00**	**$138.00**
209	Any Plan Check Not listed	**$131.00**	**$138.00**
	Hazmat Fees:		
210	Hazmat Disclosure Level I	**LA County Fee**	**LA County Fee**
211	Hazmat Disclosure Level II	**LA County Fee**	**LA County Fee**
212	Hazmat Disclosure Level III	**LA County Fee**	**LA County Fee**
213	Hazmat Placard Start Up Cost	**LA County Fee**	**LA County Fee**
214	Hazmat Placard Updates	**LA County Fee**	**LA County Fee**
	False Alarm Fees:		
215	False Alarm - 1st Repsonse	**$0.00**	**$0.00**
216	False Alarm - 2nd and 3rd Repsonse	**$169.00**	**$178.00**
217	False Alarm - 4th and beyond	**$867.00**	**$911.00**
	Inspections:		
218	Any Other Inspection Not Listed	**$131.00**	**$138.00**
	Annual Inspection of Apartments		
219	3-8 Units	**$157.00**	**$165.00**
220	9-16 Units	**$198.00**	**$208.00**
221	17-50 Units	**$263.00**	**$276.00**
222	51-100 Units	**$329.00**	**$346.00**
223	101 Units or More	**$395.00**	**$415.00**
	Annual Inspection of Businesses		
224	less than 2,000 sq ft	**$101.00**	**$106.00**
225	2,001 - 10,000 sq ft	**$224.00**	**$235.00**
226	10,000 + sq ft	**$508.00**	**$534.00**
227	Additional Inspection (3rd Visit, 2nd Reinspection)	**$158.00**	**$166.00**
228	Inspection (4th Visit and Subsequent)	**$217.00**	**$228.00**
	New Business Fire Inspection		
229	less than 2,000 sq ft	**$67.00**	**$70.00**
230	2,001 - 10,000 sq ft	**$131.00**	**$138.00**
231	10,000 + sq ft	**$263.00**	**$276.00**
	Permits:		
232	Permits - Event Tent	**$182.00**	**$191.00**
233	Permits - Special Film Feuling Truck	**$142.00**	**$149.00**
234	Permits - Any Other Required by Chief	**$307.00**	**$323.00**
235	Permits - Fireworks Display	**$590.00**	**$620.00**
	Fire Reports:		
236	Redacted	**$50.00**	**$53.00**
237	Non-Redacted	**$9.00**	**$9.00**
	Miscellaneous Fees:		
238	Investigation Cost Recovery	**Actual Cost**	**Actual Cost**
239	Witness Fees	**$169.00**	**$178.00**
240	Record Research: Intensive, Interpretive - Per Half Hour	**$50.00**	**$53.00**
241	Records: Duplication Per Page	**$0.10**	**$0.11**
242	Underground Storage Tank Removal	**$526.00**	**$553.00**
243	Clean Up, 1st Responder	**Actual Cost**	**Actual Cost**
LIBRARY			
	Library Services Fees:		
244	Replacement - Processing Fee	**$17.00**	**$10.00**
245	Replacement of Library Item	**Actual Cost**	**Actual Cost**
246	Inter-Library Loan (Per Title)	**$5.00**	**$5.00**
247	Library Asset Recovery Service	**Actual Cost**	**Actual Cost**
	Printing / Reproduction Fees:		
248	Local History Collection Image - Commercial Use	**$119.00**	**$125.00**
249	Local History Collection Image - Private Use - Resident	**$11.00**	**$12.00**
250	Local History Collection Image - Private Use - Non-Resident	**$28.00**	**$29.00**
251	Black & White	**$0.15**	**$0.15**
252	Color Copies	**$0.50**	**$0.50**

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	Passport Fees:		
253	Passport Photo - per photo	**$7.00**	**$7.00**
254	Passport Execution Fee (Per US State Department)	**$35.00**	**$35.00**
	Community Room Rental Fees:		
255	Community Room - Non-Profit Groups - Per Hr. (Min. 2 Hrs.)	**$112.00**	**$118.00**
256	Community Room - Resident / Local Business - Per Hr. (Min. 2 Hrs.)	**$101.00**	**$106.00**
257	Community Room -Non-Resident - Per Hr. (Min 2 Hrs.)	**$134.00**	**$141.00**
258	Community Room - Non-Profit Groups - Primetime (Min. 2 Hrs.)	**$185.00**	**$194.00**
259	Community Room - Resident / Local Business - Primetime (Min. 2 Hrs.)	**$174.00**	**$183.00**
260	Community Room -Non-Resident - Primetime (Min 2 Hrs.)	**$207.00**	**$218.00**
261	Community Room - Staff (Cleanup and Supervision)	**$45.00**	**$47.00**
262	Community Room - Staff (Alcohol)	**$45.00**	**$47.00**
263	Community Room - Security Deposit	**$280.00**	**$294.00**
	Equipment Rental Fees:		
264	Audio/Visual Equipment Rental	**$67.00**	**$70.00**
265	Equipment Rental - Baldwin Piano	**$40.00**	**$42.00**
POLICE			
	Penalties:		
266	Display Vehicle for Sale	**$50.00**	**$50.00**
267	Parking in Red Zone	**$50.00**	**$50.00**
268	Parking in Yellow Zone	**$50.00**	**$50.00**
269	Parking in White Zone	**$50.00**	**$50.00**
270	Parking in Green Zone	**$50.00**	**$50.00**
271	Parked on Parkway	**$50.00**	**$50.00**
272	Parking Prohibited by Sign	**$50.00**	**$50.00**
273	1 HR, 2 HR, 4HR Time Limited Parking	**$50.00**	**$50.00**
274	Parking Outside Spaces	**$50.00**	**$50.00**
275	Parked Over 72 Hours	**$50.00**	**$50.00**
276	Parking Vehicle for Sale	**$50.00**	**$50.00**
277	Washing, Servicing or Repairing Vehicle	**$50.00**	**$50.00**
278	Selling from Motor Vehicle	**$50.00**	**$50.00**
279	Parking Left Side of Roadway	**$50.00**	**$50.00**
280	Parking Adjacent to Schools	**$50.00**	**$50.00**
281	Exceeding 3% Grade/ Wheels Not Curbed	**$50.00**	**$50.00**
282	Emergency No Parking	**$50.00**	**$50.00**
283	Alley Parking - Sign Posted	**$50.00**	**$50.00**
284	Parked on Private Property	**$50.00**	**$50.00**
285	Parking on Public Property	**$50.00**	**$50.00**
286	Parking on City Owned Off-street Facility	**$50.00**	**$50.00**
287	Oversized Vehicle	**$50.00**	**$50.00**
288	Unattended Trailer	**$50.00**	**$50.00**
289	Overnight Parking	**$50.00**	**$50.00**
290	City Parking Lot (2 HR Limit)	**$50.00**	**$50.00**
	Parking Pass Fees:		
291	Parking 1 Year	**$137.00**	**$144.00**
292	Parking - Senior Citizens (65 Years old min.)	**$110.00**	**$116.00**
293	Parking - Alternate Fuel Vehicles	**$110.00**	**$116.00**
294	Parking - Monthly Pass	**$33.00**	**$35.00**
295	Parking - Replacement/ Transfer	**$18.00**	**$19.00**
296	Parking - Daily Pass	**$2.30**	**$2.40**
	All Police Reports:		
297	Redacted	**$98.00**	**$103.00**
298	Non-Redacted - Non-Resident	**$25.00**	**$26.00**
299	Non-Redacted - Resident	**$25.00**	**$26.00**
	False Alarm:		
300	False Alarm 1st	**$0.00**	**$0.00**
301	False Alarm 2nd - 3rd	**$169.00**	**$178.00**
302	False Alarm 4th and beyond	**$618.00**	**$650.00**
	Reproduction:		
303	Photo Reproduction - Per Photo	**$25.00**	**$26.00**
304	Video/Audio Reproduction	**$98.00**	**$103.00**
	Miscellaneous Fees:		
305	DUI Emergency Response	**Actual Cost**	**Actual Cost**
306	Records Check/ Clearance Letter	**$25.00**	**$26.00**
307	Special Business Background Check	**$584.00**	**$614.00**

308	Impound Fee - Vehicle Release	$144.00	$151.00
309	Juvenile Recovery	Actual Cost	Actual Cost
310	Firearms Storage & Release	$33.00	$35.00
311	Citation Corrections/ Inspection Service (resident)	$17.00	$18.00
312	Citation Corrections/ Inspection Service (non-resident)	$42.00	$44.00
313	Fingerprint Services -- Per Three Cards	$25.00	$26.00
314	Civil Subpoena	Fee set by Courts	Fee set by Courts
315	Duces Tecum Subpoena (Per CA Evidence Code)	$15.00	$16.00
316	Booking Fee	$155.00	$163.00
317	Tow Franchise Fee - per year	$1,102.00	$1,102.00
PUBLIC WORKS			
	Water Fees:		
318	Water Turn Off (After Hours)	$163.00	$171.00
319	Water Turn On (After Hours)	$163.00	$171.00
320	Water 24 Hour Door Hanger Fee	$35.00	$37.00
321	Water Turn Off for Non-Payment***	$72.00	$76.00
322	Water - New/Change Account	$112.00	$118.00
323	Water - Discontinue Service	$112.00	$118.00
324	Water - Discontinue for Non-Compliance	$217.00	$228.00
325	Water - Unauthorized Turn on	$217.00	$228.00
326	Fire Flow Testing	$579.00	$609.00
327	Temporary Meter Rental - Install	$45.00	$47.00
328	Temporary Meter Rental - Move	$112.00	$118.00
329	Temporary Meter Rental - Rental	$86.00	$90.00
330	Inspection of Backflow Prevention Device	$201.00	$211.00
331	Backflow Prevention Program Penalty	$336.00	$353.00
332	Water Installation Inspection Fee	$346.00	$364.00
	Deposit-Based Fees:		
333	Water Service Installation	$5,608.00	$5,894.00
334	Water Meter installation	$1,121.00	$1,178.00
335	Temporary Meter Rental	$2,804.00	$2,947.00
	Sewer Fees:		
336	Sewer Connection/Inspection, Existing Lateral	$393.00	$413.00
337	Sewer Connection/Inspection, Existing WYE	$393.00	$413.00
338	Sewer Connection/Inspection, Saddle Connect	$393.00	$413.00
339	Capping of Sewer Lateral	$393.00	$413.00
340	Sewer Construction Fee - New Construction	$777.00	$817.00
341	Sewer Spill in Public ROW	Actual Cost	Actual Cost
342	Fats, Oils, & Grease Permit Fee (annual)	$159.00	$167.00
343	Fats, Oils, & Grease Inspection Fee (annual)	Actual Cost	Actual Cost
344	Fats, Oils, & Grease Mitigation Penalty (annual)	$393.00	$413.00
	PW Engineering:		
345	Excavate - Utility Trenches <= 100 l.f.	$642.00	$675.00
346	Excavations-Utility Trenches >= 100 l.f.	$779.00	$819.00
347	Excavations-Utility Trenches > 100 l.f. - per l.f.	$0.61	$0.64
348	Excavation-Utility Patches	$575.00	$604.00
349	Concrete Sidewalk / Driveway Parkway / Permit	$203.00	$213.00
350	Concrete Sidewalk / Driveway / Parkway Inspection	$270.00	$284.00
351	Curb & Gutter Permit	$203.00	$213.00
352	Curb & Gutter Inspection Flat Fee	$270.00	$284.00
353	Curb Coring Base Permit	$224.00	$235.00
354	Curb Coring Inspection Flat Fee	$213.00	$224.00
355	Pavement Street & Alley	$453.00	$476.00
356	Pavement Street & Alley Inspections Flat Fee	$610.00	$641.00
357	Street/ROW Vacation/ Abandonment	$5,991.00	$6,297.00
358	Public Improvement Inspection	$542.00	$570.00
359	Public Works Plan Check Fee - Single Family*	$561.00	$590.00
360	Public Works Plan Check Fee - Other Uses**	$1,004.00	$1,055.00
361	Additional Plan Check/ Reviews Beyond 2	$168.00	$177.00
362	Final Parcel Map Review	$3,151.00	$3,312.00
363	Final Tract Map Review	$3,151.00	$3,312.00
364	Final Map Amendment - Administrative	$168.00	$177.00
365	Temp Encroachment - Dumpster	$101.00	$106.00
366	Temp Encroachment - Southwest Hills	$220.00	$231.00

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Fee Title	CY 2023 Fee
Water Rates:	
Water Services - Tier 1	$3.75
Water Services - Tier 2	$4.72
Water Services - Tier 3	$5.53
Waste Water Discharge	$2.00
Meter Service Charges - 3/4"	$94.28
Meter Service Charges - 1"	$141.72
Meter Service Charges - 1 1/2"	$260.33
Meter Service Charges - 2"	$402.66
Meter Service Charges - 3"	$734.73
Meter Service Charges - 4"	$1,209.14
Meter Service Charges - 6"	$2,395.14
Meter Service Charges - 8"	$4,292.76
Efficiency Fee	$0.14
Sewer Rates:	
Single Family Fixed Charge (per EDU per bi-month)	$30.45
Multi-Family Fixed Charge (per EDU per bi-month)	$23.92
Commercial Flow Charge (per HCF of water)	$2.01
Elementary Schools (per ADA per month)	$0.23
Middle Schools (per ADA per month)	$0.46

Fees set per Resolution 7536 & 7537

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GROWTH REQUIREMENT CAPITAL FEES

Community Development			
Growth Mgmt, Residential Development	$1.64	per Sq Ft	*set by Ordinance No. 1985*
Growth Mgmt, Commericial/Industrial Development	$1.07	per Sq Ft	*set by Ordinance No. 1985*
Gowth Mgmt, Park Impact Fee - Residential NEW	$7.65	per Sq Ft	*set by Resolution No. 7466*
Gowth Mgmt, Park Impact Fee - Residential Remodel	$7.65	per Sq Ft > 250sqft	*set by Resolution No. 7466*
Gowth Mgmt, Park Impact Fee - Senior Housing	$2.95	per Sq Ft	*set by Resolution No. 7466*

Other FEES:

Community Development			
Strong Motion Instrumentation Program – SMIP	Varies	*Pursuant to Section 2705, Chapter 8, Division 2 of the Public Resources Code of the State of California*	
Public Art Development Fee - on-site	1%	of total building valuation	*set by Ordinance No. 2325*
Public Art Development Fee - in lieu	1.5%	of total building valuation	*set by Ordinance No. 2325*

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BUSINESS LICENSE FEES

Last update: Resolution No. 7105

FEE TITLE	CURRENT FEES	UNITS	TERM		BUSINESS IMPROVE. TAX	TOTAL
Basic Business License Fees						
RETAIL WITH 1 EMPLOYEE	$96.00	LICENSE	YEAR		$36.00	$132.00
RETAIL WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
WHOLESALE WITH 1 EMPLOYEE	$96.00	LICENSE	YEAR		$36.00	$132.00
WHOLESALE WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
SERVICE WITH 1 EMPLOYEE	$96.00	LICENSE	YEAR		$36.00	$132.00
SERVICE WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
MANUFACTURING WITH 1 EMPLOYEE	$96.00	LICENSE	YEAR		$24.00	$120.00
MANUFACTURING WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$2.40	$12.00
PROFESSIONAL BUSINESSES	$130.00	LICENSE	YEAR		$48.75	$178.75
PROFESSIONAL WITH ADDITIONAL PROF EMPLYS	$70.00	BUSINESS	YEAR		$26.25	$96.25
PROFESSIONAL WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
BUSINESS BY VEHICLE	$100.00	VEHICLE	YEAR		$37.50	$137.50
BUSINESSES WITH ADDITIONAL VEHICLES	$40.00	VEHICLE	YEAR		$15.00	$55.00
CONTRACTOR $0-$4,999	$36.00	CONTRACT	QTR		$13.50	$49.50
CONTRACTOR $5,000-$49,999	$60.00	CONTRACT	QTR		$22.50	$82.50
CONTRACTOR $50,000+	$120.00	CONTRACT	QTR		$45.00	$165.00
BUSINESSES NOT CLASSIFIED	$96.00	BUSINESS	YEAR		$36.00	$132.00
BUSINESSES NOT CLASS. WITH ADD. EMPLOYEE	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
Specialty Business License Fees						
ADVERTISING STRUCTURES, SIGNS, DISPLAYS	$360.00	SIGN	YEAR	**	$135.00	$495.00
BILLBOARD	$24.00	BILLBOARD	YEAR		$9.00	$33.00
ADVERTISING VEHICLE	$120.00	VEHICLE	DAY		$45.00	$165.00
ANTIQUE DEALER	$96.00	LICENSE	YEAR		$36.00	$132.00
ANTIQUE DEALER W/ADD'L EMPLOYEE	$9.60	LICENSE	YEAR		$3.60	$13.20
APARTMENTS, HOTELS, (3+DWELLING UNITS)	$72.00	LICENSE	YEAR		$18.00	$90.00
ADDITIONAL UNITS OVER THREE	$9.60	UNIT	YEAR		$2.40	$12.00
AUCTION	$168.00	EVENT	DAY	**	$63.00	$231.00
BOARDING HOUSE	$96.00	LICENSE	YEAR	**	$36.00	$132.00
BOWLING ALLEYS	$62.40	LANE	YEAR	**	$23.40	$85.80
CANVASSERS	$96.00	PERSON	YEAR	**	$36.00	$132.00
CANVASSERS	$48.00	PERSON	DAY	**	$18.00	$66.00
CANVASSERS	$72.00	PERSON	QTR	**	$27.00	$99.00
CHRISTMAS TREE WREATHS	$168.00	LICENSE	MONTH	**	$63.00	$231.00
CIRCUS, CARNIVAL, MENAGERIE, RODEO	$480.00	EVENT	DAY	**	$180.00	$660.00
TRAINED ANIMALS EXHIBITION	$48.00	EVENT	DAY	**	$18.00	$66.00
FIREARMS	$96.00	BUS LICENSE	YEAR	**	$36.00	$132.00
FORTUNE TELLING	$400.00	LICENSE	YEAR	**	$150.00	$550.00
GARDNERS-FIRST VEHICLE	$80.00	VEHICLE	YEAR		$30.00	$110.00
GARDNERS WITH ADDITIONAL VEHICLES	$40.00	VEHICLE	YEAR		$15.00	$55.00
HOSPITALS (5 BEDS + ONE EMPLOYEE)	$192.00	LICENSE	YEAR		$72.00	$264.00
HOSPITALS WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
HOSPITALS WITH MORE THAN 5 BEDS	$9.60	BED	YEAR		$3.60	$13.20
LAUNDRY/DRY CLEANING	$120.00	LICENSE	YEAR		$45.00	$165.00
LAUNDRY/DRY CLEAN. WITH ADD. EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
LAUNDRY/DRY CLEAN. WITH NONLOCAL TRUCK	$120.00	TRUCK	YEAR		$45.00	$165.00
LAUNDRY/DRY CLEAN. W/ ADD. NONLCL TRUCKS	$48.00	TRUCK	YEAR		$18.00	$66.00
MACHINES, GAMES, VENDING	$72.00	MACHINE	QTR		$27.00	$99.00
THEATRES	$1.92	SEAT	YEAR		$0.72	$2.64
SINGLE PRODUCTION	$0.12	SEAT	SHOW		$0.05	$0.17
NRSRY/PRVT SCHL - NIGHT, 5 BEDS, 1 EMP	$192.00	LICENSE	YEAR		$72.00	$264.00
NRSRY/PRVT SCHL - NIGHT, >5 BEDS	$9.60	BED	YEAR		$3.60	$13.20
NRSRY/PRVT SCHL - DAY CARE ONLY	$120.00	LICENSE	YEAR		$45.00	$165.00
NRSRY/PRVT SCHL - NITE/DAY, ADD EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
DAY CARE ONLY	$120.00	LICENSE	YEAR		$45.00	$165.00
DAY CARE WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
PATROLMAN	$24.00	EMPLOYEE	YEAR		$9.00	$33.00
PATROL SYSTEM	$168.00	LICENSE	YEAR		$63.00	$231.00
PAWNBROKER	$240.00	LICENSE	YEAR		$90.00	$330.00
PAWNBROKER WITH ADDITIONAL EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
PEDDLER (FOOT)	$96.00	PERSON	YEAR	**	$36.00	$132.00

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BUSINESS LICENSE FEES

Last update: Resolution No. 7105

FEE TITLE	CURRENT FEES	UNITS	TERM		BUSINESS IMPROVE. TAX	TOTAL
PEDDLER (FOOT)	$48.00	PERSON	DAY	**	$18.00	$66.00
PEDDLER (FOOT)	$72.00	PERSON	QTR	**	$27.00	$99.00
PEDDLER (VEHICLE)	$128.00	VEHICLE	YEAR		$48.00	$176.00
PUBLIC DANCE HALL-LONG TERM	$960.00	FACILITY	YEAR	**	$360.00	$1,320.00
PUBLIC DANCE HALL WITH ADD. EMPLOYEES	$9.60	EMPLOYEE	TERM	**	$3.60	$13.20
PUBLIC DANCE HALL-TEMPORARY	$120.00	FACILITY	MONTH	**	$45.00	$165.00
SEARCHLIGHTS	$48.00	MACHINE	NIGHT		$18.00	$66.00
SECONDHAND DEALERS	$216.00	LICENSE	YEAR		$81.00	$297.00
SECONDHAND DEALERS WITH ADD. EMPLOYEES	$9.60	EMPLOYEE	YEAR		$3.60	$13.20
SHARPENING TOOLS	$24.00	LICENSE	MONTH		$9.00	$33.00
SALES-SHRFF,BNKRPTCY,ASSIGNEE-LONG TERM	$480.00	LICENSE	YEAR		$180.00	$660.00
SALES-SHRFF,BNKRPTCY,ASSIGNEE-SHORT	$96.00	LICENSE	DAY		$36.00	$132.00
SIDESHOW, RIDES, ETC	$96.00	LICENSE	DAY	**	$36.00	$132.00
SKATING RINKS, SHOOTING GALLERY, RACETRK	$360.00	LICENSE	YEAR	**	$135.00	$495.00
SKTNG, SHTNG, RCTRK WITH ADD, EMPLOYEES	$9.60	EMPLOYEE	YEAR	**	$3.60	$13.20
TAXICAB DRIVERS	$24.00	LICENSE	YEAR		$9.00	$33.00
TAXICAB OWNERS	$120.00	CAB	YEAR		$45.00	$165.00
VENDERS (ITINERANT)	$96.00	LICENSE	YEAR	**	$36.00	$132.00
VENDERS (ITINERANT)	$48.00	LICENSE	DAY	**	$18.00	$66.00
VENDERS (ITINERANT)	$72.00	LICENSE	QTR	**	$27.00	$99.00
VENDING MACHINES	$32.00	MACHINE	YEAR		$12.00	$44.00
MASSAGE FILING FEE	$100.00					
FINGERPRINTS	$42.00					
PERMIT FEE	$50.00	PERMIT	YEAR			
NEW BUS LIC APPLICATION/ IN-TOWN	$34.00	APPLICATION	YEAR			
NEW BUS LIC APPLICATION/ OUT-OF-TOWN	$13.00	APPLICATION	YEAR			
NEW BUS LIC APP/ OUT-OF-TOWN CONTRACTOR	$25.00	APPLICATION	YEAR			
BUISINESS LICENSE LISTING	$9.00	REQUEST	PLUS $0.10 per page			

*= Business Improvement Tax
set by Ordinance No. 1738

**= Permit Required