

Comments on the 2021-2029 Housing Element:

Planning Commission Meeting

May 10, 2022

Community Development Department

Housing Element Adoption Process

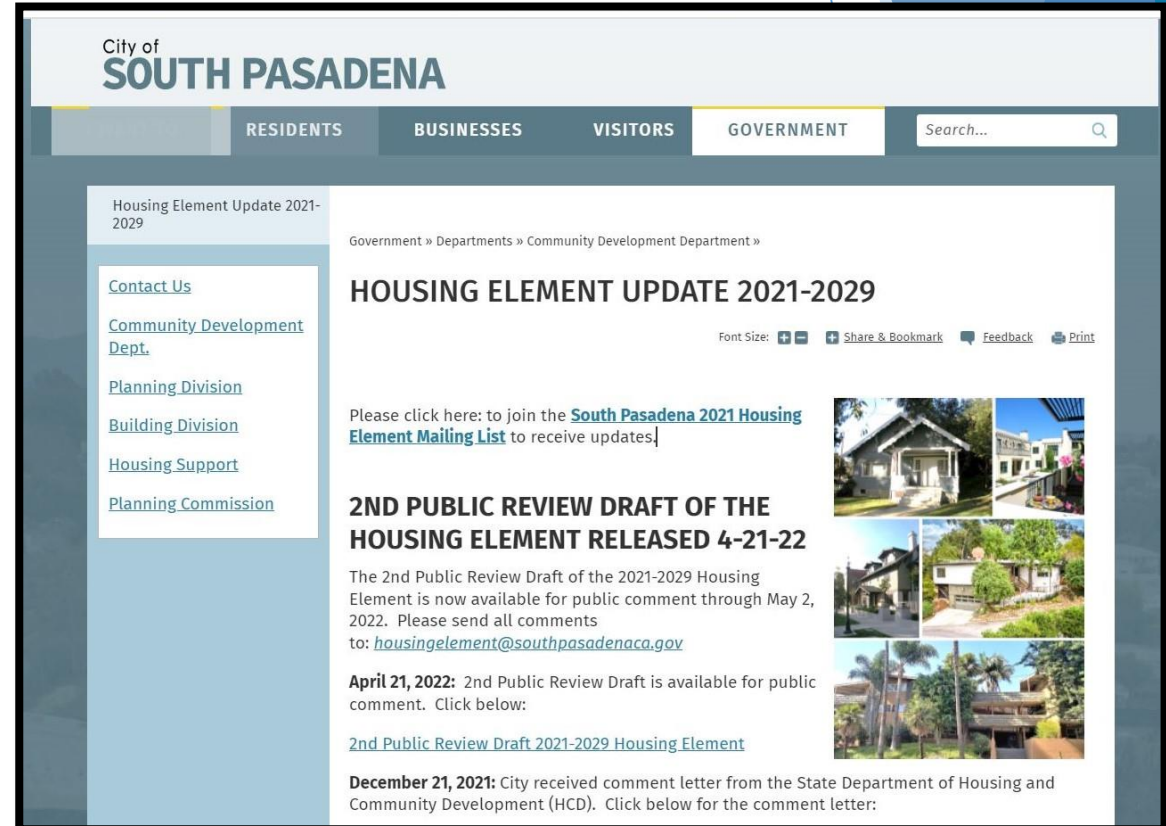
	ANTICIPATED DATE
HCD Comments Received on Draft Housing Element	December 21, 2021
Revise, release Revised Draft and send to HCD	May 2022
Receive HCD Comments on Revised Draft (60 days)	July 2022
Planning Commission/City Council Hearings to Adopt Housing Element	August - September 2022
HCD Certification (60 days)	September – November 2022

HCD Comment Letter, December 2021

- ▶ HCD's letter contained 9 pages of comments
- ▶ More comments were received on certain areas of the document:
 - ▶ Assessment of Fair Housing, including new requirement to include analysis of fair housing factors together with the sites inventory per AB
 - ▶ Sites Inventory including realistic capacity, suitability of nonvacant sites, small sites, city-owned sites, and ADUs
 - ▶ Governmental Constraints, including development standards, processes and procedures, and local ordinances/regulations affecting housing supply
 - ▶ Housing Programs
- ▶ The letter is available on the Housing Element page of the City's website here: <https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029>

Revised Draft Housing Element

- ▶ Revised Draft of the Housing Element released for public review on April 21, 2022
- ▶ It is available here:
<https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029>



The screenshot displays the City of South Pasadena website. The header includes the city name and navigation tabs for RESIDENTS, BUSINESSES, VISITORS, and GOVERNMENT. A search bar is located on the right. The main content area is titled "HOUSING ELEMENT UPDATE 2021-2029" and includes a breadcrumb trail: "Government » Departments » Community Development Department ». Below the title, there are social media sharing options and a "Print" button. The main text reads: "Please click here: to join the [South Pasadena 2021 Housing Element Mailing List](#) to receive updates." Below this is a section titled "2ND PUBLIC REVIEW DRAFT OF THE HOUSING ELEMENT RELEASED 4-21-22" with a sub-headline: "The 2nd Public Review Draft of the 2021-2029 Housing Element is now available for public comment through May 2, 2022. Please send all comments to: housingelement@southpasadenaca.gov". A date-specific announcement follows: "April 21, 2022: 2nd Public Review Draft is available for public comment. Click below:" with a link to "2nd Public Review Draft 2021-2029 Housing Element". At the bottom, another announcement states: "December 21, 2021: City received comment letter from the State Department of Housing and Community Development (HCD). Click below for the comment letter:". The page is decorated with several images of residential buildings.

Review of Comments Received

- ▶ Confirmed that sites in the proposed inventory are suitable and allow for development of at least the number of units included in the sites inventory
- ▶ Made revisions to address public comments and HCD comments
- ▶ Appendix B has been updated with details about how comments were addressed when revisions were made

Revisions to Address HCD and Public Comments

- ▶ Section 6.1 Executive Summary - updated programs in Table VI-2 to match changes to programs in Section 6.8
- ▶ Section 6.2 Introduction - Public Participation subsection was revised
- ▶ Section 6.3 Housing Needs Assessment
 - ▶ Added information on extremely low income households and ways City supports that group
 - ▶ Added information on the condition of the South Pasadena housing stock
- ▶ Section 6.4 Fair Housing Assessment
 - ▶ Added information on fair housing related outreach for the Housing Element

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.4 Fair Housing Assessment (continued)
 - ▶ Added analysis under the following sections:
 - ▶ Patterns of Integration and Segregation
 - ▶ Access to Opportunity
 - ▶ Disproportionate Housing Need & Displacement Risk in particular related to homelessness and gentrification and displacement risk
 - ▶ Added substantial amount on local history of discrimination
 - ▶ Added to the Enforcement of Fair Housing and Outreach Capacity section
 - ▶ Added analysis of sites in inventory and fair housing factors including adding charts

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.5 Housing Constraints
 - ▶ Added multi-family open space requirements
 - ▶ Added analysis regarding parking for multi-family projects
 - ▶ Added analysis of existing City Height Limit Initiative
 - ▶ Added information to the Permit Processing section
- ▶ Section 6.6 Housing Development Resources
 - ▶ Updated information about standards for emergency shelters, transitional and supportive housing, and single-room occupancy units
 - ▶ Updated information was added about the City Inclusionary Housing Ordinance

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.6 Housing Development Resources (continued)
 - ▶ Added analysis to Section 6.6.2 Land Resources:
 - ▶ Updated SB 9 analysis
 - ▶ Added Table VI-45 with historic trends to support realistic capacity on sites allowing lower densities suitable for moderate and above moderate units
 - ▶ Updated the Accessory Dwelling Unit potential based on 2021 ADU approvals and feedback from HCD
 - ▶ Updated representative projects table (Table VI-48) to indicate the types of sites in the proposed inventory that are similar to the representative multifamily projects on non-vacant sites
 - ▶ Updated information about outreach to owners of sites in the Housing Element draft inventory

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.6 Housing Development Resources (continued)
 - ▶ Added analysis to Section 6.6.2 Land Resources(continued):
 - ▶ Added information about sites in the Housing Element inventory that are proposed to receive the Affordable Housing Overlay
 - ▶ Added and removed sites in Table VI-50 and updated unit assumptions on most sites
 - ▶ Due to changes to ADU projections and sites in Table VI-50, Table VI-51 was updated to show progress towards meeting RHNA
- ▶ Section 6.7 Review of 2014-2021 Housing Element Past Performance
 - ▶ Minor updates were made to this section to update information about progress in implementation of programs

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.8 Housing Plan and Quantified Objectives - Substantive revisions were made to the following programs:
 - ▶ Program 1.b Housing Acquisition
 - ▶ Program 1.c Housing Rehabilitation and Code Enforcement
 - ▶ Program 2.a Provide Technical Assistance for Projects with Affordable Housing
 - ▶ Program 2.b Affordable Housing Production
 - ▶ Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance
 - ▶ Program 2.f Offer Services to People without Housing
 - ▶ Program 2.h Incentivize Special-Needs Housing
 - ▶ Program 2.j General Plan Affordable Housing Overlay

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.8 Housing Plan and Quantified Objectives - Substantive revisions were made to the following programs (continued):
 - ▶ Program 2.k Affordable Housing Overlay Zone
 - ▶ Program 2.l Facilitate Affordable Housing on City-Owned Property
 - ▶ Program 3.a Rezone and Redesignate Sites to Meet RHNA
 - ▶ Program 3.d Enable Parcel Assemblage
 - ▶ Program 3.f Allow and Facilitate ADUs
 - ▶ Program 3.g Monitor ADU Production
 - ▶ Program 3.h Back-up to Address Shortfall in Anticipated ADUs
 - ▶ Program 3.m Implement SB 9 and SB 10

Revisions to Address HCD and Public Comments (continued)

- ▶ Section 6.8 Housing Plan and Quantified Objectives - Substantive revisions were made to the following programs (continued):
 - ▶ Program 4.a Land Use Controls - Emergency Shelters
 - ▶ Program 5.a Fair Housing Education, Outreach, and Services
 - ▶ In addition, a new Program 5.b Removal of Racially Restrictive Covenants from Property Deeds Citywide was added to Section 6.8.
- ▶ Appendix A Sites Exhibits - updates were made to maps and the site-specific exhibits. Updates were made to nearly all exhibits to update unit assumptions and information about the site. In addition, some sites were added and removed.

Revisions to Address HCD and Public Comments (continued)

- ▶ Appendix B Public Participation Summary
 - ▶ Summary of all written public comments received on the Housing Element was added
 - ▶ Updated summary of meetings and outreach and comments received during meetings
 - ▶ Add summary of how comments received on the Public Draft Housing Element were addressed in the April 2022 revised draft
- ▶ Appendix C Letter to Property Owners - no changes
- ▶ Appendix D Qualified Entities - no changes
- ▶ Appendix E Accessory Dwelling Unit Projection Methodology - updated based on 2021 ADU approvals and feedback from HCD
- ▶ Appendix F Realistic Capacity Analysis - no changes



Community Development
Department

Comments and Questions