

Frequently Asked Questions: Tuesday, June 2, 2020 Housing Element Workshop

<u>Question/Comment</u>	<u>Answer</u>
Anything from Caltrans SR-710 properties?	The City will be evaluating all of the properties in the City, including the Caltrans properties, to determine which properties would be most feasible for additional housing units. The City, in partnership with non-profit Housing Related Entities, is working with Caltrans to acquire Phase I surplus SR-710 properties for affordable housing purposes. Caltrans Legal Department is currently reviewing the offer that has been submitted by the City.
Do you anticipate the current economic context will change RHNA #'s for So Pas?	There has been no indication from SCAG that the RHNA will change given the current and prolonged economic context.
<p>How was So Pasadena's RHNA'S number determined by SCAG when So Pas never responded to SCAG's two surveys? And what were SCAG's criteria to determine So Pas RHNA?</p> <p>Why did the City not respond to either of the two SCAG surveys, AFFH or Local Planning Factor Survey? These were due April 2019. Other cities who responded received a lower allocation. Who was responsible for responding?</p>	<p>The RHNA numbers were developed based on a formula established by SCAG that is based on: Projected household growth; Projected future vacancy need; Projected replacement need; Existing transit accessibility; Existing job accessibility; Existing residual distribution within the County; and Social Equity.</p> <p>Current staff has reviewed the City's files and has not been able to determine if AFFH or Local Planning Factor surveys were submitted for consideration. Staff has since reached out to SCAG staff to understand how the surveys would have affected our allocation. In response, SCAG staff clarified that the RHNA methodology used for all jurisdictions focused only on three inputs: 1) growth projections, 2) proximity to jobs, and 3) proximity to transit.</p> <p>The City participated in a review of SCAG's draft formula in Fall 2019 that resulted in an approximate RHNA allocation of approximately 1,200 units. Once SCAG published the final draft RHNA of 2,061 units for South Pasadena, the City has responded with several letters disputing the high RHNA allocation, and the City will file an appeal to SCAG.</p> <p>The 45-day period to appeal RHNA allocations began on September 11, 2020. On September 16, 2020 the City Council created and ratified a 5-member Ad Hoc Committee to work with Staff to prepare the City's appeal.</p>
What type of "residential approval" are you intending to reference? By the Planning Commission, even though	Residential approval refers to the point in the approval process when a residential project receives planning entitlements. This is prior to a building permit or certificate of occupancy and is the point when units in a project can be counted towards the current RHNA cycle.

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completion may be several years away?	
Can you please try to explain why the City is only seeing a handful of housing units built each year? Obviously South Pasadena is a very desirable place to live with a huge demand. What are the biggest barriers?	<p>There is not much vacant land in the City, and much of what is vacant is located in the hillside areas where the cost of development is higher.</p> <p>The cost of land compared to allowable height and density are likely obstacles to redevelopment of properties for housing in the Downtown area. Staff and consultants will have more insight into the obstacles during the later phase of the Sites Analysis when we reach out to property owners to gauge their interest in development as required by the State Housing and Community Development Department (HCD).</p>
Can you clarify what constitutes a “unit”?	<p>The US Census definition is as follows: <u>Housing Unit</u>. A housing unit is a house, an apartment, a group of rooms, or a single room occupied or intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants do not live and eat with other persons in the structure and which have direct access from the outside of the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible. If the information cannot be obtained, the criteria are applied to the previous occupants. Tents and boats are excluded if vacant, used for business, or used for extra sleeping space or vacations. Vacant seasonal/migratory mobile homes are included in the count of vacant seasonal/migratory housing units. Living quarters of the following types are excluded from the housing unit inventory: Dormitories, bunkhouses, and barracks; quarters in predominantly transient hotels, motels, and the like, except those occupied by persons who consider the hotel their usual place of residence; quarters in institutions, general hospitals, and military installations except those occupied by staff members or resident employees who have separate living arrangements.</p>
I heard MTA is eliminating some bus stops will that affect the RHNA?	<p>No. There has been no indication that the RHNA will change for this reason. If the Los Angeles County Metropolitan Transportation Authority (MTA or Metro) has eliminated bus stops in the city that affects proximity to transit, the City can include such data in the City’s appeal of the RHNA.</p>
Have you identified possible public land for affordable housing?	<p>The Sites Analysis will analyze all sites of the appropriate size to accommodate housing. Public lands are being evaluated as part of that process.</p>

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<p>I understand the City does not have a zoning designation that allows for the type of density the state says is needed to build affordable housing (30 units to an acre). Are there plans to change that in order to ensure affordable housing can be viable in the community?</p>	<p>The Mission Street Specific Plan allows 30 du/ac and greater. The Draft General Plan and DTSP currently propose to allow 30 du/ac for the entire DTSP area* and for the proposed mixed-use designation outside of the DTSP boundary.</p> <p><i>*Note: Staff is recommending that the density in the DTSP be increased to 50 du/ac for the Downtown area based on the precedent project Mission Bell which was approved with 50 du/ac.</i></p> <p>The Sites Analysis will identify additional opportunity sites for housing where rezoning to 30 du/ac could accommodate more housing.</p>
<p>ADU option does the city have guidelines?</p>	<p>The City has an existing ADU ordinance; however to maximize the number of ADUs that can be counted toward RHNA, the ordinance will need to be updated with aggressive policies and programs to incentivize production and affordability of ADUs.</p>
<p>Will the city consider acquisition of existing housing stock that is for sale to preserve as permanent or covenanted affordable housing?</p>	<p>The City does not have funds to purchase housing but instead looks for partners to purchase properties such as the surplus Caltrans properties. The City Council recently voted to join the San Gabriel Valley Regional Housing Trust (SGVRHT) in part to gain access to additional funds for affordable housing.</p>
<p>Will those experiencing homelessness and their needs be addressed in the housing element?</p>	<p>There are certain requirements of a Housing Element to discuss the needs, available services and facilities to serve those experiencing homelessness, including sufficient opportunities to locate shelters per state law, and consistency with state law related to types of housing required to be allowed that could serve those who are experiencing homelessness. In addition to the requirements that the state imposes, a city can address other housing related priorities in the Housing Element.</p>
<p>What were some of the barriers that limited achieving previous goals and how does the city plan to overcome them this round with much higher housing production goals?</p>	<p>The City does not have funds to leverage toward the production of affordable housing, and the lack of vacant properties and high cost of land are obstacles. The City Council recently voted to join the San Gabriel Valley Regional Housing Trust (SGVRHT) in part to gain access to additional funds for affordable housing.</p> <p>The City Council, Planning Commission and several community members have requested that an Inclusionary Housing Policy be developed to require that developers build a certain percentage of units as affordable. A draft Inclusionary Housing ordinance is under development. The Accessory Dwelling Unit (ADU) Ordinance can also be updated to allow more flexibility and the City could provide more</p>

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	aggressive policies and programs to incentivize the production and affordability of more ADUs.
If City is penalized for not reaching RHNA #, will all State funding be withheld or just in particular buckets?	There are some state funding sources that require a certified Housing Element and some that do not. Examples of those that do include Senate Bill 2 planning grant funds and CDBG. An example of a funding source that doesn't require a certified Housing Element is the Local Early Action Planning grant (LEAP).
I understand one of the criteria SCAG used for the calculation is if there was a transit stop. Because we "sacrificed" years ago to have this train stop, are we being "penalized" by having more housing added to our small built out city?	Proximity to a high quality transit stop is one of many factors in the RHNA methodology. 986 of the 2,062 units assigned to South Pasadena are related to this factor.
What will make the consequences of not meeting goals more dire than in the past when the state did not come down on cities when numbers not met?	The state has only recently been increasing its enforcement. Examples of more recent enforcement include the state sued one jurisdiction for not making land available to accommodate housing; and has been working with other jurisdictions without a certified Housing Element to set up a plan and schedule to gain compliance.
You may have provided the overview already, but how many housing units are there in SP now, and what would the RHNA requirements of 2k+ more units be as a % increase?	As of 2017, the City had 11,155 residential units. Adding 2,062 units would be an 18 percent increase.
You talk about how you can change the housing element but not the zoning. Isn't it pretty much required for the zoning to be changed in order for the housing element to be approved by the state?	Policies and programs in the Element will likely require changes to zoning. The zoning changes are not created by the Housing Element itself but will need to be implemented as a separate series of Zone Code Amendments by the City subsequent to the adoption of the Housing Element.
Will the housing element be consistent with the findings from the City's climate action plan currently being created	Staff is coordinating the Housing Element with the various policies being developed, including the Climate Action Plan and Draft General Plan Update and Downtown Specific Plan.

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<p>Why are rehabilitated houses not counted? We are a largely built out city with not much room for building new housing and the city should be making that case. What efforts are the city talking to get that point across to SCAG?</p>	<p>Rehabilitated houses are an important part of the city’s housing stock. Generally, they cannot be not counted towards the RHNA because they do not add new units to the overall number of housing units in the city. However, per HCD, under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that:</p> <ul style="list-style-type: none"> • will be substantially rehabilitated. • located on a foreclosed property or in a multifamily rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental. • preserved at levels affordable to low- or very low-income households, where the local government has provided those units with committed assistance.
<p>Why is the City appealing the requirements?</p>	<p>The City is appealing the RHNA allocation based on the anticipated lack of capacity to realistically accommodate over 2,000 new units within 8 years.</p> <p>On September 16, 2020 the City Council created and ratified a 5-member Ad Hoc Committee to work with Staff to prepare the City’s appeal. The 45-day period to appeal RHNA allocations began on September 11, 2020.</p>
<p>Can the city publish the criteria SCAG used to calculate this allotment so the citizens can have a discussion?</p>	<p>The methodology that SCAG used to develop the RHNA allocations is available for review here: http://www.scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf</p>
<p>So if the Planning Commission approved a project during the 5th cycle but it won’t be completed until the 6th it doesn’t count towards the latter’s compliance? Since the Planning Commission recently approved two large (for South Pas) market rate developments they can’t help us regarding RHNA compliance (since we already exceeded our numbers for</p>	<p>That is correct. The current Housing Element cycle does not conclude until midway through 2021. Approved and constructed units can begin to be counted towards the 6th cycle RHNA on June 30, 2021. The RHNA numbers are considered a minimum goal by the state so units do not count towards the next cycle once the RHNA number has been met until the next cycle begins.</p>

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market rate housing)? If so, that's crazy!	
Do you believe based on your early analysis that we can fit our RHNA in our current zoning?	There is not enough capacity within current zoning to accommodate all 2,062 units, especially the lower income units which generally require land that is zoned at 30 du/ac or higher. The Sites Analysis will determine what capacity there is, and the shortfall that would need to be accommodated through zoning changes.
What other cities or entities are the city joining up with, as mentioned, to challenge the numbers?	<p>In the past, the City has worked with the City of Cerritos, as well as SCAG and the San Gabriel Valley Council of Governments to challenge the basis of the RHNA allocations.</p> <p>For the City's appeal, the City will submit its own appeal. On September 16, 2020 the City Council created and ratified a 5-member Ad Hoc Committee to work with Staff to prepare the City's appeal. The 45-day period to appeal RHNA allocations began on September 11, 2020.</p>
Will the City consider in the new ADU ordinance how the design guidelines will affect the total potential number of additional ADUs that can be developed (such as minimum lot size and sf requirements)? For the ADU guidelines, propose alternative scenarios that vary the total potential for ADUs.	<p>The City is required to incentivize ADUs for affordable housing, so yes, we will look at any restrictions and their impacts.</p> <p>The Sites Analysis that is underway assumes that the City will adopt aggressive housing production and affordability policies and programs in order to meet its RHNA obligations.</p>
Can the city publish the RHNA number of the surrounding cities like Pasadena, San Marino, Alhambra so that the citizens can evaluate our situation compared to our neighbors?	<p>San Marino: 398</p> <ul style="list-style-type: none"> • Very Low - 149 • Low - 91 • Moderate - 91 • Above Moderate - 68 <p>La Canada Flintridge: 611</p> <ul style="list-style-type: none"> • Very Low - 251 • Low - 135 • Moderate - 139 • Above Moderate - 87 <p>Pasadena: 9,409</p> <ul style="list-style-type: none"> • Very Low - 2,739 • Low - 1,659 • Moderate - 1,562 • Above Moderate - 3,449

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	<p>Alhambra: 6,810</p> <ul style="list-style-type: none"> • Very Low - 1,769 • Low - 1,033 • Moderate - 1,077 • Above Moderate - 2,931
<p>One obvious property to build housing is the Storage site next to the Gold Line Station, a perfect location. What efforts are being made to partner or induce the owner to develop this site as opposed to having it continue as storage?</p>	<p>The storage facility adjacent to the Gold Line Station is being considered for additional density as an opportunity site for housing. Staff and the Housing Element consultants will be exploring if (and how) increases in height at this and other locations are needed in order to meet the City's RHNA.</p>
<p>Caltrans acquisition any update</p>	<p>The City has enlisted the help of its legislators to obtain regular updates regarding the status of the Phase 1 SR-710 Surplus Property Sales. Caltrans' most recent update was that the proposed offers were still being reviewed by their legal department.</p>
<p>South Pasadena has a higher housing allocation relative to existing units and population compared to Sierra Madre, San Marino, La Canada, Monrovia and Arcadia. How do you plan to push back?</p>	<p>SCAG's formula is based on Projected household growth; Projected future vacancy need; Projected replacement need; Existing transit accessibility; Existing job accessibility; Existing residual distribution within the County; and Social equity.</p> <p>The City has already submitted letters disagreeing with the South Pasadena RHNA allocation and will appeal the RHNA. On September 16, 2020 the City Council created and ratified a 5-member Ad Hoc Committee to work with Staff to prepare the City's appeal. The 45-day period to appeal RHNA allocations began on September 11, 2020.</p>
<p>If zoning is designated for low income housing, does that mean that moderate housing can no longer be built there? Say the empty lot on Mission and Fairfax is designated for 50 low income units, can the owner decide to build 50 normal units?</p>	<p>Until an Inclusionary Housing Ordinance is adopted that sets the minimum percentage of affordable units that is required, the City cannot force a developer to build affordable units. Staff anticipates that an Inclusionary Housing Policy will be presented for consideration to City Council in November or December 2020.</p>

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<p>Given the precedent of capping freeways for special uses in other cities, would capping over the Pasadena Freeway (110) be considered potentially developable?</p>	<p>Freeway capping is extremely expensive and would need to be heavily subsidized to become a viable option. Also, the 110 Freeway is an historic highway.</p>
<p>Why did the city not require inclusionary housing when approving the Mission Bell project?</p> <p>Were any low/moderate income requirements put on the Mission Bell project?</p>	<p>The City does not currently have an inclusionary housing policy. Therefore, the Mission Bell project was not required to include affordable units.</p>
<p>Can we up zone Camden Parkway and Grand Avenue? Those properties have large lots.</p>	<p>In the draft General Plan, properties along Grand Avenue are generally designated as Low Density Residential and along Camden Parkway as Very Low Density Residential. These designations are generally consistent with their current zoning. The primary variation being that the Very Low Density designation allows up to 3.9 du/ac, whereas the comparable current zoning district (Residential Estate) allows up to 3.5 du/ac. This approach is consistent with the General Plan’s Guiding Principles and policy of directing new growth to the Downtown, Ostrich Farm and Neighborhood Centers along Huntington Drive (P 3.2). Public feedback and analysis conducted during the Housing Element update will determine whether revisions to the draft General Plan need to be made to allow for increased housing development in select areas of the City.</p>
<p>Does the City have the infrastructure capacity, e.g. water, sewer, road repair to sustain 2,000 more units?</p>	<p>An Environmental Impact Report (EIR) will study whether there is infrastructure capacity to accommodate over 2,000 more housing units.</p>

Comments:

- Only 23 residents on the Zoom
- We have lots of vacant land for sale in South Pas on Peterson, Hanscom, and Kendall “Elephant Hill” near Monterey Hills off Collis and Kendall
- The limitations regarding use of developed sites for low income housing is fundamentally inconsistent with the state interest in promoting infill development.