

The City of South Pasadena provided the following comments to the Department of Community Development (HCD) on June 29, 2022, in response to HCD’s preliminary comments during their review of the 2nd Public Review Draft Housing Element (April 2022). As allowed in the review process, comments herein are presented for incorporation into HCD’s review of this draft, and are being posted for the public’s review and comments as well. The table below was shared by HCD, and the right column contains the City’s responses that do the following:

- Direct HCD to locations in the document that we believe answer the questions HCD is indicating.
- Propose additional language, shown in underline, to sections and programs that, by their inclusion here, should be considered as part of this draft.

Com ment #	HCD Comment on Previous Housing Element	Page #	Response	Prelim Review	Analysis and Notes	City Response
General Questions						
1	HCD received public comments, particularly on sites inventory. City response?					<p>The City has reviewed all of the recent public comments.</p> <p>City will be proposing to remove some sites in Table VI-44 based on public comments.</p> <p>Proposed revised text for Appendix A table for Site 19: <u>Existing use is a parking lot used by the commercial uses to the west. The Property does not have a covenant to provide required parking for adjacent uses based on a Variance that was granted. Provision of parking for the Rite Aid site would need to be resolved as part of the development of this site. This site is centrally located near transit and services. The parking lot has previously been listed for sale.</u></p>
A. Affirmatively Furthering Fair Housing						
2	Identified Sites and Affirmatively Furthering Fair Housing (AFFH): To support conclusions related to fostering inclusive communities, the element	124-133	Additional analysis suggests that because South Pasadena itself is a high opportunity area,	No/?	Impact on patterns by location/ neighborhood/tract? Analysis should	The City land reserves are limited and relying on 100% affordable projects cannot reach the RHNA goal so mixed income approach makes sense in

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<p>should analyze the location of all sites by income group and the number of units, magnitude of the impact on existing patterns of socio-economic characteristics, any isolation of the sites and number of units by income group.</p>		<p>no clustering of sites should make a difference with respect to fair housing/ patterns of segregation. Further states IZ requirements will ensure broader access to opportunity in South pas's highest income areas.</p>	<p>address impact on income pattern</p> <p>Emphasis on mixed income approach on many sites for lower?</p> <p>Effectiveness of IZ in higher opportunity areas?</p> <p>How RHNA and impact on patterns by area reflected in programs? Increased housing choices in higher opportunity/income areas: R1/SF, etc?</p>	<p>South Pasadena. The mandatory inclusionary zoning requirements also contribute to this goal.</p> <ul style="list-style-type: none"> Text proposed to be added in Section 6.4.10 Analysis of Sites Inventory for Fair Housing (approximately page 102) as follows: <u>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.</u>
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					<p><u>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 as other income groups living in the same 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 options typically dominated by single-family homes. This multi-pronged approach has been taken to ensure integration of income groups in all neighborhoods and combat fair housing issues associated with income distribution.</u></p> <p><u>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 ensure that affordable housing is included in all mixed-use and residential districts. As the ordinance is relatively new, there have not yet been opportunities to assess the effectiveness of it on increasing the supply of affordable housing, particularly in higher resource areas. However, the City has included 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.</u></p> <ul style="list-style-type: none"> • A new sentence is proposed to be added to the Potential Effects on Patterns of Integration and Segregation section at the end of the first paragraph of the Income
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					<p>subsection (approximately page 102) as follows:</p> <p><u>Additionally, in this neighborhood with slightly higher poverty rates, the City has identified mixed-income sites to both meet the need of existing and future lower-income areas while also combating concentration of lower-income households by integrating moderate- and above moderate-income units.</u></p> <ul style="list-style-type: none"> • A second new sentence is proposed to be added to the Potential Effects on Patterns of Integration and Segregation section at the end of the second paragraph of the Income subsection (approximately page 102) as follows: <p><u>Additionally, in this neighborhood with slightly higher poverty rates, the City has identified mixed-income sites to both meet the need of existing and future lower-income areas while also combating concentration of lower-income households by integrating moderate- and above moderate-income units.</u></p> <ul style="list-style-type: none"> • A third new sentence has been added to the Potential Effects on Patterns of Integration and Segregation section in the third paragraph of the Income subsection (approximately page 103) as follows: <p><u>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</u></p>
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					<p><u>in all neighborhoods where sites have been identified.</u></p> <ul style="list-style-type: none"> • A new paragraph has been added to the Income subsection just below Figure VI-24 (approximately page 104). The text is below: <u>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.</u> • New text has been added in the Potential Effects on Access to Opportunity section in the Jobs and Transit Proximity subsection. The new text is below: <u>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 units. The identification of sites is expected to support housing opportunities for current</u>
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						<p><u>and future South Pasadena residents near jobs and transit to support a strong economy and provide economic mobility opportunities, therefore positively impacting the neighborhood.</u></p> <ul style="list-style-type: none"> New text has been added in the Potential Effects on Access to Opportunity section in the Educational Opportunities subsection (approximately page 107). The new text is below: <p><u>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.</u></p>
3	<p>Local Data and Knowledge: The element generally does not address this requirement.</p>	51-56-89, 93-98, 116-118	Additional information about poverty, patterns of segregation, opportunity, etc	~/?	<p>added info on covenants history; what about zoning practices, investment? Other local knowledge? Other planning documents? Code enforcement, local infrastructure and other investments discussed. other discriminatory such as zoning,</p>	<p><u>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, that would influence development patterns in South Pasadena.</u></p> <p><u>Additional proposed revisions a bit further down in the Mid-20th Century Racial Exclusion section (approximately page 96): Since the 1940s, there have not been governmental policies or practices in South Pasadena that supported, directly or</u></p>

				<p>growth controls, local initiatives practices after the 1940's.?</p>	<p><u>indirectly, discrimination against non-white residents.</u></p> <p><u>A new section Investment Patterns has been added (starting approximately on page 94) after the Mid-Century Racial Exclusion section. The new text is below:</u></p> <p><u>Investment Patterns</u></p> <p><u>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 need, which has prevented disinvestment in any particular area of the city. Investment is based on public demand and benefits all residents. Recent projects that specifically target increased access to resources and neighborhood revitalization in areas with slightly higher rates of poverty include:</u></p> <p><u>South Pasadena Library:</u> <u>The South Pasadena Library Capital Improvement Program (CIP) 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 will possibly be funded in part by a State Library infrastructure grant, requiring matching funds from the City.</u></p>
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					<p><u>Fremont/Huntington Mobility Active Transportation Project:</u> <u>The proposed 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.</u></p> <p><u>North-South Corridor (Fair Oaks) ITS Deployment:</u> <u>The project includes a traffic study on Fair Oaks 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.</u></p> <p><u>Rectangular Rapid Flashing Beacons:</u> <u>These pedestrian actuated crossing devices that halt oncoming crosswalk traffic using rectangular shaped rapid flashing LED lights, will be</u></p>
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					<p><u>installed at three locations in the City’s lower-income residential area: Fremont Avenue and Lyndon Street, Mission Street and Diamond Avenue, and Mission Street and Fairview Avenue. The devices and their installation are grant funded by the Caltrans Highway Safety Improvement Program (HSIP).</u></p> <p><u>Pedestrian Crossing Devices:</u> <u>The project consists of the installation of pedestrian crossing devices at one or more locations in the City, depending on the device selected, and a feasibility analysis of the location(s). Potential locations include Huntington Drive, Fair Oaks Avenue, and Meridian Avenue, and potential devices include High-Intensity Activated Crosswalk (HAWK) Beacons / Pedestrian Hybrid Beacons (PHBs), Rectangular Rapid-Flashing Beacons (RRFBs), or other devices deemed appropriate for the selected location(s).</u></p> <p><u>Mission Street Slow Street:</u> <u>Though not a CIP project, the City’s Slow Streets Program includes a temporary demonstration project along Mission Street 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. This is accomplished by installing temporary program equipment along streets. This takes the form of 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</u></p>
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					<p><u>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. After the installation is removed, the project team will develop an evaluation report, which will include an assessment of the design’s observable performance, and an evaluation of the community’s experience during and at the conclusion of the program.</u></p> <p><u>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. Projects listed in the CIP that establish equity in transportation demands, will be prioritized in locations where there are lower-income housing units.</u></p> <p><u>Another new section was added after the Investment Patterns section – Land Use and Zoning Practices. The new text is below:</u></p> <p><u>Land Use and Zoning Practices</u></p> <p><u>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</u></p>
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					<p><u>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:</u></p> <ul style="list-style-type: none"> • <u>Single Family Residential: Land designated for detached, single-family residential land use (one or two dwelling units per parcel of land).</u> • <u>Other Residential: Land designated to allow for multiple dwelling units per parcel of land or a blend of multiple uses that includes residential use.</u> • <u>Non-Residential: Land designated for non-residential uses such as parks and open space, commercial, and industrial.</u> <p><u>As part of the analysis, land that is not developable, such as streets, waterways, and other similar areas, were removed.</u></p> <p><u>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 land in 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. Across the SCAG region,</u></p>
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					<p><u>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.</u></p> <p><u>However, this does not negate the potential impacts on fair housing that result from the dominance of single family zoning in South Pasadena. Therefore, in an effort to combat these patterns, the City has included the following programs:</u></p> <ul style="list-style-type: none"> • <u>Program 2.e to encourage density bonuses in conjunction with the Inclusionary Housing ordinance to increase the supply of affordable units.</u> • <u>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.</u> • <u>Program 3.k to encourage production of ADUs to increase density in existing single-family neighborhoods.</u>
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4	<p>Contributing Factors: The element should re-assess and prioritize contributing factors upon completion of analysis and make revisions as appropriate.</p>	134-136	Added contributing factors	~/No/?	<p>Contributing factors were not prioritized. Factors reflected with meaningful actions? For example: strategies to increase more affordable housing types in higher opportunity neighborhoods or throughout the community?</p>	<p>Draft states in the last sentence on page 106 of the clean version of the draft element that prioritization of contributing factors is indicated in bold text in Table VI-33 and that the actions to meaningfully affirmatively further fair housing related to these factors are bolded and italicized. Table VI-33 starts on page 107 of the clean version of the draft element. The prioritization information can be emphasized more through revisions to the actual table.</p> <p>Revisions to Table VI-33 are proposed to address this comment. In the section for meaningful actions to address contributing factors related to displacement/exclusion of lower-income residents and overpayment for housing by renters and homeowners (far right column), the name of Program 2.b was revised to reflect the correct program name. Also in that section of the table Program 2.i Inclusionary Housing Regulations – Monitor for Effectiveness was added to address this fair housing issue as a priority action. Also in this section the title of Program 3.k was corrected to ADU Education, Promotion, and Homeowner Outreach. This is still a priority action.</p>
A. Sites Inventory						
5	<p>Realistic Capacity: For sites intended to accommodate the moderate and above moderate income RHNA (Table VI-41), the element indicates a realistic capacity assumption of 80 percent of maximum allowable densities based on development standards and historic trends. However, the element should include supporting information such as a list of recent trends</p>	199-207, F1-1 – F1-4	-Listed projects at or above 80% maximum allowable density	Yes		

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<p>by project, zone, allowable density, number of units, built density and affordability.</p> <p>In addition, the City will be using an affordable housing overlay zone to accommodate the RHNA. Several sites proposed for the overlay have existing non-residential general plan designations and as a result, the calculation of residential capacity should account for the likelihood that sites may develop with 100 percent non-residential uses.</p> <p>The methodology should be based on based on factors such as development trends, performance standards or other relevant factors and add or modify programs (e.g., Program 3.b) as appropriate. The analysis should also rescale the 95 percent assumption on overlay sites, taking into account proposed new allowable densities and development standards such as heights.</p>	<p>200</p> <p>174 200 220</p>	<p>-Listed examples of nonresidential redevelopment</p>	<p>~/?</p> <p>No</p>	<p>Small amount? Recent 100% non-residential development? Pending? Likelihood?</p> <p>Only 4 sites with commercial, of those, most (3: 3, 6, 7 and 18) sites have expressed interest in residential and not all use 95%</p>	<p>The four sites proposed to receive the overlay are not zoned or designated commercial. The assumption of 95 percent is only used for Site 18 and that site is currently zoned High Density Residential and would only be allowed to redevelop as residential. New information about these sites was added in the current draft on page 165 of the clean version of the draft as follows:</p> <p>“Four of the sites included in Table VI-50 are proposed to receive the Affordable Housing Overlay (Sites 3, 6, 7 and 18). Three of those sites are already designated and zoned for residential development (Sites 3, 6, and 18).</p> <p>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.</p> <p>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</p>
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	<p>the element assumes 100 percent of larger (greater than 0.2 acres) vacant sites</p>				<p>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. Site 18 proposes the number of units that could be accommodated at 95 percent of maximum base density. Site 18 is currently zoned and designated High Density Residential which allows for a maximum building height of 45 feet. The maximum allowed height for this site is not proposed to change when zoning is updated to implement the density changes on Housing Element sites. Maximizing density at the 30 dwelling units per acre proposed to be allowed under the Affordable Housing Overlay would be possible well within the height limit that applies to this site. 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.”</p> <p>Sites in Table VI-44 with 2 units rather than 1 that are considered suitable for implementation of SB 9 are all vacant with no existing uses.</p>
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	will double in capacity. The element should include information to support this assumption.	200		No/?	- Minimal discussion of the extent existing uses impede additional development - fair amount of interest? What does this mean? How much? Circumstances? Site characteristics? How align with identified sites? How much is being counted? Monitoring program?	
6	Small Sites: Sites smaller than half an acre are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. While the element broadly mentions potential for consolidation based on	217 219-221 App A	-Talked about overlay zone’s potential to spur housing development on these sites -Sent letters, held meetings asking owners of small sites if they	No/?	What does strong potential mean? Common owner? Interest from property owner? Conversations between owners? Cohesive site that	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 13 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.a and will include

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	<p>trends in other nearby cities, it must include additional analysis to demonstrate the potential for consolidation on sites 10, 15, 19, 21 and 25. For example, the analysis could describe interest in consolidation from property owners based on proposed or enhanced policies or other conditions rendering parcels suitable and ready for lot consolidation.</p>		<p>were interested in development</p>		<p>lends itself to consolidation? How does trend match with South Pasadena zoning and development standards and site characteristics? Affordability in trends? How many lots were consolidated? Any sites less than 20 units with consolidation? See specific analysis of sites 10, 15, 19, 21 and 25?</p>	<p>adoption of the Downtown Specific Plan. Two small sites show fewer than 20 realistic units (Site 6 and Site 18). However, the maximum unit potential when multiplying the acreage of the sites times the maximum proposed density on both of these sites would result in more than 20 units on each site. Existing available examples have already been included in the current draft. Expect more projects to come forward once zoning and GP changes. Sites 10 (Gold Line Storage) and 21 (Parking Lot at Raymond Ln. and El Centro St.) in the previous draft of the Housing Element were removed and not included in the current draft. Additional information about previous draft sites 15 (now Site 13), 19 (now Site 18) and 25 (now Site 23) was added to Appendix A and Program 2.I in the current draft.</p>
7	<p>Environmental Constraints: The element notes many parcels are impacted by environmental constraints and sensitivities and generally describes a few environmental conditions within the City. However, the element must relate those conditions to identified sites and describe any other known environmental or other conditions that could impact housing development on identified sites in the planning period.</p>	149 179- 181	<p>Goes into more detail about environmental constraints States constraints allow the number of identified units (p. 181)</p>	~/?	<p>Analysis of impacts on identified sites? Any other known conditions that preclude/impact development? Any examples of developments on similar sites? See p. 126? How do recent examples relate to identified</p>	<p>It was noted in Appendix A, Site 9 that the site identified in Table VI-44 on East State Street was identified for relocation of the City public works yard. The public works yard replacement site identified on East State Street has been further examined and seems not to be feasible due to the cost of development to meet the public works yard needs. Propose to update the text for Site 9 in Appendix A to say: <u>The current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the public works yard, in</u></p>

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					<p>sites? Slopes similar?</p> <p>Public comments?</p>	<p><u>order to vacate the property for an affordable housing project.</u></p> <p>For APN 5317028270 on East State Street the City is looking into whether there is sufficient room for 15 residential units on the part of the property with access to Mockingbird Lane and that area is not underneath power lines. The City is continuing to look into other environmental issues on this site due to the proximity to Pasadena’s power plant.</p> <p>Some sites on steep slopes will be proposed to be removed from the next draft of the Housing Element. In addition, information about recent projects on slopes between 22 and 54 percent is included in the existing clean version of the draft on page 118.</p>
8	<p><u>Accessory Dwelling Units (ADUs):</u> The element should either adjust projections downward based actual on the average number of ADU permitted since 2018 (approximately 10 units per year) or include additional analysis and policies and programs.</p> <p>Further, while the element utilizes Southern California Association of Governments (SCAG) affordability figures approved by HCD, it must also consider public comments, including related to ADU affordability and could consider market conditions dissimilar from SCAG’s affordability figures.</p>	<p>183, 209-213</p> <p>211</p>	<p>Gives details about compliance with state ADU law, also provides background and programs regarding projected ADU assumptions.</p>	<p>No/?</p> <p>~/?</p>	<p>2021 figures differ from HCD records (20 ADUs) leaving a 4 year average near 10 ADUs – why the difference? What are 2022 figures? Actual applications? How support doubling?</p> <p>Public comments considered? How</p>	<p>The numbers included in the draft for 2021 ADU building permits conflicted with the 2021 Housing Element Annual Report and will be corrected. 19 ADUs received building permits in 2021, of which 9 will count towards the 6th cycle. The 2022 ADU building permits so far in 2022 are exceeding the projected 2022 number. From 1/1/22 through 6/22/22, 29 ADU building permits have been approved of the projected 35 building permits for this year. Revisions will be made to reduce the 2021 numbers to the correct numbers. However, the forecasted number (297) will not be changed for a total of 306.</p>

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					account for market? See program and monitoring of affordability	In addition, our understanding is that HCD supports relying on the SCAG ADU affordability analysis.
A. Zoning for a Variety of Housing Types						
9	<i>Emergency Shelters:</i> The element mentions emergency shelters are permitted in the Business Park zone, includes analysis of acreage and lists development standards. However, the element should also analyze those standards, particularly bed limits and parking and add or modify programs as appropriate.	50 187-189 315	Added analysis and programs to be in compliance with state law	No	Program 4.a should specifically commit to modify spacing, beds and parking – program only commits to bed limits	Program 4.a will be revised to call for revising standards for parking and distance between shelters to comply with state law. The Eight Year Objective for Program 4.a is proposed to be amended as follows: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law <u>in regard to parking and distance between shelters</u> and to establish the maximum number of beds, permitted in any one emergency shelter at 30 beds.
A. Governmental Constraints						
10	Land-Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to multifamily parking garages, heights and open space and must address how development standards will facilitate	139, 140, 142-149, 151-152, 163-166, 171	Added details about all land use constraints and how they limit development.	~/No/?	- Multi-family open space requirements: identified but no analysis - Parking: Mentions “subterranean parking is the only	Program 3.a calls for any needed zoning changes.

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	<p>achieving maximum allowable densities under the proposed overlay zones. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.</p>				<p>viable option” to meet requirements, but no further analysis.</p> <p>- Height Limits: 45 feet likely nonviable for many projects especially projects with onsite affordable housing. Public comments highlighted how cities own analysis showed that this made projects unviable but this is not a part of the analysis. A lack of support for a ballot measure noted.</p>	<p>Analysis of heights including the local initiative is included in the current draft starting on page 120 of the clean version.</p>
<p><u>11</u></p>	<p>Processing and Permit Procedures: While the element mentions the design review by the Design Review Board, Cultural Heritage Commission or Planning Commission, it should analyze the process, including processing times.</p> <p>The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information such as the time from initial application to issuing building permits. The analysis should address impacts on</p>	<p>166 173, 174, 178, 179</p>		<p>No/?</p>	<p>Approval findings listed but no analysis</p> <p>Although it mentions this process earlier, it does not go into the “Pre-application” wait times, which public commenters have pointed out can</p>	<p>Program 3.a calls for any needed zoning changes. In addition, processing times are addressed by Program Program 3.l – Increase and Maintain Planning and Housing Staff Resources which has already been partially implemented.</p>

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	housing cost, supply, timing and approval certainty.				take more than a year. Analysis of timing?	
12	Other Local Ordinances: The element must analyze any locally adopted ordinances that directly impacts the cost and supply or residential development (e.g., inclusionary requirements, short term rentals, growth controls).	100, 163, 195-	Additional details added on these ordinances	No	<p>Inclusionary analysis? Impacts on costs? 20%? Less than 10 unit a constraint? Fee options for lower? In lieu fee and cost of a comparable unit? So \$600-700K? does density bonus affordability count toward inclusionary? Infeasibility clause?</p> <p>Public comments? Input from builders? Any economic analysis? Other requirements? Who approves?</p> <p>Program 2.i must also commit to evaluate as a constraint, impacts on cost and feasibility, etc.</p>	<p>As the Inclusionary in-lieu fee is being developed, the City is reviewing the economic feasibility of developing inclusionary housing onsite, with consideration to bonuses and concessions available to those projects. The City expects this report to be presented to the Planning Commission in Summer 2022.</p> <p>Density bonus units are not included in the calculation of the City's Inclusionary requirement.</p> <p>Proposals to comply with the Inclusionary Housing Ordinance are reviewed along with the other required permits for a project so the approval body would be the same as for the rest of the project.</p>

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<p>13</p>	<p>Housing for Persons with Disabilities (Group Homes for Seven or More Persons): The City’s zoning code excludes group homes for seven or more persons from most residential zones and subjects these uses to a conditional use permit (CUP). The element should include specific analysis of these and any other constraints for constraints on housing for persons with disabilities and add or modify programs as appropriate to permit these uses objectively with approval certainty.</p>	<p>184-187 319</p>	<p>Removing CUP requirements for residential care facilities with more than 7 people and details about zoning constraints</p>	<p>No</p>	<p>Program 5.b (p. 319) – licensing should not be required – modify program</p>	<p>Will clarify in Program 5.b that state licensing requirements will still be required for facilities that require a state license as not all do.</p> <p>Specifically, the language will be edited as follows:</p> <p>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, <u>when a state license is a requirement for the residential care facility.</u></p>
	<p>While the element includes an analysis of potential non-governmental constraints, such as the availability of financing, it must analyze requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis should address any hinderances on the jurisdiction’s ability to accommodate RHNA by income category and include programs as appropriate.</p>	<p>136 137-140, 142-152, 166, 173, 174, 178, 179</p>	<p>-no requests at lesser densities (p. 174)</p>	<p>No/?</p>	<p>time between approval and building permit?</p> <p>Check page 136?</p>	<p>The following sentence exists in the draft element on page 127 of the clean version of the element and page 174 on the version that shows revisions above the Application Processing Times subheading:</p> <p>“Applications for building permits are usually submitted within one year once a project is fully entitled.”</p>

B. Housing Programs

14	Program 3.b (Mixed-use Development): The Program should be revised with additional incentives or other strategies based on a complete analysis of nonvacant sites and realistic capacity assumptions.	308	Adds details about incentive program for mixed use development	No	No incentives beyond existing practice and complying with state law	The City is continuing to look into this as part of the Downtown Specific Plan development.
15	Program 3.d (Enable Parcel Assemblage): The Program should consider additional incentives, more frequent review and revision and any modification based on a complete analysis.	309	Added additional details about program	No	Depends on analysis More frequent review and revision Strengthen commitment to incentives (address “could” and “discuss”)	The City is committed to working with the development community on parcel assemblage and the program in the current draft reflects this commitment.
16	Program 2.I (City-owned Property): The Program should be revised with additional actions based on a complete analysis of City-owned properties.	305-306	Additional details from analysis.	~/?	Depends on complete analysis 2 building permits by 2029? This does not reflect units but a permit for multiple units. Add objective for total units in addition to lower	The program proposes for the City to issue building permits for 2 projects by 2029. The following language exists in Program 2.I in the draft element: “Eight-year Objective: Issuance of building permits for two projects, for a total of at least 70 ELI, VLI and LI units.” The unit numbers in the objective above need to be revised to correct the lower income numbers and add in the moderate and above moderate numbers. The following revisions are proposed (see underline and strikethrough changes): Eight-year Objective: Issuance of building permits for two projects, for a total of at least <u>470</u> ELI, VLI

						and LI units, <u>18 moderate units, and 11 above moderate units.</u>
C. Quantified Objectives						
17	While the element includes these new construction, rehabilitation and conservation objectives, the element could consider conservation objectives beyond 5 units in the planning period. For example, the City could consider other programs that result in conservation of the existing housing stock such as enforcement, housing choice vouchers or energy conservation strategies.	4 320		~/?	Minor revisions to conservation objectives from 5 to 20 – Need? Consider objectives for Programs 1a, 1c, 2c, 2d, 3c, 3i, 5a	The rehabilitation and conservation quantified objectives in Table VI-55 are proposed to be revised to 61 units. The footnote will be updated to note that these reflect the quantified objectives in Program 1.c, 2.c and 2.d. Changes to the footnote are shown below. 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. <u>The number of units is based the quantified objectives in Program 1.c, 2.c, and 2.d.</u>
D. Public Participation						
18	While the element describes public meetings, workshops and study sessions, moving forward, the City could employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households	Appendix B		No	No special effort made to reach low income households or renters.	The following language is in the draft on page 29 of the clean version of the draft: 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

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						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.
19	In addition, the element should describe how comments, including those received by HCD, were or will be considered and incorporated into the element.	28-29, 89-95, Appendix B		No	Plenty of comments about sites inventory, fair housing, realistic capacity, and zoning for a variety of housing types that does not appear to be integrated into the element.	Appendix B describes how public comments were addressed. The responses here further address more recent public comments.