



## CITY OF GLENDALE, CALIFORNIA

Community Development  
Planning

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February 16, 2023

### ***California Department of Housing and Community Development***

Division of Housing Policy Development  
2020 West El Camino Ave, Suite 500  
Sacramento, CA 95833

**Subject: Minor Modifications to City of Glendale 2021-2029 Housing Element Update**

Dear Ms. Prasad,

We are pleased to submit to the California Department of Housing and Community Development minor modifications to the Readopted 2021-2029 City of Glendale Housing Element. This Housing Element describes the City's updated plan for addressing the housing needs of its residents through October 15, 2029. As stated in the Department's letter dated February 10, 2023, the readopted housing element submitted on December 14, 2022 addressed the majority of statutory requirements; however, three minor modifications were necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The City has made these minor modifications and looks forward to being found in compliance by February 28, 2023 so that it can successfully receive \$3.7 million dollars in PHLA funds which will help construct affordable housing for those earning between 30% and 80% AMI.

The modifications made to the readopted Housing Element are minor and were made at the administrative level, as allowed by the City Council in accordance with Section 3 of Resolution 22-170, provided again for your reference.

The City is committed to working with the California Department of Housing and Community Development (HCD) to continue to implement the housing element, to ensure the legal adequacy of the general plan, and to preserve local control of land use decisions.

We have greatly appreciated the Department's assistance throughout.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erik Krause".

Erik Krause  
Deputy Director of Community Development  
City of Glendale  
[ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov) | (818) 937-8156

A handwritten signature in blue ink, appearing to read "Amanda Tropiano".

Amanda Tropiano  
Principal  
De Novo Planning Group  
[atropiano@denovoplanning.com](mailto:atropiano@denovoplanning.com)

## 2. Accessory Dwelling Units

In January 2020, new State legislation pertaining to Accessory Dwelling Units (ADUs) went into effect. The legislation amended Government Code Sections 65852.2 and 65852.22. The City subsequently updated its zoning ordinance for consistency with State law.

The City ~~approved-permitted 150 ADUs in 2018, 148~~110 ADUs in 2019, ~~and 179~~146 ADUs in 2020, and 265 ADUs in 2021. The City has taken significant proactive steps to advertise the opportunity for residents to construct ADUs, including information on the City's website, hosting presentations to the community, Planning Commission and City Council, and answering questions from the public in-person at City Hall and over the telephone. The City is also exploring the opportunity to prepare pre-approved plans to further streamline the ADU review and approval process.

During preparation of this updated Housing Element, it came to the City's attention that the California Department of Housing and Community Development Online Annual Progress Report – Data Dashboard and Downloads was depicting the number of ADUs permitted annually in Glendale incorrectly. This Dashboard utilizes information from each jurisdiction's Housing Element Annual Progress Report and summarizes the information in various formats. City Staff worked proactively with representatives from HCD to successfully resolve HCD's software issue and to ensure that the permit numbers reflected on the dashboard accurately match the City's correct permit reports.

Glendale made a conservative estimate of the number of ADUs that will meet a portion of the City's RHNA obligation. The City used the average annual number of ADUs ~~constructed-permitted~~ over the past three years multiplied by 8 (the number of years in the planning period), to estimate the number of ADUs (at a minimum) to be constructed during the planning period. While there is a slight difference between the number of units permitted and the number constructed in any given year, the City of Glendale, specifically, has observed that permitted ADUs are constructed and occupied within approximately 12 months. Currently, there is a small lag between units permitted and constructed due to changes in ADU requirements at the State-level which have caused homeowners to pause and refine their plans, but the City has received no indication that permitted units will not be constructed within the planning period. For example, in 2021, the City issued 265 new permits for ADUs or JADUs and realized construction of 257 new units. The number of ADUs and JADUs *constructed* in 2021 is a 36% increase over the City's projected assumption for the development of ADUs and JADUs during the planning period, further supporting the City's estimates outlined in this section.

The City fully expects that based on the trends seen in 2020, 2021, and 2022, ADU production will outpace assumptions during the planning period. The City has included Program 1F to monitor the production of this housing type, including affordability levels served, and City make adjustments to the City's inventory if production lags behind projections.

The average annual number of ADUs ~~developed-permitted~~ from ~~2018-2019-2021~~ was ~~150~~173, multiplied by 8, yields the estimate of ~~1,272~~1,384 ADUs to be ~~permitted-constructed~~ between 2021 and 2029 (if the City was to use the average of 2020-2022 estimates, the annual average for ADU permits would actually be 224 units for a total potential of 1,792 permits during the planning period). However, in recognition that a *small portion* of these units may be permitted but for some reason not developed during the planning period (although the City finds this to be unlikely and not consistent with past experience), the City has only credited 1,272 (92%) of the expected permitted ADU units towards meeting a portion of its RHNA (approximately 159 annually, only 60% of the more recent 2021 and 2022 ADU permit numbers). This is a conservative assumption and production will likely outpace this target during the planning period, either due to increasing interest in developing ADUs and/or a higher proportion of permitted units being constructed. As previously discussed, it is the City's expectation that while there is a small lag between permitted and constructing an ADU, the vast majority of permitted units are constructed within 12 months and, given the increasing number of permits, the average number of ADUs actually constructed year over year is expected to increase. Additionally, the affordability level of these ADUs is assumed to be consistent

with the findings of SCAG's ADU affordability study and the findings for Los Angeles County <sup>6</sup>.

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<sup>6</sup> SCAG estimates an affordability breakdown of ADUs in the Los Angeles County 2 subregion as follows: 15.0% extremely low-income, 8.5% very low-income, 44.6% low-income, 2.1% moderate-income, and 29.8% above moderate-income. 6th Cycle Housing Element Update Technical Assistance – ADU Affordability Analysis, August 27, 2020.

provided streamlined review and are only subject to objective design standards consistent with relevant provisions of SB 35 and SB 330 as provided by applicable sections of the Government Code, including but not limited to Sections 65905.5, 65913.4, 65940, 65941.1, 65950, and 66300. State law defines objective design standards as those that “involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant and public official prior to submittal.”

**E. Emergency shelter parking:** The Zoning Code will be updated to require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with AB 139.

**F. Reasonable Accommodation Finding:-** Review the City's reasonable accommodation procedure for constraints and revise the procedure as needed to create an objective standard for review (including revising or removing Finding #5).

**G. Parking Standards:-** The Zoning Code will be updated to reduce the guest parking standards in the PRD Zone and to reduce required parking standards for efficiency and one-bedroom units to reduce costs and constraints to development. The reductions will either 1) limit parking to no more than one space for studio and one bedroom units, or 2) be based on a process, such as focus group meetings with affordable and market rate housing developers, that identifies parking requirements that would constrain residential development, including housing affordable to very low and low income households and special needs households, and limits parking to levels that are identified through the study to be feasible and to not constrain residential development.

**H. Multifamily and Mixed-Use Development and Permitting Standards.** The City will update its multifamily and mixed-use development and permitting standards, including lot coverage and height requirements, to reduce constraints to the development and affordability of housing and provide higher levels of approval certainty. This includes replacing the requirement that multifamily and mixed-use projects in Commercial zones rely on R-1250 standards and increase the maximum height for multifamily and mixed-use

developments. The modification will either: 1) permit heights of at least three stories, or 2) be based on a process, such as focus group meetings with affordable and market rate housing developers, that identifies maximum building height requirements that would constrain residential development, including housing affordable to very low and low income households and special needs households, and permits building heights to levels that are identified through the study to be feasible and to not constrain residential development.

The City will also remove the requirement that 100% residential projects in commercial zones require a CUP and that multifamily projects in the IMU-R zone requires an AUP and will prepare and adopt new performance standards applicable to development in the IMU-R zone which will replace the need for a CUP or AUP for residential development (these permitting requirements will be removed).

**I. Objective Standards.** The City will prepare and adopt new objective design standards for multifamily and mixed-use projects.

**F.J. Residential Care Facilities for Seven or More Residents.** The Zoning Code will be updated to ensure zoning permits group homes objectively with approval certainty for residential care facilities for seven or more residents.

<b>Program Goals</b>	Maintain a Zoning Code that is in compliance with State Housing Law.
<b>Responsible Agencies</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>2021-2029 Objectives</b>	Ensure that the City's Zoning Code is consistent with State law and update the Zoning Code as needed to comply with future changes.
<b>Timeframe</b>	Zoning Code Amendments adopted by December 20222024.

*only sites with the highest likelihood of redevelopment are included in the inventory. Together, these sites represent only 2.1% of all developable parcels in Glendale. Future residential development is not precluded in other areas, but rather, the characteristics of these sites demonstrate most appropriately that they are the best and most likely sites to be redeveloped during the planning period. This non-vacant sites analysis includes a specific discussion regarding the patterns and trends associated with the redevelopment of sites within these zoning districts following the discussion of these five key indicators.*

## **2. Year Built. Of the 60 sites analyzed, the following year built trends emerged:**

- The majority of sites (56 out of 60) were built before 1991 (meaning that the building is at least 30 years old)
- Four sites were built after 1991; three of these sites are parking lots associated with a residential use and one site (built in 1998) is an office building

*Finding: Year built should be 1991 or earlier (at least 30 years old). All sites identified are at least 30 years old.*

## **3. Floor Area Ratio. Of the 60 sites analyzed, the following floor area ratio trends emerged:**

- Of the sites with a valid floor area ratio (22 sites), the floor area ratio ranged from 0.08 to 3.75
- Only one site had a floor area ratio higher than 2.0; this site had a floor area ratio of 3.75 and is an office building built in 1986

*Finding and Response: Existing floor area ratio should be 2.0 or lower. The vast majority of underutilized sites have a floor area ratio of less than 2.0. Only six out of 1,071 sites in the inventory (all located within the Downtown Specific Plan) have a floor area ratio greater than 2.0. The City has specifically evaluated these six outlier sites and has determined that the higher floor area ratios are a result of the parcel's association with surrounding use (for example, the parcel has a building but the building's parking is on an adjacent parcel) is not a constraint to the redevelopment of these sites and that the other characteristics of the site including its zoning, improvement to land value ratio, and limited demand for existing uses warrant its inclusion in the inventory.*

## **4. Improvement to Land Value Ratio. Of the 60 sites analyzed, the following improvement to land value ratio trends emerged:**

- Of the sites with a valid improvement to land value ratios (48 sites), the values ranged from 0.01 to 10.36
- Of the sites with valid improvement to land value ratios, the majority of sites (43) had an improvement to land value ratio of less than 2.0
- Of the five sites with an improvement to land value ratio of greater than 2.0, all are single-family residential homes

*Finding and Response: Existing improvement to land value ratio should be less than 2.0. The vast majority of underutilized sites have an improvement to land value ratio of less than 2.0. Of the 1,071 sites in the inventory, 989 (92.3%) have an improvement to land value ratio of less than 1.0; 65 sites (6.1%) have an improvement to land value ratio between 1.0 and 2.0. While the remaining 17 sites (1.6%) have an improvement to land value ratio between 2.0 and 4.94, the City has specifically evaluated these outlier sites and has determined that other site characteristics including its zoning, floor area ratio, and limited demand for existing uses warrant its inclusion in the inventory.*

## **5. Existing Uses. Of the 60 sites analyzed, the following trends related to existing uses emerged:**

- Eighteen sites are developed with residential uses with four or more units

- Seventeen are single-family homes
- Seven sites are developed with commercial uses (auto service, banks, restaurants and stores)
- Seven sites are parking lots
- Five sites are developed with public/semi-public uses (schools, churches)
- Five sites are developed with office uses
- One site is developed with industrial uses

*Finding and Response. Existing uses do not typically constrain the redevelopment of a site and opportunity sites may be developed with a range of existing uses, including residential, commercial, office, and public facilities. All sites identified in the inventory are developed with one of the existing uses exemplified in the current project list. Coupled with the other site characteristics, including current zoning, year built, floor area ratio, and improvement to land value ratio, no currently developed uses are expected to prevent the redevelopment of a site.*

*In analyzing the 60 “evidence” project sites, there was no identifiable pattern between the site’s previous use and its redevelopment potential. Each site was individually analyzed to determine its characteristics and use prior to redevelopment. In addition to the existing residential uses described above, here is a detailed description of the existing uses of the “evidence” project sites:*

- **Educational/institutional or public facility** uses: a former (now vacant) private preschool and associated parking lot; a former (now vacant) church and associated parking lot; two sites, which are currently under construction as a five-story and two-story senior housing development, were occupied by two former one-story educational use buildings.
- **Industrial** uses: a former industrial use building (vacant since approx. 2010) and gated parking lot; a warehousing/distribution building with loading bay/storage area.
- **Office** uses: a two-story office building with entrance/tuck-under parking on first floor and office uses on second floor, attached to two-story parking garage on adjacent parcel; a six-story office building and financial center on northwestern quadrant of the parcel, surface parking and driving aisles, and a two-story parking garage; a one-story multi-tenant building with light industrial uses (electronics repair, plumbing, security systems) that shares parking lot with auto-repair and self-storage/moving truck rentals; a one-story office building and gated parking lot last occupied by private security company; an eight-story former office building that has been converted into apartments with ground-floor office/financial uses; a prior office use building that is now under construction as a mixed-use development; a vacant one-story office/retail use adjacent to a discount retail store.
- **Parking lot**: three parcels developed with former parking lot are now under construction with a multi-family residential project; three parcels developed with surface parking lot; a surface parking lot.
- **Commercial** uses: a former restaurant, now developed with newly-constructed three-story residential use (Glenoaks Residences); two one-story buildings hosting restaurant/retail (Chipotle and Dollar Tree) with parking lot/driving aisle in between; a one-story auto-repair use with multiple repair bays; a used auto dealership, small one-story office, and large parking lot.

*Similarly, each proposed site was also individually analyzed. Of the sites with existing non-residential uses, 147 sites have existing commercial, industrial and/or office uses and 4 sites have educational/institutional or public facility uses that required more thorough analysis (note: some sites contained a mixture of uses). Here is a description of those proposed sites with existing commercial, industrial, and office use as noted in Appendix A (Existing Use/Vacancy).*

- **Industrial** uses: 19 industrial/warehouse/distribution, typically with loading bays, storage areas, and gated parking lot. Ten light-industrial (manufacturing, contractor and/or service-related), typically with loading bays, storage areas, and/or gated parking lot.



- Office uses: 22 office uses, including eight two-story multi-tenant office buildings with parking, eight one-story multi-tenant buildings with parking, two three-story buildings with tuck-under or ground floor parking, and four multi-story office buildings, one nursing care and one former government office (vacant).
- Parking lot: 18 surface parking lots (not parking structure and not part of another use).
- Commercial uses: 22 strip-mall type (multi-tenant with associated parking lot) service/restaurant/retail uses, 23 restaurant uses and associated surface parking, Nine medical use and associated parking, Seven automobile (repair) use and one carwash, Five financial service uses.
- Educational/institutional uses and public facilities: Three churches (1- and 2-stories) and associated surface parking lots and one government facility (a post office) where the government use could be maintained and integrated into redevelopment of the half-acre site. This postal site is located within proximity to several other postal facilities; since 2010, numerous USPS sites have been redeveloped in communities throughout California, including in the cities of Roseville, San Diego, and Burlingame. This site is located within the City's SFMU zone in an area prioritized for redevelopment.

As shown, individual analysis shows that the "evidence" and proposed sites share a similar assortment of uses. The "evidence" project sites included a wide variety of office uses, restaurants, industrial uses, service uses, retail uses, mom-and-pop independent businesses, nationally recognized franchise/chains, and educational/institutional uses and public facilities. As stated, the "evidence" sites did not exhibit an identifiable pattern where a site's existing use would indicate redevelopment potential. Instead, it is more likely that the site was redeveloped as housing because: a) the City permitted housing to be built on the site; and b) the property owner determined housing would be a more profitable use than the existing use, due to a high demand for housing in the region. It follows that less profitable, less in-demand uses may have a higher "upside" potential than businesses that are doing reasonably well and may be more likely to be redeveloped within the planning period; however, any analysis based on a site's predictive profitability would be speculative. Instead, as shown by the "evidence" sites, the City can reasonably expect that a site has development potential based on development patterns and trends that indicate high demand for housing, particularly in areas served by existing infrastructure and services. As previously stated, all sites identified in the inventory are developed and served by existing infrastructure and services. No currently developed uses on the proposed sites are expected to prevent redevelopment of a site.

### Increase in Development Potential in Residential Areas

The City has conducted a records search of residential projects developed in the City's residential zones from 2014 through 2020 and analyzed the presence of existing residential units (if any) and the number of new units constructed. Year after year, the City has seen existing residential units demolished and replaced with new multifamily projects increase existing capacity by 300%-1,600%. The presence of existing residential uses is not an impediment to the development of residential uses in residentially zoned areas.

*Table 63: History of Development in Residential Zones, 2014-2020*

Year	Number of Projects Surveyed	Existing Units Demolished	Units Constructed	Percent Increase
2014	4	4	26	550%
2015	3	2	38	1800%
2016	8	15	66	340%
2017	18	13	78	500%
2018	3	3	50	1567%
2019	8	13	79	508%



Adopted  
12/06/22  
Devine/Najarian  
Absent: Kassakhian

RESOLUTION NO. 22-170

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GLENDALE  
ADOPTING THE CITY OF GLENDALE 2021-2029 HOUSING ELEMENT OF  
THE GENERAL PLAN (CASE NO. PGPA 2119840)**

**WHEREAS**, on February 1, 2022, the City Council of the City of Glendale ("Council") adopted a 2021-2029 Housing Element, that has since been revised, consistent with comments and requested revisions received from California Department of Housing and Community Development ("HCD"); and

**WHEREAS**, on November 16, 2022, the Planning Commission conducted a noticed public hearing pursuant to the provisions of Section 2.68.130 of the Glendale Municipal Code, 1995 and Chapter 3, Title 7 of the Government Code of the State of California, where it reviewed and recommended adoption of the above-referenced revised 2021-2029 Housing Element; and

**WHEREAS**, the Council has received, reviewed and accepted City of Glendale 2021-2029 Housing Element (Case No. PGPA 2119840) ("City of Glendale 2021-2029 Housing Element") to replace the current City of Glendale 2021-2029 Housing Element previously adopted by the Council on February 1, 2022; and

**WHEREAS**, the Council has reviewed and considered all materials and exhibits of current record relative to the City of Glendale 2021-2029 Housing Element; and

**WHEREAS**, the Council has received and considered the recommendation of the Planning Commission recommending the approval of the City of Glendale 2021-2029 Housing Element; and

**WHEREAS**, based on substantial evidence provided in the City of Glendale 2021-2029 Housing Element, including the Background Report and Appendix A, such as the age of the structure, building conditions, minimal lot coverage, low improvement to land value ratio, local and regional development patterns, property owner interest, demand for existing uses, and changing commercial real estate market conditions, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the City of Glendale 2021-2029 Housing Element; and

**WHEREAS**, the Council has reviewed and considered an exemption under State CEQA Guidelines Section 15061(b)(3) (commonsense exemption) applicable to the City of Glendale 2021-2029 Housing Element ("Project"), because the Project involves policies, programs, and actions to meet the City's Regional Housing Needs Allocation that either would not cause a significant effect on the environment or incorporates actions that have already been taken

by the City, as well as an exemption pursuant to State CEQA Guidelines Section 15283 and California Government Code Section 65584(g), and as such finds the Project exempt from further environmental review; and

**WHEREAS**, the Council has conducted a noticed public hearing pursuant to the provisions of Section 2.68.130 of the Glendale Municipal Code, 1995 and Chapter 3, Title 7 of the Government Code of the State of California; and

**WHEREAS**, the Council has found the City of Glendale 2021-2029 Housing Element promotes and protects the public health, safety, comfort, convenience, and general welfare of the affected properties, the surrounding neighborhoods, and the community as a whole.

**NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GLENDALE AS FOLLOWS:**

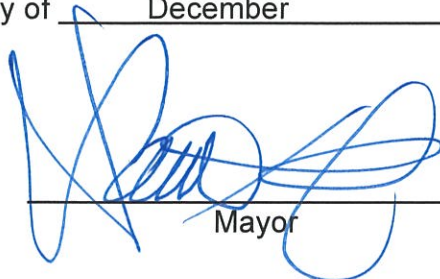
**Section 1.** The recitals set forth above are true and correct.

**Section 2.** The City of Glendale 2021-2029 Housing Element is hereby approved and adopted, and this Element shall replace the previously adopted Housing Element and be made part of the City's Comprehensive General Plan, and this Element shall be forwarded to the State Department of Housing and Community Development for certification.

**Section 3. Housing Element Minor Modifications.** The City Manager or his/her designee is authorized to make minor modifications to the City of Glendale 2021-2029 Housing Element to address comments from HCD on the City of Glendale 2021-2029 Housing Element, provided that the modifications would not increase the residential development potential of the City beyond what is currently allowed under existing general plan and zoning designations and would not result in any new actions by the City that would require a General Fund commitment of \$20,000 or greater.

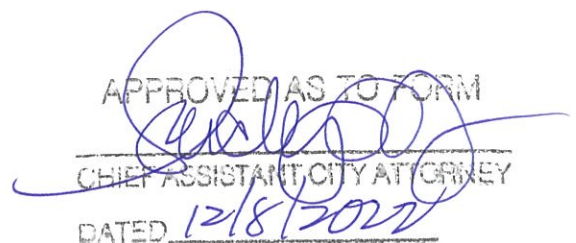
This resolution shall become effective 30 days after the date of adoption.

Adopted this 6th day of December, 2022.

  
\_\_\_\_\_  
Mayor pro tem

Attest:

  
\_\_\_\_\_  
City Clerk

APPROVED AS TO FORM  
  
\_\_\_\_\_  
CHIEF ASSISTANT CITY ATTORNEY  
DATED 12/8/2022

STATE OF CALIFORNIA                     )  
COUNTY OF LOS ANGELES            ) ss.  
CITY OF GLENDALE                    )

I, SUZIE ABAJIAN, Ph.D., Clerk of the City of Glendale, certify that the foregoing Resolution was adopted by the Council of the City of Glendale, California, at a regular meeting held on the 6th day of December, 2022, and that same was adopted by the following vote:

Ayes:           Asatryan, Devine, Najarian, Brotman (pro tem)

Noes:           None

Absent:         Kassakhian

Abstain:       None

  
\_\_\_\_\_  
City Clerk