May 10, 2022

Paul McDougall, Senior Program Manager
Department of Housing and Community Development
Division of Housing Policy Development
2020 W. El Camino, Suite 500
Sacramento, CA 95833

Subject: City of South Pasadena Revised Draft 2021-2029 Housing Element

Dear Mr. McDougall:

We are pleased to submit a second draft of the 2021-2029 South Pasadena Housing Element for review. This Housing Element describes the City's plan for addressing the housing needs of its current and future residents through October 15, 2029. Additional revisions have been made in response to the letter from HCD dated December 21, 2021 and public comments received on the first Public Draft since its release on October 12, 2021 and reposting with two minor edits on October 21, 2021. All revisions made since the first draft we submitted to you are shown in redline format. For this subsequent draft revision, the City posted the revised draft on its Housing Element Update web page and emailed a link to all individuals and organizations that have previously requested notices relating to the City's housing element on April 21, 2022, 10 days before submitting this draft revision to HCD.

The City of South Pasadena is committed to working with the California Department of Housing and Community Development to ensure that this Housing Element obtains certification to maintain eligibility for grant funding programs, to ensure the legal adequacy of the General Plan, and to preserve local control of land use decisions. As demonstrated in the Housing Development Resources and Housing Plan and Quantified Objectives sections of the Housing Element, the City has land zoned for more housing units and is proposing rezoning of additional land to meet the needs of residents at all income levels.

We look forward to hearing from your office. Please do not hesitate to contact me at (805) 295-1530 or asinsheimer@placeworks.com with any questions regarding the draft.

Sincerely,

PLACEWORKS

Amy Sinsheimer

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Cc:
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Elizabeth Bar-El, AICP, Retired Annuitant Contract Planner, City of South Pasadena

Attached:
City of South Pasadena Revised Draft 2021-2029 Housing Element
City of South Pasadena Revised Draft 2021-2029 Housing Element – Tracked Version

City of SOUTH PASADENA

CITY OF SOUTH PASADENA

2021-2029 GENERAL PLAN HOUSING ELEMENT

REVISED Public Review Draft | April 2022

Acknowledgements

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City of South Pasadena
2021-2029 HOUSING ELEMENT

6.1 EXECUTIVE SUMMARY

A New Approach to Increased and Inclusive Housing Production

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

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

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

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

New State Housing Legislation

The governor signed three significant housing bills in September 2021, as the draft housing element was undergoing its final administrative review for public release. Due to the timing, for the most part, these bills, known as SB 8, SB 9 and SB 10, were not included in the body of analysis in terms of potential housing sites to comply with the RHNA. Nevertheless, the City anticipates that the expanded development potential that the state has offered through this legislation will likely result in additional units in some single-family neighborhoods, which would contribute toward housing element implementation, as reported annually to HCD.

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

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

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

The Public Outreach Process

The South Pasadena community began an ongoing discussion about future land use and transportation decisions that would affect the community in 2017 through the General Plan and DTSP planning processes. On March 21, 2018, the City Council held a study session on pending State affordable housing bills, the City's housing element compliance, and a Keyser Marston

Associates report that introduced options for regulatory tools to respond to state affordable housing mandates. The City Council requested that inclusionary housing issues be included in future public outreach on housing policy. The overlap of these policies with the General Plan/DTSP was recognized, causing a shift in the approach to land use policy, the planning process and the public discussion.

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

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

Quantified Objectives

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

Table VI-1
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED	REHABILITATED
Extremely Low/ Very Low Income	757	7	8
Low Income	398	9	8
Moderate Income	334	4	9
Above Moderate	578	0	10
Total	**2,067**	**20**	**35**

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

Summary of the Housing Plan

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.				
Program 1.a - Energy Efficiency The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.	Ensure consistency with State green building standards triennially when the California Building Code is adopted.	General Fund; grants	City Manager's Office	Every three years; next building code adoption expected in 2023.
Program 1.b - Housing Acquisition The City will partner with and support affordable housing developers to create new and rehabilitated, deed-restricted, affordable housing units on the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.	Complete a feasibility study and use the recommendations to support decision-making regarding possible partnerships with non-profit affordable housing developers pursuing acquisition and rehabilitation of the surplus properties as affordable housing to expand housing mobility opportunities for lower-income households and revitalize underused areas.	Measure H	Community Development Department/City Manager's Office	Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 1.c - Housing Rehabilitation and Code Enforcement The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy. That will augment the already established code enforcement work.	Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.	CDBG, HOME, SB 2 PHLA, others	Community Development Department/ City Manager's Office	Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Develop Occupancy Inspection Program and Policy in fiscal year 2022/2023.
Program 1.d – Assisted Housing Unit Preservation The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that there are no affordable housing units with deed-restrictions and subsidized funding currently in South Pasadena. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions: ▪ Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability. ▪ If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources. Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12	Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.	General Fund	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives. If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing. When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.				
Program 1.e – Environmental Health Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and	Determine whether there are existing sources of water contamination and mitigate as appropriate.	General Fund	Community Development Department	Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
groundwater contamination to reduce exposure to these environmental threats.				
Goal 2.0 Encourage and Assist in the Provision of Affordable Housing Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.				
Program 2.a – Provide Technical Assistance for Projects with Affordable Housing The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency. The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.	Expand housing mobility opportunities through affordable housing and encourage affordable development in high resource areas by facilitating timely review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.	General Fund	Community Development Department	Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.
Program 2.b - Affordable Housing Production The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.	Fund and build 100 affordable units, at least 40 of which are in high resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and at least 30 in affluent neighborhoods to facilitate	Inclusionary in-lieu fees; General Fund; grant funding	City Manager's Office; Community Development Department	Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

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	housing mobility in mixed-income neighborhoods.			
Program 2.c - CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the Housing Rights Center.	Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households whenever possible to facilitate housing mobility for a minimum of five low-income and five very low-income households to receive assistance during the 2021-2029 planning period.	CalHome	State of California/City Manager's Office; Housing Rights Center	Ongoing as NOFAs are released for CalHome; Housing Rights Center will conduct outreach at least once a year.
Program 2.d **- Section 8 Housing Choice Voucher Program for Rental Assistance** The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.	Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract HRC to provide a biannual educational workshop, beginning in 2023, for landlords, property managers, and other housing providers on the benefits of marketing units to HCV holders with the objective of at least 5 housing providers pricing their units to be eligible for HCV.	HUD	Los Angeles County Development Authority	Ongoing

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Program 2.e - Facilitate Density Bonus for Projects with On-site Affordable Housing The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.	Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.	General Fund	Community Development Department	Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing
Program 2.f - Offer Services to People without Housing The City will continue its emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.	General Fund and grants	Police Department	Coordinate a meeting with neighboring jurisdictions by February 2023 to identify strategies and translate materials on homeless services to Spanish by May 2023.
Program 2.g – Expand Senior Housing Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.	Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.	General Fund and grants	Community Development Department	Ongoing
Program 2.h - Incentivize Special-Needs Housing City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications	Assist with creation of 30 units for those with special needs to reduce displacement risk and expand mobility opportunities.	Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, and other State and federal programs designated specifically for special-needs groups	Community Development Department, City Council	Prepare reasonable accommodation procedure handout and application form and post on website by December 2022; Train staff to process reasonable accommodations by December 2022; Seek funding opportunities beginning in 2022 and annually thereafter; all

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or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.				implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act by December 2022.
Program 2.i - Inclusionary Housing Regulations – Monitor for Effectiveness To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards. On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units and provide an evaluation of the program's effectiveness and any recommended revisions to increase the effectiveness of the program. The review will occur by April of each year starting in 2022 and if revisions are deemed necessary, they will be made when such needs are identified.	Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.	General Fund (Code development); developer obligation (implementation)	Community Development Department	Continue to implement the Inclusionary Housing requirements and facilitate the production of 600 lower-income and 300 moderate-income units during the planning period. Review effectiveness of the ordinance at producing affordable housing units annually starting in April 2023. If revisions to the ordinance are deemed necessary after that review, update zoning by the end of 2023, then annually thereafter as revisions are needed.

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Program 2.j – General Plan Affordable Housing Overlay The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.	Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.	General Fund, (for staff resources)	Community Development Department	Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.
Program 2.k – Affordable Housing Overlay Zone The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.	Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.	General Fund	Community Development Department	Amend zoning to include overlay by October 15, 2024.
Program 2.l – Facilitate Affordable Housing on City-Owned Property The City will utilize City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the first RFP will be issued by 2024, in order to begin construction within two years and complete within the housing element cycle period. A second RFP on an additional inventory site will be issued by 2026. Projects under this program will be expedited in compliance with the SB 35 streamlined ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives. The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are: ▪ Site 9: Public works yard site ▪ Site 14: City-Owned Parking Lot site (City owns three of the	Issuance of building permits for two projects, for a total of at least 70 ELI, VLI and LI units.	General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.	Community Development Department (Housing Division)	City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP in 2024 and second RFP in 2026. Building Permit issuance for first project by 2025; two building permits issued by 2029.

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four parcels) The City is already coordinating with the owner of the other parcel on Site 14. Site 9 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 13 in Table VI-50 and will coordinate with the owner of the other parcel on Site 13 to encourage development of housing on that sites.				
Goal 3.0 Provide opportunities to increase housing production Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.				
Program 3.a - Rezone and Redesignate Sites to Meet RHNA Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 20-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.	Rezone sufficient sites to address 938 units (31.3 acres) in the lower-income RHNA categories.	General Fund	Community Development Department	Latest date to complete General Plan amendments and rezoning: October 15, 2022

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Program 3.b - Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan in 2022. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing.	Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.	General Fund	Community Development Department	Ongoing and adopt updated General Plan, Downtown Specific Plan, and other needed zoning changes by 2022. See also Program 3.a.
Program 3.c – Replacement of Lost Units from Residential Demolitions In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to: ▪ Non-vacant sites ▪ Vacant sites with previous residential uses that have been vacated or demolished.	Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.	General Fund	Community Development Department	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Program 3.d – Enable Parcel Assemblage To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers/owners approach the City with interest in lot consolidation	Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.	General Fund (legislative efforts); Grant funding (implementation)	City Manager's Office; Community Development Department	Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months. Ongoing: Support

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for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2022, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.				consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Program 3.e – Develop an Electronic Permitting System Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.	All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.	General Fund and grants	Community Development Department	Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.
Program 3.f – Allow and Facilitate ADUs The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time. This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as	Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).	General Fund; SCAG grant	Community Development Department	Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

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a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include: ▪ Online application process with staff intake for quality control ▪ Maintain and amend materials for better applicant guidance, as needed ▪ Provide consistent staff training and support ▪ Look for all opportunities to provide certainty earlier in the process ▪ Reduce the number of steps and shorten timeframes, and Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.				
Program 3.g – Monitor ADU Production The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).	Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.	General Fund	Community Development Department	Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

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Program 3.h – Back-up to Address Shortfall in Anticipated ADUs The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.	Address lower-income RHNA if ADU numbers aren't as high as projected.	General Fund	Community Development Department	Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.
Program 3.i – ADU Amnesty Program To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.	Convert all known existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.	General Fund (for staff resources)	Community Development Department	Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach.

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Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.	Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.	General Fund	Community Development Department	Develop affordability covenant program and amend fees by July 1, 2023.
Program 3.k – ADU Education, Promotion and Homeowner Outreach A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc. The City will also make the following efforts to promote ADU development: ▪ Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU	Facilitate the process of ADU development through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.	General Fund, grant funding	Community Development Department	Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

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

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development. ▪ Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly. ▪ Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs. ▪ Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage. ▪ Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.				
Program 3.1 – Increase and Maintain Planning and Housing Staff Resources The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.	Augment and support staff resources to expedite housing projects and implement housing programs.	General Fund	Community Development Department, City Council	City has already advertised new Planning positions and aims to be fully-staffed by June 2022. Include the housing division in the 2022-2023 budget and add new staff by December 2022.
Program 3.m – Implement SB 9 and SB 10 These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption. The City took action by urgency ordinance to establish objective standards in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. The City will also adopt a user-friendly and objective administrative process in compliance with SB 9 within the context of other City development requirements. The City will also review the provisions of SB 10 to	Administration of SB 9 ordinance is ongoing; specific administrative process and guidelines for SB 9 to be developed by December 2022; explore potential zoning code amendments pursuant to SB 10.	General Fund	Community Development Department	SB 9 implementation began in December 2021, material preparation by December 2022; SB 10 review and consideration by December 2024

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explore whether and how these might be utilized to enhance housing construction, pursuant to a full and extensive public process. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual report to HCD.				
Goal 4.0 Compliance with State Housing Laws Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.				
Program 4.a – Land Use Controls – Emergency Shelters In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))	The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law and to establish the maximum number of beds permitted in any one emergency shelter at 30 beds.	General Fund	Community Development Department	Adopt zoning amendments within one year of Housing Element adoption.
Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing. Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.	The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.	General Fund	Community Development Department	Complete amendments to Zoning Code by December 2022.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 4.c – Land Use Controls – Flexible Zoning Regulations The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.	The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.	General Fund	Community Development Department	Ongoing as applications are received.
Program 4.d – ADA Accessibility Standards Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.	Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals.	General Fund	Community Development Department	Amend zoning by 2024.
Program 4.e –Universal Design Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member.	Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design.	Community Development Department	General fund, grants	Three years for development of zoning standards and incentives; ongoing application and enforcement of accessibility requirements; ongoing education efforts.
Program 4.f – Senate Bill 35 Procedure or Policy Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.	Streamline housing projects as required by SB 35.	General Fund	Community Development Department	Complete in 2022.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.				
Program 5.a – Fair Housing Education, Outreach, and Services Provide Fair Housing education, outreach, mediation, and referral services through the City Manager's office and the Housing Rights Center (HRC) and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.	Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with HRC staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.	General fund, State, and federal funds	City Manager's Office; Community Development Department, Housing Rights Center, federal and State agencies	Ongoing
Program 5.b – Encourage a Variety of Housing Types Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements.	Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.	Community Development Department	General fund, State, and federal funds	Amend zoning for Residential Care Facilities by June 2022. Incorporate the provisions of SB 9 in single-family zones by December 2022. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide In the 1940's, covenants that restricted the sale of property to Whites or Caucasians only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.	Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.	General Fund; grants if offered through a State or County program	Community Development Department; Los Angeles County Recorder	Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2022; encouragement of removal from private properties: ongoing.

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6.2 INTRODUCTION

6.2.1 Overview

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

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

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

6.2.2 Purpose and Authority of the Housing Element

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

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

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

Housing Needs Assessment (Section 6.3)

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

Fair Housing Assessment (6.4)

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

Analysis of Constraints on Housing (6.5)

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

Site Inventory and Analysis (Section 6.6)

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

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

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

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

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

Housing Programs (Housing Plan) (Section 6.8)

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

Quantified Objectives

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

6.2.3 Authority and Scope of the Housing Element

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

6.2.4 Public Participation

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

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

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

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

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

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

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

6.2.5 California Environmental Quality Act

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

6.2.6 Relationship to Other General Plan Elements

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

6.3 HOUSING NEEDS ASSESSMENT

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

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

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

6.3.1 Community Profile

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

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

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

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

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

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

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

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

Table VI-4
POPULATION CHARACTERISTICS

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

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

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

Table VI-5
RACE AND ETHNICITY CHARACTERISTICS

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

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

6.3.2 Employment Trends

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

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

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

Source: 2015-2019 ACS DP03: Selected Economic Characteristics

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

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

Source: 2020 SCAG RTP/SCS

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

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

6.3.3 Household Characteristics

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

Household Composition and Size

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

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

Table VI-8
PERSONS PER HOUSEHOLD – 2019

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

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

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

Table VI-9
AVERAGE HOUSEHOLD SIZE

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

Source: California DOF (2007, 2012, 2019)

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

Overcrowding

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

Table VI-10
TENURE BY HOUSEHOLD SIZE

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

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

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

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

Table VI-11
PERSONS PER ROOM

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

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

Household Income and Income Distribution

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

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

Table VI-12
2018 HOUSEHOLD INCOME BY TENURE

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

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

Table VI-13
HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER

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

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

Support for Lower Income Households

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

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

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

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

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

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

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

6.3.4 Regional Housing Needs Assessment

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

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

final allocation of 2,067 units (see Table VI-15 below) in the Final RHNA that SCAG adopted on March 3, 2021.

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

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

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

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

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

Source: SCAG RHNA, Adopted March 3, 2021

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

6.3.5 Extremely Low-Income Households

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

For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of 757 very low-income units (378 units) represents the additional housing needed to be provided for extremely low-income households. Some extremely low-income households could include household members with mental, physical or developmental disabilities, and special needs. A single senior citizen on a limited amount of fixed income, such as SSI, could also be considered extremely low income. As detailed earlier in this chapter, a greater percentage of extremely low-income households in the city are renter households. Extremely low income households are second only to very low income households in terms of paying more than 30 percent of monthly income towards housing. To address the needs of extremely low-income households with mental, physical, or developmental disabilities, the Housing Element includes a program for providing for housing types for this special-needs group (see Program 2.h) in addition to other programs that would also address extremely low-income households (Programs 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance, Program 2.f - Offer Services to People without Housing, Program 2.g – Expand Senior Housing, Program 2.j – General Plan Affordable Housing Overlay, Program 2.k – Affordable Housing Overlay Zone, Program 3.f – Allow and Facilitate ADUs and the other ADU-related programs, Program 4.a – Land Use Controls – Emergency Shelters, Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers, Program 4.d – ADA Accessibility Standards, Program 4.e – Universal Design, and Program 5.a - Fair Housing Education, Outreach, and Services)

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

- The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.

- The City adopted an amendment to the Zoning Code to add clarifying language to the definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This will be amended to continue to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.
- Housing Choice Vouchers: Information about Section 8 vouchers, accessible through Los Angeles County, is available on the City's website with this link to County website: https://www.southpasadenaca.gov/residents/housing/.
- The "Housing" webpage was relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.
- HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. According to LACDA, there are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.
- Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.

6.3.6 Special-Needs Groups

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

Table VI-16
HOUSEHOLDS WITH SPECIAL HOUSING NEEDS

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

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

Persons with Disabilities

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

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

The 2015-2019 ACS identified 1,750 persons aged 18 and over living with a disability (3,569 disabilities tallied) in the City of South Pasadena. Of these, 700 are between the ages of 18 and 64 (1,217 disabilities tallied) and 393 are 65 and older (2,352 disabilities tallied). The most common disabilities in South Pasadena for those under 65 are cognitive disabilities (319), followed by independent living disabilities (248), and ambulatory disabilities (225). Among seniors, the most common disabilities include ambulatory disabilities (743), followed by independent living disabilities (546), and hearing disabilities (393). In 2019, there were 441 employed and 16 unemployed persons with disabilities in the City's labor force, representing about 3 percent of the City's working-age population. There were also 243 persons with disabilities, or 2 percent of the City's working-age

population, that were not in the City's labor force. Table VI-17 provides information about South Pasadena residents with disabilities by disability type and age. Table VI-18 demonstrates the employment characteristics of this group within the context of the overall South Pasadena labor force.

Table VI-17
DISABILITIES BY TYPE AND AGE OF RESIDENT

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

Source: 2015-2019 ACS: S1810 Disability Characteristics.

Table VI-18
EMPLOYMENT AMONG POPULATION WITH DISABILITY

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

Source: ACS, 2015-2019: S1810 Disability Characteristics

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

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

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

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

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

Persons with Developmental Disabilities

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

Table VI-19
PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE

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

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

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

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

Senior Households

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

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

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

AGE	UNITS	PERCENT
OWNER-OCCUPIED		
15 to 24 Years	0	0%
25 to 44 Years	811	17%
45 to 64 Years	2,255	48%
65 Years or older	1593	34%
Total Units	4,659	100%
RENTER-OCCUPIED		
15 to 24 Years	103	2%
25 to 44 Years	2,655	51%
45 to 64 Years	1,836	36%
65 Years or older	574	11%
Total Units	5,168	100%
HOUSEHOLD INCOME	**SENIOR HOUSEHOLDS**	**PERCENT**
Less than $25,000	386	18%
$25,000 to $59,999	539	25%
$60,000 to $99,999	396	18%
$100,000 or more	846	39%
Total Senior Householders	2,167	100%
Total Households	9,827	22.1% (Senior Households of all Households)

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

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

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

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

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

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

Farmworkers

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

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

Large Households

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

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

Single-Parent Households

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

Table VI-21 provides a detailed breakdown of the City of South Pasadena's household composition in 2018. The total number of single-parent households with children in South Pasadena is 766, approximately 12 percent of all family households in the City. This represents a decline of approximately 17 percent from the 924 single-parent households reported in 2010. Female-headed households with children represent 480 or approximately 8 percent of all family households. Male-headed households with children represent 286 or approximately 4 percent of all family households. Specifically, female householders with children declined by an approximate 31 percent from 2010 to 2018. Female householders with no children also declined approximately 21 percent over the same period. Single-male householders with children, on the other hand, increased approximately 24 percent from 2010 to 2018, though male-headed households without children declined by approximately 19 percent over the same period. These contrasting trends indicate that all kinds of female-headed households have chosen to leave South Pasadena along with single-male householders without children over the last decade though the motivations for these decisions are unknown.

Housing opportunities for lower-income single-parent households with children can primarily be addressed through rental assistance and the provision of affordable rental units. Program 2.d specifically addresses the need for vouchers for rental assistance and multiple other programs in this Housing Element address the provision of affordable rental units.

Table VI-21
FAMILY HOUSEHOLD COMPOSITION

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

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

Unhoused (Homeless) Persons

In January 2020, the Greater Los Angeles Homeless Count was conducted by the Los Angeles Homeless Services Authority (LAHSA). This Point in Time (PIT) study identified a total population of 15 unsheltered persons in the seven census tracts that comprise the City (Figure VI-2). The 2021 Count was cancelled due to the COVID-19 pandemic. However, the SPPD, which has a continuous program to assist people to find housing when they are present in the city, estimates that approximately 20-25 individuals were sleeping outdoors throughout the City in 2021, with a daytime population of about 30-35 unhoused individuals who choose to receive services in South Pasadena, such as the County's Shower of Hope or Holy Family weekday meal distribution.

Although the PIT count was cancelled in in 2021, LAHSA conducted a count in 2022, which was delayed until February 22nd through 24th. The official results are pending, but South Pasadena police, who participated, indicated that 28 individuals were counted within the City limits. Program 4.a has been updated to ensure that the Code allows for emergency shelters to accommodate the increased number.

Figure VI-2
2020 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA

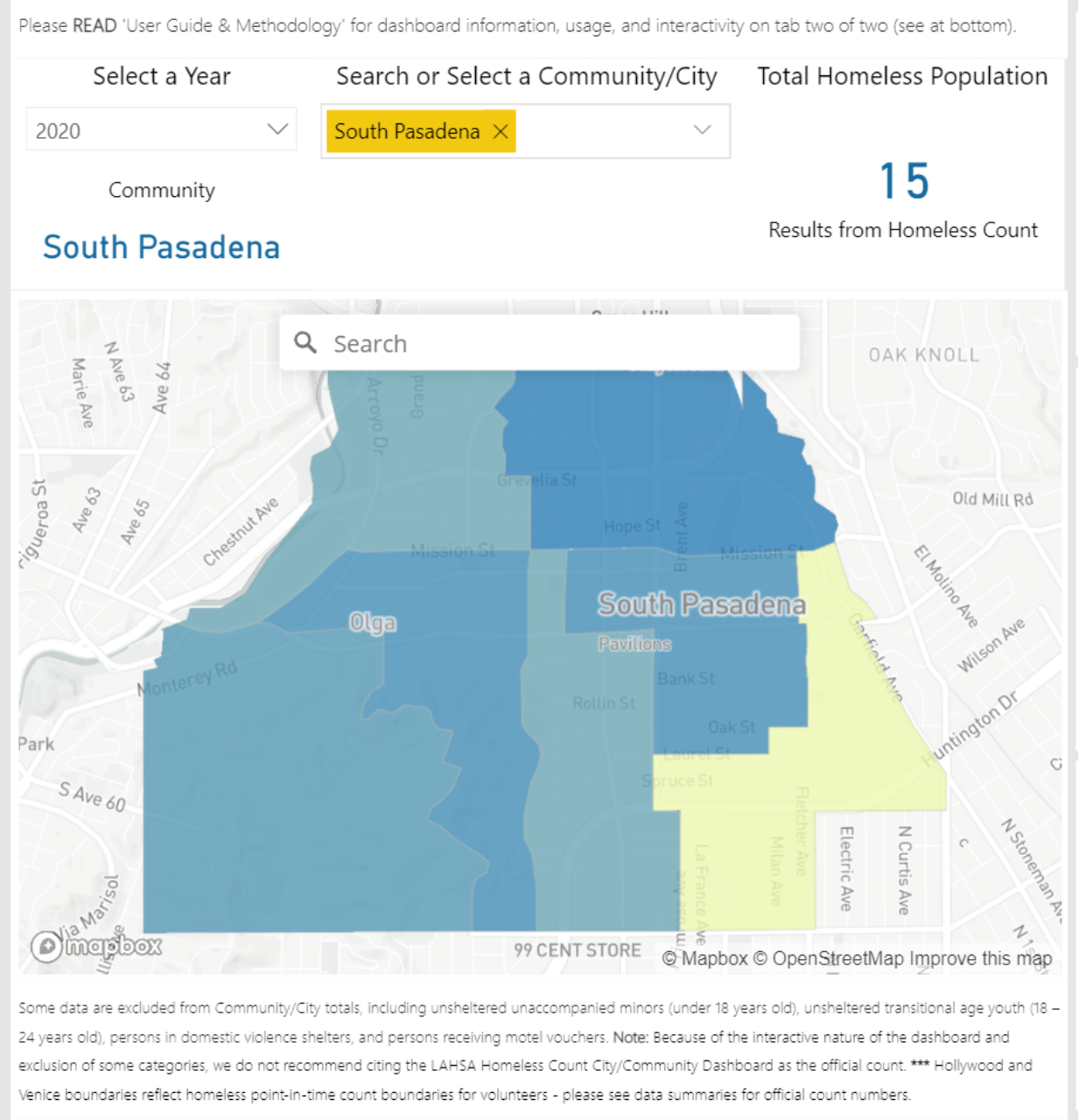
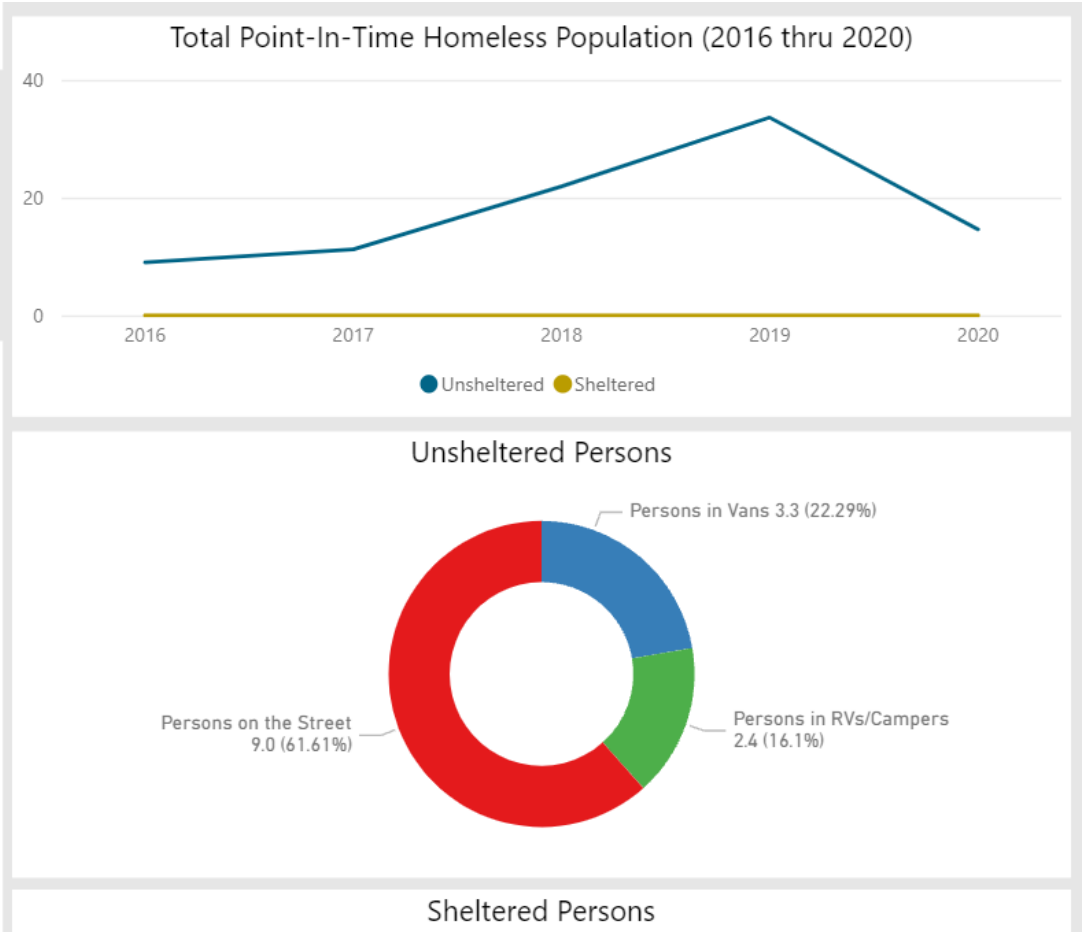


Figure VI-2 (continued)
2020 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA



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

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

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

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

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

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

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

6.3.7 Housing Profile

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

Number of Housing Units

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

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

Table VI-22
HOUSING UNITS BY OCCUPANCY STATUS

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

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

Housing Growth

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

Table VI-23
HISTORIC HOUSING TRENDS: 1980-2019

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

Source: California DOF, 2019, 2020

South Pasadena has high standards for architecture and landscape preservation, and its residents take pride in its appearance. Much of the planning over the last few decades has utilized highly discretionary processes, which may have slowed residential development. Development may have also been hindered by the City's decades-long struggle to reverse the planned 71 Freeway extension, which was finally cancelled by Caltrans. Today, South Pasadena's leadership is taking a different approach to encouraging housing as reflected in the housing programs in this document. Although many discretionary processes are still in place, the City has already implemented quicker and more ministerial permitting through the inclusionary housing ordinance to provide more flexibility for residential projects, particularly through encouraging concessions along with density bonuses for projects that provide affordable housing units. These concessions include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects.

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

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

Housing Type and Tenure

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

Table VI-24
HOUSING UNITS BY TYPE AND OCCUPANCY STATUS

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

Source: California DOF, 2019

Age and Condition of Housing Stock

Compared to more recently planned and developed cities in the state, South Pasadena has a disproportionately older housing stock, due to its proximity to central Los Angeles and early availability of public transportation. It was incorporated in 1888, among the first cities to do so in Los Angeles County. This can have implications on the overall condition of the housing stock regarding maintenance and repair needs. Policies beginning fifty years ago placed a value on historic preservation of those early built single-family homes, also contributing to the continued presence of

many of these older structures, which were not required to be built to the standards required by more recent building codes for energy efficiency and seismic safety.

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

As illustrated in Table VI-25, approximately 45.9 percent of the city's occupied housing units were built prior to 1949. Since the last housing element, 315 housing units from this era (about 6 percent) have been demolished. Today, nearly 94 percent of the occupied housing stock is over 30 years old, indicating likely rehabilitation needs.

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

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

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

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

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

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

poor condition or potentially structurally unsound. The majority of homes requiring maintenance or abatement are owned by longtime residents.

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

The City has authority to enforce Code violations on residential properties exhibiting characteristics of blight. In the past, enforcement has mostly proceeded based on receiving a complaint. Property owners are first informed to bring the property into compliance with city codes, with additional steps and citations issued if necessary to achieve compliance. Where homeowners are eligible, the City strives to identify programs and to assist lower-income and elderly homeowners to access them.

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

Table VI-26
HOUSING CONDITION SURVEY SUMMARY 2022

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

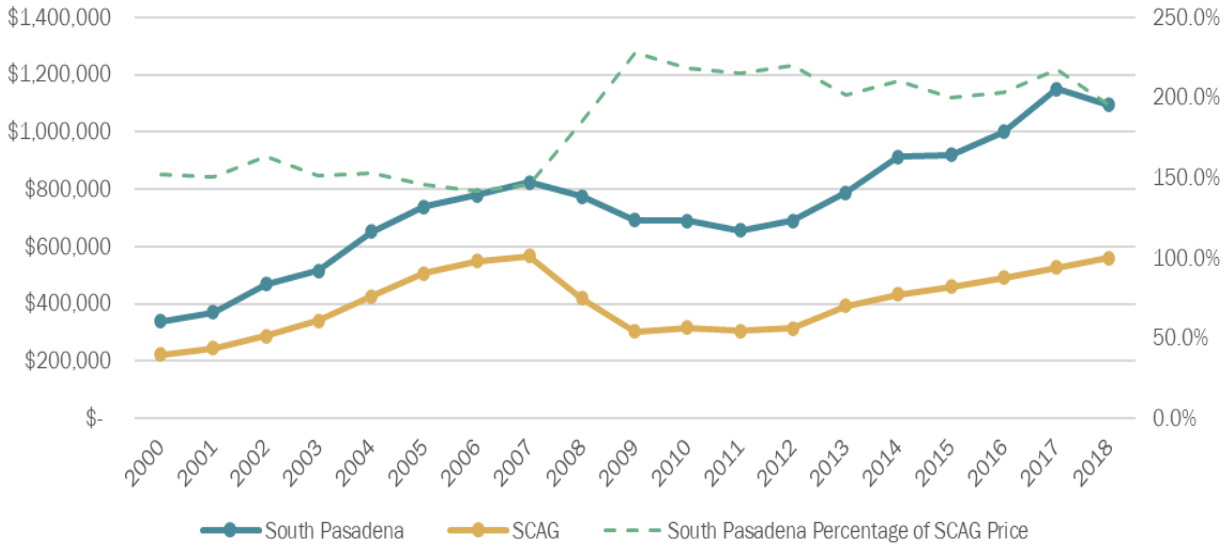
Source: City of South Pasadena Community Development Department, 2022

Home Prices

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

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

Figure VI-3
MEDIAN HOME SALES PRICE FOR EXISTING HOMES



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

Rental Rates

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

Table VI-27
RESIDENTIAL RENTAL PRICES

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

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

Housing Costs and Affordability

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

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

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

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

Source: 2014-2018 CHAS, 2020 HCD Income Limits

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

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

Source: 2014-2018 CHAS, 2020 HCD Income Limits

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

Table VI-30
AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS

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

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

Assisted Housing at Risk of Conversion

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

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

6.3.8 Summary of Housing Needs

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

Table VI-31
SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS

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

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

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

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

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

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

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

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

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

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

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

6.4 FAIR HOUSING ASSESSMENT

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

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

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

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

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

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

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

6.4.1 Outreach

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

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

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

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

Workshops

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

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

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

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

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

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

Community Surveys

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

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

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

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

Public Hearings

The City also presented on or discussed the Housing Element at 10 public hearings. At each of these meetings, the public was invited to attend and share comments on the Housing Element update and process.

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

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

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

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

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

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

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

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

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

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

Outreach Summary

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

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

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

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

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

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

6.4.2 Assessment of Fair Housing Issues

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

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

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

6.4.3 Patterns of Integration and Segregation

Since 2017, the California Tax Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, including proximity to job opportunities; quality of schools; environmental health and safety; and other economic, social, and environmental indicators—in an effort to provide evidence for policy recommendations[12]. This effort has been dubbed "opportunity mapping," and it is available to all jurisdictions in California to evaluate access to opportunities within their communities. As previously stated, the City of South Pasadena has been categorized as "highest resource" by TCAC and HCD, compared to Los Angeles County (see Figure VI-4), meaning that South Pasadena has been identified as having strong educational opportunities, a balanced jobs-housing ratio, high property values, a

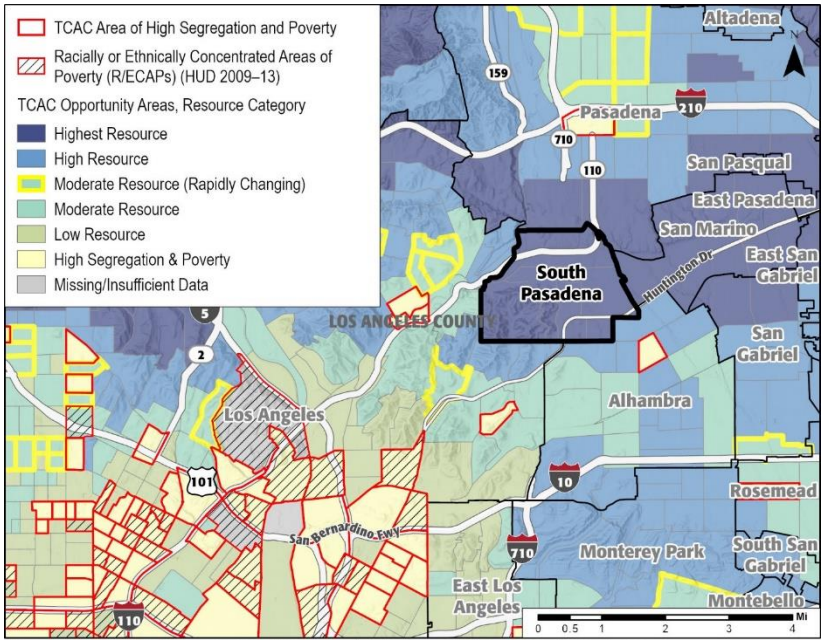
[2] California Tax Credit Allocation Committee and Housing and Community Development Department. *2020 TCAC/HCD Opportunity Map*, 2020. https://belonging.berkeley.edu/tcac-opportunity-map-2020
[3] U.S. Census Bureau. *2010 Decennial Census*. 2020. https://hudgis-hud.opendata.arcgis.com/
[4] U.S. Census Bureau. *2006-2010 American Community Survey*. 2010. https://hudgis-hud.opendata.arcgis.com/
[5] U.S. Census Bureau. *2010-2014 American Community Survey*. 2014. https://hudgis-hud.opendata.arcgis.com/
[6] U.S. Census Bureau. *2015-2019 American Community Survey*. 2019. https://hudgis-hud.opendata.arcgis.com/
[7] Esri. *Methodology Statement: 2018/2023 Esri US Updated Demographics*. July 2018. https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2018-2023_Esri_US_Demographic_Updates.pdf
[8] GreenInfo Network. *California School Campus Database.* 2021. http://www.mapcollaborator.org/mapcollab_cscd/?base=map&y=37.34396&x=-123.48633&z=6&layers=notes%2Cpolygons%2Cschoolboundaries%2Cschoolcentroids&opacs=100%2C25%2C100%2C100
[9] U.S. Census Bureau. *Longitudinal Employer-Household Dynamics*. 2014. https://lehd.ces.census.gov/
[10] California Health & Human Services Agency. *Percent of Household Overcrowding (> 1.0 persons per room) and Severe Overcrowding (> 1.5 persons per room).* October 2020. https://data.chhs.ca.gov/dataset/housing-crowding
[11] California Department of Housing and Community Development. *Affirmatively Furthering Fair Housing Data and Mapping Resources.* 2021. https://affh-data-resources-cahcd.hub.arcgis.com/
[12] California Tax Credit Allocation Committee and Housing and Community Development Department. *California Housing Task Force: Methodology for the 2020 TCAC/HCD Opportunity Map*, June 2020. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf

high median income, and other positive conditions. In areas with lower resource designations than South Pasadena, these indicators of success do not present as strong of opportunities, which may include more limited access to jobs, lower home values, a shortage of outdoor recreational space, and more. The trends and factors that resulted in these patterns of access to resources and other fair housing issues may stem from historical patterns or current practices.

Areas of High Segregation and Poverty

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

Figure VI-4
TCAC/HCD OPPORTUNITY AREAS



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

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

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

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

- **Program 1.b.** Purchase surplus properties and support affordable housing developers to create new and rehabilitated deed-restricted, affordable housing units, using any profit from the proceeds of historic properties to generate additional affordable housing.
- **Program 2.b.** Increase funding for affordable housing through the City's membership with the San Gabriel Valley Regional Housing Trust (SGVRHT).
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.

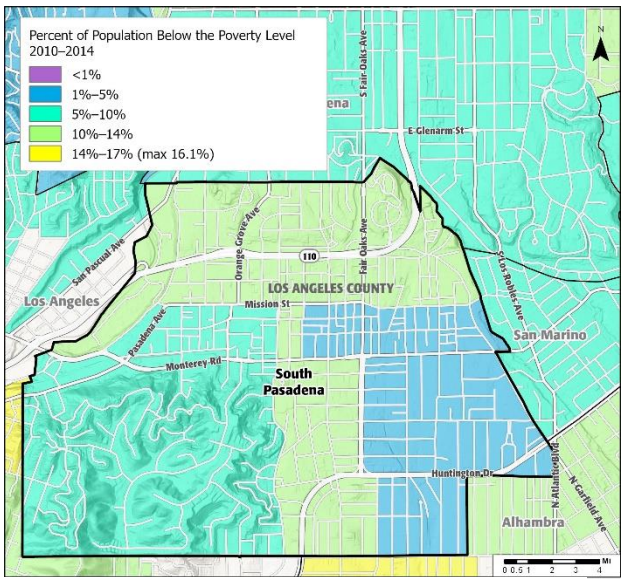
- **Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.
- **Programs 3.h and 3.k.** Encourage the construction of ADUs and monitor construction to track affordability
- **Program 4.d.** Revise the zoning code to require a minimum proportion of units in new construction be ADA accessible.

Poverty Rates

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

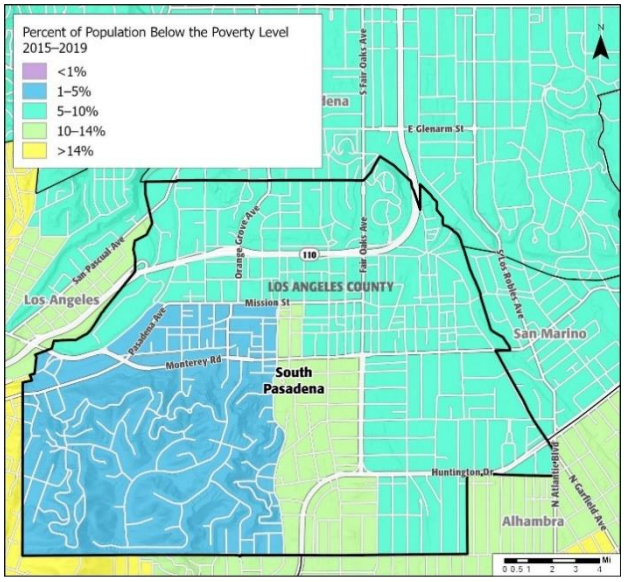
The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less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

Figure VI-5
LOCAL POVERTY RATES 2010–2014



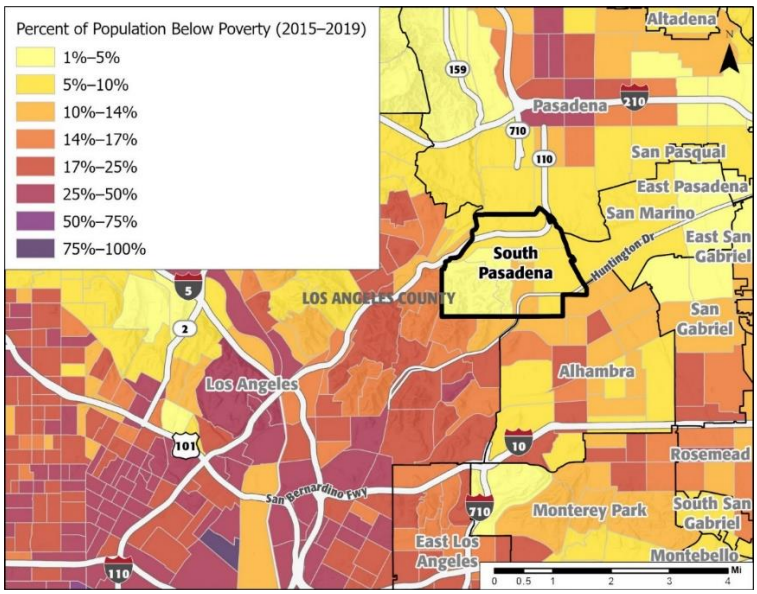
Source: U.S. Census Bureau, 2010-2014 American Community Survey[7]

Figure VI-6
LOCAL POVERTY RATES 2015–2019



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

Figure VI-7
REGIONAL POVERTY RATES 2015–2019

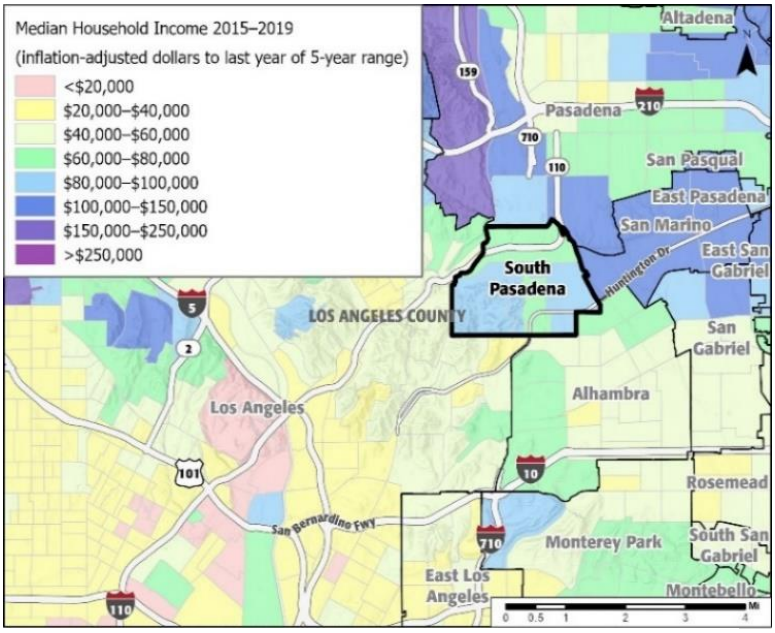


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

South Pasadena Household Income and Affordability as a Fair Housing Consideration

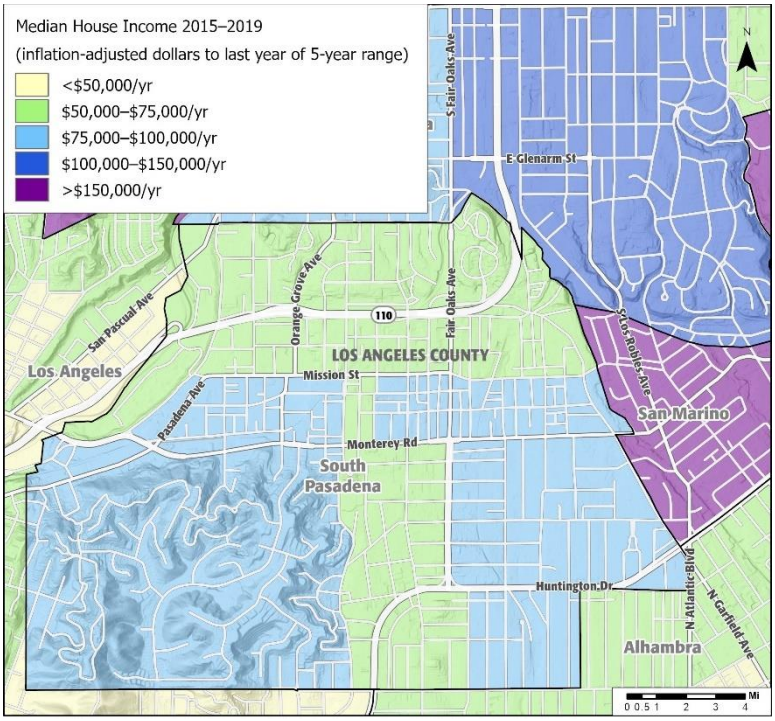
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes are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

Figure VI-8
REGIONAL MEDIAN INCOME 2015–2019



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

Figure VI-9
LOCAL MEDIAN INCOME 2015–2019

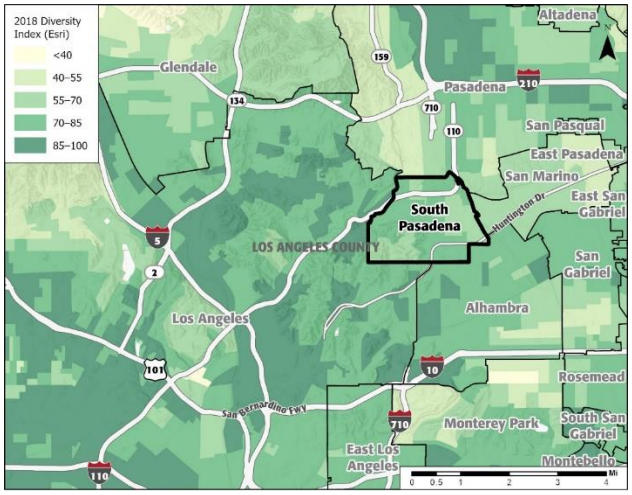


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Ethnic Diversity

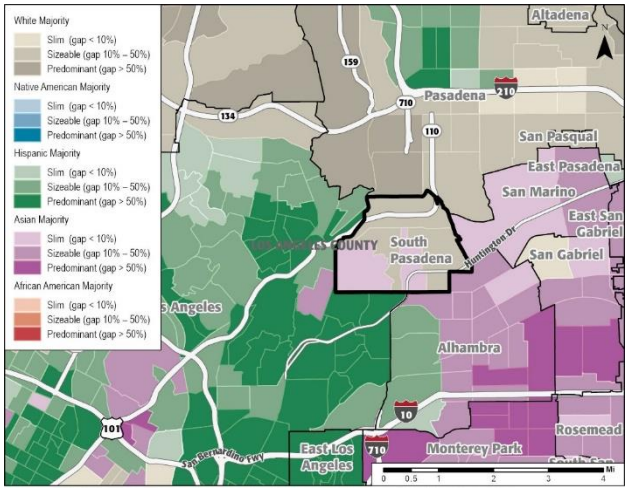
With respect to ethnic diversity, as shown in Figure VI-10, most areas of Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the north,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

Figure VI-10
REGIONAL DIVERSITY INDEX 2018



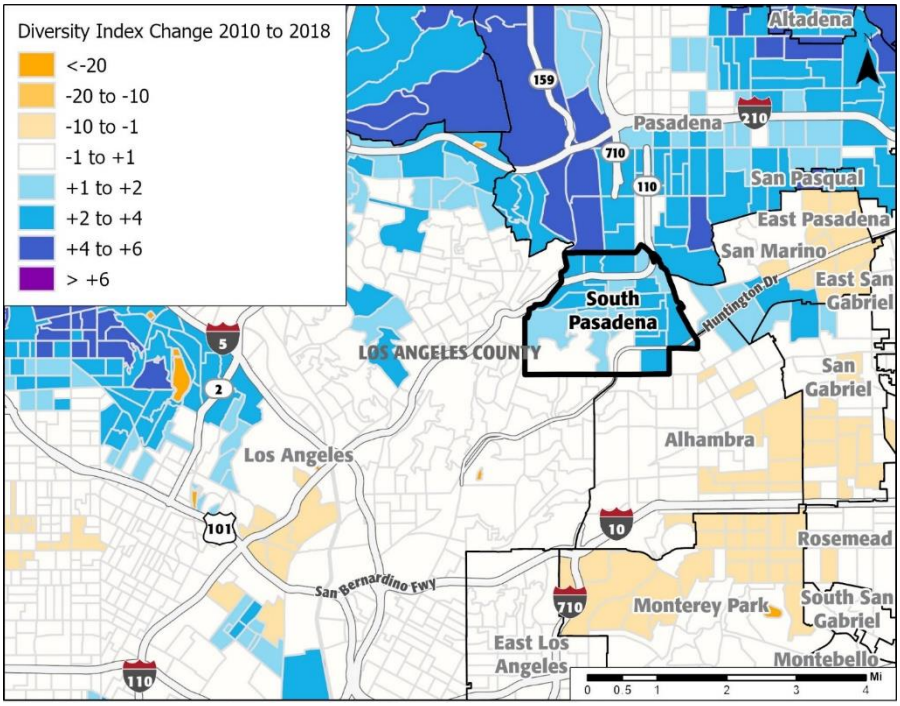
Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Figure VI-11
REGIONAL ETHNIC PREDOMINANCE



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

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

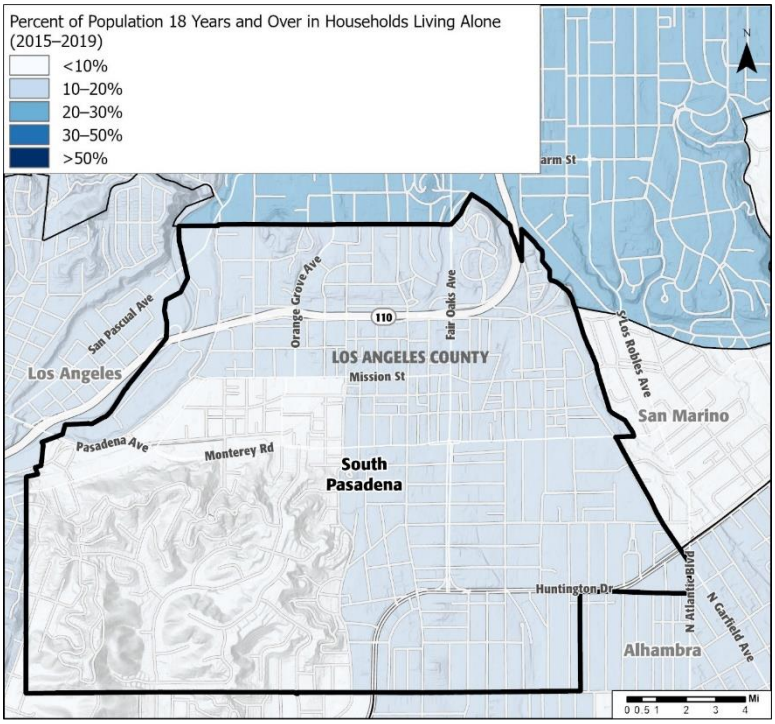


Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Single-Person Household Distribution

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

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

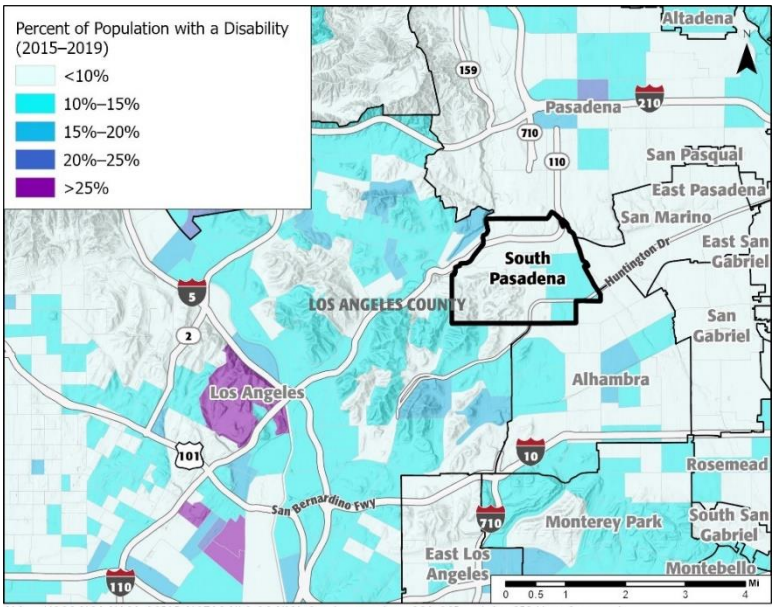


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Persons Living with Disabilities

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

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



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

Fair Housing for Seniors

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

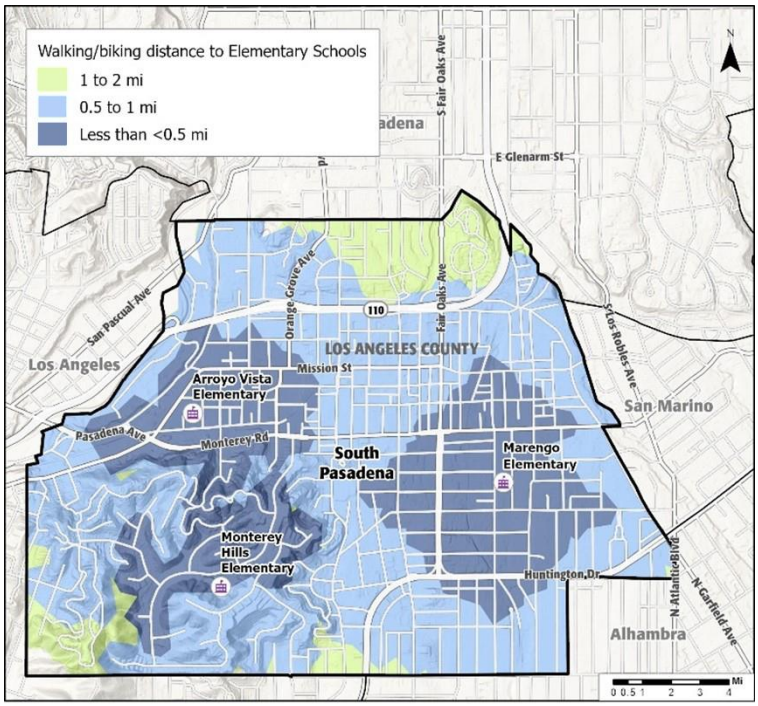
in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.4 Access to Opportunity

Education Resources

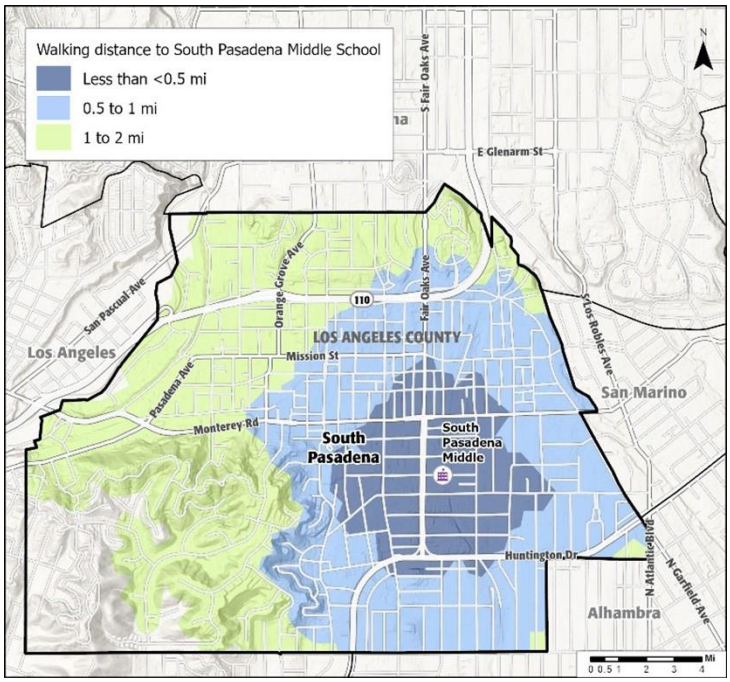
In a statewide review of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, all of South Pasadena's public schools, including all of its elementary schools as well as its middle and high school, are ranked in the 95th percentile or higher.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

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



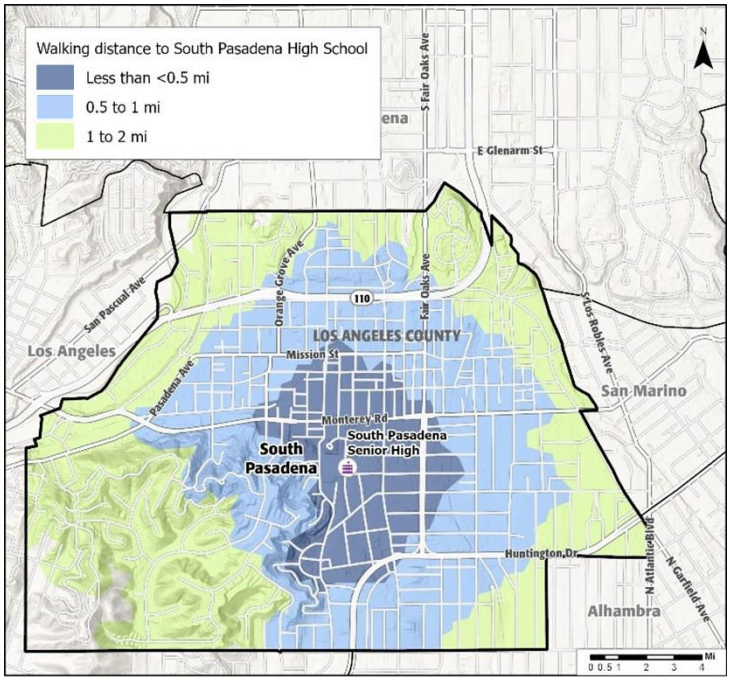
Source: GreenInfo Network, California School Campus Database, 2021[10]

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



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

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



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

Public Transportation Resources

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

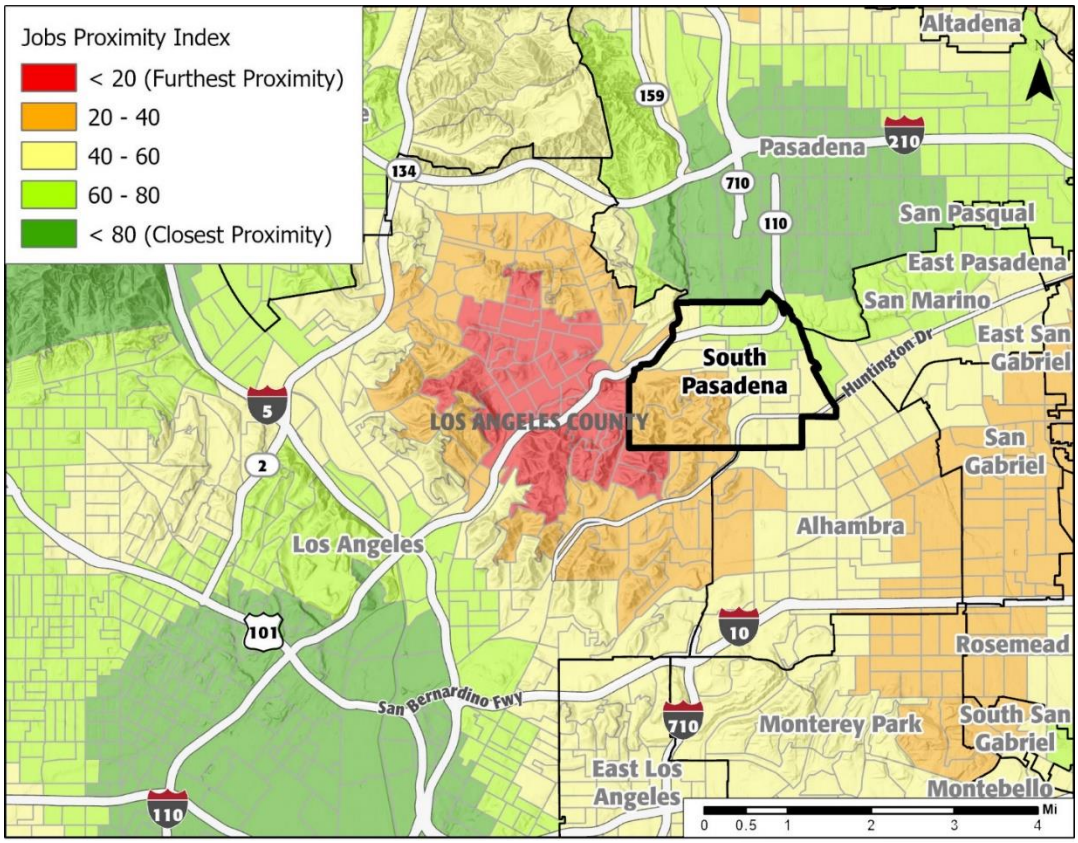
With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station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

Employment Proximity

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

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

Figure VI-18
REGIONAL JOBS PROXIMITY INDEX



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

Environmental Health

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

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

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

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

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

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

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

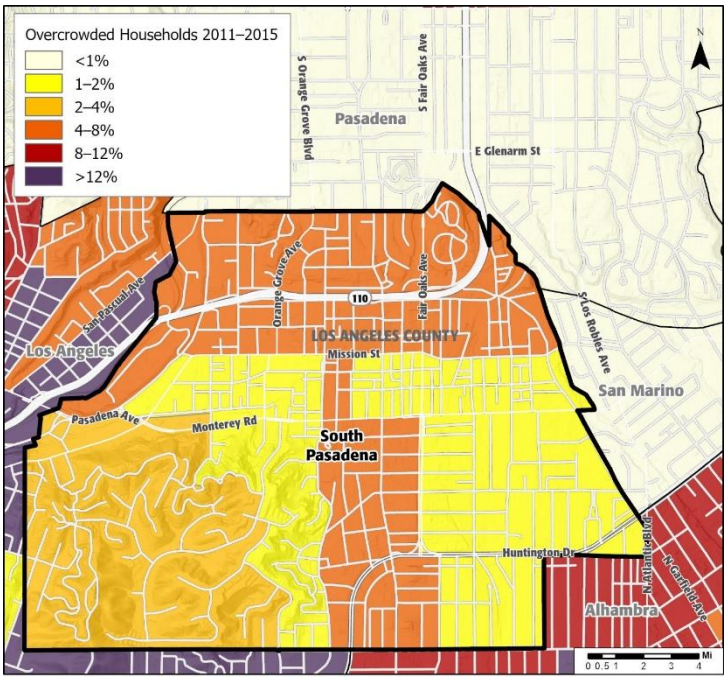
In order to address the potential for any negative living conditions and fair housing concerns that may continue to result from environmental hazards and pollutants, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino (Program 1.e). The City will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

6.4.5 Disproportionate Housing Need and Displacement Risk

Overcrowding as a Fair Housing Issue

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

Figure VI-19
LOCAL HOUSING OVERCROWDING



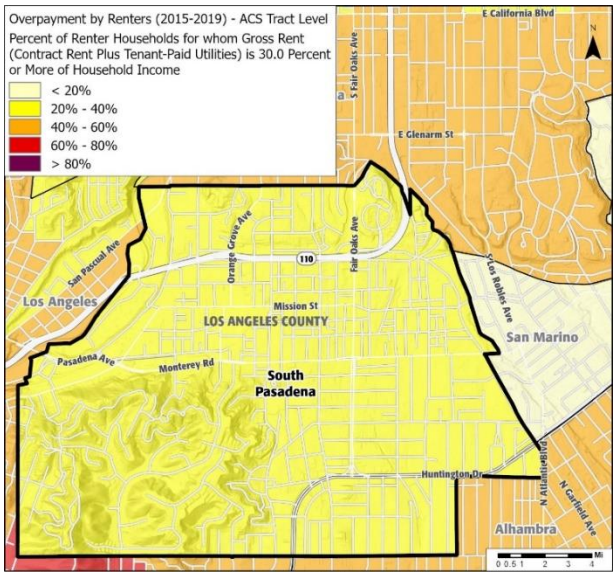
Source: California Health & Human Services Agency, 2020[12]

Overpayment for Housing as a Fair Housing Issue

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

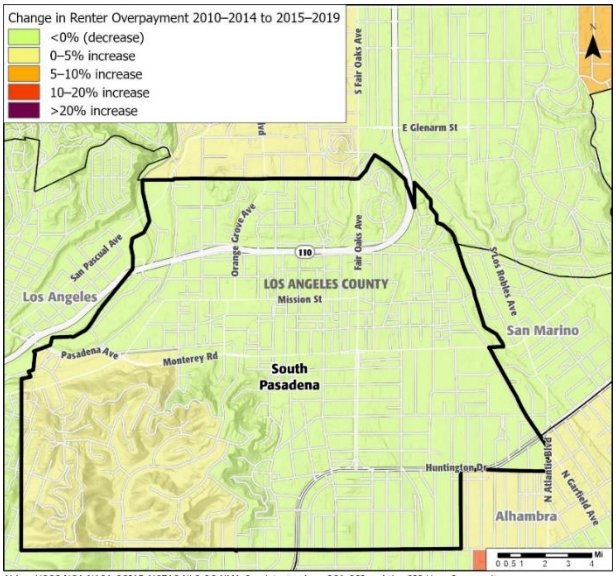
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-20). As shown in Figures VI-20 through VI-23, overpayment for housing has increased in two areas of the city, in the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

Figure VI-20
LOCAL OVERPAYMENT BY RENTERS



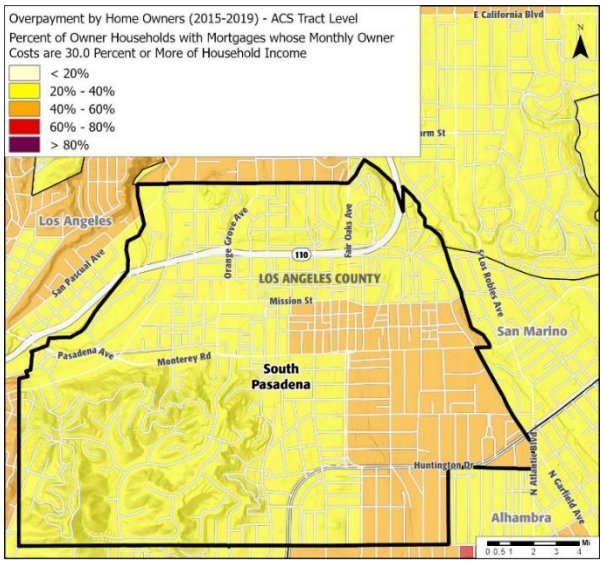
Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

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



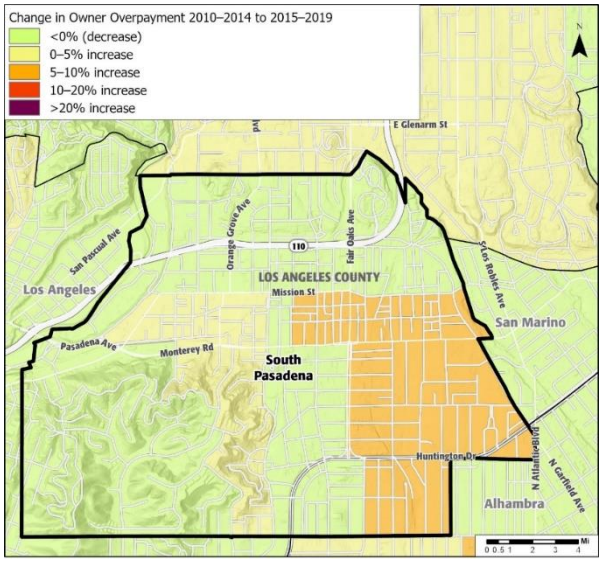
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Figure VI-22
LOCAL OVERPAYMENT BY OWNERS



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

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



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

Housing Stock Concerns for Fair Housing

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

Homelessness

The Los Angeles Homeless Services Authority (LAHSA) divides Los Angeles County into eight Service Planning Areas (SPAs) so the organization and individual jurisdictions can better serve and meet the needs of the communities in these areas. The City of South Pasadena is within Service Planning Area 3 (SPA-3): San Gabriel Valley, which includes communities located in the eastern portion of Los Angeles County. The 2020 Homeless Point-in-Time (PIT) count conducted by LAHSA counted a total of 4,555 homeless persons in SPA-3, of which 15 identified as residing in the City of South Pasadena (less than 0.01 percent of the SPA-3 homeless population). Approximately 66 percent of the total homeless population of SPA-3, or 3,027 people, were considered unsheltered and 33 percent, or 1,528 people, were sheltered. Additionally, approximately 940 people in SPA-3, or 20 percent of the population, were households with at least one child under 18 and one adult over 18; there were no unaccompanied minors recorded. In February 2022, LAHSA conducted a PIT to update these numbers, with participation from City of South Pasadena police. While the detailed results of this survey were not yet released at the time of this draft, police indicated that 28 homeless individuals were counted within the City. Without having the details about this population, the City completed this assessment based on the demographic composition of the 2020 homeless population.

According to the LAHSA in 2020, approximately 49 percent of the total homeless population in SPA-3 identified as Hispanic or Latino, 23 percent identified as Black or African American, three percent identified as American Indian, Alaska Native, Asian, and multi-racial. Additionally, 28 percent were experiencing serious mentally illness, 25 percent had a physical disability, seven percent had a developmental disability, 8 percent were seniors, and four percent were veterans. Of the homeless population in SPA-3, two percent identified as gay or lesbian, two percent as bisexual, and five percent as sexual orientation non-conforming. Given the small size of South Pasadena's homeless population, it is unlikely that all of these protected classes are represented. However, without data available at the city-level, it is assumed that the percentages of each protected class applies to the 15-person homeless population in the city. Under this assumption, the following groups may be disproportionately represented as part of the homeless population compared to the total city population:

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

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

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

Gentrification and Displacement Risk

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

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

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

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

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

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

6.4.6 South Pasadena History

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

Historic Land Development Patterns

Incorporated in 1888, South Pasadena was one of the first municipalities in the Los Angeles area and has featured relatively stable boundaries since initial incorporation, even as its population has grown dramatically. With roots as an agricultural community growing mostly citrus, South Pasadena eventually become a streetcar suburb of Los Angeles with the extension of a Pacific Electric transit line to the City in the early twentieth century. The City grew quickly, seeing high double-digit and even triple-digit decadal growth rates between 1900 and 1930. Low double-digit decadal growth continued until the mid-twentieth century, when most of South Pasadena's land was almost completely built out. Since that time, the population of South Pasadena has generally fluctuated within a range of approximately 22,000 to 25,000 residents. These historical trends are reflected in South Pasadena's development pattern, with the oldest neighborhoods lying close to the former streetcar lines and newer development in more distant and hilly areas that would, in earlier times, have been less accessible or not feasible for construction. The more central portions of the City that were close to the historical streetcar lines are also the areas that feature most of the City's multifamily housing, including units that may be more affordable to households with medium or lower incomes. Additional areas of multifamily housing are found in the northern and especially northeastern areas of the City.[19]

Mid-20^{h} Century Racial Exclusion

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

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

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

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

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

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

Earlier in the decade, in 1942, in response to Executive Order 9066 requiring the relocation of persons of Japanese ancestry to internment camps, 165 Japanese-American residents of South Pasadena were forced to evacuate South Pasadena. There is not clarity as to what happened to homes that were evacuated by these residents. The South Pasadena Review (*What will Become of Homes Vacated By Japanese Families?*, April 3, 1942) reported on a Chamber of Commerce meeting at which the attendees' primary concern in regard to the imminent deportation of the Japanese community that would leave 47 homes vacant was the prospect that these homes would become occupied by "undesirables" and would "soon be snapped up by colored families moving down from Pasadena or surrounding communities." Mayor Andrew O. Porter, present at the meeting, responded to suggestions that properties be improved so as to be too expensive for such families, by saying that the City cannot exercise any control over these properties and that the responsibility for improvement rests with the owner of the property. The group's effort to keep blacks and other minority groups out of South Pasadena appears to have been effective, given City Manager Clough's declaration in 1946 (above) in regard to the racial profile of the city's residents.

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

6.4.7 Enforcement of Fair Housing and Outreach Capacity

The City enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of City policies and code for compliance with California law and referring fair housing complaints to appropriate agencies. The City of South Pasadena refers fair housing complaints to the Housing Rights Center (HRC) in Pasadena and maintains a Housing Support page on the City's website to assist access for community members. The role of the HRC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the HRC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs.

The HRC serves residents in Los Angeles County, including South Pasadena, with issues regarding tenants' rights, fair housing, and other related needs. As noted on the HRC's website:

> *"The Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing. HRC was founded in 1968, the same year that Congress passed the Fair Housing Act (FHA). Our mission is to actively support and promote freedom of residence through education, advocacy, and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law."*

As part of outreach efforts, HRC provided the City with fair housing cases and inquiries managed by the organization in the last 5 years to identify patterns and specific housing needs. Discrimination towards those with mental and physical disabilities was the most common subject of inquiries and cases across all years, as shown in Table VI-32. Discrimination cases have remained relatively low since fiscal year 2016/2017, with a peak of 7 cases during fiscal year 2019/2020. While cases and inquiries specifically related to discrimination are relatively low in South Pasadena, HRC provided other housing services to 410 individuals during the five year period. These services included providing information and counseling on a variety of tenant-landlord rights and obligations, including, but not limited to, rent increases, lease terms, repairs, and pets. The most common issue raised is regarding noticing (20 percent of questions), followed by rent increases (17 percent) and substandard conditions (13 percent). Across both housing issues and discrimination cases and

inquiries, approximately 84 percent of calls were made to HRC by in-place tenants, followed by seven percent of calls from those seeking rental housing. HRC also received calls from landlords, realtors, managers, and homebuyers. Of the hundreds of South Pasadena cases and inquiries, the HRC confirmed that none were made against the City of South Pasadena, LA County, or any public housing authority.

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

None of these fair housing agencies provided specific location information for cases, either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Policy 5.1 has been included to participate in the programs offered by the HRC and provide public information at City Hall or through the City's website, regarding fair housing issues and HRC consultation.

Table VI-32
HRC DISCRIMINATION INQUIRIES AND CASES

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

Source: Housing Rights Center, 2016-2021

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

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

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

6.4.8 Analysis of Sites Inventory for Fair Housing

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

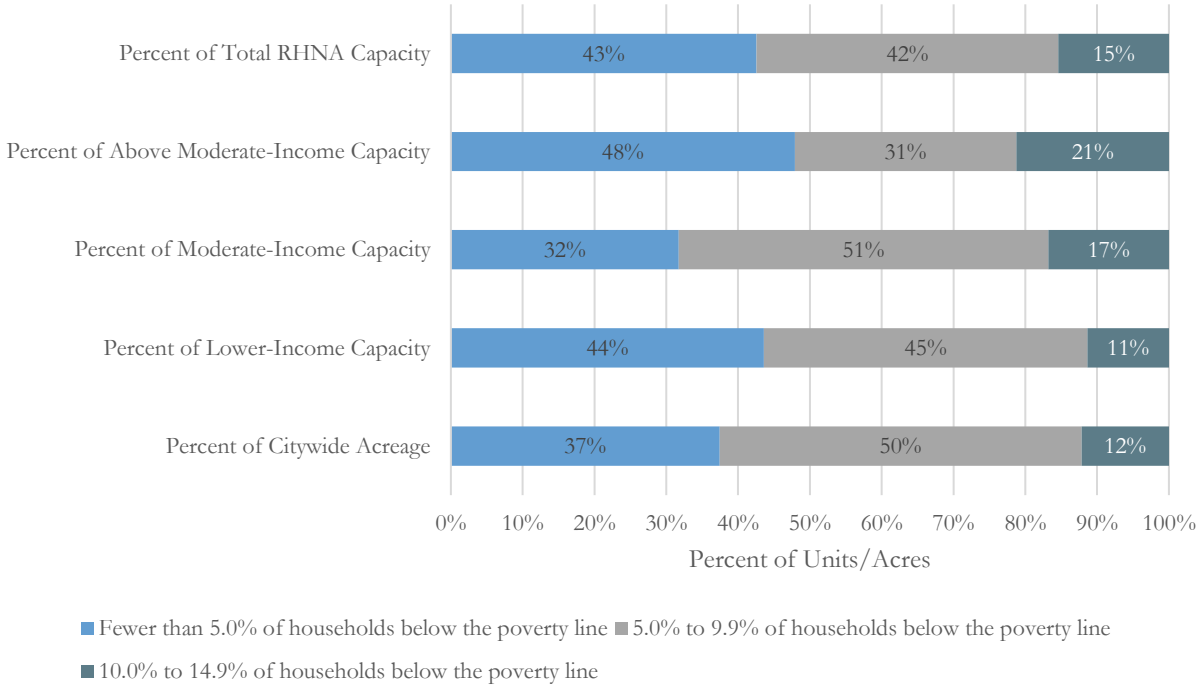
The locations of South Pasadena's proposed housing opportunity sites are not anticipated to contribute to the reinforcement or worsening of any fair housing issues. (A full listing and descriptions of South Pasadena's housing sites are contained in Tables VI-44, VI-50 and Appendix A, Sites Exhibits.)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

Potential Effects on Patterns of Integration and Segregation

Income

The locations of South Pasadena's housing opportunity sites are not anticipated to reinforce or exacerbate patterns of segregation and integration, whether with respect to race or economic status. As shown in Figure VI-24, South Pasadena has relatively low rates of poverty, with approximately 87 percent of the city's geographical area having a poverty rate of less than 10 percent. While poverty rates are slightly higher in the central portion of the city south of Mission Street (Figure VI-6), housing opportunity sites are located across South Pasadena in a distribution that closely reflects the rate of poverty in the city, with approximately 15 percent of the projected RHNA capacity located in areas with a poverty rate of greater than 10 percent, compared to 12 percent of the city's land falling into this category. Approximately 89 percent of lower-income units are projected in neighborhoods with fewer than 10 percent of households below the poverty line, ensuring that future lower-income units are not concentrated in areas of higher poverty rates, thus affirmatively furthering fair housing by facilitating housing mobility to areas of affluence. The few sites for lower-income units identified in an area with a higher poverty rate are all located along major transit corridors, as shown in Figures A-1.a through A-1.g, thus providing the best possible access to transit, direct access to employment opportunities, and other resources. As Figure VI-24 demonstrates, although there are modest differences in poverty rates throughout South Pasadena, housing opportunity sites are distributed in such a manner as to promote mixed-income communities and encourage lower-income units in areas of affluence and moderate and above-moderate units in areas with slightly lower median incomes, thereby serving to dilute any potential effects with respect to concentration of poverty. The inclusionary housing requirement will also ensure that new developments serve a variety of household income categories within the same site.

Figure VI-24
UNITS AND CITY ACREAGE BY POVERTY RATE



Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

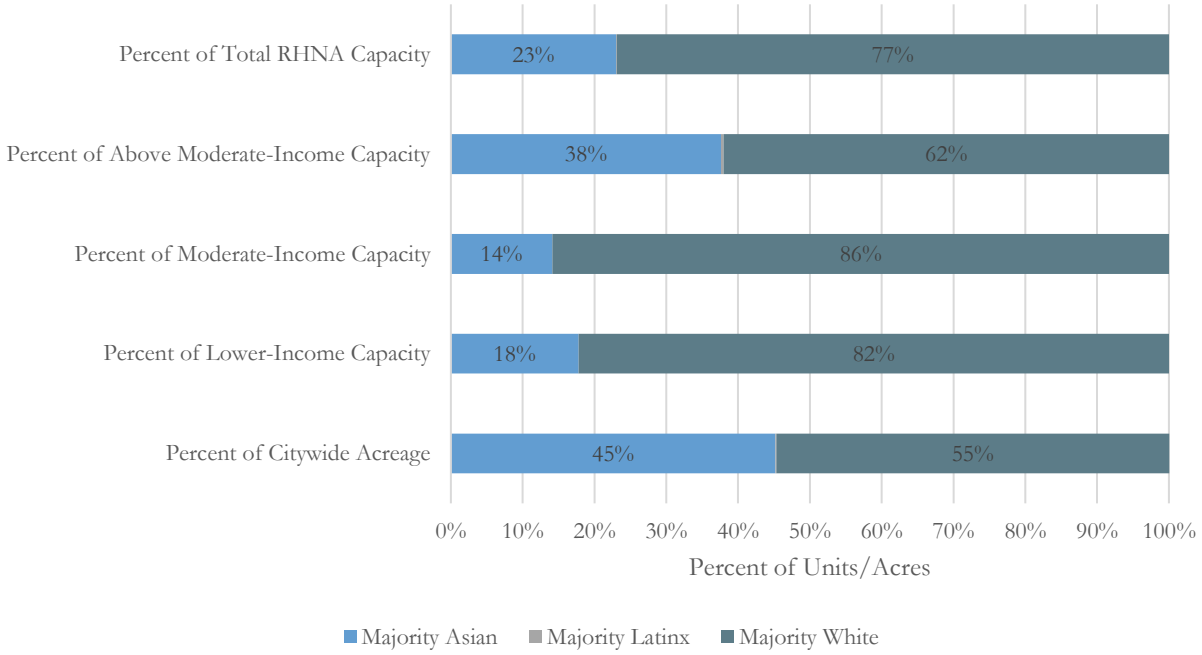
Race and Ethnicity

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

While there is a concentration of Asian residents in the southern portion of the city, south of Mission Street (Figure VI-11), other indicators in this area such as quality of schools, median income, and familial status suggest that this population is not negatively isolated and has equal access to economic, educational, and environmental opportunities compared with residents of other areas of the city. As presented in Figure VI-25 the majority of the population identify as Asian in approximately 45 percent of the city, while the majority of residents identify as White in the remaining 55 percent. While 82 percent of lower-income units and 86-percent of moderate-income units are identified in

areas that are a majority White, these areas also offer quality schools, have higher jobs proximity index scores than the southwestern portion of the city, and are closer to commercial corridors along Fair Oaks Avenue and Mission Street, indicating strong access to resources, services, and amenities.

Figure VI-25
UNITS AND CITY ACREAGE BY MAJORITY POPULATION

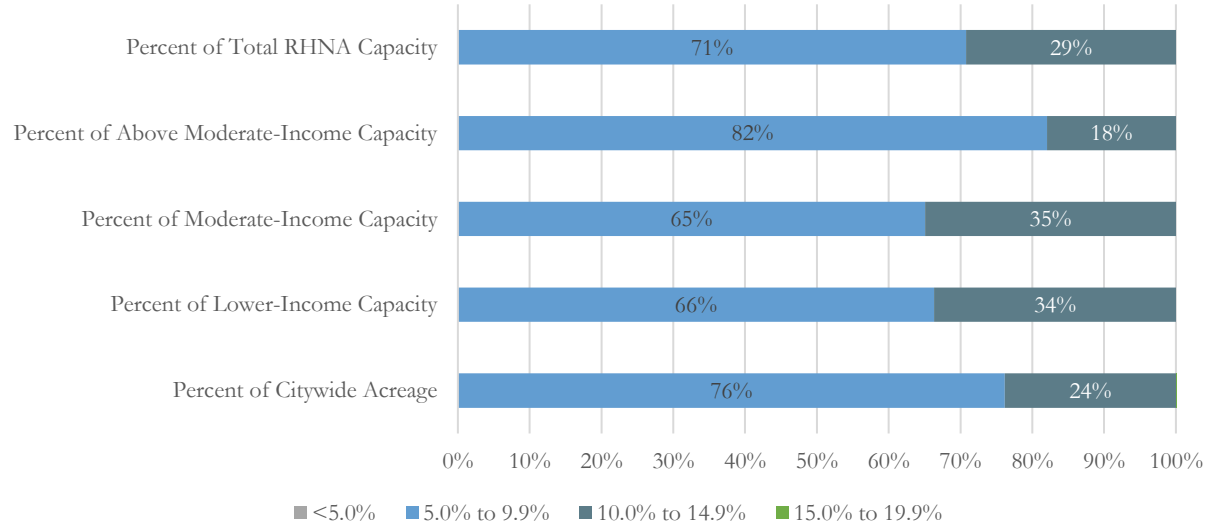


Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

Disability

Approximately seven percent of South Pasadena's population lives with at least one disability, a rate that is relatively low compared to the region. As shown in Figure VI-26, approximately 71 percent of the total RHNA capacity identified in the sites inventory is in areas in which 5.0 to 9.9 percent of residents have a disability, closely reflecting the distribution of land in South Pasadena by disability rate. Locating units affordable to lower- and moderate-income residents near and along commercial corridors will help to improve access for, and accommodate the needs of, persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit. Additionally, mixed housing types viable in the high-density and mixed-use zones can help accommodate the needs of residents living with disabilities by integrating services or amenities on-site.

Figure VI-26
UNITS AND CITY ACREAGE BY DISABILITY RATE



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

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

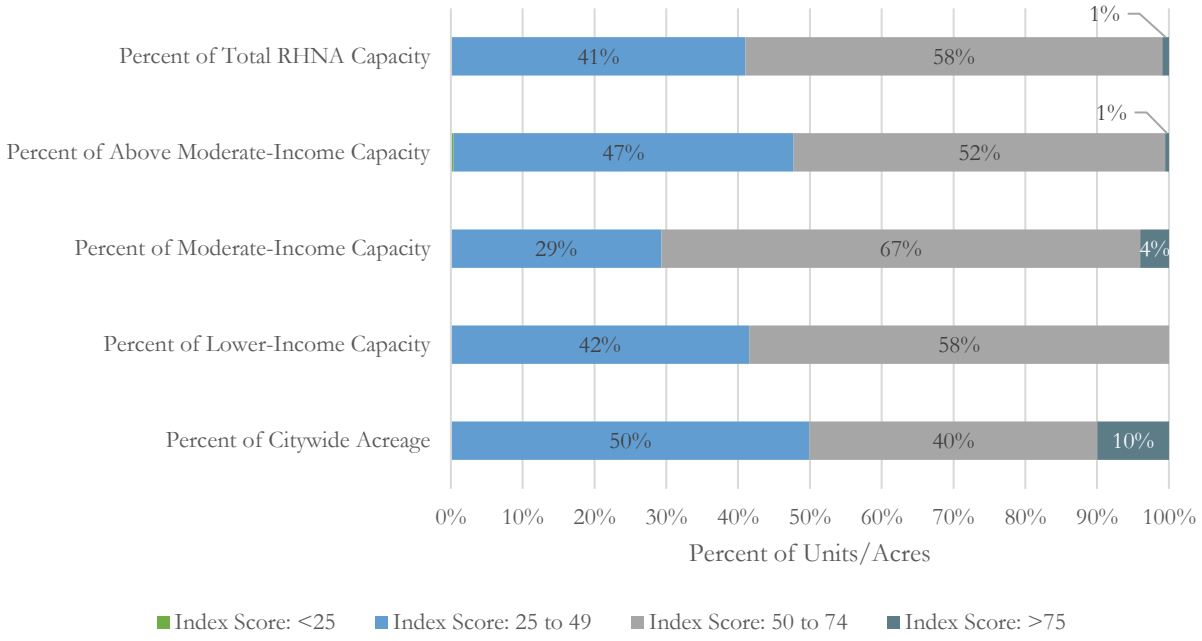
Potential Effects on Access to Opportunity

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

Jobs and Transit Proximity

Based on the data presented in Figure VI-18, the majority of South Pasadena's housing opportunity sites would feature moderate to good access to jobs, and would also have good access to bus stops along Fair Oaks Avenue, as well as the South Pasadena Metro L Line light rail station. As shown in Figure VI-27, a slightly larger share of the RHNA capacity is located in areas scoring 50 or above for job proximity (58 percent) than the citywide acreage (50 percent). Approximately 58 percent of lower-income units and 71 percent of moderate-income units are located in areas scoring 50 or above, suggesting that these units will offer strong access to employment opportunities. While not all units are planned in the areas of highest job proximity, the remaining units offer mobility opportunities for households that choose to live further from existing job opportunities. The location of several lower-income sites along the Fair Oaks Avenue and Mission Street corridors will provide close proximity to employment opportunities in these areas as well as the regular transit stops located along both of these thoroughfares.

Figure VI-27
UNITS AND CITY ACREAGE BY JOB PROXIMITY INDEX SCORE



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

Educational Opportunities

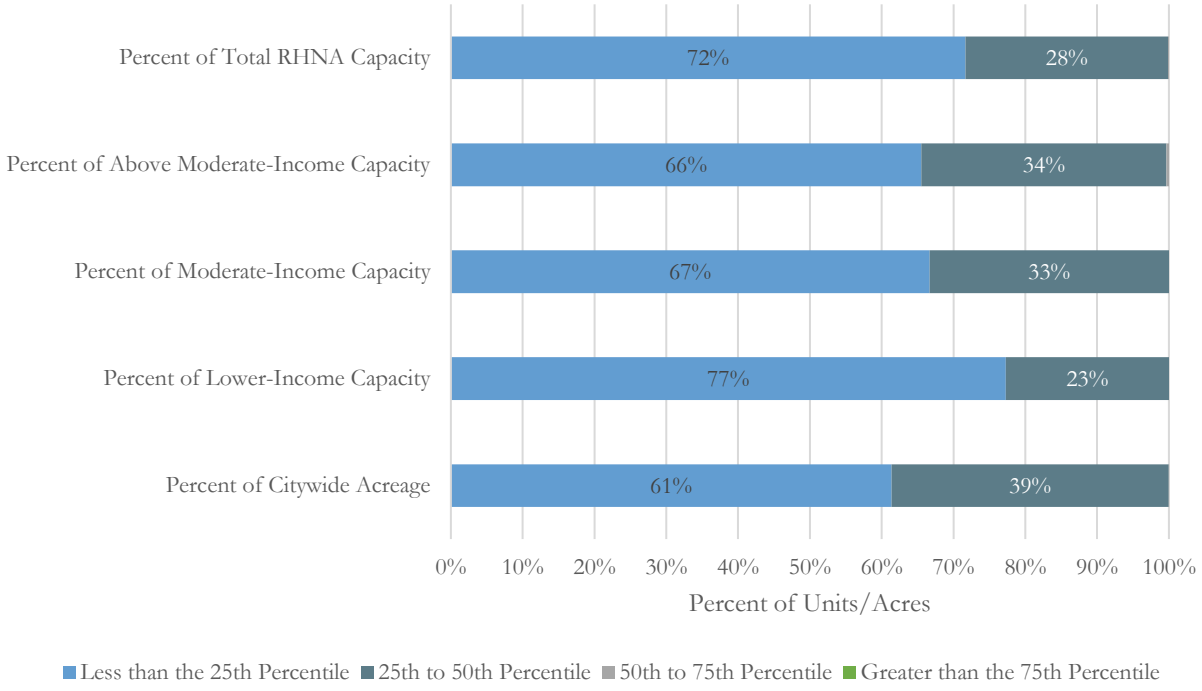
As discussed in Section 6.4.4 (Access to Opportunity), all public schools in the City of South Pasadena score in the 95th percentile or higher compared to the rest of the state. Additionally, Figures VI-15 through VI-17 demonstrate that nearly all parcels in the city are located within a mile of an elementary school and that the middle and high schools are centrally located. Given the location, access, and proficiency of schools in South Pasadena, the sites identified in this Housing Element to meet the RHNA will provide housing opportunities for new and existing households, including lower-income households, near good schools. TCAC and HCD have identified all of South Pasadena as scoring in the 82nd percentile or higher, further supporting that the location of sites will not limit access to proficient schools for any socioeconomic group.

Environmental Health

Despite historic contamination of drinking water sources, all census tracts in South Pasadena score between the 9th and 34th percentiles for OEHHA's assessment of environmental pollution, likely as a result of extensive efforts to mitigate past contamination in the San Gabriel Valley. As shown in Figure VI-28, 72 percent of the unit capacity to meet the City's RHNA is located in areas that score below the 25th percentile, or the best environmental conditions. This includes 77 percent of lower-income units and 67 percent of moderate-income units. Though 28 percent of the RHNA capacity is located in areas with slightly higher scores, the generally low scores throughout the City

indicate that all residents across the City will have similar access to healthy environmental conditions. The distribution of units at each affordability level will not create a discrepancy in access to positive environmental conditions.

Figure VI-28
UNITS AND CITY ACREAGE BY CALENVIROSCREEN PERCENTILE



Source: CalEnviroScreen 4.0, 2021; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena that score above the 34th percentile.

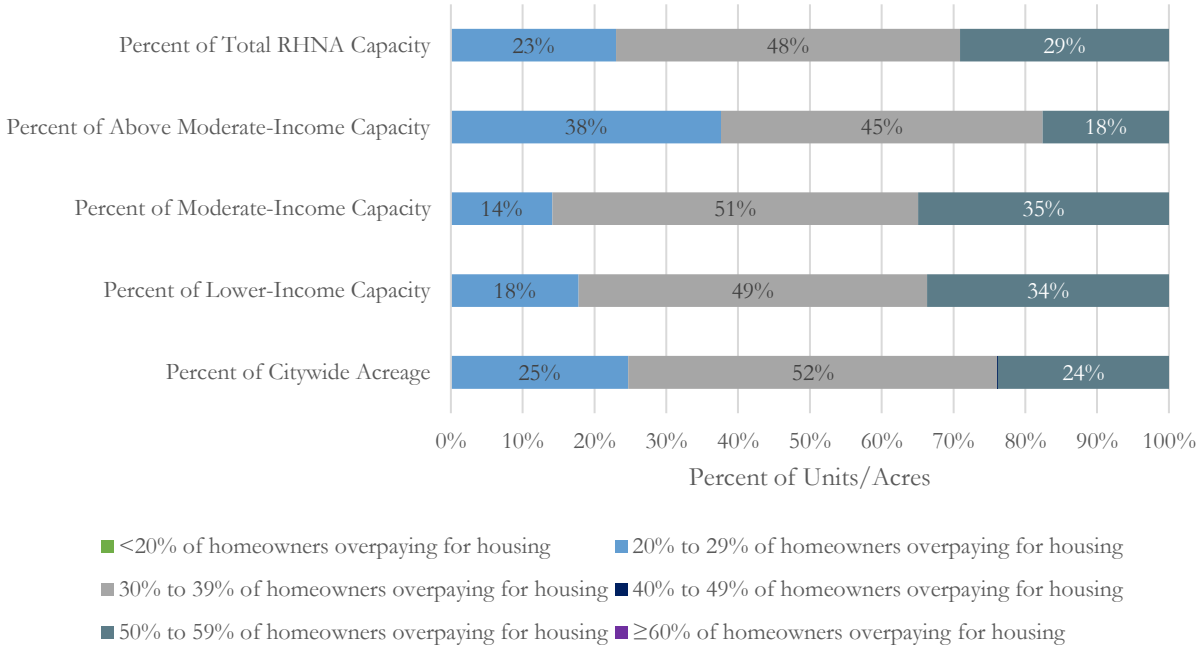
Potential Effects on Disproportionate Housing Need

Overpayment

While overpayment rates are lower in South Pasadena than many nearby jurisdictions, as shown in Figures VI-20 and VI-22, owners and renters throughout the city, and the greater Los Angeles area, are overpaying for housing because of rapidly increasing housing costs that outpace wage increases. With a large supply of lower- and moderate-income households in the central portions of South Pasadena with good access to schools, transit, and commercial districts, the sites inventory guides new housing toward opportunities to alleviate pressure for households to relocate to less accessible and/or less affordable areas of the City due to housing costs. As shown in Figure VI-2, the allocation of the total RHNA capacity closely reflects the patterns of overpayment among homeowners. A greater percentage of the units to meet the lower- and moderate-income RHNA have been identified on sites located in areas in which more than 30 percent of homeowners are overpaying for housing, therefore reducing displacement risk for these households by expanding the supply where there is

greatest need. In contrast, there is a larger share of above moderate-income units (38 percent) in the southwestern portion of the city where overpayment is lower, likely due to the high median income. Approximately 18 percent of lower-income units have also been identified in areas of lower homeowner overpayment rates, including along Monterey Road and Pasadena Avenue, to encourage mixed-income neighborhoods and facilitate housing mobility opportunities for these households.

Figure VI-29
UNITS AND CITY ACREAGE BY RATE OF HOMEOWNER OVERPAYMENT

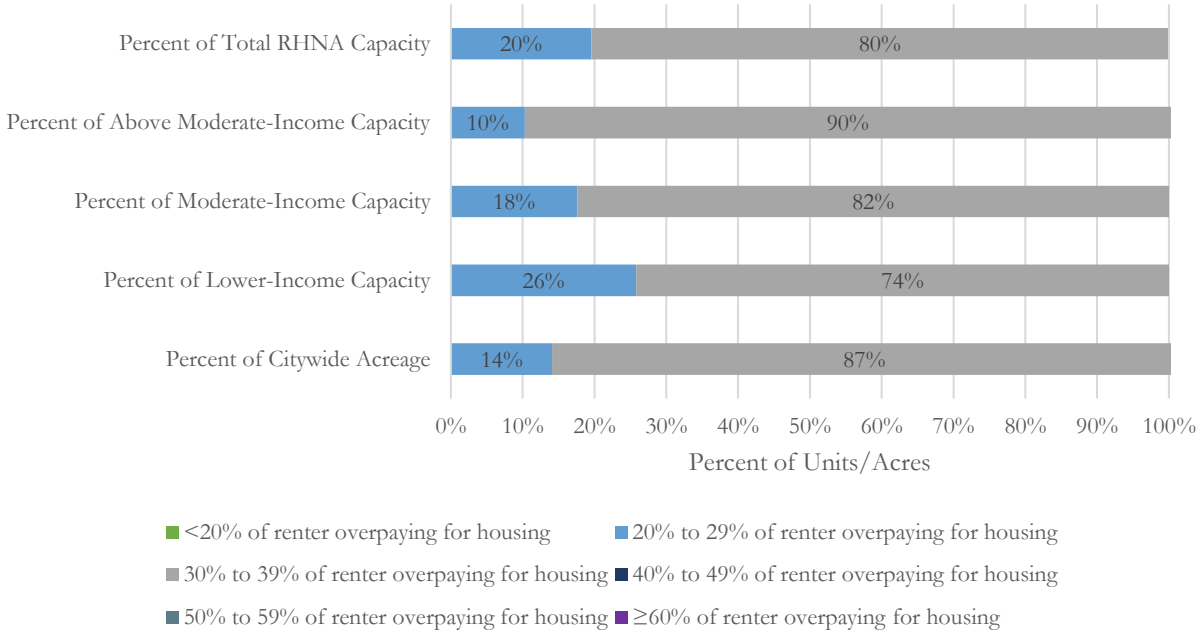


Source: 2015-2019 ACS; City of South Pasadena, 2022

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

Renter overpayment in South Pasadena is notably lower than in surrounding jurisdictions, as seen in Figure VI-21. The rate of overpayment among renters ranges from 20 to 39 percent throughout the City (Figure VI-30). As with homeowner overpayment, the distribution of the total RHNA capacity by renter overpayment rates closely mirrors the citywide rates, with approximately 20 percent of units in areas in which 20 to 29 percent of renters are cost burdened and 80 percent in areas in which 30 to 39 percent of renters are cost burdened. Relatively low overpayment rates among renters likely reflect a barrier to entry to the South Pasadena housing market for lower- and moderate-income households, given the shortage of affordable rental housing. As such, the plan to build more rental housing specifically for these income groups will increase mobility opportunities while minimizing displacement risk due to overpayment.

Figure VI-30
UNITS AND CITY ACREAGE BY RATE OF RENTER OVERPAYMENT



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

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

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

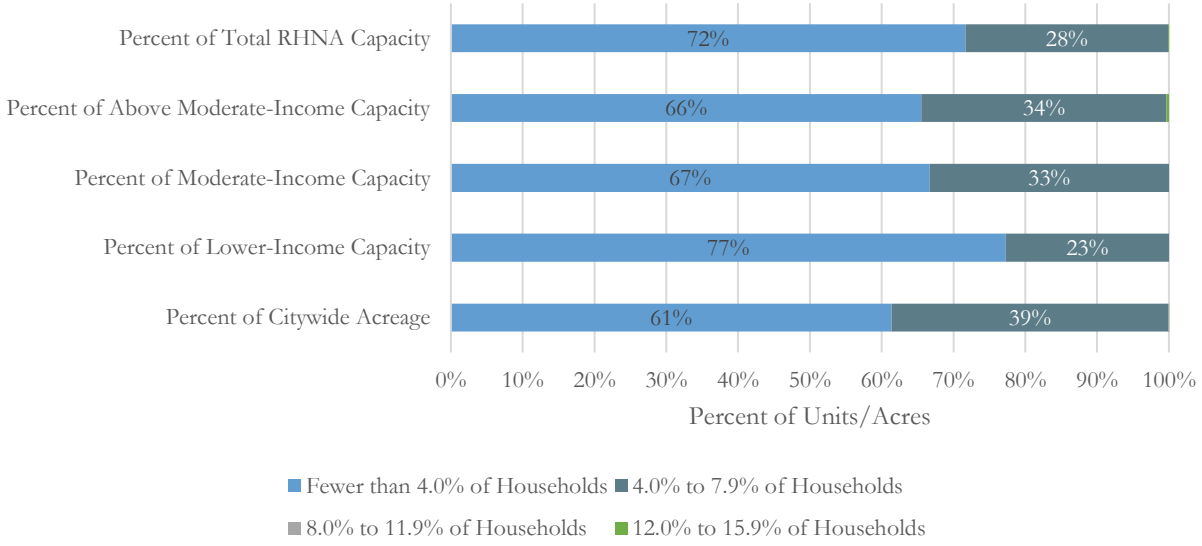
Overcrowding

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

The distribution of moderate income and above-moderate income units closely follows overcrowding patterns, with 66 percent of moderate-income unit capacity and 66 percent of above-moderate

income unit capacity in areas where fewer than four percent of households are overcrowded. Approximately 77 percent of lower-income units are located in these areas, with the remaining 23 percent along Fair Oaks Avenue, where overcrowding is currently slightly higher. Given the low rates of overcrowding throughout the City, the identification of sites in all census tracts will help to alleviate overcrowding through increased mobility opportunities and a larger supply of lower- and moderate-income housing units in general, particularly near commercial corridors. Additionally, the construction of more above-moderate income units will expand the housing stock, offering new market-rate housing opportunities to potentially reduce displacement and overcrowding for these households as well.

Figure VI-31
UNITS AND CITY ACREAGE BY RATE OF OVERCROWDING



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

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

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

6.4.9 Contributing Factors to Fair Housing Issues

The overall housing shortage in the Los Angeles region, and particularly the shortage of subsidized, affordable housing units with a range of sizes to meet the needs of all persons, is a contributing fair housing factor for South Pasadena and for all its surrounding jurisdictions. South Pasadena is part of a bigger housing market for above-moderate and for moderate and lower income households.

The Housing Plan in Section 6.8 addresses South Pasadena's obligation to contribute its fair share toward addressing the regional shortage by identifying the local factors that contribute toward it.

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

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

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

Table VI-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Displacement/exclusion of lower-income residents and overpayment for housing by renters and homeowners	**Housing shortages in the City** **Lack of affordable and assisted housing units** Unaffordable rents and home prices Cost of rehabilitation or repair Shortage of sites that could be feasibly redeveloped **Currently limited partnerships with affordable housing developers**	Program 1.c - Housing Rehabilitation and Code Enforcement Program 2.a - Planning Assistance and Permit Processing Program 2.b - Affordable Housing Production/Inclusionary Housing Program 2.c - CalHome Program Program 2.d - Section 8 Rental Assistance Program 2.e - Density Bonus Program 2.f - Homeless Services Program 2.k - Affordable Housing Overlay Zone Program 3.a - Rezone and Redesignate Sites to Meet RHNA Program 3.c – Replacement of Lost Units from Residential Demolitions Program 3.f - Allow and Facilitate ADUs Program 3.g - Monitor ADU Production ***Program 3.k - General Plan Affordable Housing Overlay*** Program 4.a - Land Use Controls – Emergency Shelters Program 4.b - Land Use Controls – Transitional and Supportive Housing Program 5.a - Fair Housing Education, Outreach, and Services
Modest overcrowding in central and northern areas of the City	Availability of affordable units in a range of sizes	Program 3.b - Mixed-Use Developments and Adaptive Re-Use Program 3.d - Parcel Assemblage Program 3.f - Allow and Facilitate ADUs Program 5.b - Encouraging a Variety of Housing Types
Displacement risk due to repair and rehabilitation need to maintain habitability and/or lack of accessibility for seniors and persons with disabilities	Aging housing stock **Cost of rehabilitation or repair** **Cost of retrofitting existing properties** **Shortage of accessible units** Need for higher levels of new, ADA-compliant development	Program 1.b - Housing Acquisition ***Program 1.c - Housing Rehabilitation and Code Enforcement*** Program 2.g - Senior Housing Program 3.f - Allow and Facilitate ADUs ***Program 4.d - ADA Accessibility Standards*** Program 4.e - Universal Design
Potential housing discrimination against protected classes	**Existing racially restrictive covenants, though not enforced** **Historic discriminatory practices** Lack of education and mediation services for renters, buyers, property owners, and real estate professionals	Program 4.d - ADA Accessibility Standards ***Program 5.a - Fair Housing Education, Outreach, and Services*** ***Program 5.c - Removal of Racially Restrictive Covenants from Property Deeds Citywide***

6.5 HOUSING CONSTRAINTS

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

6.5.1 Market Constraints

Construction Costs

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

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

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

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

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

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

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

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

Land Costs

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

development. This will undoubtedly have an effect on land prices as the market adjusts to the changes in opportunity for land in different parts of the city.

Mortgage Financing

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

6.5.2 Governmental Constraints

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

General Plan Land Use Element and the Mission Street Specific Plan

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

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

Table VI-34
GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES

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

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

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

Residential Zoning Regulations

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

Table VI-35
RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT

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

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

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

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

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

Multi-Family Open Space Requirements

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

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

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

Table VI-36
MULTI-FAMILY COMMON OPEN SPACE

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

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

c. Elevation. A minimum of 60 percent of the required common open space shall be located at grade or the level of the first habitable floor.

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

2. Allowed uses. Required common open space:

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

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

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

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

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

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

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

Residential Parking Requirements

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

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

Program 3.a in Chapter 6.8, the City will adopt parking requirements that facilitate the proposed maximum residential densities, for the sites listed in Table VI-50.

Table VI-37
RESIDENTIAL PARKING REQUIREMENTS

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

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

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

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

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

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

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

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

Building Codes and Enforcement

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

Development and Planning Fees

The City collects various fees from applicants to cover the costs of processing permits and providing necessary services and infrastructure. Table VI-38 describes South Pasadena's 2021 planning fee schedule. The City fee schedule is available on the City website.

Table VI-38
2021 PLANNING FEE AND IMPACT FEE SCHEDULE

PLANNING APPLICATION	FEE
Variance	$3,446.00 (first); $2,431.00 (each additional)
Conditional Use Permit; with first variance	$3,655.00; $4,700
Administrative Use Permit	$1,625.00
Temporary Use Permit (non-profit)	$240.00
Temporary Use Permit	$481.00
Tentative Parcel Map	$3,877.00
Tentative Tract Map	$10,513.00
Lot Line Adjustment/Parcel Merger/Certificate of Compliance	$ 2,089.00
Hillside Development Review; with variance	$2,089.00; $3,133.00
General Plan Amendment	$20,887.00
Vacation-Easements, Alley's, Streets	$1,842.00
Zone Clearance	$65.00
Cultural Heritage Commission-Landmark Review	$1,567.00
Cultural Heritage Certificate of Appropriateness for Additions/Alterations	$1,567.00 (single-family); $3,133.00 to $9,399.00 (multifamily (3-8 to 100+ units))
Categorical Exemption	$147.00
Initial Study	$5,222.00
Environmental Impact Report	$26,109.00
Negative Declaration	$295.00
Mitigation Monitoring Inspection & Administrative Fee	Actual Cost
Zoning Text & Map Amendments	$10,443.00
Specific Plan Application	$10,443.00
Specific Plan Amendment	$20,887.00
Development Agreement Review	$10,443.00
Planned Development	$10,443.00
Technology Surcharge (Percentage Applied to Fire, Building, Engineering, and Planning Permits)	10%
General Plan Maintenance Fee (Percentage of Building Permit Feet)	15%
DEVELOPMENT IMPACT FEES	
Residential	$1.64 per sq. ft.
Park Impact Fee -- Residential	$7.65 per sq. ft.
Park Impact Fee – Residential Remodel	$7.65 per sq. ft. > 250 sq. ft.
Park Impact Fee – Senior Housing	$2.95 per sq. ft.
Public Art Development Fee – on-site	1% of total building valuation
Public Art Development Fee – in-lieu	1.5% of total building valuation
School Fees	$4.08 per sq. ft.
Water Connection	$7,916.00 per unit
Sewer Connection	$2,094.00 per unit
Los Angeles County Sanitation District	$3,980.00

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

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

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

Typical Residential Project Fee Estimate

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

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

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

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

Regulations Impacting Housing Supply

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

City Height Limit Initiative

On July 12, 1983, the voters in South Pasadena approved a citywide height limit of 45 feet in a special municipal election (see Section 36.300.040 of the SPMC). This ballot initiative can only be amended or rescinded through another vote of the electorate. However, some projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, may request and receive a height increase beyond the ballot initiative limit, in order to comply with State law, which takes precedence.

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

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

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

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

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

The City also analyzed the impact of the 45 foot height limitation on unit sizes and examined the development standards (besides height) that would be needed to achieve high quality design while achieving densities of 70 or 80 units to the acre. Two actual projects, one in Santa Monica (100% affordable) and one in Hercules (market rate) in northern California were modeled for this analysis (see Figure VI-32). Both projects include a range of bedroom types. The Hercules project that was built at 76 units per acre average had an average unit size of 825 square feet. At 80 units per acre, the Santa Monica project had a smaller average unit size (732 square feet) although it included units with

up to three bedrooms. Both projects achieved a level of design that avoided boxy massing that would not be compatible with South Pasadena's urban form. The analysis confirms that the densities and heights proposed in the sites inventory, to be implemented through rezoning, are reasonable and feasible.

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

76* du/ac Hercules, CA

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

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

ACHIEVABLE HOUSING DENSITIES IN A THREE-STORY BUILDING

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

80 du/ac Los Flores, Santa Monica

Source: PlaceWorks, 2020

Visual simulation analyses were performed on representative inventory sites including the vacant site in Ostrich Farm (Site 1), the Tyco site in Ostrich Farm (Site 4), Meridian site (Site 10), Vons site (Site 20), and Ralphs site (Site 24). Site numbers in parentheses correspond to the numbering in Appendix A and Table VI-50. The analysis included modeling multiple densities and heights on each site. It also included identifying precedent projects from the list mentioned earlier in this section that could be suitable for the site in terms of design, scale and massing. These sites occur in different areas of the city and have different contexts so were chosen to represent what could happen on the whole range of sites chosen to receive higher densities. All of the representative sites analyzed are proposed to receive a maximum allowed density of 70 units per acre which is the highest base density proposed for sites in the Housing Element and in the city overall in the proposed General Plan Update. Some of the other sites with proposed density increases have lower proposed maximum densities so could also feasibly develop within the 45 foot height limit based on the analysis of higher density projects.

Based on the analysis and information above, the 45 foot height limit does not constrain the development of projects with densities of up to 70 units per acre.

Local Review and Permit Procedures

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

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

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

Table VI-40
ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS

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

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

Notes:

(1) See Article 7 for land use definitions.

(2) Allowable locations restricted to El Centro Street between Fremont and Diamond; Fair Oaks Avenue; Fremont Avenue north of Monterey Road; and Huntington Drive.

(3) Permit required determined by Section 36.350.170.

(4) Per Article 7 of Chapter 36 "Zoning" of the South Pasadena Municipal Code, manufactured homes on permanent foundations are considered single-family land uses.

Permit Processing

The time it takes to process development permits and other governmental approvals contributes to the high cost of housing and is thus considered a constraint for housing development. In response to California law and the need to support more housing for the community, South Pasadena has been shifting toward more efficient permit review processes, reducing the number of hearing bodies involved in project approval and improving inter-departmental coordination to streamline the entitlement process.

Discretionary Design Review: Efforts to Streamline

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

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

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

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

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

As part of the zoning work called for in Program 3.a in Chapter 6.8, the City will evaluate whether any of the above findings is subjective and a constraint to development of additional multifamily housing in the City on the sites identified in this Housing Element. Revisions will be made to the City's zoning regulations to address these constraints as part of implementation of Program 3.a. The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review hearing and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the project type. This

makes it possible for housing projects to be approved at one public hearing unless the project is continued for revisions or appealed. The exception is for properties deemed historically or culturally significant, which require design review by the CHC followed by the Planning Commission. The intent is to expedite most housing applications through an easier permit process.

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

Application Processing Times

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

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

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

application processing time will be reduced when the City acquires the electronic permitting system (Program 3.e).

Table VI-41
TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES

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

Source: South Pasadena Community Development Department, 2022

* Depending on entitlement and significance of impact

City Staff Assistance in the Permit Process

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

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

Permits to Encourage Development of Affordable Residential Projects

The Zoning Code provides for flexibility in the application of Zoning Code standards through the planned development permit process for multifamily projects that include a certain percentage of the project as affordable housing. The purpose of the planned development permit is to allow consideration of innovation in site planning and other aspects of project design and more effective design responses to site features, uses on adjoining properties, and environmental impacts than the

Zoning Code standards would produce without adjustment. Planned development permit approval may be requested for an affordable multifamily housing, mixed-use commercial, and multifamily residential development, or senior housing project and requires approval of a conditional-use permit. Planned development permit approval may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, such as floor area ratio, building height (but not beyond the ballot initiative maximum of 45 feet), setbacks, parking, and street layout.

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

6.5.3 Environmental Constraints

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

Topography

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

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

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

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

Slope Stability

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

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only known active faults of local significance actually located in South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along any of these faults has the potential to generate surface ruptures that would affect structures within the city.

Flooding

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

Fire Hazards

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

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

roofing materials. This requirement increases the cost of developing new residential structures but is warranted by the fire risk inherent in this area.

Open Space

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

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

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

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

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

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

Multifamily Residential Districts

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

Mixed-Use Zoning Code Provisions

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

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

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

Mixed-Use Development Regulations in the CG Zoning District

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

Mixed-Use Development Regulations in the MSSP Zoning District

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

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

Accessory Dwelling Units

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

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

Manufactured Homes

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

Housing for Persons with Disabilities

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

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

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

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.

2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.

3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

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

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

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.

- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

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

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

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

d. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

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

Emergency Shelters

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

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

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

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

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

A. Special design standards:

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

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

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

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

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

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

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

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

B. Management and operations standards:

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

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

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

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

e) Loitering is prohibited.

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

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

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

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

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

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

Transitional and Supportive Housing

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

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

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

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

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

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

Single-Room Occupancy

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

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

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

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

Zoning Provisions to Encourage Affordable Housing

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

a. Planned Development Permit

The City's Zoning Code provides flexibility in the application of development standards for a project containing an affordable housing or senior housing component pursuant to the approval of a planned development permit (see Municipal Code Section 36.410.100). Planned development permit approval may be requested for an affordable housing, mixed-use, or senior housing project to modify or adjust any applicable development standard of the Zoning Code. Approval of a planned development permit may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, including, but not limited to, FAR, building height, setbacks, parking, and street layout. Planned development permits are approved by the Planning Commission at a public hearing and pursuant to findings summarized below.

1. The project must be consistent with the actions, goals, objectives, policies, and programs of the General Plan and any applicable specific plan, allowed within the applicable zoning district, and comply with all applicable provisions of the Zoning Code and adopted design guidelines other than those modified by the planned development permit, and be adequately served by public facilities, services, and utilities.

2. The approved modifications to the development standards of the Zoning Code are found to be necessary and appropriate to accommodate the superior design of the proposed project, its compatibility with adjacent land uses, and its successful mitigation of environmental impacts.

3. The location, size, planning concepts, design features, and operating characteristics of the project are and will be compatible with the character of the site, and the land uses and development intended for the surrounding neighborhood by the General Plan.

4. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the use.

5. The establishment, maintenance, or operation of the use would not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood of the proposed use, any neighborhood improvements, or the citywide welfare.

The Planning Commission may impose any conditions deemed reasonable and necessary to ensure that the project will comply with the findings. Standard conditions of approval applied by the Planning Commission as part of an approval for a planned development permit are summarized below.

1. Appropriate City building permits are required prior to construction.

2. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.

3. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.

4. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.

5. A demolition permit is required for any existing buildings to be demolished.

6. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.

7. Where required, CAL-OSHA permits must be obtained.

8. Compliance with all State of California disability access regulations for accessibility and adaptability is required.

9. Plan check for electrical, mechanical, plumbing, and sewer is required.

10. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.

11. A soils report is required.

12. A grading and drainage plan approved by the City is required prior to issuance of the building permit.

13. Structural and energy calculations are required to be provided.

14. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.

15. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.

16. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

Depending on workload, review and approval of a planned development permit by the Planning Commission can be completed within 6 to 12 months. The Housing Element includes Program 4.c to maintain the Zoning Code provision allowing approval of a planned development permit for projects proposing development of affordable housing to encourage its development.

b. Affordable Housing Incentives

The Council adopted SPMC Section 36.370 (Affordable Housing Incentives) in 2013 to incorporate State requirements to grant density bonuses and incentives and/or concessions for affordable housing by right. The "Affordable Housing Incentives" provisions of the Zoning Code allow for the granting of a density bonus to eligible projects upon approval by the Community Development Director and the granting of affordable housing incentives and/or concessions to eligible projects by the Planning Commission. State density bonus law has been updated since 2013 expanding the amount of bonus (up to 50 percent for many projects and up to 80 percent for 100-percent affordable projects), increasing the number of incentives and concessions the City must offer, and expanding the list of types of projects that are eligible for a State density bonus. Although the City implements state density bonus law as it is updated, the City has included Program 2.e in this Housing Element to update the Zoning Code to comply with current State density bonus law.

Some of the central components of the affordable housing incentives in SPMC 36.370 are a ministerial approval process for eligible projects; reduced parking requirements and allowing tandem parking or uncovered parking on the project site; a process for inclusion of a Child Care Facility and requirements to ensure unit quality. The location of the designated dwelling units within projects receiving a density bonus or incentives and/or concessions is at the discretion of the City with the goal to integrate the units into the overall project with designated dwelling units reasonably dispersed throughout the development, where feasible. Furthermore, the affordable units must contain on average the same number of bedrooms as the market-rate units, and must be compatible with the design or use of the remaining units in terms of appearance, materials, and finish quality. If a project is to be phased, the affordable units must be phased in the same proportion as the market-rate units, or phased in another sequence acceptable to the City. Alternatively, the City may authorize some or all of the designated dwelling units associated with one housing development to be produced and operated on an alternative development site.

As part of the approval of a density bonus and incentive and/or concession, the developer is required to record a deed restriction against the property that ensures that continued affordability of the designated units is maintained.

c. Inclusionary Housing Ordinance

In 2018, City Council directed staff to explore policies to proactively increase the production of affordable housing. In 2019, at the City Council's direction, the Community Development Department began outreach in the community, and heard strong support from the community for an inclusionary housing policy. After extensive outreach, and some delay due to the pandemic, on March 9, 2021, the Planning Commission recommended adoption of a draft inclusionary housing ordinance. The City adopted the inclusionary housing regulations (Ordinance 2355) ordinance on May 5, 2021.

This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. Those changes will be adopted at or near the same time as Housing Element adoption as will zoning updates to codify those changes outside of the Downtown.

The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).

Inclusionary Requirements

The inclusionary regulations require any project with three or more residential units proposed in South Pasadena to include at least 20 percent of the base number of units in the project as affordable to lower- or moderate-income households. Applicants may pay an in-lieu fee instead of providing units only for projects containing three or four residential units, for any ownership project, or for fractional units calculated as part of the inclusionary requirement. The in-lieu fee option is described further in the next section.

The inclusionary requirement would change as the number of units in a project increases. Only rental projects between 3 and 10 units may include moderate-income units as part of the inclusionary mix. Larger projects with rental units would need to include a mix of lower-income and very/extremely low income units, as detailed in the ordinance. Ownership (condominium) projects containing for-sale inclusionary units would provide them as moderate-income units.

Table VI-43 summarizes the implementation alternatives allowed by SPMC 36.375.050 – Inclusionary Unit Requirement for different types of residential projects.

Table VI-43
INCLUSIONARY HOUSING REQUIREMENT OPTIONS

	3-4 RENTAL UNITS	5-10 RENTAL UNITS	11+ RENTAL UNITS	FOR-SALE UNITS
On-site Option	20% of base # of units; affordable to extremely low, very low, low, or moderate income	20% of base # of units; Designate an affordable unit as extremely low, very low, lower, or moderate income, provided that if the project includes two affordable units, either: a. Both units shall be lower income; or b. At least one shall be a very-low income unit and the other unit may be very low, lower, or moderate.	20% of base # of units; Provide 50% of required affordable units as extremely low or very low and 50% as lower-income units. In case of an uneven number, one more unit shall be provided as very low.	20% of base # of units; Provide as moderate-income units
Off-site Option	N/A	YES	YES	YES
Rehabilitation/ Conversion of Existing Units Option	N/A	YES	YES	YES
Land Dedication Option	N/A	YES	YES	YES
In-Lieu Fee Option	YES	N/A	N/A	YES

Source: City of South Pasadena, 2021; SPMC 36.375.050

Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to promote clarity regarding the City's expectations for quality and contextual design for all projects, providing more certainty to applicants, particularly those on a large enough scale to have a stronger effect on the surrounding area. All of the sites included in the sites inventory to address the lower-income RHNA are of sufficient size to derive strong benefit from taking advantage of the proposed design incentives in the inclusionary regulations. The incentives offered exceed guarantees available under State Density Bonus law. Incentives are offered for height, minimum unit size, and parking. Based on the recently adopted regulations, the City expects an increase in higher-density residential development with on-site affordable units. Program 2.i calls for implementation and monitoring of the Inclusionary Housing ordinance.

In-Lieu Fee Option

The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. The in-lieu

fee study was completed and resulted in various fee options. On March 16, 2022, the fee options were taken to City Council for review and to provide direction. On March 18, 2022, the Planning Commission reviewed and provided comments on the study and the Council's direction from the March 16th City Council meeting. The Commission's comments will be incorporated into the staff report for Council's public hearing to adopt a fee resolution tentatively scheduled for May 18, 2022. The City Council shall establish the fee by resolution, then it will adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.

Alternatives to Building Inclusionary Units On-Site

There are a few alternatives to building the inclusionary units on-site for rental projects with five or more units. These include building the units on another site, donating land, or rehabilitating existing residential units and deed-restricting them as affordable housing. Use of these alternatives is subject to Planning Commission approval.

Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects as required by the ordinance.

Since the inclusionary regulations were recently adopted, the City has not yet been able to collect data to analyze its effect. Program 2.i commits the City to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if and when this is deemed necessary for greater effectiveness.

6.6.2 Land Resources

This section describes the resources available for the development, rehabilitation, and preservation of housing in the City of South Pasadena. This section includes an inventory of sites zoned for residential development that are suitable for future housing development in South Pasadena and an evaluation of the City's ability to provide adequate sites to address its identified share of future housing needs.

Availability of Sites for Housing

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. Opportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), and Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily residential, which would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.
- Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; sites are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

All sites discussed in this section are shown on maps in Appendix A of this Housing Element.

Sites Inventory

Table VI-44 describes the vacant sites remaining in the City that can accommodate residential development. All these sites are suitable for development of moderate and above-moderate residential development. One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so it is included

in Table VI-50, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).

In determining the realistic unit capacity for sites listed in Table VI-44 that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. Table VI-45 presents recent projects in medium and lower density areas of the City that support the 80 percent assumption. All of the projects exceeded 80% of allowed unit capacity. It should also be noted that 90 percent of the sites in Table VI-45 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption of SB 9, which allows duplex development on single-family parcels statewide. Accordingly, realistic capacity on those sites has been considered to be 100 percent (one unit).

With the recent adoption of SB 9, the potential density on single-family sites could be considered to be doubled. However, a realistic approach is needed based on actual site characteristics and trends in the city, so the approach taken for the sites inventory was to count potential for more than one unit only on vacant parcels greater than .20 acres (Table VI-44). Each of these sites are assumed to have a realistic capacity for two units. Potentially, these parcels could be split and develop four units, but the City has taken a conservative approach to SB 9's potential as it has been so recently adopted and data is still unavailable. The City adopted an urgency ordinance to implement SB 9 in December 2021, which includes objective standards. The City has been monitoring interest in utilizing the provisions of SB 9 and has received a fair amount of interest but has not yet received any applications for an SB 9 project. The City is reviewing the fact sheet released by HCD in March 2022 and will use it to guide administration of state law for this type of project.

A small number of the sites in this table are in nonresidential zones. The changes to allow greater density on many nonresidential sites and incentivize housing development via the City's inclusionary regulations will further encourage housing development on non-residentially zoned properties. The realistic development capacity for each site can be increased with approval of a density bonus as part of a development application. Zoning Code provisions applicable to the zoning district for each site, as described in the Constraints section, were assumed and no density bonuses or the inclusionary housing regulations were applied. This is for consistency with state guidance as stated in the HCD 2020 Housing Element Site Inventory Guidebook:

"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

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Table VI-44
VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Monterey Rd. at Pasadena Ave.	91030	5311010012[3]	Medium Density Residential	RM	N/A	14	0.28	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010007[3]	Medium Density Residential	RM	N/A	14	0.31	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010010[3]	Medium Density Residential	RM	N/A	14	0.34	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010015[3]	Medium Density Residential	RM	N/A	14	0.40	Vacant	YES - Current	Privately Owned	Available	0	4	0	4
Monterey Rd. at Pasadena Ave.	91030	5311010008[3]	Medium Density Residential	RM	N/A	14	0.65	Non-Vacant	YES - Current	Privately Owned	Available	0	4	0	4
E. State St. near Raymond Hill Rd.	91030	5317028270	Medium Density Residential	RM	N/A	14	2.73	Vacant	YES - Current	City-Owned	Available	0	15	0	15
Monterey Rd. at Pasadena Ave.	91030	5312002007[2]	High Density Residential	RH	N/A	24	0.10	Vacant	YES - Current	Privately Owned	Available	0	1	0	1
Monterey Rd. at Oak Hill Ave.	91030	5312002009[2]	High Density Residential	RH	N/A	24	0.13	Vacant	YES - Current	Privately Owned	Available	0	2	0	2
Monterey Rd. at Oak Hill Ave.	91030	5312002025[2]	High Density Residential	RH	N/A	24	0.15	Vacant	YES - Current	Privately Owned	Available	0	2	0	2
Arroyo Verde Rd. and Pasadena Ave.	91030	5311001018	General Commercial	CG	N/A	24	0.35	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Moderate							**5.48**					0	40	0	0
End of Flores de Oro	91030	5314026937	AM	RS	N/A	1 unit per parcel	0.36	Vacant	YES - Current	City-Owned	Available	0	0	2	2
End of Maycrest Ave.	91030	5310016028	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Rollin St.	91030	5314026050	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
La Portada St. at Via del Rey	91030	5314025021	AM	RS	N/A	1 unit per parcel	0.75	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa St.	91030	5311009056	AM	RS	N/A	1 unit per parcel	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009057	AM	RS	N/A	1 unit per parcel	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009058	AM	RS	N/A	1 unit per parcel	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Cielo at Santa Teresa	91030	5311009055	AM	RS	N/A	1 unit per parcel	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015034[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015033[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010030[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010029[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave at Blair Ave.	91030	5311010028[3]	Estate & Very Low Density Residential	RS	N/A	3.5	2.37	Vacant	YES - Current	Privately Owned	Available	0	0	6	6
Bank St. at Meridian Ave.	91030	5314020007	Estate & Very Low Density Residential	RS	N/A	3.5	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Fairview Ave. at Highland St.	91030	5317011025	Estate & Very Low Density Residential	RS	N/A	3.5	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009903	Estate & Very Low Density Residential	RS	N/A	3.5	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010027	Estate & Very Low Density Residential	RS	N/A	3.5	0.36	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308032044	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308006024	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308019034	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308034016	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031001	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hanscom Dr. at Illinois Dr.	91030	5308021008	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308023015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310022006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017021	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017020	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Fletcher Ave. at Oak St.	91030	5320030038	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023008	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Brunswick Ave.	91030	5311015016	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023004	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311010065	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308034015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Winding Ln at Huntington Dr.	91030	5320018022	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022003	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308022042	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Short Way St. at Oak Hill Ave.	91030	5312031029	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave at Oak Crest Ave.	91030	5314010005	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026010	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308024017	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017018	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023007	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. and Illinois Dr.	91030	5308021904	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022002	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Mountain View Ave. at Alta Vista Ave.	91030	5314010024	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022009	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308021012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009909	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308032012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311008033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015006	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308024033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310034900	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308034017	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Hill Dr.	91030	5308002070	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034003	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Las Palmitas St. at Camino del Sol	91030	5308002064	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Sol at Hill Dr.	91030	5308002059	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Oneonta Dr. at Bonita Dr.	91030	5310026011	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034018	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Warwick Ave.	91030	5311006013	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Alta Vista Ave.	91030	5314008014	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Blair Ave. at Saint Albans Ave.	91030	5311017058	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camden Ave. at Camden Parkway	91030	5321011013	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Saint Albans Ave.	91030	5311006900	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015005	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034004	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006001	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5314006020	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031041	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Berkshire Ave. at Valley View Rd.	91030	5310018901	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Kolle Ave. at Monterey Rd.	91030	5311007019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Cambridge Pl. at Valley View Rd.	91030	5310018903	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006904	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006025	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006053	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006048	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028051	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028055	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028034	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028900	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028054	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028052	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028049	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Hanscom Dr.	91030	5308027007	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028053	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028050	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028035	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028036	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5312016016	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5312016015	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027008	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027020	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Hanscom Dr.	91030	5308027017	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027018	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

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Hill Dr. at Peterson Ave.	91030	5308027019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Kolle Ave.	91030	5311006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031040	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308021902	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308021009	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Flores de Oro at Camino Lindo	91030	5314016064	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5311014048	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Ave.	91030	5308031039	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Collis Ave.	91030	5312017025	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave. at Indiana Ave.	91030	5314007017	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Bank St.	91030	5314019023	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031042	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Diamond Ave. at Oak St.	91030	5319031901	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Saint Albans Ave. at Blair Ave.	91030	5311008039	Low Density Residential	RS	N/A	6	0.21	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016900	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016901	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Alta Vista Ave. at Indiana Ave.	91030	5314006039	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Sol at Las Palmitas St.	91030	5308002072	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014042	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Warwick Pl. at South Ln.	91030	5311006028	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Kolle Ave.	91030	5311006068	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Rollin St. at Meridian Ave.	91030	5314017901	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	State-Owned	Available	0	0	2	2
Alta Vista Cir. at Indiana Ave.	91030	5314006005	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Ave. at Pinecrest Dr.	91030	5311006057	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024034	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016014	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014043	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Harriman Ave. at Hill Dr.	91030	5312017043	Low Density Residential	RS	N/A	6	0.27	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Braewood Ct.	91030	5314016044	Low Density Residential	RS	N/A	6	0.28	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308020027	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Alta Vista Cir. at Alta Vista Ave.	91030	5314005045	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Braewood Ct. at Meridian Ave.	91030	5314016075	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Collis Ave. at Hill Dr.	91030	5312017044	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Pl. at Oak Hill Ln.	91030	5312020012	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5306006905	Low Density Residential	RS	N/A	6	0.31	Vacant	YES - Current	City-Owned	Available	0	0	2	2
End of Harriman Ave.	91030	5312017042	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024031	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
End of Indiana Terrace	91030	5314005021	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Flores de Oro	91030	5314016030	Low Density Residential	RS	N/A	6	0.33	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Collis Ave. at Hill Dr.	91030	5312017049	Low Density Residential	RS	N/A	6	0.33	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hill Dr. at Warwick Pl.	91030	5308027016	Low Density Residential	RS	N/A	6	0.34	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005017	Low Density Residential	RS	N/A	6	0.35	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Oak Hill Terrace	91030	5311006055	Low Density Residential	RS	N/A	6	0.37	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308031053	Low Density Residential	RS	N/A	6	0.72	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Bank St. at Meridian Ave.	91030	5314018010	Low Density Residential	RS	N/A	6	0.73	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Peterson Ave. and Harriman Ave.	91030	5308032902	Low Density Residential	RS	N/A	6	0.78	Vacant	YES - Current	City-Owned	Available	0	0	3	3
Hanscom Dr. at Illinois Dr.	91030	5308034901	Low Density Residential	RS	N/A	6	2.43	Vacant	YES - Current	City-Owned	Available	0	0	11	11
Hanscom Dr. at Peterson Ave.	91030	5308033904	Low Density Residential	RS	N/A	6	4.14	Vacant	YES - Current	City-Owned	Available	0	0	19	19
Mission St. and Grand Ave.	91030	5313006038	Mission Street Specific Plan	MSSP	N/A	36.7	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	4	4
Mission St. and Fremont Ave.	91030	5315008042	Mission Street Specific Plan	MSSP	N/A	36	0.45	Vacant	YES - Current	Privately Owned	Available	0	0	12	12
ABOVE-MODERATE SUBTOTAL							**37.42**					**0**	**0**	**238**	**238**
TOTAL							**42.90**					**0**	**40**	**238**	**278**

Source: City of South Pasadena, 2021

Note 1: Available means the site has not been entitled for development

Note 2: These four parcels have the same owner and are for sale. The City has recently received developer interest in developing residential units on these parcels as one project.

Note 3: These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Table VI-45
REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	BUILT DENSITY	PERCENT OF ALLOWED CAPACITY
1974 Huntington Drive	5321008016	.24	Under Construction	RM	Duplex	Market rate 3-unit ownership project	3	12.5 du/acre	>100%
1413 Lyndon	5319003004	.20	Completed in 2016	RM	Single-family home	Market rate 3-unit ownership project	3	10 du/acre	> 100%
191 Monterey Rd.	5311010022	.70	Completed in 2017	RM	Single-family home	Market rate 9-unit ownership project	9	12.9 du/acre	92%
1818 Peterson Ave.	5508025027	.09	Entitled in 2021	RS	Vacant	Market rate 1,231 sf Single-family dwelling with 495 sq. ft. JADU	2	11.1 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)
807 Rollins St.	5314017901	.23	Entitled in 2021	RS	Vacant	Market rate 3411 sf Single-family dwelling, (JADU-ready, entitled in April 2022)	1	4.3 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)

Source: City of South Pasadena, 2022

Accessory Dwelling Unit Potential

In the last five years, ADUs have become more broadly allowed under California law. The City's local zoning regulations have been updated regularly to reflect those changes to state law. Beginning in 2017, the City has seen steady increases year over year in permitted ADUs each year. Before 2017, no ADUs were permitted. Local interest in ADUs is significant. ADU building permit numbers from 2017 through 2021 are listed below.

- 2017 – 1 ADU received a building permit
- 2018 – 4 ADUs received building permits
- 2019 – 7 ADUs received building permits
- 2020 – 8 ADUs received building permits
- 2021 – 32 ADUs received building permits

The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City issued 21 building permits for ADUs in the second half of 2021 (see Table VI-46). The City's projection for permit issuances starting at the beginning of 2022 through the end of the projection period is provided in Table VI-46. (See also Appendix E for more detailed analysis). The projection assumes that ADU permits will increase at a similar rate to the increase from 2017-2021, as shown above, in 2022 and 2023 because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. This supports the conservative assumptions in Table VI-46 and the more vigorous assumptions in Table VI-47.

Table VI-46
ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING PERMITS	ADU BUILDING PERMITS
2020 - Actual	17	8
2021 - Actual	45	32
Issued after June 30, 2021 (Actual)	28	21
2022	50	35
2023	55	39
2024	55	39
2025	65	39
2026	68	39
2027	68	39
2028	68	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	420	297

As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between January 1, 2022, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-51 provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Due to all of these efforts – some already initiated and some to be initiated during the first two years of the planning period – the City expects the ADU production numbers may be higher than 318 units. While the analysis of how the City will address the RHNA includes 297 additional ADUs, Table VI-47 presents a projection of 383 ADUs that represents a higher range that is also potentially achievable. This scenario reflects the actual number of approved ADU Planning applications and building permits issued in 2021, assumes a 10-percent annual increase in applications beginning in 2022 that continues for the next five years before leveling off, and assumes that 75 percent of approved Planning applications will receive building permits.

Table VI-47
POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING APPLICATIONS	ADU BUILDING PERMITS ISSUED	NOTES
2020	30	8	Actual
2021	45	32	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	21	Actual
2022	50	38	Assumption of 10% increase in applications and 50% moving forward to building permits
2023	55	41	Assumption of 10% increase in applications and 60% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	Assumption of 10% increase in applications and 75% moving forward to building permits
2026	72	54	Assumption of 10% increase in applications and 75% moving forward to building permits
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	Assumption of steady application rate, no increase
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total June 30, 2021-October 15, 2029	510	383	Total ADU applications and permits over 8.3-year projection period

To provide additional context, this projection scenario forecasts that less than 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU over the next 10 years beginning in June 2021. Additionally, the estimate does not include multifamily ADUs, which are estimated to become more popular as apartment building owners get more savvy on the ADU law. Furthermore, the City's program to grant amnesty for illegal units and recognize them as ADUs will likely bring additional units into the housing stock, and are not contemplated in this scenario. Based on all of these considerations, the City considers this ADU projection scenario to be more likely than the 297-unit projection, although the more conservative estimate is used to demonstrate RHNA compliance.

Market Trends

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance updates and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.

Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-48 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.

Table VI-48
REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-50 (AND SITE ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Buildout starting in Summer 2021 and concluding in Fall 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail)	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.45 FAR	Odd-shaped sites near transit: North side of Mission (8, 10, 12) Site 14, combined with adjacent lots Other sites near rail transit: City Yard (9); Fremont/Mission (12), Arco (8) *These sites are similar in size and proximity to transit; identified for rezoning to produce more units than example project.*
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	Entitled in 2021	MSSP	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units on above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.48 FAR	School Site -11 (historic resource); Carrows site (12); Parking Lot sites -13, 14 (rectangular; several parcels combined) *These sites are similar in size to the Mission Bell project, with structures on a portion of the lot that could be incorporated into a larger project or demolished; identified for rezoning at higher densities to produce more units than example project.*
Eight Twenty 820 Mission St.	5315-017-094, 5315-017-082, 5315-017-067, 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses	38	20	109% of allowed FAR (Allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Parking Lot sites -13, 14 (rectangular; several parcels combined) *Like the example project, these properties are owned by parties interested in consolidating to build a larger multi-family project (some are City-owned); identified for rezoning to produce more units than example project.*
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in Spring 2020	CO	Commercial retail with underutilized parking lot	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (Allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (16, 17, 20, 21, 22) YMCA-owned Site (23) Monterey Road Site (3) *These sites are similar in size and have owner interest in developing a residential project that would include on-site affordable housing and receive a density bonus. One site is in consideration for affordable housing overlay zone for higher density.*
Mission Meridian Village Meridian Ave and Mission St	5315021001, 5315021079, 5315021047	1.6	Built in 2005	MSSP	Lower density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes: three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 10) Vacant Site/Ostrich Farm (1) Tyco Site (4) School District Site (11) Ralph's Site (24) *These are larger sites, in mixed-use areas, with potential for a project with multiple structures including affordable housing per the IHO; identified for rezoning to produce more units than example project.*

Source: PlaceWorks and City of South Pasadena, 2022

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Regional Examples of Small Site Development

Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-49 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. The City has also included Program 3.d to encourage and facilitate parcel assemblage.

Table VI-49
REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION

ADDRESS/ PROJECT NAME	JURISDICTION	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY
Stanford Pasadena, 150 S. Oak Knoll	Pasadena	0.23	preliminary entitled 2017	Rental	19	83
Stanford Pasadena, 139 S. Oak Knoll	Pasadena	0.20	preliminary entitled 2017	Rental	16	80
233 Hudson	Pasadena	0.37	entitled 2018	Condo, 5,729 SF of retail/office	42	114
Pico Eleven, 1112 Pico Blvd	Santa Monica	0.44	finished 2018	Condo	32	73
1819 Pico	Santa Monica	0.49	preliminary entitled 2020	Condo, 4,174 SF of retail/office	48	98
3223 Wilshire	Santa Monica	0.45	constructed 2020	Rental, 5,418 SF of retail/office	53	118
2225 Broadway	Santa Monica	0.22	constructed 2020	Rental, 2,751 SF of retail/office	15	68
1450 Cloverfield	Santa Monica	0.45	constructed 2020	Rental, 8,385 SF of retail/office	34	76

Source: PlaceWorks, 2021

Sites to Address the Lower-Income RHNA

To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-50). As with the one vacant site, all of these sites would either be affected by proposed changes to their General Plan Land Use designation or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites to address the lower-income RHNA that are in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-50. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished; and Programs 2.j and 2.k address the Affordable Housing Overlay.

In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-50 about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C. The City followed up again with owners in the table who hadn't responded to the earlier rounds of outreach both via letter and phone calls in late 2021 and early 2022, yielding multiple additional responses. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, including the inclusionary housing ordinance, and suggests the property owner consider affordable housing. In addition to sites owned by the City, staff has solicited interest from property owners of approximately 16 properties on the inventory, as noted in Appendix A. Some of these have pending applications for projects that include residential units (also noted in Appendix A). In other cases, property owners or their representatives have had meetings with City staff to plan for applications following the City's adoption of the General Plan, DTSP and zoning code amendments.

Because projects on all of the sites included in Table VI-50 are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 60 percent of the units were assumed to address the lower-income RHNA and 40 percent are assumed for moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus

for projects on these sites supports the realistic capacity assumptions. 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).

Site 7, the Methodist Church Site is designated and zoned as Community Facilities. Part of the more than 6-acre site is already developed with non-residential community facility uses. Based on discussions with the owners about their interest in developing unused portions of the site for multifamily housing, the likelihood of development of undeveloped portions of the site with higher density residential has been established. In addition, all sites included in Table VI-48 are examples of multifamily projects developed on sites designated to allow non-residential development.

The zoning amendments with development standards to implement the application of the Affordable Housing Overlay to this site along with Sites 3 and 6 will ensure allowed heights and other development standards to accommodate feasible development of projects with at least 30 dwelling units per acre (see Programs 2.j and 2.k). The unit assumptions on three of those sites (3, 6, and 7) are lower than 95 percent of the maximum allowed units under the proposed density and are based on discussions with property owners about expected numbers of units they would propose on those sites. 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.

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Table VI-50
SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NONVACANT
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
3	181, 185 and 187 Monterey Rd.	91030	5311015035	8	0	0	8	Shortfall of Sites	0.34	Medium Density Residential	RM	Medium-Density Residential with AH Overlay	RM with AH Overlay	30	Non-Vacant
		91030	5311010001	7	0	0	7	Shortfall of Sites	0.33	Medium Density Residential	RM			30	Non-Vacant
		91030	5311010002	14	0	0	14	Shortfall of Sites	0.59	Medium Density Residential	RM			30	Non-Vacant
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012010	2	0	7	9	Shortfall of Sites	0.98	Estate & Very Low Density Residential	RE	Estate & Very Low Density Residential with AH Overlay	RE with AH Overlay	30	Non-Vacant
			5311012011	2	0	4	6		0.78						
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	100	0	0	100	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with AH Overlay	CF with AH Overlay	30	Non-Vacant
8	Mission St. and Orange Grove Ave.	91030	5313006025	14	7	3	24	Shortfall of Sites	0.50	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
9	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	20	9	5	34	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
10	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
11	Mission St. and Fairview Ave.	91030	5315008900*	0	19	89	108	Shortfall of Sites	1.90	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
12	Mission St. and Fremont Ave.	91030	5315009051	5	0	45	50	Shortfall of Sites	0.81	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003044*	13	6	2	21	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	7	2	2	11	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant
14	El Centro St. and Mound Ave.	91030	5315003903	6	2	2	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	55	Non-Vacant
		91030	5315003904	4	2	1	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	4	2	1	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	6	3	2	11	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant
15	Oxley St. and	91030	5315003033	6	2	2	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	55	Non-Vacant
		91030	5315003032	8	3	2	13	Shortfall of Sites	0.22	General Commercial	CG				Non-Vacant
16	Fair Oaks Ave. and Grevelia St.	91030	5315001070	33	15	8	56	Shortfall of Sites	0.85	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	70	Non-Vacant

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NONVACANT
17	Fair Oaks Ave. at Hope St.	91030	5318004019	17	8	4	29	Shortfall of Sites	0.50	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	60	Non-Vacant
18	Brent Ave. at Hope St.	91030	5318004023	7	3	2	12	Shortfall of Sites	0.41	High Density Residential	RH	High Density Residential with AH Overlay	RH with AH Overlay	30	Non-Vacant
		91030	5318004012	4	1	1	6	Shortfall of Sites	0.21	High Density Residential	RH				Non-Vacant
19	Mission St. and Brent Ave.	91030	5318015017	18	7	4	29	Shortfall of Sites	0.62	General Commercial	CG	Downtown Mission	Mission Street	55	Non-Vacant
20	Fair Oaks Ave. and Monterey Rd.	91030	5315004066	14	7	3	24	Shortfall of Sites	0.36	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	70	Non-Vacant
		91030	5315004083	42	18	10	70	Shortfall of Sites	1.06	General Commercial	CG			70	Non-Vacant
		91030	5315004084	75	29	21	125	Shortfall of Sites	1.88	General Commercial	CG			70	Non-Vacant
		91030	5315004085	26	12	6	44	Shortfall of Sites	0.66	General Commercial	CG			70	Non-Vacant
21	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	80	30	23	133	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	70	Non-Vacant
22	Fair Oaks Ave. and Bank St.	91030	5319003029	30	14	6	50	Shortfall of Sites	0.89	General Commercial	CG	Downtown SP	Fair Oaks	60	Non-Vacant
23	Garfield Ave. at E. Huntington Dr.	91030	5321015018	6	3	2	11	Shortfall of Sites	0.20	Medium Density Residential	RM	Mixed Use	Mixed Use	55	Non-Vacant
		91030	5321015017	6	2	2	10	Shortfall of Sites	0.19	Business Park/Research & Develop	RM				Non-Vacant
		91030	5321015016	5	2	1	8	Shortfall of Sites	0.16	Business Park/Research & Develop	RM				Non-Vacant
24	Garfield Ave. and E. Huntington Dr.	91030	5321019009	7	2	2	11	Shortfall of Sites	0.17	General Commercial	CG	Mixed Use	Mixed Use	70	Non-Vacant
		91030	5321019022	73	28	21	122	Shortfall of Sites	2.92	General Commercial	CG			70	Non-Vacant
	TOTAL			**972**	**344**	**338**	**1,654**		**36.84**						

Source: City of South Pasadena, 2021

* Included in prior Housing Element sites inventory

Availability of Infrastructure

Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Impact Report being prepared for the Housing Element and the update of the General Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.

Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-51. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-51
COMPARISON OF SITE CAPACITY AND RHNA

INCOME GROUP	TOTAL RHNA	UNITS APPROVED SINCE 6/30/21	ADUS WITH APPROVED BUILDING PERMITS SINCE 6/30/21	PROJECTED ACCESSORY DWELLING UNITS	UNITS ON VACANT AND NON-VACANT SITES WITH SUITABLE ZONING	UNITS ON VACANT SITES NEEDING ZONING CHANGES	UNITS ON NON-VACANT SITES NEEDING ZONING CHANGES	SURPLUS RHNA
Extremely Low	757	0	3	45	0	70	902	33
Very Low		0	2	27				
Low	398	0	9	130				
Moderate	334	0	1	6	40	0	344	57
Above Moderate	578	9	6	89	238	0	338	102
TOTAL	**2,067**	**9**	**21**	**297**	**278**	**70**	**1,584**	

Note: The income levels assigned to the ADUs approved since June 30, 2021 are based on the SCAG ADU affordability analysis.

6.6.3 Financial Resources

A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-52 describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to the City on a competitive basis for a variety of housing and community development activities. City competes for funds through the State's application process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Federal Emergency Shelter Grants	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	New Construction Rehabilitation Homeless Assistance Public Services
Home Investment Partnership Program (HOME)	Grants available to the City on a competitive basis for a variety of housing activities. City competes for funds through the State's application process.	Homebuyer Assistance Rehabilitation New Construction Rental Assistance
Housing Choice Voucher Program (Section 8)	Assistance program that provides direct funding for rental subsidies for very low-income families.	Rental Assistance
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	New Construction
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	Rehabilitation
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.	Homeless Assistance New Construction
Housing Opportunities for Persons with AIDS (HOPWA)	The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.	Rental assistance
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	Homebuyer assistance Rehabilitation New construction Rental assistance

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
2. State Programs		
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and non-entitlement jurisdictions, and competitive grants to non-entitlement jurisdictions.	Predevelopment Development Acquisition Rehabilitation Preservation Matching Funds Homelessness Assistance Accessibility Modifications Homeownership Assistance Fiscal Incentives
Local Early Action Planning (LEAP) Grants	The Local Action Planning Grants (LEAP), provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that: Accelerate housing production Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.	Housing element updates Updates to zoning, plans or procedures to increase/accelerate housing production Pre-approved architectural and site plans Establishing State-defined Pro-housing policies See complete list in program materials
SB 2 Technical Assistance Grants	Financial and technical assistance to local governments to update planning documents and zoning ordinances to streamline housing production, including but not limited to general plans, community plans, specific plans, implementation of sustainable communities strategies, and local coastal programs.	Technical assistance Planning document updates
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	Homebuyer Assistance
Building Equity and Growth in Neighborhoods (BEGIN)	A state-funded program administered by HCD which provides low- and moderate-income households up to $30,000 for a down payment.	Homebuyer Assistance
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	Homebuyer Assistance Rehabilitation
Single Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	Homebuyer Assistance
Housing and Disability Advocacy Program (HDAP)	Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.	Rental assistance
No Place Like Home	Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.	New construction
Mental Health Services Act (MHSA)	Funding through MHSA of 2004 available to counties to spend toward mental health services.	New construction Special needs programs

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Homeless Emergency Aid Program (HEAP)	A block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California.	Identified homelessness needs Capital improvements related to homelessness Rental assistance
California Emergency Solutions and Housing (CESH)	Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.	Homelessness service system administration New construction Rental assistance
Low-Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	New Construction
3. Private Resources/Financing Programs/Regional Programs		
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multifamily rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition
Federal National Mortgage Association (Fannie Mae)	Fixed-rate mortgages issued by private mortgage insurers. Mortgages which fund the purchase and rehabilitation of a home. Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance Rehabilitation
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. City provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	Homebuyer Assistance
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	New Construction Homebuyer Assistance Rehabilitation Housing Supportive Services
San Gabriel Valley Regional Housing Trust	A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects.	New Construction

6.6.4 Opportunities for Energy Conservation

Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.

Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use, which translates to a reduction in energy use. In 2020, the Council adopted a Climate Action Plan (CAP) as a long-range planning document that guides the City towards a target of carbon neutrality by 2045, which aligns with the State's overall climate goals. The Housing Plan also includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when

opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.

As part of the City's commitment to protecting the environment and building resiliency, South Pasadena chose to utilize Clean Power Alliance as the City's residential electricity provider in February 2019, and commercial electricity provider in May 2019. The City selected 100% Green Power as the default option for residential customers, which provides 100% renewable energy through South California Edison's (SCE) electrical infrastructure. In 2021, 95% of residents subscribed to the 100% Green Power option.

The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-53
COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED

INCOME LEVEL	RHNA ALLOCATION	UNITS PERMITTED 2013-2020	REMAINING ALLOCATION
Very Low	17	1	16
Low	10	3	7
Moderate	11	1	10
Above Moderate	25	113	-
Total	**63**	**118**	**33**

Source: City of South Pasadena Annual Progress Reports, HCD, 2021

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due

to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

    - Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.
- Seniors:
    - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.
- Unhoused Persons:
    - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
    - In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In

addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.

- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
- The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.

Table VI-54 describes the City's progress in implementing the 2014-2021 Housing Element programs.

Table VI-54
2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Energy Efficiency Program This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program. **Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.	The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements. For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in more enforcement of housing maintenance and support for displaced tenants. The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.	Amend and continue with current energy-related program.
Planning Assistance and Permit Processing The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.	The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight Year Objective: Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period.		
Housing Development Program This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications. **Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate-income housing units during the 2014-2021 planning period.	No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full-service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.	Amend substantially to reflect current City efforts and continue.
CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners. **Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.	The City continues to provide information about CalHome and conducts outreach through its consultant, the Housing Rights Center. They serve as the main source of this type of information and support for South Pasadena residents.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Section 8 Rental Assistance The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons. **Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.	Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/ The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program. HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.	Continue.
Housing Acquisition and Rehabilitation A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing. **Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).	Amend to address accomplishments and continue.
Density Bonus for Affordable Housing The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households.	The Senior Housing project at 625 Fair Oaks was approved in 2020 and received a 35-percent density bonus. It will have 86 units with 13 units reserved for low-income households. The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction with adoption of an inclusionary housing ordinance, the City incorporated streamlined approval for waivers in conjunction	Amend to address updates to state law and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist with development of 21 lower income units and 5 moderate income units.	with the density bonus for projects that include on-site inclusionary housing. City staff regularly provides assistance to applicants considering proposing projects using the density bonus.	
Homeless Services The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena. **Eight-year Objective**: The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.	The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region. In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents. Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Senior Housing The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors. **Eight-year Objective**: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing apartment buildings as affordable senior housing whenever possible.	The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.	Continue.
Vacant Sites The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels. **Eight-year Objective:** Continue to maintain an inventory of vacant and underdeveloped sites for development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate-income housing units.	No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.	Amend and continue.
Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. **Eight-year Objective:** Continue to promote the development of housing units above ground floor commercial uses on vacant properties located	The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market-rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs is also located in a mixed-use district. A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been included in the draft programs section to further facilitate housing in the mixed-use areas.	Amend and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.		
Residential Second Units The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts. **Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.	The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2021 addressed issues that had added complexity to ADU approval in order to further facilitate ADU production. Although the 5th Cycle objective for residential second units was low, ADUs have become a much more significant component of the housing strategy over the past eight years. In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. Following the City's adoption of a new ADU ordinance in mid-2021, the number of building permits for ADUs increased substantially to 32 building permits in 2021. At the close of this housing element period, a second Code revision (Phase 2 for historic properties) was adopted in order to better facilitate ADUs on those properties, which is expected to further increase the applications and issuance of building permits for ADUs.	Amend and continue.
Land Use Controls 1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit. **Eight-year Objective:** The City will adopt an amendment to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use	Objective 1: Ordinance 2253 amended the Zoning Code to remove the conditional-use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. Objective 2: The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum	Objective 1. Delete. Objective 2. Amend and continue. Objective 3. Amend to reflect accomplishments and continue. Objective 4. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months. 2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300 foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population. **Eight Year Objective**: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds. 3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. **Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. 4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area, establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for	number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P-permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law. Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements. Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.	Objective 5. Amend to address completed portions of the program and continue. Objective 6. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
review by the Director of Planning and Building prior to occupancy and operations. **Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types. 5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements. **Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. 6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations. **Eight-year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code. 7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.		

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.		
Provision of Technical Assistance to Developers of Affordable Housing The City's Planning & Building Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. **Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process. The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications are submitted with all requirements to streamline the approval process. The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding. ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Fair Housing Program The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs. **Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing for persons with disabilities, on a case by case basis, in order to promote equal access to housing.	The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation. The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know-your-rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.	Amend and continue.
Promote Energy Conservation The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents. **Eight-year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building design guidelines and development standards, including the use of solar	Policies are being developed as part of the General Plan Update, currently underway.	Combine with Energy-Efficiency Program and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates, and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.		

6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES

This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.

6.8.1 Goals, Policies, and Programs

The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:

- Conserving the existing supply of affordable housing;
- Assisting in the provision of housing;
- Providing adequate sites to achieve a variety and diversity of housing;
- Removing governmental constraints as necessary; and
- Promoting equal housing opportunity.

The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: City Manager's Office

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b - Housing Acquisition

The City will partner with and support affordable housing developers to create new and rehabilitated, deed-restricted, affordable housing units on the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible partnerships with non-profit affordable housing developers pursuing acquisition and rehabilitation of the surplus properties as affordable housing to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy. That will augment the already established code enforcement work.

Eight-year Objective: Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.

Funding Source: HOME, SB 2 PHLA, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Develop Occupancy Inspection Program and Policy in fiscal year 2022/2023.

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that there are no affordable housing units with deed-restrictions and subsidized funding currently in South Pasadena. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational

resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and groundwater contamination to reduce exposure to these environmental threats.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the Housing Rights Center.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Expand housing mobility opportunities through affordable housing and encourage affordable development in high resource areas by facilitating timely review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

Program 2.b – Affordable Housing Production

The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.

Eight-year Objective: Fund and build 100 affordable units, at least 40 of which are in high resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and at least 30 in affluent neighborhoods to facilitate housing mobility in mixed-income neighborhoods.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the Housing Rights Center.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households whenever possible to facilitate housing mobility for a minimum

of five low-income and five very low-income households to receive assistance during the 2021-2029 planning period.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; Housing Rights Center

Timeframe: Ongoing as NOFAs are released for CalHome; Housing Rights Center will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract HRC to provide a biannual educational workshop, beginning in 2023, for landlords, property managers, and other housing providers on the benefits of marketing units to HCV holders with the objective of at least 5 housing providers pricing their units to be eligible for HCV.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing.

Program 2.f - Offer Services to People without Housing

The City will continue its emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department

Timeframe: Coordinate a meeting with neighboring jurisdictions by February 2023 to identify strategies and translate materials on homeless services to Spanish by May 2023.

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.

Funding Source: General Fund (for staff resources) and grants

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special-Needs Housing

City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's

website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Eight-year Objective: Assist with creation of 30 units for those with special needs to reduce displacement risk and expand mobility opportunities.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December 2022; Train staff to process reasonable accommodations by December 2022; Seek funding opportunities beginning in 2022 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act by December 2022.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units and provide an evaluation of the program's effectiveness and any recommended revisions to increase the effectiveness of the program. The review will occur by April of each year starting in 2022 and if revisions are deemed necessary, they will be made when such needs are identified.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: Continue to implement the Inclusionary Housing requirements and facilitate the production of 600 lower-income and 300 moderate-income units during the planning period. Review effectiveness of the ordinance at producing affordable housing units annually starting in April 2023. If revisions to the ordinance are deemed necessary after that review, update zoning by the end of 2023, then annually thereafter as revisions are needed.

Program 2.j – General Plan Affordable Housing Overlay

The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.

Program 2.k – Affordable Housing Overlay Zone

The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning to include overlay by October 15, 2024.

Program 2.l – Facilitate Affordable Housing on City-Owned Property. The City will utilize City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the first RFP will be issued by 2024, in order to begin construction within two years and complete within the housing element cycle period. A second RFP on an additional inventory site will be issued by 2026. Projects under this program will be expedited in compliance with the SB 35 streamlined

ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives.

The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are:

- Site 9: Public works yard site
- Site 14: City-Owned Parking Lot site (City owns three of the four parcels)

The City is already coordinating with the owner of the other parcel on Site 14. Site 9 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 13 in Table VI-50 and will coordinate with the owner of the other parcel on Site 13 to encourage development of housing on that sites.

Eight-year Objective: Issuance of building permits for two projects, for a total of at least 70 ELI, VLI and LI units.

Funding Source: General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Create City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP in 2024 and second RFP in 2026. Building Permit issuance for first project by 2025; two building permits issued by 2029.

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 20-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.

Eight-year Objective: Rezone sufficient sites to address 938 units (31.3 acres) in the lower-income RHNA categories.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Latest date to complete General Plan amendments and rezoning: October 15, 2022

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan in 2022. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing.

Eight-year Objective: Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing and adopt updated General Plan, Downtown Specific Plan, and other needed zoning changes by 2022. See also Program 3.a.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers/owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2022, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties.

The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Online application process with staff intake for quality control
- Maintain and amend materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce the number of steps and shorten timeframes, and
- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.

Eight-year Objective: Address lower-income RHNA if ADU numbers aren't as high as projected.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Convert all known existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program and amend fees by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.
- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.
- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the process of ADU development through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.

Funding Source: General Fund, grant funding

Responsible Agency: Community Development Department

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

Timeframe: Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.l – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: City has already advertised new Planning positions and aims to be fully-staffed by June 2022. Include the housing division in the 2022-2023 budget and add new staff by December 2022.

Program 3.m – Implement SB 9 and SB 10

These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption. The City took action by urgency ordinance to establish objective standards in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. The City will also adopt a user-friendly and objective administrative process in compliance with SB 9 within the context of other City development requirements. The City will also review the provisions of SB 10 to explore whether and how these might be utilized to enhance housing construction, pursuant to a full and extensive public process. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual report to HCD.

Eight-year Objective: Administration of SB 9 ordinance is ongoing; specific administrative process and guidelines for SB 9 to be developed by December 2022; explore potential zoning code amendments pursuant to SB 10.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: SB 9 implementation began in December 2021, material preparation by December 2022; SB 10 review and consideration by December 2024

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))

Eight-year Objective: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law and to establish the maximum number of beds permitted in any one emergency shelter at 30 beds.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully

address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code by December 2022.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design.

Responsible Agency: Community Development Department

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives; ongoing application and enforcement of accessibility requirements; ongoing education efforts.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete in 2022.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the Housing Rights Center to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the Housing Rights Center at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide Fair Housing education, outreach, mediation, and referral services through the City Manager's office and the Housing Rights Center (HRC) and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with HRC staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Funding Source: General fund, State, and federal funds

Responsible Agency: City Manager's Office; Community Development Department, Housing Rights Center, federal and State agencies

Timeframe: Ongoing

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements.

Eight-year Objective: Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: Amend zoning for Residential Care Facilities by June 2022. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide

In the 1940's, covenants that restricted the sale of property to Whites or Caucasians only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property

purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Eight-year Objective: Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.

Responsible Agency: Community Development Department; Los Angeles County Recorder

Funding Source: General Fund; grants if offered through a State or County program

Timeframe: Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2022; encouragement of removal from private properties: ongoing.

6.8.2 Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-55.

Table VI-55
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED[1]	REHABILITATED[1]
Extremely Low/ Very Low Income	757	7	8
Low Income	398	9	8
Moderate Income	334	4	9
Above Moderate	578	0	10
Total	2,067	20	35

2. 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.

APPENDICES

Appendix A: Sites Exhibits

Appendix B: Public Participation Survey

Appendix C: Letter to Property Owners

Appendix D: Qualified Entities

Appendix E: Accessory Dwelling Unit Protection Methodology

Appendix F: Realistic Capacity Analysis

Appendix A:
Sites Exhibits

Maps and Exhibits - 2021-2029 Housing Element

- Citywide Maps of Sites in the Land Inventory
- Overview Maps of Sites to Address the Lower-Income RHNA
- Detailed Exhibits for Sites to Address the Lower-Income RHNA

Figure A-1.a. Citywide Sites Inventory Map (1)

Figure A-1.b. Citywide Sites Inventory Map (2)

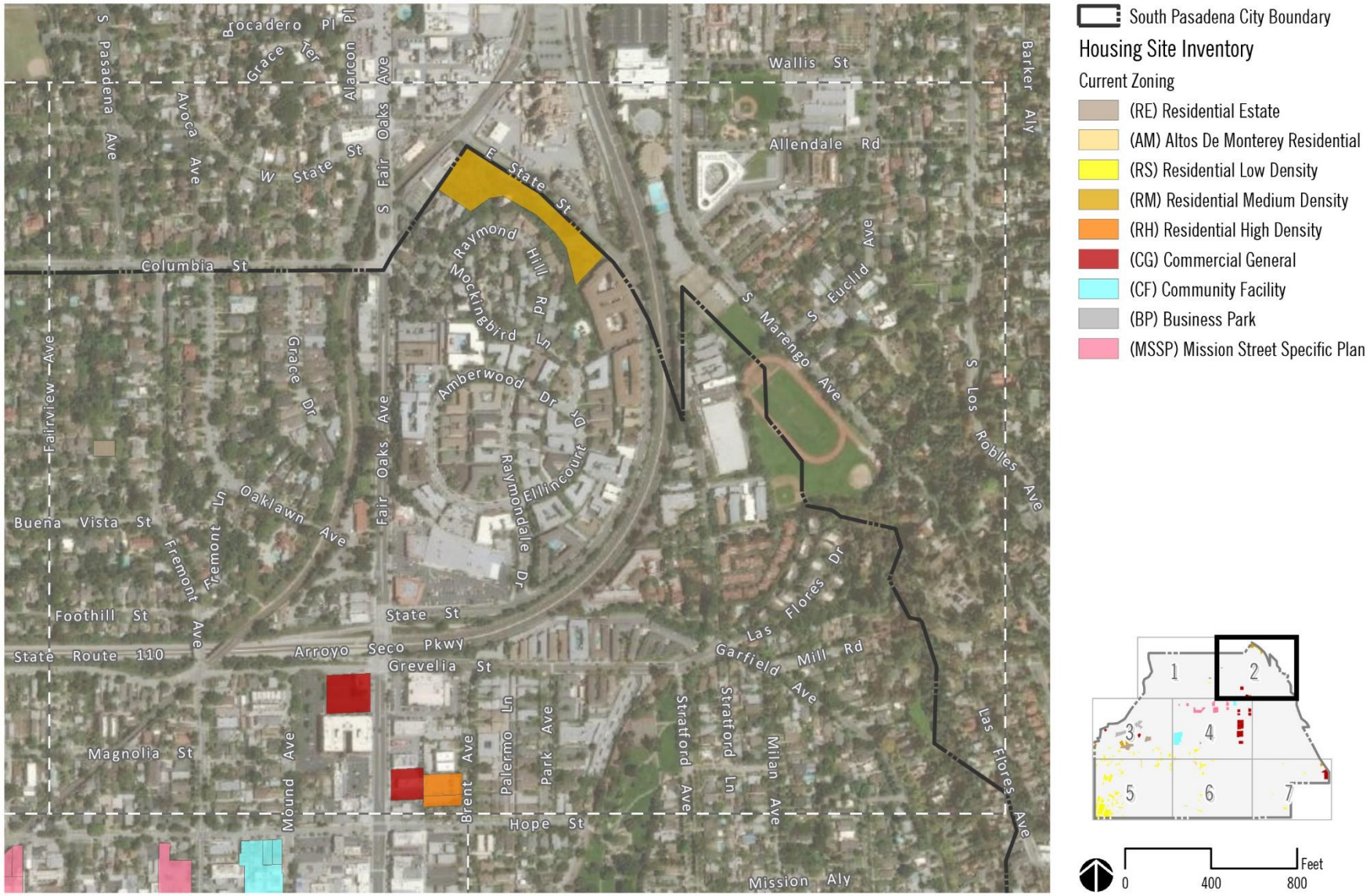


Figure A-1.c. Citywide Sites Inventory Map (3)

Figure A-1.d. Citywide Sites Inventory Map (4)

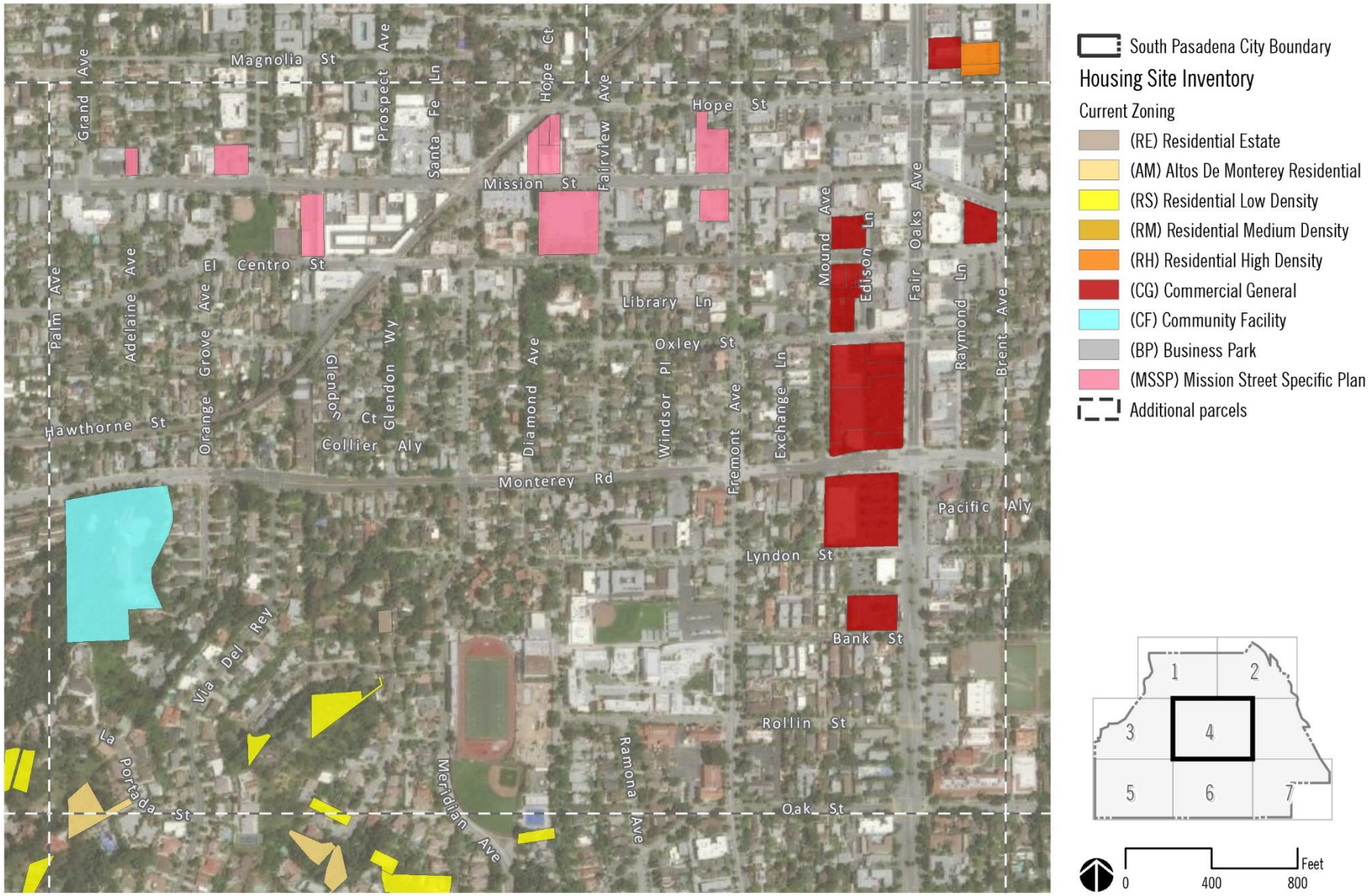


Figure A-1.e. Citywide Sites Inventory Map (5)

Figure A-1.f. Citywide Sites Inventory Map (6)

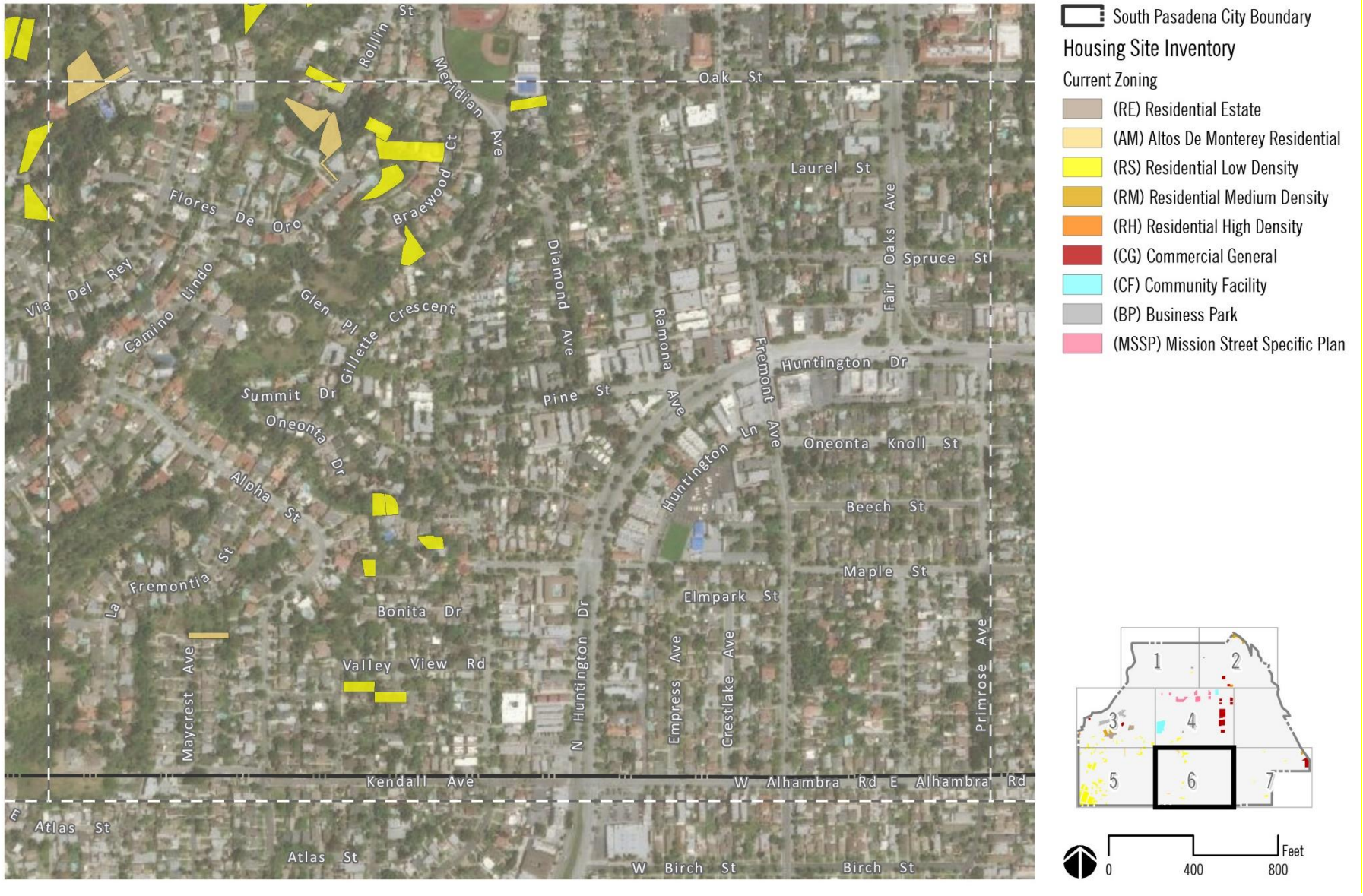


Figure A-1.g. Citywide Sites Inventory Map (7)

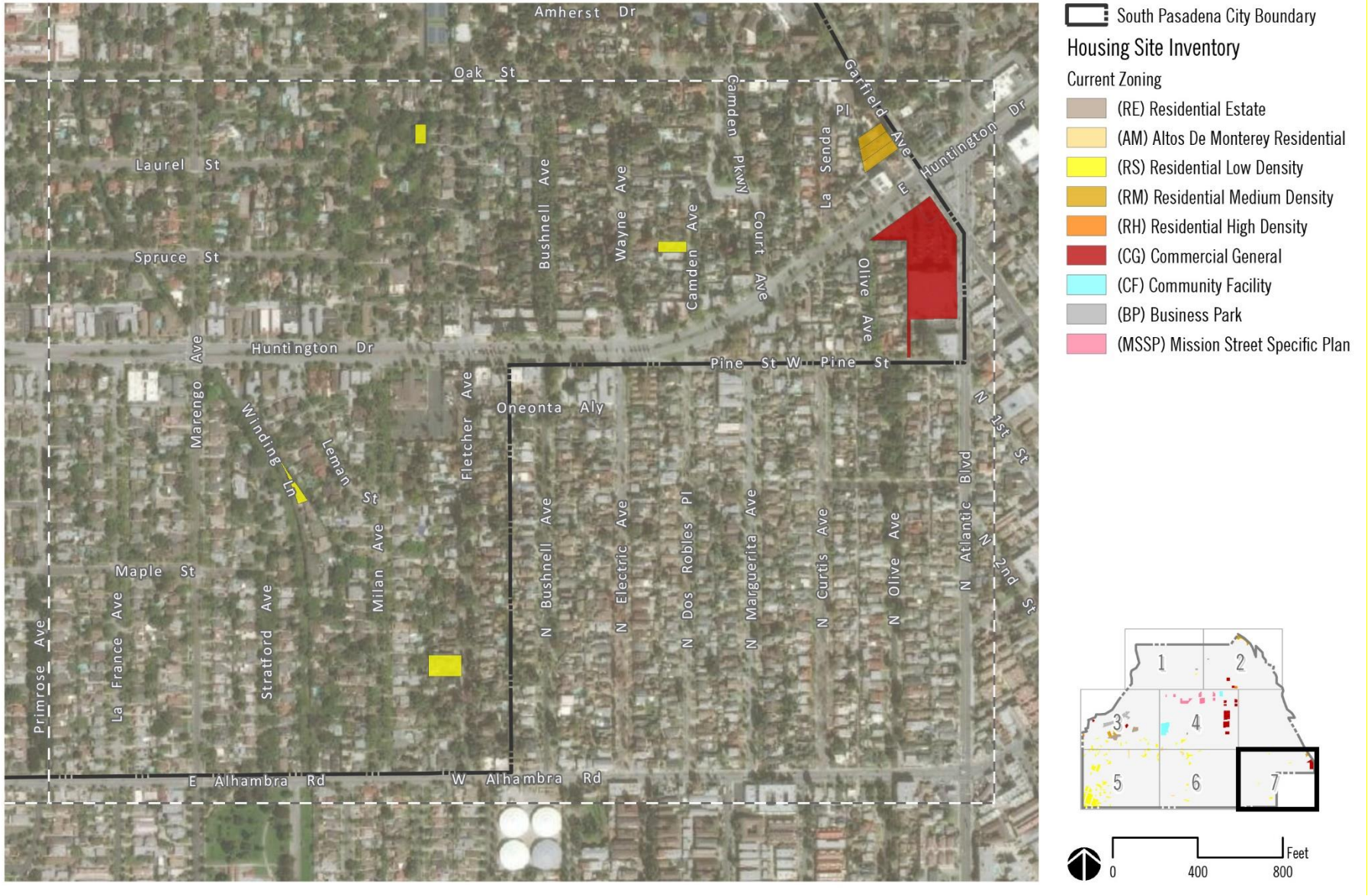


Figure A-2.a Maps of Sites to Address the Lower-Income RHNA Inventory (1)

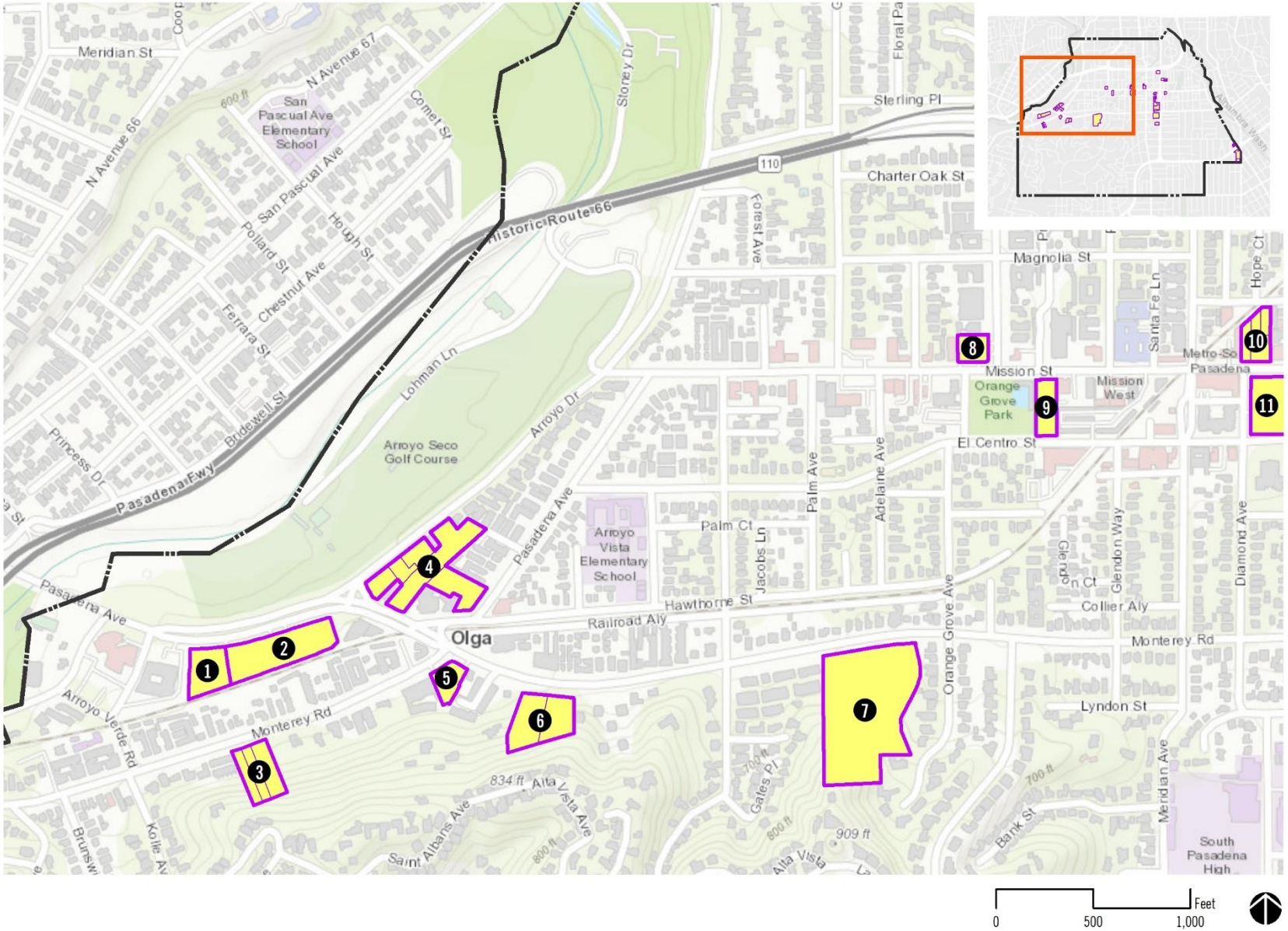


Figure A-2.b Maps of Sites to Address the Lower-Income RHNA Inventory (2)

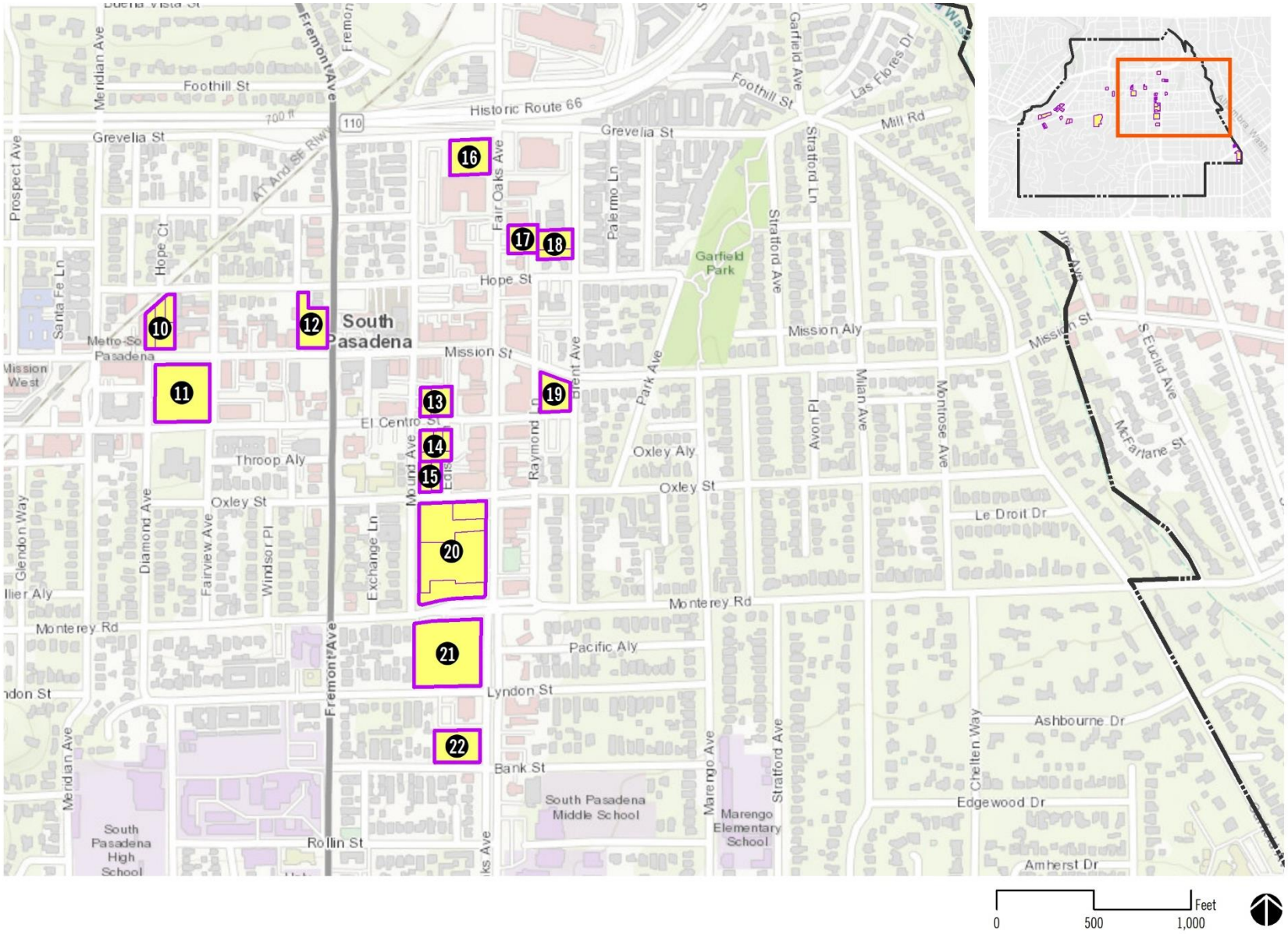
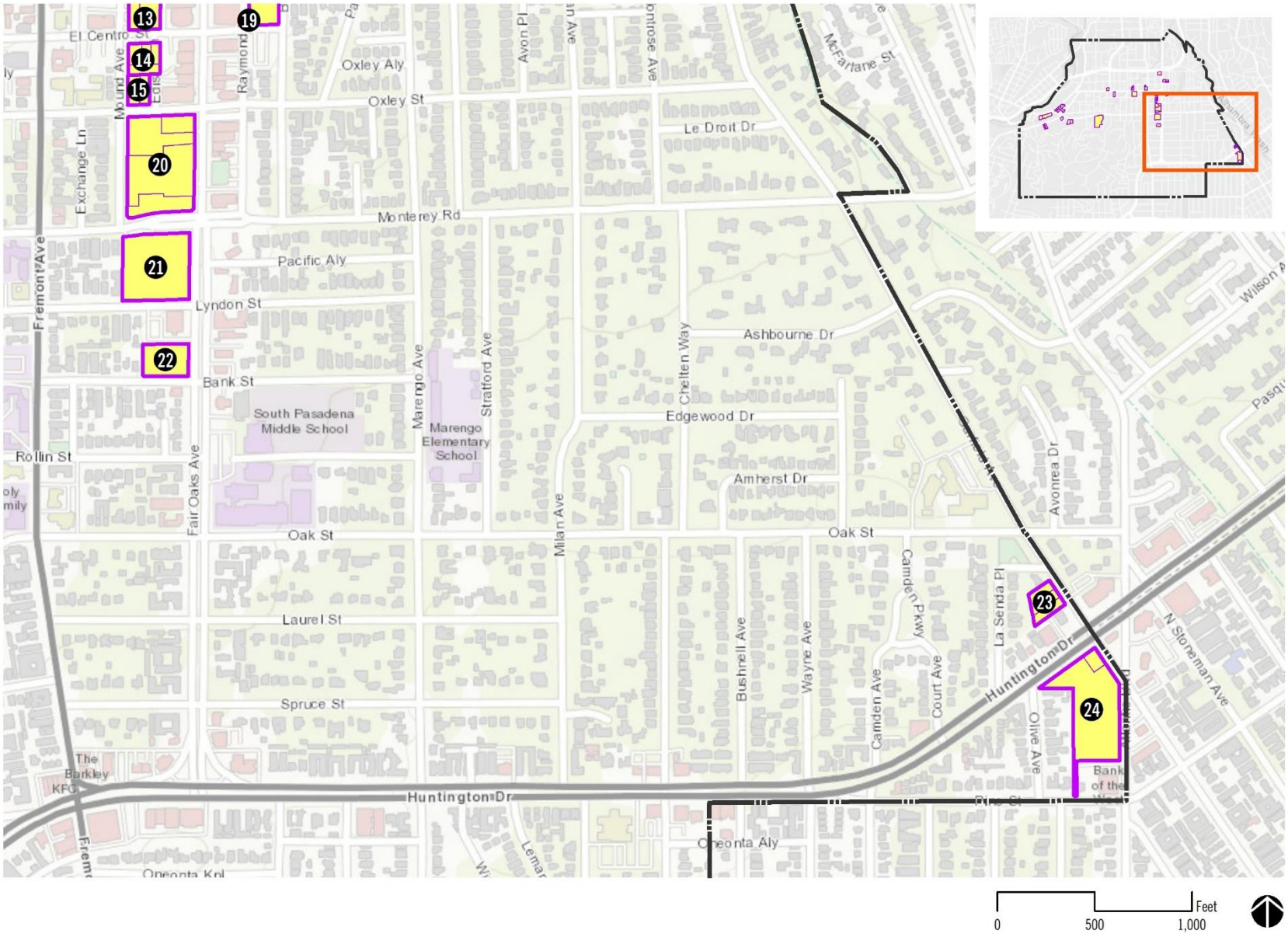


Figure A-2.c Maps of Sites to Address the Lower-Income RHNA Inventory (3)



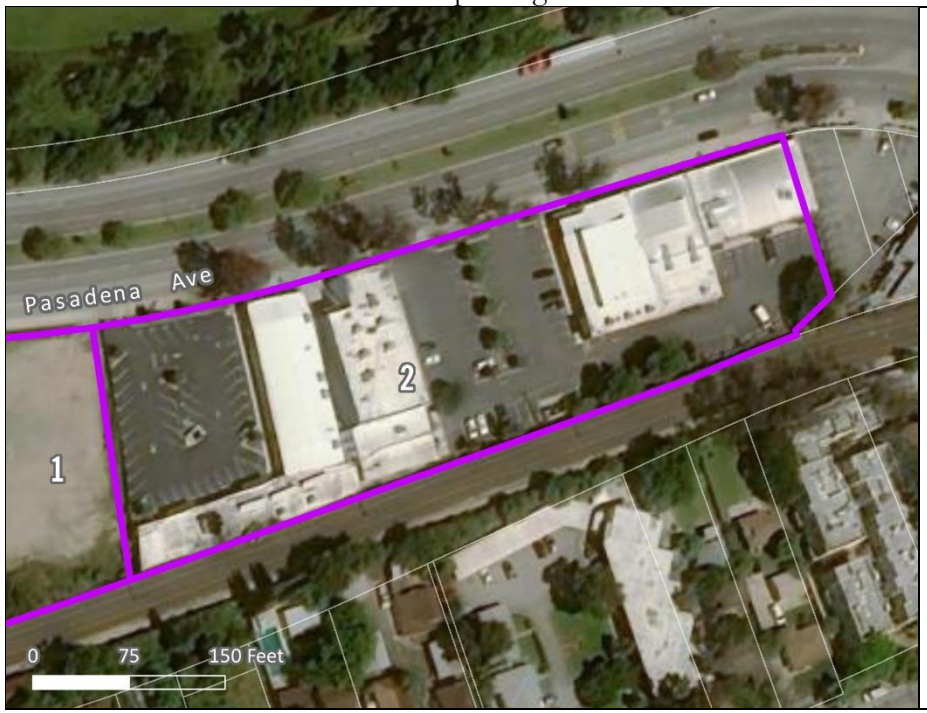
SITES TO ADDRESS THE LOWER-INCOME RHNA

1. Vacant Site

This site is vacant.

Parcel Number	5311003096
Site Size (acre)	1.05 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use with Housing Opportunity Site
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	70 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes - Verbal communication between City staff and property owner representative; Property owner representatives requested meeting with City (7/28/21 and 8/9/21 meetings to discuss potential housing proposal)

2. Business and Research Park parking lot site



Existing use is as a business park with offices and large surface parking areas. The site is underutilized given the large parking lot and proposed density. Bullseye Glass and Judson Studios (southwestern-most buildings) are relatively new tenants.

Parcel Number	5311004010
Site Size (acre)	2.23 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	50 lower-, 20 moderate-, 13 abovemoderate-income units= 83 total units
Property Owner or Developer Interest in Residential Development?	Developer interest in site with some previous discussions with property owner. Current status unknown.

3. Monterey Road site

Underutilized parcels each with one single-family home on it. All three parcels have the same owner. Owner is interested in the development of high-density residential housing. Potential projects that have been discussed with the City would propose consolidation of the three parcels.

Parcel Numbers	5311015035, 5311010001, 5311010002
Site Size (acre)	5311015035 – 0.34 acres, 5311010001 - 0.33 acres, 5311010002 – 0.59 acres = 1.26 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM with Affordable Housing Overlay
Proposed General Plan Land Use	Medium-Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	29 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes, both Property Owner and Developer Interest

4. Tyco site

Existing uses include parking lots and underutilized industrial buildings. All parcels have the same owner. Owner is interested in consolidating the parcels and developing a few hundred units of high-density housing on the site.

Parcel Numbers	5313011007, 5313011009, 5313011010, 5313011012, 5313011013
Site Size (acre)	5313011007 – 0.89 acres, 5313011009 – 0.34 acres, 5313011010 – 0.24 acres, 5313011012 – 1.00 acres, 5313011013 – 0.80 acres =3.26 acres total
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	130 lower-, 57 moderate-, 30 above moderate-income units = 217 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner/Developer interested in building over 300 units

5. Liquor store site

Existing use is liquor store. Underutilized site with surface parking and proposed density.

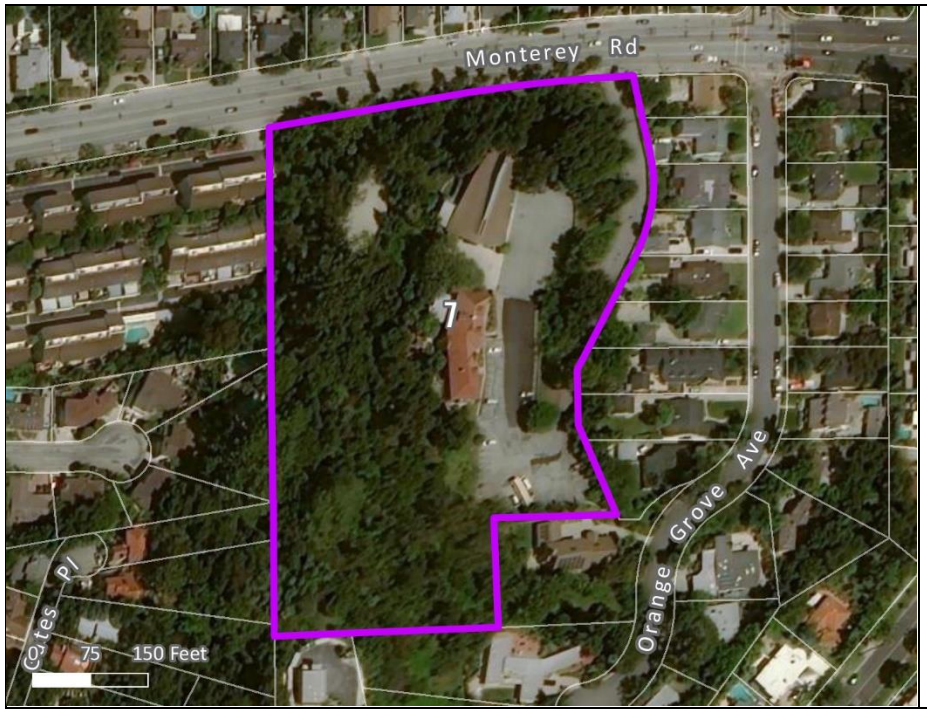
Parcel Number	5311012019
Site Size (acre)	0.55 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	19 lower-, 8 moderate-, 4 above moderate-income units = 31 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner. No expressed interest from any developers.

6. Arroyo Vista Inn site

Existing use is a bed & breakfast inn. Owners are interested in affordable housing development on the portions of the parcels close to Monterey Road, retaining the existing buildings. Close to transit and amenities.

Parcel Number	5311012010 and 5311012011
Site Size (acre)	5311012010 – 0.98 acres and 5311012011 – 0.78 acres = 1.76 acres total
Current General Plan Land Use	Estate & Very Low Density Residential
Current Zoning	RE
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RL with Affordable Housing Overlay
Proposed General Plan Land Use	Very Low Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	4 lower-income, 11 above moderate-income units = 15 total units
Property Owner or Developer Interest in Residential Development?	Yes. Letter and Meetings with Property Owners for Affordable Housing

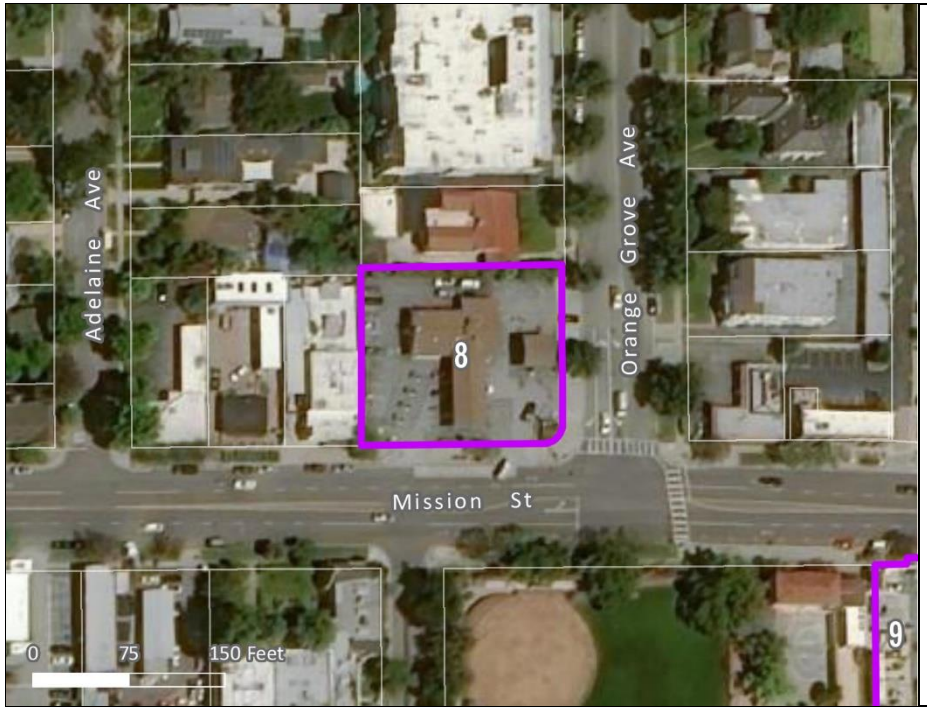
7. Methodist Church site



Existing use is church buildings, parking lot, and open space/undeveloped area. The church that owns the property has been studying different scenarios for developing the site further to incorporate housing, including affordable housing units. The existing church building and parking lot would be retained along with some areas of slopes, but other areas of the site are underutilized and could easily accommodate housing development. Based on these assumptions and the discussions with the owners about their intentions, the site could be developed with 100 units.

Parcel Number	5314003083
Site Size (acre)	6.65 acres
Current General Plan Land Use	Community Facilities
Current Zoning	CF
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	CF with Affordable Housing Overlay
Proposed General Plan Land Use	Civic with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	100 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes. Meetings with property representatives and architects in response to their interest in developing 100 housing units.

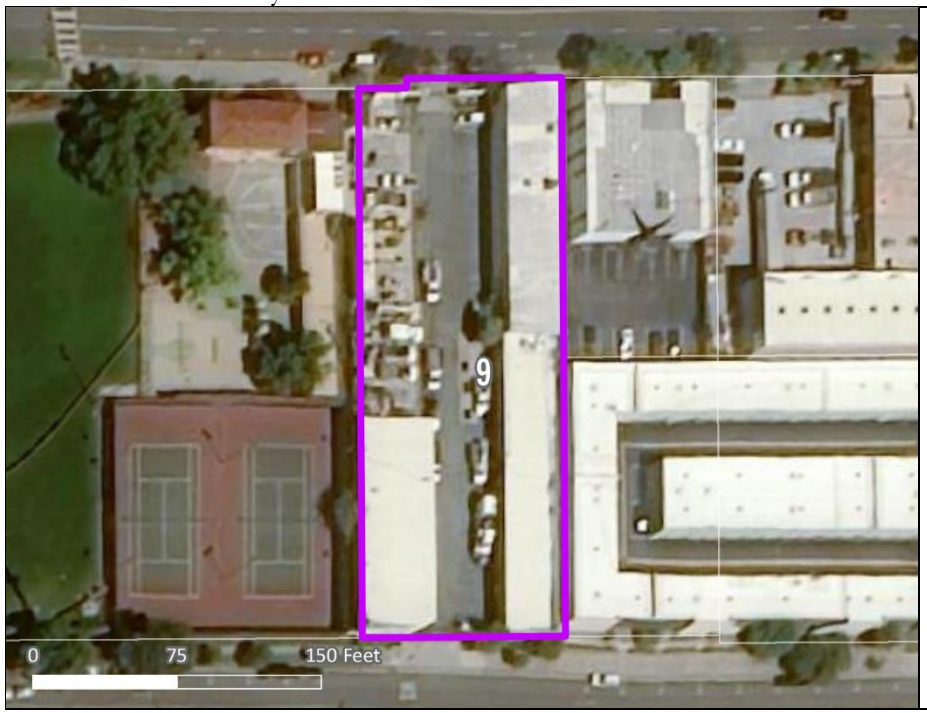
8. Gas station site



Existing use is a gas station. There is potential for redevelopment of the site based on recent project trends and active economic reinvestment in area. This site is centrally located near transit and services.

Parcel Number	5313006025
Site Size (acre)	0.50 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	14 lower-, 7 moderate-, 3 above moderate-income units = 24 total units
Property Owner or Developer Interest in Residential Development?	Yes. Property owner representative met with City staff regarding interest in a mixed-use project with housing

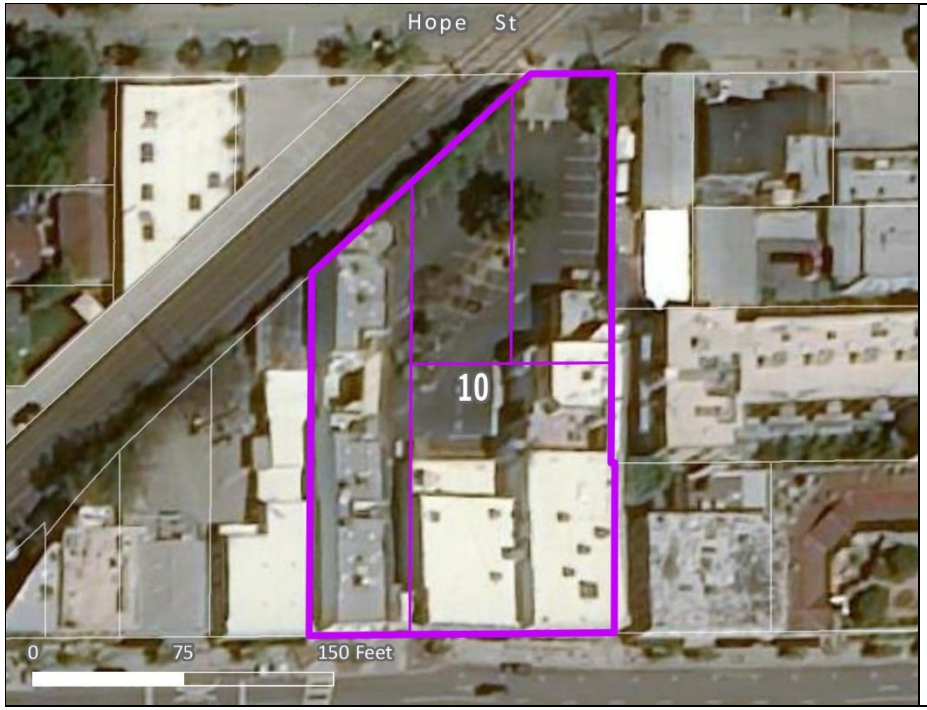
9. Public works yard site



Existing use is the City public works yard. This property is owned by the City. This site is centrally located near transit and services. The City has identified another location (APN 5317028270) on East State Street near the northern city border where the public works yard could be relocated if this site was developed for housing. This property is included in Program 2.l for developing City-owned sites with affordable housing.

Parcel Number	5315020901
Site Size (acre)	0.71 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	20 lower-, 9 moderate-, 5 above moderate-income units = 34 total units
Property Owner or Developer Interest in Residential Development?	Yes, City-owned and replacement Yard property identified.

10. Meridian site



Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services.

Parcel Numbers	5315014030, 5315014032, 5315014033, 5315014044
Site Size (acre)	5315014030 – 0.23 acres, 5315014032 – 0.16 acres, 5315014033 – 0.13 acres, 5315014044 – 0.31 acres= 0.83 acres total
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street (adjacent to the track)
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	34 lower-, 15 moderate-, 8 above moderate-income units = 57 total units
Property Owner or Developer Interest in Residential Development?	Yes. Meeting and site visit with owner representative and City staff

11. School District site

The property contains a historic school district building, but the majority of the property is a surface parking lot. This site is identified in the current adopted South Pasadena Housing Element. In 2021, the South Pasadena Unified School District sold the property to a developer. The current property owner has held multiple meetings with City staff to discuss a proposal for mixed-use, retail, housing, affordable housing, and adaptive reuse of historic resource. In September 2021, the developer submitted an application for Planning entitlements that is expected to go to Public Hearing in early summer 2022. The requested project is for 108 ownership units with approximately 19 units proposed as affordable moderate income units. The project is subject to the inclusionary housing requirements in the Zoning Code. The units assigned to this site are based on that application. This site is centrally located near transit, schools and services.

Parcel Number	5315008900
Site Size (acre)	1.90 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	19 moderate-income and 89 above moderate-income units = 108 total units
Property Owner or Developer Interest in Residential Development?	Yes, application received.

12. Carrow's site

Existing use is Carrow's restaurant with surface parking. This site has good potential for complete redevelopment with possible integration of restaurant into a mixed-use building. The owner has submitted an application for 50 units including 5 affordable units utilizing the State Density Bonus. The application was submitted prior to the inclusionary housing ordinance and is thus not subject to its provisions. This site is centrally located near transit and services.

Parcel Number	5315009051
Site Size (acre)	0.81 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	5 lower- and 45 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Yes. Application under review; unit count based on current application

13. El Centro St. and Edison Ln. Site

Existing use is a moderately used parking lot. The west parcel of the two parcels is owned by the City. The entire site is identified in the current adopted South Pasadena Housing Element. This site is centrally located near transit and services.

Parcel Numbers	5315003044, 5315003901
Site Size (acre)	5315003044 – 0.37 acres and 5315003901 – 0.19 acres= 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed-Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	20 lower-, 8 moderate-, 4 above moderate-income units = 32 total units
Property Owner or Developer Interest in Residential Development?	The smaller, west parcel is City-owned. Although no response was received from the property owner of the east parcel, the City will continue efforts to consolidate the parcels to develop a housing project.

14. City-Owned Parking Lot site

Existing use on the three northern parcels is a parking lot and a small theatre building. Those three parcels are owned by the City. There has been recurring interest from developers over the years for senior affordable housing development. The fourth parcel at the south end of the site could be consolidated with the other three parcels to develop as one site. There is one single-family residence on the existing site. It is not occupied by a lower-income household. The owners are interested in their property redeveloping together with the City-owned parcels as multifamily affordable units.

Parcel Numbers	5315003903, 5315003904, 5315003902, 5315003035
Site Size (acre)	5315003903 – 0.18 acres, 5315003904 – 0.12 acres , 5315003902 – 0.12 acres, 5315003035 – 0.19 acres = 0.61 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	1 parcel Vacant, 2 parcels Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	20 lower-, 9 moderate-, 6 above moderate-income units = 35 total units
Property Owner or Developer Interest in Residential Development?	Yes, Three parcels are city-owned and the owners of the fourth parcel are interested in their parcels being consolidated with the city parcels and all four parcels redeveloping together for multifamily residential development

15. Oxley site

These are two adjacent parcels with the same owner. The owner has confirmed to the City that they are interested in redeveloping their parcels for multi-family housing. Currently, each parcel has one single-family home on it. They are not currently occupied by lower-income households.

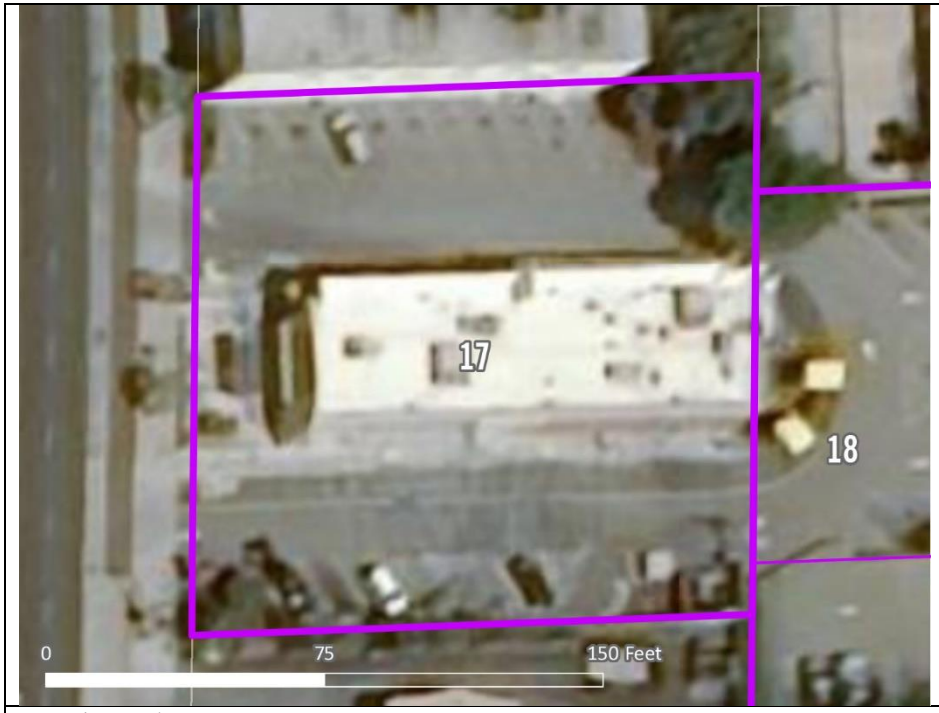
Parcel Numbers	5315003033, 5315003032
Site Size (acre)	5315003033 – 0.18 acres, 5315003032 – 0.22 acres = 0.42 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	14 lower-, 5 moderate-, 4 above moderate-income units = 23 total units
Property Owner or Developer Interest in Residential Development?	Yes, property owner is interested in redevelopment with multifamily residential

16. Shaker's site

Existing use is a small restaurant, Shaker's, with substantial surface parking. This is a strong site for redevelopment for housing, and could incorporate the existing or a replacement restaurant and possibly other ground floor commercial uses. Staff has held multiple meetings with the property owner and property owner's representative, who are very interested in developing the site with a high-density housing/mixed-use project. Redevelopment of the site will require a Historic Resources Evaluation (HRE) report for demolition. This site is centrally located near transit and services.

Parcel Number	5315001070
Site Size (acre)	0.85 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	33 lower-, 15 moderate-, 8 above moderate-income units = 56 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner representatives have met several times with City staff.

17. McDonald's site

	Existing use is a McDonald's restaurant with extensive surface parking. Identified as likely to redevelop based on recent project trends and active economic reinvestment in area. Most likely redevelopment would be as a restaurant incorporated into the ground floor of a mixed-use building. In the past, there has been interest in consolidating this site with adjacent sites on Fair Oaks. Also, the parcel adjacent to the east is underutilized surface parking with adjacent MF uses. This site is centrally located near transit and services.
Parcel Number	5318004019
Site Size (acre)	0.50 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	17 lower,- 8 moderate-, 4 above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	No response from property owner. No recent expressed interest from developers.

18. McDonald's Parking Lot site

	Existing use is the parking lot for McDonald's. It is an underutilized surface parking lot with adjacent MF uses and a potential site for consolidation to the west. This site is centrally located near transit and services.

Parcel Number	5318004023, 5318004012
Site Size (acre)	5318004023 – 0.41 acres, 5318004012 – 0.21 acres = 0.62 acres total
Current General Plan Land Use	High Density Residential
Current Zoning	RH
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RH with Affordable Housing Overlay
Proposed General Plan Land Use	High Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	11 lower,- 4 moderate-, 3 above moderate-income units = 18 total units
Property Owner or Developer Interest in Residential Development?	City has contacted property owners and provided explanation about the housing element, but has not received an official response. No expressed interest from developers.

19. Parking Lot at Mission St. and Brent Ave.

Existing use is a parking lot used by the commercial uses to the west. Property does not provide required parking for adjacent uses. This site is centrally located near transit and services. The parking lot has previously been listed for sale.

Parcel Number	5318015017
Site Size (acre)	0.62 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	18 lower-, 7 moderate-, 4 above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	No response from property owner. No expressed interest from developers

20. Vons site

Existing use is Vons grocery store and parking lot. All parcels have the same owner. Identified as having potential to redevelop based on recent regional land use trends, owner interest in potential residential development, and active economic reinvestment in the area. Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that includes a grocery store would be anticipated. This site is centrally located near transit and services.

Parcel Numbers	5315004066, 5315004083, 5315004084, 5315004085
Site Size (acre)	5315004066 – 0.36 acres, 5315004083 – 1.06 acres, 5315004084 – 1.88 acres, 5315004085 – 0.66 acres = 3.96 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	157 lower-, 66 moderate-, and 40 above moderate-income units = 263 total units
Property Owner or Developer Interest in Residential Development?	Property owner has expressed interest to City in being able to develop higher density residential development in the future.

21. Pavilions parking lot site

Existing use is a supermarket (Pavillions) with a large surface parking lot with the commercial use set back from the street. Although currently undergoing a remodel to update the store, the owner has informed the City that they are also developing a proposal to redevelop the property with underground parking, a new market and high density housing on upper levels at the maximum that would be allowed by City zoning, and would include affordable housing units. The project would be similar to others that the owner has implemented in other locations throughout the state.

Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that would include the grocery store use as well as housing. This site is centrally located near transit and services and schools.

Parcel Number	5319002034
Site Size (acre)	2.67 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	80 lower-, 30 moderate-, 23 above moderate-income units = 133 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff in higher density housing redevelopment.

22. Office building and parking lot site

Existing use is a two-story office building in rear, surface parking on frontage. There is potential for redevelopment of the site based on recent project trends and active economic reinvestment in area.This site is centrally located near transit and services. There is a 3-5 year lease, leaving the potential for full redevelopment toward the end of the 6th cycle.

Parcel Number	5319003029
Site Size (acre)	0.89 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	30 lower-, 14 moderate-, 6 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff.

23. YMCA-owned site

One parcel is vacant and the other two are underutilized and each have one existing single-family house on them. The existing homes are not historic. All three parcels are owned by the South Pasadena San Marino YMCA. (The YMCA facility is not adjacent but nearby.) The YMCA Board has considered building more housing on the property but is only interested if it can build at a higher density than currently allowed.

Parcel Numbers	5321015018, 5321015017, 5321015016
Site Size (acre)	5321015018 – 0.20 acres, 5321015017 – 0.19 acres, 5321015016 – 0.16 acres= 0.55 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Mixed Use Centers
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	55 du/ac.
Realistic/Net Units	17 lower-, 7 moderate-, 5 above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	Representative of property owner (YMCA Board) expressed interest to City staff in developing a higher density residential project based on proposed rezoning.

24. Ralphs site

Existing use is a Ralphs grocery store and extensive parking lot. Both parcels have the same owner. The unit assumptions for this site only assume redevelopment of the parking lot, approximately 63 percent of the site.

Parcel Numbers	5321019009, 5321019022
Site Size (acre)	5321019009 – 0.17 acres, 5321019022 – 2.92 acres= 3.09 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Mixed Use Centers with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	80 lower-, 30 moderate-, 23 above moderate-income units = 133 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner.

Appendix B:
Public Participation Summary

Appendix B: Summary of Public Participation

Release of Public Review Draft Housing Element

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. Below is a summary of all outreach since initiation of the Housing Element update, all written comments on the Housing Element received by the City, and how comments on the draft were addressed in this revised draft Housing Element. The summaries of outreach and community input are organized by type of outreach or meeting.

Public Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform.

Workshops 1 and 2

The City held two online public workshops with the general public to solicit feedback from City residents on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. The same workshop was held on the two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about Housing Elements. That survey was available before, during, and after the workshops. In addition, the City set up an email address to receive input ahead of the workshops and throughout the Housing Element Update and encouraged participants to submit comments and questions via email.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with an overview of the 6th-cycle Housing Element Update process, with a question-and-answer period in the middle. The second part of the workshop presentation focused on the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. Interaction was conducted via chat and email to minimize inappropriate content or behavior or instances of Zoom "bombing" by uninvited guests. Participants were directed to share their questions either through Zoom's chat feature or to email their questions to the City. The City staff selected questions among those received and answered some of them during the meeting as time allowed. They indicated that all questions would be answered in a frequently asked questions (FAQ) document that they drafted after the meeting's end and was then posted on the City's website.

Public Workshop, May 30, 2020 (Workshop 1)

There were approximately 30 participants at this workshop. Due to technical difficulties with the chat feature for some participants, after the end of the presentation more questions were answered by City staff and the consultant team.

The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: https://www.southpasadenaca.gov/home/showdocument?id=21084

- Participants asked about the RHNA process and how the number was determined for South Pasadena.
- Participants asked about the potential for golf courses, school district lands, and other sites with existing uses to be re-purposed for meeting the City's RHNA.
- Participants asked about Accessory Dwelling Units (ADUs) and their potential for rental units for low-income housing as well as the potential implications of the legalization of AirBnB in the City.
- Participants asked about the impacts of potentially increasing maximum density and height limits to increase housing supply.

Public Workshop, June 2, 2020 (Workshop 2)

There were approximately 30 participants at this workshop. The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: ***https://www.southpasadenaca.gov/home/showdocument?id=24141***

- Participants asked about CalTrans-owned properties and how those might be used for new housing.
- Participants asked about the potential lowering of the City's RHNA resulting from the current economic slowdown and future elimination of Metro bus stops in the City.
- Participants asked about the consequences and penalties for a non-compliant housing element.
- Participants asked about the methodology for determining RHNA and how SCAG had arrived at the City's RHNA numbers.
- Participants asked about the City's future ADU guidelines.

Workshops 3 and 4

The City held two online public workshops with the general public to solicit feedback from City residents on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m. The same workshop was held on two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about what should be discussed at the workshops. That survey was available before and during the workshops and was closed after the workshops. In addition, the City continued to accept emails to receive input ahead of the workshops.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with a brief overview of the 6th Cycle Housing Element Update process and the strategies under consideration to address the City's RHNA. Meeting participants were then separated into virtual breakout rooms to discuss questions about RHNA strategies. The groups were small, at around five people, and each had staff or consultant facilitators. Polling questions were asked of participants soon after the beginning of the workshop, after the presentation right before the breakout groups, and then the same questions were asked again just after the breakout group segment to gauge whether opinions changed based on the breakout group discussions. The polling questions were:

First poll after slide 4 – second team meeting rolls slide

- Did you participate in the Housing Element Workshops 1 or 2?
- If not, have you watched presentations the City has posted on their website about the Housing Element?

Second poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

Third poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

The discussion questions for the breakout groups were:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena, either because of the size, style, mix of uses, features, degree of affordability, etc.?

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

The workshops concluded after the breakout room discussion.

Public Workshop, September 23, 2020 (Workshop 3)

There were approximately 12 participants at this workshop. The participants represented members of City commissions, City Council members, housing advocates, community members, those who work in South Pasadena, and both renters and homeowners. The results of the two substantive poll questions for Workshop 3 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs) – 20%
    - Upzoning single-family areas – 30%
    - Increasing density without increasing height – 0%
    - **Increasing height and density – 50%**

Poll after breakout groups and report-backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs) – 11%
    - Upzoning single-family areas – 22%
    - Increasing density without increasing height – 11%
    - **Increasing height and density – 56%**

There were two breakout groups at Workshop 3. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

    - Sees a lot of obstacles for housing and would like the City to think outside of the box
    - Knows many of the legislators that wrote the laws, wants to make sure the City makes decisions that would provide the best housing
    - Wants to make sure the City avoids liability with HCD and advocacy groups
    - Wants to hear what fellow residents thought about the different proposals and what is important for the future
    - Would like to see broad community support coming together to get behind this element.
    - Wants to make sure housing is built for everyone in the San Gabriel Valley
    - Wants to make sure RHNA gets distributed to affirmatively affirm fair housing and avoids concentrations of poverty
    - Would like to see increased density and sustainable landscapes
    - Concerned about big RHNA increase that the City has to absorb. Important to preserve small town character and single-family neighborhoods as we add housing
    - A lot of people want to live here, want to make it possible for a variety of people to live here. Likes idea of increased height limits and greater densities

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

    - Higher-density/height can provide more affordable/lower-income housing without looking like Downtown Los Angeles
    - Two-thirds of ADUs can be deemed affordable
    - Believes the City needs to upzone and increase densities and will need more ideas for low-income housing
    - Should go beyond the targeted zoning for the six areas mentioned
    - City will run into issues with the no-net-loss rule
    - Does not believe HCD will give the City the minimum number of ADUs that is calculated
    - Least favorite is upzoning single-family housing
    - Would like to see more analysis that increased density/height is needed. Believes the City will face some difficulty with providing sufficient proof for specific parcels
    - Frustrated with the City's ability to provide low-income housing since there is no redevelopment or assistance from the State, believes the only tool available is inclusionary housing
    - It's hard to imagine the proposal for upzoning single-family would be accepted by most residents, interested in what kind of implications will happen from the Housing Element in different portions of the City
    - ADUs could be problematic as long-term housing, especially for families. Shouldn't be the primary solution
    - Higher densities could allow a blending of housing affordable to lower- and higher-income brackets
    - Not opposed to ADUs, concerned with affordability levels
    - Concerned about reliance on ADUs
    - More potential for ADUs as a solution than other options
    - ADUs are a wonderful idea. City should allow ADUs to be legalized/acknowledged without penalty
    - Asked about Caltrans properties. City let the questioner know that they have not heard back from Caltrans regarding a potential partnership. City is interested in working with Caltrans to rehabilitate the Caltrans properties. Can't easily count those towards to RHNA because they are not new units.
    - Desires choices for all affordability levels
    - Increase in height and density sounds nice. Interested in understanding more about how to distribute height and density so as not to limit affordability options to confined areas
    - Concerned about waiving or lowering parking requirements and traffic from ADUs
    - Be careful with parking issues
    - Important to consider reasons behind voter-imposed height limit
    - Preserve small-town character

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

    - To reduce GHG emissions, housing should be concentrated around High-Quality Transit Area (Gold Line Station)
    - Should be as close to the Gold Line Station as possible, should eliminate parking requirements in those locations
    - Along transit corridors (Huntington/Fair Oaks/Gold Line)
    - Near the Gold Line is preferred; however, it is a historic district
    - Vons center is a prime location
    - Definitely near transit, there will be some capacity issues with the historic character, commercial corridors
    - At least half of participants agreed housing should be dispersed through many areas of the City

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Monrovia/Azusa examples, options are diverse in terms of affordability
    - Smaller buildings on Raymond Street (south of Colorado) at Fair Oaks/Mission, need good design guidelines
    - Encinitas, higher-density project example (May 20th presentation to City Council)
    - Hiring great architects, variety of designs that are respectful of the context
    - The mix of densities by the middle school. There is a tradition of a mix of densities in South Pasadena.
    - Historic Ostrich Farm building in South Pasadena
    - President Apartments at 669 South Union in Los Angeles. It is a six-floor apartment building with 105 units.
    - We have a good mix all over town. Multifamily units are well integrated. Fit with diversity of architectural styles appropriate for each neighborhood
    - Mission Meridian in South Pasadena. It is a traditional mix with landscaping, setbacks, and quality materials. It did a good job of reflecting the historic character while also providing relatively dense housing and a range of bedrooms.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - As close to the Gold Line as possible, parking reformed
    - Proactive code enforcement, rental housing
    - Inclusionary Housing Policy
    - Sustainability
    - Affordability was mentioned by several people
    - Inclusive of income groups/families
    - Ability to be here in the long haul

- More permanent supportive housing
- Population-specific housing
- Encourage long-term tenants and homeowners, mix of kinds of housing and affordability
- Community, sustainability, and infrastructure adapting to climate change

The following question was brought up during the breakout groups:

- Has South Pasadena explored tax increment financing in lieu of disassembly of redevelopment?

Public Workshop, September 26, 2020 (Workshop 4)

There were approximately 15 participants at this workshop. The participants represented members of City commissions, housing advocates, community members, students, those who work in South Pasadena, and included renters and homeowners. The results of the two substantive poll questions for Workshop 4 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 15%
  - Upzoning single-family areas – 31%
  - Increasing density without increasing height – 15%
  - **Increasing height and density – 38%**

Poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 0%
  - **Upzoning single-family areas – 43%**
  - Increasing density without increasing height – 14%
  - **Increasing height and density – 43%**

There were three breakout groups at Workshop 4. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

   - Has followed the state laws and wants to make sure the City builds good looking beneficial housing
   - Not against raising the height in certain area (Ostrich Farms)
   - Housing should relate to the existing character and add value to the City
   - Believes affordable housing should be done first
   - Wants to hear what the community wants in terms of meeting our RHNA goals
   - Wants development of Caltrans properties according to the character of the community

- Interested in seeing more housing in the area, different types of housing suitable for families
- Would like a housing element that will sustain growth that the City can accommodate reasonably
- Concerned about impacts on schools
- Favors some minor height improvements in key areas
- Need more flexibility for low-income housing design
- Inclusionary housing regulations
- Affordable housing
- Address density and height within zoning (increase)
- Wants priority city process to follow HCD guidelines
- Prioritize geographic equitable distribution of units
- Prioritize housing dispersed equitably not just in concentrated areas.

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- No. The City would have to work with an outside partner (regional). There is no incentive for developers to provide affordable housing.
- None of the above, none of the options presented were good. Need to build more and increase density. Concerns about traffic around Ralphs and Vons sites.
- Most residents favor height and density modifications in certain areas but not all over town. City-owned property on Mound/El Centro could be a good candidate for low-income mixed-use housing, three to four stories.
- Look at adaptive re-use/micro-apartments. Need to work with the state to get credit for these types of developments.
- Upzone throughout the City (single-family areas). Would provide more opportunities. Focus on specific parcels for more density and height.
- A few people said all of the above.
- Reduce parking.
- Increase density without increasing the height, and work with developers to not create boxy projects. Can do a lot with density without height, allow up to five stories perhaps? City doesn't allow smaller product because of density.
- Adaptive re-use is counted by HCD for RHNA.
- 80 percent development assumption is not likely.
- Eliminating parking minimums in the Mission/Meridian zone.
- Downtown does not need more parking to claim more affordable units.
- The more we look at density, upzoning single-family lots, and increasing height will make a difference for planning for versus the actual building of housing. Should keep in mind.
- Inclusionary zoning. Could achieve a large amount through inclusionary housing.
- A few people liked the height and density increase strategy and had these additional comments:

  - One worried about ballot measure actually passing.
  - Likes the Andalucia precedent project.
  - Concern about sites at the periphery, need transit-oriented development.
- Upzoning single-family would be good for disbursement of housing in City. So, favor single-family upzoning but may be a stretch.
- Closer to transit (rail).
- A few people were skeptical about aggressive ADU numbers. Some had additional comments:
  - Doesn't understand how that works for renters.
  - Hard to monitor.

3. Are there certain areas of the City where increasing housing strategies should be concentrated?
   - Throughout the City but look for specific areas around transit, commercial areas, neighborhood amenities.
   - Concentrate around transit stop, walkable places, Downtown, Fair Oaks, Mission District. Opportunity by Ostrich Farm can be created.
   - Mound/Oxley is close to amenities and would encourage walkability/public transit.
   - Huntington Drive has pockets that could accommodate increased density, paratransit would be needed to support development in other areas.
   - All of the above - Downtown, Mission west of the subway stop, Mission should allow four stories.
   - Mission west does not want to mess with the historic downtown. There is not a lot of transit ridership. Has been a decrease in ridership.
   - If throughout City, not blanket, culture may not support it.
   - City/PlaceWorks has done a good job of identifying areas but there are some additional/other areas: Huntington Drive is underutilized (four cities connect). Currently, medical offices and low rise that is underutilized. Also look at Ostrich Farm, Mission, and Fair Oaks.
   - First priority is near Gold Line station. Incalculable asset that we are not realizing potential of.
   - Meridian mixed-use is good. Exciting possibility for mixed-use and density in that corridor.
   - Disbursement throughout City but with contextually different housing types. More near transit and services (Gold Line). Well served everywhere already, so can add housing anywhere.
   - Prefer to see more housing near transit hubs (Mission/Fair Oaks and metro station).
   - Near transit and where practical; consider vacant lots.
   - Downtown could accommodate a lot; Fair Oaks has a lot of opportunity for mixed-use; should be spread to some of the existing multifamily areas - triplex/four-plex.
   - Shouldn't only be in 3-5 targeted areas of the city. Look at single-family residential neighborhoods also. Allow higher densities on first two-three properties off main corridors.

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Different style in different places, Mission should look like it was built 150 years ago.
    - Different styles are appropriate, design review process is important, micro-apartments is something that should be considered in some areas, should not limit ourselves to a specific style/type.
    - Townhomes at Hope and Meridian is a good example, design standards that are not automobile oriented, cars are moved to the back, less curb-cuts, design and size should prioritize three bedrooms or more to accommodate families.
    - Mission/Meridian townhomes, variety of styles, bungalow to Spanish, does not want generic developments, need to have a sense of place, or reflects the historic character.
    - Needs to represent South Pasadena, Adobe style, historic examples, character needs to be similar to the unique neighborhoods.
    - Respect the historic fabric of the neighborhood block, be flexible given the context of the neighborhood, save the front historic design and modifications are located in the back, concerned about affordable housing
    - Generally, multifamily - Look at occupants, tenants (end users) as they transition over lifespan. Professionals, families, seniors; look at different users. Density/massing/open space/courtyards great but also can limit development so we need to look closer as implications of those constraints. It can be too restrictive. Need to dive into more and see specific examples.
    - Dense, walkable courtyard multifamily buildings already exist in South Pasadena. See Bank Street (10 units of housing in communal setting possible because without onerous parking requirements). Would love to see that happen again. Currently, the City parking requirements do not allow such projects to be built. Would like to see requirements change to bring back those types of projects and diversity of housing types.
    - Sierra Vista Apartments on Esperanza Avenue (low-income senior, 1-2 bed), example of dense affordable complex with beautiful exterior - Yosemite lodge style. Blends well with single-family and multifamily on block. It is only 45 units, so maybe higher density to get more units.
    - Likes Andalucia example, doesn't like Aliso example.
    - Mission Meridian.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - Design standards are set in stone, we can make sure it looks good.
    - That infrastructure/community services are able to support the new housing units.
    - Specifically, how we address affordable housing. One concern of ADU plan is that her work as an architect has shown that ADUs are just additional single-family for real estate but does not meet the goal of affordable units. Not just adding units, but how can we assure they are affordable units? Multifamily development also needed to meet minimum they need to make their projects pencil out. Make it more viable and provide more assurance. Don't skim the surface. Financing for developing affordable units is needed,

mentioned Pasadena as an example. Can City partner with bank or banks for affordable housing?

- Housing Element sets values to production. Wants to see recognition of race-based exclusionary practices. Contemporary recognition and repair of redlining and other racist practices. Altos de Monterey in the 1960s was the only place to allow non-white residents. Would like to see acknowledgement of past and commit to real policies that are equitable.
- In addition to being affordable, have permanent supportive housing.
- Reduce parking requirements near transit stops.
- Tenant protections.

The following questions were brought up during the breakout groups:

- Do all units count the same toward the RHNA requirement? For example, is a one-bedroom apartment treated the same as a three-bedroom dwelling?
- Could 710/Caltrans money be used for more transit?
- RHNA appeal, what are our chances to lower our numbers?

Public Workshop, October 21, 2021 (Workshop 5)

The City held a hybrid public workshops after release of the public draft Housing Element on Thursday, October 21, at 6:30 pm. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the workshop was to provide an overview of the 2021-2029 Public Review Draft Housing Element. After the presentation, the public was invited to ask questions and share comments. The meeting had approximately 12 participants, including two in-person and others on Zoom. Four participants spoke. The following summarizes these questions, comments and staff responses:

- The first question asked for clarification about AB 1398 regarding the possibility for getting the Housing Element approved by HCD by the February 11th deadline in order to avoid the mandatory timeframe for rezoning. The City clarified that before AB 1398 was approved, the February 11th deadline was for the adoption of the Housing Element by the City Council. However, with the change in law, adopting the Housing Element by the February 11th date is no longer a requirement to stay on the 8-year housing cycle. The law says in order to avoid a deadline to complete the rezoning within one year of October 15, 2021, the City would need to have adopted their Housing Element and submitted the adopted Housing Element to HCD for a 90-day review and receive certification at the end of that review before February 11, 2022. That new timeline is not feasible because the City is at the initial point of submitting the Draft Housing Element for the first 60-day review by HCD and will not have enough time to adopt and submit the final to HCD by February 11, 2022. Consequently, the City will adopt after February 11, 2022 and be required to complete the rezoning before October 15, 2022.
- The next question asked was in reference to whether Junior Accessory Dwelling Units (ADUs) were included as part of the site inventory in order to meet the City's RHNA. The City answered that both ADUs and JDUs will be counted.
- The third question asked how the City plans to incorporate the 6th, 7th and 8th (future) Regional Housing Need Allocations (RHNA) if the General Plan update is a 25-year plan with the follow-up question about the City's approach for meeting the RHNA from the 1st - 5th Housing Element updates. The City answered that through the 8-year timeframes for updating the Housing Element, the City will attempt to show that the City has the capacity to build the

units during the projection period while keeping in mind that the City's capacity to develop these units is in line with the longer-term General Plan. The Housing Element is on a different timeframe from the General Plan and will be updated again in 2030. Furthermore, staff clarified that the Program Environmental Impact Report (PEIR) will be covering the Housing Element, General Plan Update and Downtown Specific Plan (DTSP). Thus, the City will use the General Plan and the PEIR as guide when analyzing appropriate sites for the next housing element update. To answer the follow-up question, staff explained that the City was able to address capacity for the 63 RHNA units in the 5th Housing Element with existing zoning.

- The next question was in regard to the sites inventory. A property owner wanted to confirm that his property was included in the sites inventory as he is interested in developing housing. PlaceWorks confirmed and directed the speaker to find the site in the document. The property was identified as Site #4 and is shown in Table VI-46 and Appendix A. The speaker also wanted to know where the City was in terms of timeline for revising the General Plan. City staff answered that there is a draft of the General Plan Update from 2019, but that it had been put on hold during much of the Housing Element Update preparation in order to integrate consistent programs and policies that align with the Housing Element. Staff stated that the revised draft of the General Plan will be released for public review shortly.
- The last comment was about the importance of the City undertaking companion capacity planning for infrastructure including schools, water, wastewater, parking, etc. The commenter noted that the community has been requesting this type of analysis for two years. He would be more comfortable with the plan for housing presented in the draft if that infrastructure analysis was completed.

Surveys

The City conducted public outreach via two online community surveys. Each of the surveys was launched prior to public workshops for the Housing Element Update.

Survey 1 – May - September 2020

The first survey was made available on the City's website in May 2020 and was open until September 2020 to allow for a long time period for input to be provided due to the impacts of the COVID-19 pandemic. The link to the survey was also sent to everyone who registered for Workshops 1 and 2. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to find out a little bit about their perspective on housing issues. A total of 33 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about housing and the General Plan Housing Element. This survey should take about 2 minutes.

1. *Are you:*
    a. *Renter in South Pasadena*
    b. *Property owner in South Pasadena*
    c. *Other*

2. *Have you heard of the Housing Element of the General Plan?*
   YES or NO
3. *Have you heard of the regional housing needs assessment or RHNA numbers?*
   YES or NO
4. *Please rank the following issues in order of importance to you.*
   a. *Production of additional housing stock*
   b. *Preservation of existing housing stock*
   c. *Creation of economically sustainable neighborhoods*
   d. *Providing a diverse cost range of housing opportunities*
5. *Has housing affordability impacted you or your family personally?*
   YES or NO
6. *Have you participated in the City's General Plan Update process?*
   YES or NO

The following summarizes the responses to the survey:

1. Are you a renter, property owner, or other?

   Approximately 60 percent of respondents were property owners, 35 percent were renters, and 3 percent chose other.

2. Have you heard of the Housing Element of the General Plan?

   Three quarters of respondents had heard of the Housing Element, one quarter had not.

3. Have you heard of the regional housing needs assessment or RHNA numbers?

   Approximately 80 percent of respondents had heard of RHNA, 20 percent had not.

4. Please rank the following issues in order of importance to you?

   Respondents ranked the four options in the following order from highest to lowest priority:

   - Providing a diverse cost range of housing opportunities
   - Creation of economically sustainable neighborhoods
   - Preservation of existing housing stock
   - Production of additional housing stock

   It should be noted however that most respondents chose all four options as priorities.

5. Has housing affordability impacted you or your family personally?

   Approximately 55 percent of respondents had been impacted personally in terms of housing affordability, approximately 45 percent had not been impacted.

6. Have you participated in the City's General Plan Update process?

   Approximately 58 percent of respondents had previously participated in the General Plan Update process, approximately 25 percent had not.

Appendix B

Survey 2 – September - October 2020

The second survey was made available on the City's website in September 2020 and was open until October 2020. The link to the survey was also sent to everyone who registered for Workshops 3 and 4. The main purpose of the survey was to identify the housing strategies people would like to learn about and discuss at Workshops 3 and 4. A total of 17 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about how the City of South Pasadena can achieve its Regional Housing Needs Assessment (RHNA) allocation for the 2021 Housing Element Update. This survey should take about 2 minutes.

During the workshops on September 23rd and 26th, 2020 we plan to discuss the following topics that are options for the City to address its RHNA allocation:

- *Effort to Appeal the City's RHNA number*
- *Options to Address the RHNA and Receive a Certified Housing Element*
    a. *Programs and strategies for an aggressive program to produce more affordable Accessory Dwelling Units (ADUs) in South Pasadena*
    b. *Options for zoning changes to increase density (number of housing units allowed on a property)*
        i. *Allowing more ADUs to be built on a single-family property*
        ii. *Allowing multifamily housing buildings to be built in single-family neighborhoods*
        iii. *Allowing housing to be built in areas that do not currently allow residential development*
        iv. *Increasing building heights and densities to allow more housing units to be built in mixed-use areas in town and/or just on specific sites*

1. *Have you participated in the City's previous Housing Element workshops?*
2. *Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?*
3. *Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target? Choose as many as you agree with.*
    a. *Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units*
    b. *Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development*
    c. *Increased density in specific areas of the City*
    d. *Increased height in specific areas of the City*
    e. *Increased density and height in specific areas of the City*
    f. *Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood*
    g. *Other*
4. *What other topics/options would you like to see discussed at these or future workshops?*
5. *What questions do you have about the RHNA or 2021 Housing Element Update?*

The following summarizes the responses to the survey:

1. Have you participated in the City's previous Housing Element workshops?

   41 percent of respondents said yes, 59 percent said no.

2. Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?

   35 percent said yes, 41 percent said no. Three people chose other and wrote in a response. The write-ins included two people who said the appeal won't work, another said don't spend any money on the RHNA appeal, and another said they don't know enough to choose yes or no.

3. Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target?

   The number of votes each strategy received is shown below from the strategies that received the largest number of votes to those that received the least votes.

   - Increased density in specific areas of the City – 9 votes
   - Increased density and height in specific areas of the City – 9 votes
   - Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development – 8 votes
   - Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood – 7 votes
   - Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units – 6 votes
   - Increased height in specific areas of the City – 6 votes

   Several write-in strategies were also proposed:

   - Convert any retail and business buildings that become vacant to residential
   - Widescale upzoning of single-family neighborhoods
   - Reuse empty commercial buildings for affordable housing
   - Increased height and density throughout the City.

4. What other topics/options would you like to see discussed at these or future workshops?

   - I would like to know what ways you guys are planning to fit the 2,062 housing units if the height limit is not changed.
   - Use of non-profit developers versus regular developers.
   - The aggressive ADU idea is an attempt to shirk the city's responsibility to build more housing. It will likely not succeed - as the state will not accept it. ADUs have been legal in South Pasadena for 3 years and there has been almost nothing built. There is little the city can do to get more "aggressive" - let alone reach the type of numbers being talked about. The City needs to allow real densities of greater than 30 units to an acre in your multifamily areas. The multifamily I've seen built has such low densities that it encourages only luxury 1,900 square foot condos.

- There is a lot of fear of change in South Pasadena. Can we help people visualize South Pasadena in a future that satisfies RHNA requirements? That might help focus energy on the choice between the options.
- Streamlined permitting process. Progressive ways to address the missing middle housing types.
- I hope to see the elimination of parking requirements to facilitate unit production and a serious discussion about inclusionary zoning.
- Adaptive reuse of commercial buildings for affordable housing.
- At the first Zoom Housing Meeting, numerous sites were presented as potential areas for development. But much of this data was based on a single conversation with the owner of the property who "said they were open to considering development." I found that rather loosey goosey. There were too many "ifs" in that scenario.
- South Pasadena, along with other towns, is bleeding commercial space. What are the options for converting some of these into work/living lofts?
- Finally, all of the development that has been greenlit in the city only offers 13 "affordable units." All development must focus on affordability or we can never come close to meeting the numbers. We know that developers don't make money on building affordable housing, so who will the city partner with to make that happen?
- What about the additional infrastructure that will be needed to support 20 percent more units and a 20 percent increase in population?
- We just came out of a 7-year drought. Where will the extra water supplies come from?
- Multiple studies in the last decade, including at Mission Meridian, have proven that transit based housing is an urban myth. It does not reduce traffic. If this plan goes forward, how will South Pasadena achieve its green Climate Action Plan goals in the coming 10 to 20 years?
- Regarding specific locations within the City to be up zoned – PlaceWorks' previous presentation at the Planning Commission did not address Huntington Drive or any area south of it.
- Even in a city as small as South Pasadena, effects of any changes will be distributed unevenly, which will produce uneven follow-on effects. I live near the Metro station and near the proposed Seven Patios project, which will create a significant traffic impact, especially on Farmer's Market days. How do any of the proposed options take into account the related structural changes that they will create?

5. What questions do you have about the RHNA or 2021 Housing Element Update?

- In what ways are you planning for the moderate and above moderate housing if you don't get the 1,000 ADUs?? What is the current zoning capacity of South Pasadena assuming the 50 units/acre for the Draft DTSP??
- In what ways is the City of South Pasadena critically thinking about progressive development, instead of just appealing the RHNA numbers?
- More information on inclusionary requirements, ADU considerations for RHNA counts, and Caltrans housing considerations for RHNA counts.

- I have some questions as to the accuracy of the predictions since they were determined pre-Covid. There are now more people moving out of the California than moving into the state.
- The increased density adjacent to the Gold Line Station under the pretense that all of these people will take the train to work in Pasadena/Downtown L.A. is a false flag. No one at the Mission Meridian Transit Village takes the Gold Line to commute. The ridership on the trains has steadily declined for three years. The few people I know who used the train to commute to Downtown Los Angeles are now driving as a precaution during Covid-19. The condos at the Mission Meridian Transit Village sold for upwards of $1.1 million in 2005. To be honest, it's highly unlikely that anyone who has paid that amount of money for a home is commuting by train. This was reported in the Los Angeles Times in 2007 and still holds true today. My council member used to ride his bike to take the train, but even he has quit doing that. He affirms that residents living at Mission Meridian are not commuting by train.
- Explain why South Pasadena never responded to the AFFH or LPFS surveys sent out by SCAG in 2018 and due back no later than April 2019. Our city's allocation now includes excess allocation from other cities who responded to the survey and saw their initial allocations reduced.
- When are you going to admit you want our city to look like Glendale, Pasadena, and Alhambra?
- Do we need to vote on these changes to the General Plan or will it be decided by the City? For instance, height increase was considered for the November Ballot, but up zoning wasn't. Who makes the decisions?
- Can we zone for/build more housing to exceed the target?
- What are resources I can consult to learn more about the RHNA process, specifically to understand how South Pasadena's RHNA number compares to that of other communities?

Hearings

City staff and their consultant, PlaceWorks, presented at multiple public hearings at different points in the update process prior to release of the public draft Housing Element.

July 21, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on July 21, 2020. The presentation covered the City's RHNA allocation, sites analysis and options for addressing the identified RHNA shortfall, options for inclusionary housing policy and ADU regulations, and potential options for increased density and height to accommodate additional housing. Information on potential changes to allowed density and height on specific sites was studied and presented. The following questions and input were received from the Planning Commission:

- Provide additional explanation of what moderate and above moderate RHNA means
- Has staff considered studying the Pavilions site?
- One consideration is changing what is allowed in single-family areas versus increasing the height limit in other areas
- Has staff looked at the stables site?

- Should think about a road diet on Monterey Road
- Consider street parking in the ADU regulations
- Could pre-approved ADUs include pre-fabricated units? It seems like they would be more affordable
- Are there precedents and incentives for converting market rate units to affordable units?
- What about the Caltrans properties?
- What about condo version to market rate then to affordable housing?
- Showing partial site redevelopment of Vons and Ralphs sites as the baseline condition with full redevelopment with density and height increases is misleading. If this is the approach needs to be supported more.
- Amount of parking provided for the precedent projects versus what would be required under South Pasadena's regulations?
- Wondering about the illustrative examples show versus the sites/areas a ballot measure to increase height would actually apply to
- Has City had conversations with the owners of all of these sites?
- Can regulations regarding height and zoning be adjusted after the Housing Element is adopted?
- Do Density Bonus units count towards the RHNA?
- Seems weird to have a ballot measure to increase height before the Housing Element.
- Will the RHNA change?
- Seems like the City would be forced to build more small units
- Makes sense to have less parking at the Gold Line Storage sites. Connect with the Downtown Specific Plan and General Plan and do that with all the 5 sites.
- Transit access to each of the 5 sites needs to be looked at
    - Ralphs site should be good, there are multiple bus lines
    - Ostrich farm site – not sure if there is sufficient transit access
- Increased density can add economic benefit/energize the area, just one edge might not make sense
- Premature for a height ballot initiative, the tail is wagging the dog
- Should fight the RHNA
- State Density Bonus – allows increased height
- South Pasadena isn't alone in facing a large RHNA increase
- The Council and the Mayor Pro Tem have personally written to and spoken with SCAG and state legislators and they aren't getting any traction on changing the RHNA
    - Alhambra – 6,000 + unit RHNA
    - San Marina – 398 unit RHNA
    - Beverly Hills – 3,096 unit RHNA
- The area a height increase applied to could be less site specific – a wider area
- More study is needed ahead of a ballot measure on height, leaning towards not recommending

- Supportive of strategic increased heights but thinks we aren't there yet, not enough time to make a decision to have a ballot measure ahead of the deadline for the general election. Not supportive of sending to City Council for November ballot
- Supportive of need to reconsider height limits
- Housing need is critical
- The consideration of height increase needs to be more thoroughly vetted, can't support at this time

Three recorded voicemail comments were received:

- First voicemail comment - SPRIG
    - Need an alternative that accommodates the RHNA within the 45-foot height limit
    - They gathered 67 signatures – don't want height increase
- Second voicemail comment
    - No height increase
    - Concerns about water, sewer, and electricity
- Third voicemail comment
    - Opposed to height-limit increase
    - Confirmed they had also submitted written comment

August 5, 2020

City staff and PlaceWorks presented to the City Council at their meeting on August 5, 2020. The presentation focused on the consideration by the Planning Commission at their July 21st meeting of recommending to the City Council to place a ballot measure to propose allowing increased height on the November ballot. Staff reported that the Planning Commission did not recommend moving forward with the ballot measure at this time. Staff also presented regarding a potential RHNA appeal by the City.

August 11, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on August 11, 2020. New analysis and information was presented about specific sites studied for potential height and density increases, following up on the presentation at the July 21st meeting. Updates included information on transit accessibility of candidate sites, parking ratios for precedent examples, and the addition of one site for consideration for potential height and density increases.

The following questions and input were received from the Planning Commission.

- Regarding Ostrich Farm Area:
    - Why not include parcels to the east of the vacant site?
    - Ostrich Farm area is appropriate, without needing to be as surgical as elsewhere
    - Need to look at how to make Ostrich Farm more of a complete neighborhood
    - Can it connect to Highland Park?

- Regarding Meridian Property:
    - Be careful to recognize historic district
    - Be careful not to overwhelm surrounding historic structures with additional height
    - Agree with sensitivity towards Meridian site
- Comments regarding sites in general:
    - Vons, Ralphs, and Ostrich Farm are good opportunities
    - Generally, site locations seem pretty smart
    - Concern about putting a lot of units in far corner of the city
    - Traffic and parking should be a top consideration
    - Traffic and parking analysis need to go hand in hand with these sites
    - Look at what State density bonus law means when considering additional heights
    - We need to build more housing
    - Presentation materials are going to be key pieces when communicating to residents
    - How much time do we have to make zoning changes outlined in Housing Element?
    - Does a height increase need to be in place at adoption of Housing Element?
    - What is required to prove redevelopment potential of a non-vacant site?
    - Question regarding ADU production target; answered that City will have to include aggressive programs
    - What does it mean if we don't raise heights? (need to explain to the public)
    - Is there a way to raise heights without going to the voters?
    - Can City get credit for units built in excess over prior Housing Element cycle?

September 8, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on September 8, 2020. The focus of the presentation was ADUs and options for supporting that housing type in the City as part of the Housing Element and ongoing City programming. Staff was specifically seeking input on update to the City's ADU zoning regulations and consideration of policies and programs to include in the draft Housing Element.

One recorded voicemail comment was received:

- City talked about ADU projection methodology at the July 21st Planning Commission meeting. Doesn't see that in the presentation this time.

The following questions and input were received from the Planning Commission:

- Will objective design standards be part of the near-term ADU ordinance update?
- Are the projected ADU numbers changing?
- Some ADU updates should be made now and maybe some later – before or after Housing Element adoption. The items to do later would be the more aggressive measures.
- Address parking problem related to ADUs
- Okay with duplex, deed-restriction ADU idea
- All were supportive of amnesty program.
    - One commissioner asked: Why does it need to be limited to non-historic properties?

- Yes, City should streamline planning and building review process
- Yes, supportive of homeowner assistance – guide to ADU development process
- Supports fee reductions for affordable ADUs
- Okay with ADU monitoring, but some concerns about staff time resources
- Okay with education and promotion around ADUs. Supportive of proactive/targeted outreach to certain neighborhoods and areas with larger lots
- Supportive of allowing two detached ADUs as long as there is enough room on the parcel for open space
- Concerned about streamlining impacts on staff workload. Should have as many standard ADU building types as possible. One-stop shop is a good idea.
- If City allowed two detached ADUs on a parcel could they require parking?
- Should include pre-fab ADU units – important for education program
- Should include costs and sources for loans in education and promotion program
    - City of Pasadena is offering two types of loans to encourage ADUs
- Careful who gets included on the list of resources (builders, etc.). Don't want to unfairly support or not support someone.
- Could tie education and promotion to streamlined approval
    - Homeowners could provide case study materials about the process, costs, how it went for them
- Could have objective criteria for which builders/others get included on the resources list

December 15, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on December 15, 2020. The presentation focused on additional design and economic analysis PlaceWorks prepared for certain sites to understand what types of housing projects would be feasible and acceptable on those sites and how changes to the City's General Plan and zoning related to density would relate to what is allowed under State Density Bonus law. The additional focused most on the Vons site.

January 26, 2021

City staff and PlaceWorks presented to the Planning Commission at their meeting on January 26, 2021. The meeting focused on the proposed Inclusionary Housing Regulations. Supporting information was presented regarding analysis of height and density on certain sites, following up on earlier meetings, in particular, the December 15, 2020, meeting.

May 26, 2021

City staff and PlaceWorks presented an update on the Housing Element process to the Planning Commission at their meeting on May 26, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the Planning Commission:

- Was the City concerned by HCD's preliminary review of some of the Housing Element sections?
- Asked about thresholds for sites analysis.
- Asked about the overlay described in Table VI-4 and details of the proposed zoning column.

- Mentioned public comment from Josh Albrektson from the previous Planning Commission meeting, not to forget it.
- What happened at the EIR scoping meeting?
- Thinks the City is being too optimistic about the analysis of the sites. Should remove small and steep single-family sites. In general, overly optimistic in all categories including ADUs, vacant and non-vacant sites.
- Multiple commissioners agreed yes, density increases are needed.
- Should ask other cities for ideas of how to meet the RHNA, need some magical solutions.
- Do City-owned sites included in the Housing Element have to be surplus?
- Does not want to include the ballfield or stables as Housing Element sites.
- Can the affordable housing production program be strengthened?
- Generally concur with strategies that were in the preliminary draft programs submitted to HCD.
- Would like another chance to review sites at the time of the public draft.
- Could there be some sort of "pre-permit program" for ADUs as a way to gauge interest in ADUs?
- Would it be possible for the planning commissioners to do a driving tour some of the sites?
- Interested in the church sites strategy.
- Likes the idea of redoing the City Hall site.
- Could the parcels by war memorial building on Fair Oaks possibly be added to the inventory?
- Can existing units be rehabilitated and counted towards the RHNA?
- Multiple commissioners said yes to the affordable housing overlay.
- Don't rule out all historic sites.
- Should increase densities in Ostrich Farm and Downtown.
- Should put increasing the citywide height limit back on the table and continue the community conversation.
- Will minimum densities be put into place?
- Raising height limits on certain properties should be considered.
- Multiple commissioners felt the sites to receive the affordable housing overlay will be competing with state density bonus in terms of incentivizing actual development. The overlay should be calibrated to produce results.
- In favor of affordable housing overlay but not as spot zoning.
- Feels the City doesn't have enough staff capacity to implement all of the proposed Housing Element programs. There is a long wait time for processing applications for ADUs. Need dedicated housing staff.
- Maybe strategy for projecting ADUs can be to project numbers annually – make more specific – year 2, year 3, etc.
- Can the parcel assemblage program work in conjunction with overlay zoning?
- They have done lot consolidation on hillside sites. There was an example of this from the previous Planning Commission meeting.

- Should spend time justifying the ADU projection number.
- Have demolitions of affordable units been an issue in South Pasadena?
- What the EIR is evaluating is a moving target, can't really finish the analysis yet.
- Please post the PowerPoint for this meeting.
- Need to get the word out to the public that the comment period is coming.
- History and context information in the Housing Element will be very helpful.
- There should be more aggressive publicity about the ADU amnesty program.
- Supportive housing for those with disabilities is needed.

October 12, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on October 12, 2021. The meeting focused on the release of the 2021-2029 public review Draft General Plan Housing Element. Public comments included:

- 95% realistic capacity because of density bonus?
- No analysis of inclusionary housing regulations?
- ADU projection numbers are too high

The following summarizes the input and questions from the Planning Commission:

- Which programs are state mandates, which are continuing from previous Housing Element? Please present this at the Oct 21st community workshop.
- Asked for clarification on state requirements regarding Senate Bill 9
- Asked for more context for regarding the level of input sought from the community at this point in the process.
- Need to explain RHNA and why the number is high.
- The Planning Commission requested an informational update at their Nov 9th meeting, including HCD comments if possible.

November 9, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on November 9, 2021. Four members of the public commented. These comments included:

- The City should have a requirement to hire local skilled workforce – both for reducing environmental/AQ/VMT impacts and for local jobs. The City of Hayward recently put this type of policy/requirement in place.
- Is the City applying for any state funding programs mentioned in the Housing Element programs?
- The ADU projection numbers are wildly optimistic.

The following summarizes the input and questions from the Planning Commission:

- Projected ADUs are only 20% of City's RHNA

- Is more than 50% of lower income RHNA being accommodated on non-vacant sites?
- Are there regional or nearby examples of projects - could any of that analysis or examples be strengthened/added to?
- The majority of the Planning Commission expressed concerns over the public's potential reaction to the rezoning and density changes included in the Draft, as well as the potential confusion about what the City is doing.
- Suggested strengthening the information in the water quality section of the Assessment of Fair Housing
- Asked for clarification about ADU track record information in the draft
- Could a program be added to close the gap between planning approvals and building permits?
- Could a program be added to work with prospective ADU applicants – ombudsman/mentor/technical assistance?
- Staffing and staff retention are critical to implementing the Housing Element programs
- Understand based on analysis presented earlier in the Housing Element project that the densities/units assumed in the HE will lead to bulkier buildings with smaller units if there is no density bonus/height increase for the project
- For rezoning, would be helpful to know what percent of the City will require rezoning?
- Agrees with public comment re: local skilled workforce and VMT reduction. Would be good for South Pasadena to have a local workforce requirement.
- Suggested more public outreach, with an emphasis on going to the people, and enhancing the site maps.
- What about the Caltrans housing?
- Some cities are fighting the RHNA
- Many of the regulations from the state in the Housing Element are impossible to meet
- Are many SCAG jurisdictions going to be in compliance?
- Sites maps could be better, add a legend/key. Note whether a site is vacant or non-vacant.
- Thinks the City has been doing a good job of getting the word out to the public about the project

November 17, 2021

City staff presented to the City Council on the public draft Housing Element at their meeting on November 17, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the City Council:

- Does the Monterey Road site (Site #3 in Appendix A) have an approved project?
- Ostrich Farm sites – what input has been received from property owners.
- Asked about the Carrow's site.
- Can the densities proposed in the draft fit within the 45 foot height limit?
- When will the aggressive ADU amnesty program happen?
- Is the City considering objective design standards to implement SB 9?
- Could SB 10 apply to only one parcel?

- Impressed with staff and the outreach that has been done to property owners. Thinks they've gone a long way toward addressing any controversy in the community.
- Amazing that there was no public comment at this meeting.
- The RHNA formula was unfair to South Pasadena.
- The Executive Director of Move LA was concerned about the RHNA approach related to High Quality Transit Corridors (HQTCs). Communities don't want HQTCs identified in the future because they will receive higher RHNA numbers because of them.
- Staff and consultants – good job addressing this complex topic.

Written Public Comments

Received Prior to Public Draft

The City received the following written public comments prior to the release of the Public Draft Housing Element.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 9, 2020) expressed concern over staff report indication that City does not currently allow ADUs within the Mission Street Specific Plan area. Mr. Gelfand noted that such a policy is unlawful, citing State code, GC 65852.2.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 13, 2020) expressed satisfaction with the recent Planning Commission meeting where the City Attorney confirmed that the City is required to allow ADUs in the Mission Street Specific Plan's Districts that allow residential uses. Mr. Gelfand stated that during a Planning Commission meeting, staff suggested the definition of 'public transit', under the state ADU law, is limited to major transit stops. Mr. Gelfand states that this is not true and provided a citation for ADU state law, Gov Code 65852.2(j)(10). Mr. Gelfand states that the City does not have a parking problem, it has a "driving problem". Mr. Gelfand believes that reducing parking will actually alleviate traffic. Mr. Gelfand states that parking is meaningless in consideration of citywide. high access to transit. Mr. Gelfand states that the City's proposal to count 1,000 ADU units toward its RHNA allocation is preposterous; however, the City's plan to incentivize ADU development is taken seriously. They feel it will result in a modest increase in ADU production.

Leonora Camner, Executive Director of Abundant Housing LA, and Anthony Dedousis, Director of Policy and Research of Abundant Housing LA, regarding Preliminary Sites Analysis from the July 21, 2020 Planning Commission Agenda Report (September 4, 2020). Ms. Camner and Mr. Dedousis identified major issues in the Preliminary Sites Analysis, including:

1. The report appears to treat new housing capacity (i.e. the potential for new housing) as equivalent to realistic housing production (i.e. actual new housing). This is incorrect; they are not the same thing.

2. The report contains extremely optimistic forecasts of future ADU production which are extremely unlikely to be achieved even with aggressive policies, based on recent development trends.

3. The Preliminary Sites Analysis for lower-income housing is unlikely to meet California's standards for affirmatively further fair housing.

4. By accommodating insufficient housing growth to meet the RHNA targets at each income level, the Preliminary Sites Analysis is likely to fall afoul of the No Net Loss requirement.

They conclude their letter noting that Abundant Housing LA (AHLA) published a detailed memo, "Requirements and Best Practices for Housing Element Updates: The Site Inventory", explaining the key legal requirements and AHLA's recommended best practices for housing element updates. They offer availability to discuss our concerns further, and offer recommendations for additional policies to incorporate into South Pasadena's Housing Element Update.

Dr. Josh Albrektson (via email to HCD, February 25, 2021) informed HCD that they would receive a letter from Abundant Housing LA, YIMBY Law, and others regarding South Pasadena's current Housing Elements plans. Dr. Albrektson claims the City is not following any of the rules in the HCD's June 10th memo. Dr. Albrektson states the City is going to HCD for a review soon, so Dr. Albrektson wanted to give HCD some local knowledge. Dr. Albrektson states that the City is passing an ADU ordinance that will make it harder to build ADUs. Dr. Albrektson states that in the fire zone, they will require all ADUs to be within 150 ft of the front property line, have sprinklers, and for all garage and structure conversions the parking lot must be replaced.

Dr Josh Albrektson (March 8, 2021) provides a list of six issues he identified as "illegal" in the preliminary draft Housing Element sections, referencing a Housing Element Memo he states the City does not comply with. Theses issues are:

1. Claiming a projection of 1,000 ADUs in the Housing Element.

2. Objective design standards versus subjective design guidelines for ADUs and what really qualifies as an objective standard.

3. It is illegal to backdate an ordinance or apply it to projects that have completed a pre-application checklist. This comment related to the City's inclusionary housing ordinance and the definition of "deemed complete."

4. Inclusionary units and density bonus cannot be used to count for RHNA units in the Housing Element. The analysis MUST use the base zoning.

5. The inclusionary housing ordinance will cause a significant drop in realistic development capacity.

6. AB 1505, regarding rental inclusionary housing, commenter provided a link to an HCD 2019 memo about this law.

Dr. Albrektson concludes with stating that South Pasadena will not produce a compliant Housing Element due to not following HCD's guidelines. Dr. Albrektson states that there are more reasons other than what he listed for which he predicts HCD will reject the City's draft element.

Abundant Housing LA (March 10, 2021) references a past 2020 letter the organization sent to the Mayor and identifies five concerns, some of which are carried forward from the 2020 letter, about the City's preliminary draft Housing Element sections. The five major concerns are:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its map of best candidate sites appears to include many sites where redevelopment is extremely unlikely.

2. Planning continues to make overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies.

3. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

4. Planning indicates that the proposed Inclusionary Housing Ordinance will help the City achieve its lower-income RHNA targets without a clear assurance that this ordinance will be accompanied by adequate zoning densities.

5. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

The organization provides recommendations for each identified concern for the City to consider.

Dr. Josh Albrektson (via email to HCD, April 12, 2021) introduced himself and summarized past public comments he has provided to the City about the Housing Element. Dr Albrektson indicates when he believed the City's actions were in conflict with State housing law and/or other guidance from HCD. The time frame of his comments range from July 2020 to April 2021.

Dr. Josh Albrektson (via email to HCD, April 13, 2021) presenting items he would like HCD to tell South Pasadena regarding its preliminary draft Housing Element sections. The list of points is below:

1. ADU estimates must be realistic.

2. A 10% Low and 10% VLI inclusionary housing requirement is a significant governmental constraint to housing and that must be accounted for in the realistic development capacity calculations.

3. Realistic development calculations must include factors like topography [and existing uses meaning that]...realistic development potential for these sites ...should be much less than 50%.

4. All sites included must be realistic. Sites that are currently leasing or have no owner affirmation or city sites that require replacements cannot be included in the sites inventory.

5. All sites included in vacant land list must actually be realistically able to be developed.

6. All sites must include a realistic number of possible affordable units.

7. Provided link to own sites inventory sheet

Dr. Albrektson provides additional information in the email that generally appeared to support his initial points above and offered some new ideas, listed below:

- Development limitations, including the City's height limits and inclusionary housing ordinance are impeding development.
- Market trends indicate multifamily development interest is low
- The City offers "representative project" examples that are dated (from 2005/2017) and would not comply with current laws and are therefore not representative.

- Using inclusionary units and state density bonus is not a substitute for appropriate zoning and is specifically outlawed. What this will actually do is make it so that almost all buildings can no longer be financially viable and nothing will get built in South Pasadena.

Andrew Jarnagin (April 28, 2021) describes what he identifies are three key issues with the City's 5th Cycle Housing Element that should be addressed in the 6th Cycle. These three issues are:

1. Encourage transit-oriented development in the downtown area
2. Remove barriers to affordable housing
3. Provide data to support policy and projections

Mr. Jarnagin offered additional comments for the City's Planning and Building Department. Mr. Jarnagin concludes with questions for the City related to its capacity to support meeting RHNA targets.

Dylan Casey, Executive Director of California Renters Legal Advocacy and Education Fund, (May 5, 2021) commented on the City's ADU ordinance. Mr. Casey states that the ordinance as currently proposed presents numerous conflicts with state ADU standards. Mr. Casey claims that if the Council fails to amend the ordinance to resolve these conflicts, South Pasadena would lose the ability to apply any development standards to ADU permits, and be forced to apply only the state minimum standards. Mr. Casey states that the proposed ordinance is in violation of Gov. Code Section 65852.2, as it would be more restrictive than is permitted under state law. Mr. Casey believes that the City should embrace ADU development and consider its benefits.

Anthony Dedousis, Director of Policy and Research at Abundant Housing LA, (via email to HCD, May 5, 2021), referenced two past letters (September 2020 and March 2021) submitted to City Planning. Mr. Dedousis notes that they have not received a response from City staff and City councilmembers.

Dr. Josh Albrektson (via email to HCD, May 20, 2021) sent information about inclusionary housing ordinance affordability levels recently passed by four different cities to provide a comparison demonstrating that South Pasadena's should be lower. The comparison cities were Pomona, Alhambra, Pasadena, and San Francisco.

Andrew Jarnagin (July 26, 2021) notes that he attended the May 26th, 2021 South Pasadena Planning Commission meeting and reported that HCD's review of the preliminary draft Housing Element sections was discussed in a positive light, which oversimplified the significant changes expected of the Housing Element in order to be in compliance. Mr. Jarnagin provided comments about HCD's informal review of the City's ADU projection and sites inventory. Mr. Jarnagin states that the South Pasadena community should be prepared for a non-compliant Housing Element from HCD. He believes that elected officials and residents must be presented realistic options for RHNA numbers to assess different approaches and determine policies that best align with local desires.

The Steering Committee Members of Our Future LA (September 14, 2021) provided feedback broken down into six focus areas. The focus areas are listed below along with the major topics within each focus area:

1. Protections – tenant protections including just cause eviction protections and enforcement, rent stabilization, tenants' right to counsel, strengthen permanent tenant education, and tenant anti-harassment protections.

2. Preservation – prioritize rezoning in high resource neighborhoods, don't include rent stabilized units in the sites inventory, implement no net loss laws, institute local programs and funding sources to preserve existing affordable housing.

3. Prioritization of Affordable Housing – value capture, create affordable housing on public land, 100% affordable housing overlays including for areas zoned R1.

4. Site Capacity Assessment – likelihood uses will discontinue, realistic capacity, report on progress towards 5th cycle RHNA, include a 15-30% buffer of sites.

5. Affirmatively Furthering Fair Housing – increase concentration of lower income households in areas where concentrations are currently low, reduce concentrations of lower income households in areas of noise or pollution, reduce noise and pollution, invest in historically disinvested areas including place-based strategies, analyze patterns of segregation and discrimination, prioritize site identification in high opportunity census tracts, identify funding and programs to ensure affordable units are built, solicit input on the housing element from all socioeconomic groups.

6. Forecasts of ADU Development – should use safe harbor methodology, provide for mid-cycle adjustments, use city-specific data to forecast affordability.

Our Future LA requested the opportunity to meet with the City to address their concerns in greater detail.

Comments Received on Public Draft

Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a

researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up

60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.

- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.

   c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
3. Accessory Dwelling Units
   a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
   b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
4. Zoning
   a. Allow residential to be built in areas that are zoned for commercial use.
   b. Allow flexibility in inclusionary zoning.
5. Better entitlement process and reducing barriers to development
   a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
   b. Reduce parking standards and eliminate parking minimums.
   c. Cap fees on all new housing.
   d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.

Revisions in Response to Comments on the Public Draft Housing Element

Comment: Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

- How addressed: The City's Inclusionary Housing Ordinance is mandatory for projects of a certain size, unlike the option to take advantage of state density bonus law. In addition, certain incentives are provided under the Inclusionary Housing Ordinance if applicants comply with objective design standards.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

- How addressed: The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

- How addressed: Additional information about the Inclusionary in-lieu fee study that the City has been conducting has been included in this draft in Section 6.4. Program 2.i in Section 6.8 commits the City monitoring the effectiveness of the Inclusionary Housing Ordinance annually and revising the ordinance if needed to improve its effectiveness at producing affordable housing units.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

- How addressed: ADU building permit approvals in the City continue to increase and permit processing times have decreased. No revisions have been made in response to this comment.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
    - How addressed: This type of program is required by the state for inclusion in the Housing Element. If any deed-restricted affordable housing is created during the planning period, the City will implement this program related to those units.
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
    - How addressed: Revisions have been made to Program 2.a to provide more certain timing for program actions.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
    - How addressed: No revisions have been made in response to this comment.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
    - How addressed: Comment noted.

- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
    - How addressed: According to LACDA, there were 10 vouchers in use in South Pasadena in 2021. Revisions were made to Program 2.d to increase outreach to encourage use of vouchers in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
    - How addressed: No revisions have been made in response to this comment.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
    - How addressed: Most of the sites included in the Housing Element that are proposed to received the Affordable Housing Overlay only allow lower densities currently. No revisions have been made in response to this comment.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
    - How addressed: Program 2.l has been substantially revised since the last draft of the Housing Element.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
    - How addressed: An additional incentive has been added to Program 3.d along with more detail about program timing and implementation.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
    - How addressed: The City processing time for ADUs has decreased in recent months. The applications received and building permits approved for ADUs has continued to increase substantially during 2021 and early 2022.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
    - How addressed: Comment noted.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
    - How addressed: Comment noted. The City has already made progress implementing Program 3.l which is noted via revisions to the program in this draft.

- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
    - How addressed: The City took action by urgency ordinance to establish objective standards for SB 9 in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. Revisions have been made to Program 3.m with this updated information.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.
    - How addressed: No revisions have been made in response to this comment.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

- How addressed: Refer to earlier response related to the Inclusionary Housing Ordinance.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

- How addressed: See earlier responses.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

- How addressed: The City Hall site has been removed from the sites inventory in this draft.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

    - How addressed: The City has continued to reach out to property owners about interest in development of sites in the inventory. Additional information has been added to Appendix A as applicable.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

    - How addressed: The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

    - How addressed: See earlier responses regarding ADU production.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

    - How addressed: Revisions have been made to Section 6.6 and Appendix E, however the City continues to rely on the SCAG affordability analysis as it is the best data available.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

    - How addressed: See earlier response regarding monitoring of the effectiveness of the Inclusionary Housing Ordinance.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

    - How addressed: Section 6.4 Fair Housing Assessment has been substantially revised since the last draft to address comments received and to address a new state law AB 1304 that went into effect since the previous draft was released.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

- How addressed: No revisions have been made in response to this comment.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
        - How addressed: Historic exclusionary practices occurred throughout South Pasadena. Rezoning to address housing needs will address all income categories and will take place in areas of the City that are high resource.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
        - How addressed: No revisions have been made in response to this comment. However, revisions have been made to Programs 1.c to address the need for tenant protection in addition to Program 1.d which was already included in the draft Housing Element.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
        - How addressed: The City's Inclusionary Housing Ordinance was adopted in 2021. Part of its intent is to create more homeownership opportunities for lower income residents or those who would like to become residents of South Pasadena who have historically been excluded. In addition, Program 5.c has been added to this draft to support inclusion and to remove racially restrictive covenants from property deeds citywide.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
        - How addressed: Zoning work called for in Program 3.a addresses this comment. Revisions have been made to that program and to Section 6.4 to address constraints associated with existing development standards.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
        - How addressed: The City is committed to complying with state no net loss statute and has included as many suitable sites as possible that can be analyzed to be adequate. The number of sites included in this draft exceeds the City's RHNA. Residential development will be allowed on a substantially larger number of sites once the General Plan, DTSP and associated zoning changes are complete.
    c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
        - How addressed: Housing regulations statewide and locally in South Pasadena have changed significantly in the last two years including related to ADUs and with the adoption of the Inclusionary Housing Ordinance. Basing likelihood of development for the 6th cycle on the 5th cycle housing unit development doesn't make sense in light of these changes.

3. Accessory Dwelling Units
    a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
        - How addressed: Programs 3.g and 3.h address this comment.
    b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
        - How addressed: Programs 3.g, 3.i, and 3.k address this comment.
4. Zoning
    a. Allow residential to be built in areas that are zoned for commercial use.
        - How addressed: Sites currently zoned for commercial use are proposed to receive the Affordable Housing Overlay or to have their base General Plan land use and zoning changed in order to address the City's RHNA.
    b. Allow flexibility in inclusionary zoning.
        - How addressed: The City's Inclusionary Housing Ordinance allows a variety of options depending on the project type and whether an applicant chooses to comply with the objective design standards in the ordinance.
5. Better entitlement process and reducing barriers to development
    a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
        - How addressed: The sites rezoned to address the lower-income RHNA as called for in Program 3.a of this Housing Element will allow projects with 20 percent affordable units ministerially. Other projects are eligible for ministerial review under state law.
    b. Reduce parking standards and eliminate parking minimums.
        - How addressed: Program 3.a calls for the city to evaluate parking requirements as part of the DTSP and zoning amendments to implement the Housing Element.
    c. Cap fees on all new housing.
        - How addressed: No revisions have been made in response to this comment.
    d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.
        - How addressed: No revisions have been made in response to this comment.

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Appendix C:
Letter to Property Owners

CITY OF SOUTH PASADENA

OFFICE OF THE PLANNING AND COMMUNITY DEVELOPMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: (626) 403-7210 ▪ FAX: (626) 403-7211
WWW.SOUTHPASADENACA.GOV

October 20, 2020

[PROPERTY OWNER NAME]
[PROPERTY OWNER ADDRESS LINE 1]
[PROPERTY OWNER ADDRESS LINE 2]

Re: 2021-2029 Housing Element Update

Dear Property Owner,

The City of South Pasadena (City) is in the process of updating its Housing Element of the General Plan as required by state law. The new Housing Element is intended to address the housing needs of current and future City residents. One of the requirements of the Housing Element is for the City to demonstrate that there is sufficient land to allow the development of a range housing types to include higher density multi-family units.

The City has identified the property at [PROPERTY ADDRESS], which our records indicate you own, as having the potential to be developed with higher density multi-family units. A development with up to 30 units per acre is already allowed in this location either under current zoning or would allowed by the draft General Plan and Downtown Specific Plan, currently undergoing community input and anticipated for adoption in mid-2021. One of the options the community will consider through ongoing outreach is whether to allow increasing the height or density on specific sites or in certain areas of the City to accommodate more affordable housing.

The City would like your input regarding the future of your property.

- ☐ **Are you interested in new residential development at [PROPERTY ADDRESS] within the next 3-8 years?**
  - **If yes:**
    - **Have you already begun to explore this possibility?**
    - **Have you considered a particular type of project?**
    - **Have you considered developing the property with affordable units?**
    - **Would an increase in height or density change your perspective?**
- ☐ **Do you have any concerns about your property being identified for potential housing development in the Housing Element?**

We look forward to your input to ensure we develop the most accurate and feasible plan for our housing future. Please send us an email at HousingElement@SouthPasadenaCA.gov to provide us with your feedback by November 3, 2020, so that we can complete our Housing Element update effort. If you have any questions or comments please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development at MLin@SouthPasadenaCA.gov or (626) 403-7236.

Sincerely,

Joanna Hankamer
Director of Planning and Community Development

Appendix D:
Qualified Entities

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
FRESNO	Fresno Housing Authority	P.O. Box 11985	Fresno	CA	93776	(559) 443-8475	Edward Stacy	ned@pacbell.net	(559) 445-898	Local, regional, national nonprofit org.		6/14/17	12/16/98
ALL COUNTIES	American Baptist Homes of the	6120 Stoneridge Mall Road, 3rd F	Pleasanton	CA	94588	(925) 924-7162	Ancel Romero		(925) 924-723	Local, regional, national public agenc	X	8/14/14	12/22/98
ALAMEDA	Housing Authority of City of Alar	701 Atlantic Ave	Alameda	CA	94501	(510) 747-4300	Denise Connors	dconnors@alamedahsg.org	(510) 522-784	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of the City of	3203 Leahy Way	Livermore	CA	94550	(925) 447-3600	Jon D. Hovey	livhsg@prodigy.net	(925) 447-094	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of County of A	22941 Atherton St	Hayward	CA	94541	(510) 538-8876	√	obasgal@aol.com	(510) 727-855	Local, regional, national nonprofit org.			12/23/98
ALL COUNTIES	USA Properties Fund	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Jesse Slansky		(323) 650-474	Local, regional, national public agenc	X	12/13/13	12/23/98
CONTRA COSTA	Rubicon Programs, Inc.	2500 Bissell Ave	Richmond	CA	90804	(510) 235-1516	Tom Matthews	TomM@Rubiconpgms.org	(510) 235-202	Local, regional, national nonprofit org.		6/5/17	12/23/98
KERN	Golden Empire Affordable Hous	3600 CheSte.r Ave. Ste. B	Bakersfield	CA	93301	(805) 633-1533	Gary Kammer		(805) 633-161	Local, regional, national nonprofit org.		6/14/17	12/23/98
LAKE	Lake County Housing Services I	255 N. Forbes St.	Lakeport	CA	95453	(707) 263-2510	Linda Hedstrom	linda_h@co.lake.ca.us	(707) 263-275	Local, regional, national nonprofit org.		6/14/17	12/23/98
LOS ANGELES	West Hollywood Community Ho	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Robin Conerly	robin@whchc.org	(323) 650-474	Local, regional, public agency	X	8/14/14	12/23/98
LOS ANGELES	City of Pomona Housing Authori	505 South Garey Ave	Pomona	CA	91766	(909) 620-2368	Benita DeFrank, Neighborhood Services Director		(909) 620-370	Local, regional, national nonprofit org	X	6/14/17	12/23/98
LOS ANGELES	Hollywood Community Housing	1726 N. Whitley Ave	Hollywood	CA	90028	(323) 469-0710	Christina V. Duncan		(323) 469-189	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Hope - Net	760 S. Westmoreland Ave	Los Angeles	CA	90005	(213) 389-9949	Canoace Whalen	hope-net@pacbell.net	(213) 389-009	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Skid Row Housing Trust	1317 E. 7th St	Los Angeles	CA	90021	(213) 683-0522	Jim Bonar		(213) 683-078	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	The Long Beach Housing Devel	333 W. Ocean Blvd., 2nd Flr	Long Beach	CA	90802	(562) 570-6926	Diana V. McNeel		(562)570-674	Local, regional, national nonprofit org	X		12/23/98
MARIN	Housing Authority of the County	4020 Civic Center Drive	San Rafael	CA	94903	(415) 491-2530	Anna Semenova	ASemenova@marinhousing.org	(415) 491-253	Local, regional, national nonprofit org	X	2/26/14	12/23/98
MARIN	Canal Community Alliance	91 Larkspur St	San Rafael	CA	94901	(415) 454-2640	Tom Wilson	canalca@aol.com	(415) 454-396	Local, regional, national nonprofit org	X		12/23/98
ORANGE	Neighborhood Housing Services	350 Hillcrest	La Habra	CA	90631	(562) 694-2051	Diane Ste.wart	nhs@aol.com	(562) 694-205	Local, regional, national nonprofit org	X		12/23/98
SAN DIEGO	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN DIEGO	San Diego Housing Commissior	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	8/14/14	12/23/98
SAN DIEGO COU	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7590	Dottie Pierce	dottiep@sdhc.org	(619) 578-735	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN FRANCISCO	Tenderloin Neighborhood Devel	201 Eddy St	San Francisco	CA	94102	(415) 776-2151	Don Falk	tndc@ix-netcom.com	(415) 776-395	Local, regional, national nonprofit org	X		12/23/98
SAN JOAQUIN	Stockton Shelter for the Homele	P.O. Box 4803	Stockton	CA	95204	(209) 465-3612	Bill Mendelson		(209) 943-480	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Cambrian Center, Inc.	2360 Samaritan Place	San Jose	CA	95124	(408) 559-0330	Dale J. Harrington	dale2360@ix.netcom.com	(408) 377-047	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Charities Housing Development	195 East San Fernando St	San Jose	CA	95112	(408) 282-1125	Chris Block	chblock@aol.com	(408) 282-113	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Palo Alto Senior Housing Projec	455 E. Charleston Rd	Palo Alto	CA	94306	(650) 494-1944	Genie Dee	gxdee@california.com	(650) 493-743	Local, regional, national nonprofit org	X		12/23/98
SONOMA	Burbank Housing Development	3432 Mendocino Ave	Santa Rosa	CA	95403	(707) 526-9782	John Lowry	burbank@sonic.net	(707) 526-981	Local, regional, national nonprofit org	X		12/23/98
ALAMEDA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702		Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/9/17	12/24/98
ALL COUNTIES	Resources for Community Deve	2220 Oxford St	Berkeley	CA	94704	(510) 841-4410	Dan Sawislak	dsawislak@rcdhousing.org	(510) 548-350	Local, regional, national nonprofit org	X	6/5/17	12/24/98
ALPINE	Amador-Tuolumne Community A	935 South State Highway 49	Jackson	CA	95642	(209) 223-1485 E	Raj Rambob	rrambob@atcaa.org	(209) 223-417	Local, regional, national public agenc	X	5/24/17	12/24/98
CALAVERAS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
COLUSA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
CONTRA COSTA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	East Bay NHS	2320 Cutting Blvd	Richmond	CA	94804	(510) 237-6459			(510) 237-648	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
CONTRA COSTA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
EL DORADO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
FRESNO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
FRESNO	Better Opportunities Builder, Inc	P.O. Box 11863	Fresno	CA	93775	(559) 443-8400	Tracewell Hanrahan	nandersen@bobinc.org	(559) 443-849	Local, regional, national nonprofit org	X	8/14/14	12/24/98
GLENN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
KERN	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
KINGS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
LASSEN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
LOS ANGELES	Housing Authority of the City of	2500 Wilshire Blvd, PHA	Los Angeles	CA	90057	(213) 252-4269	Larry Goins			Local, regional, national public agenc	X	3/3/11	12/24/98
LOS ANGELES	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
MADERA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MADERA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIPOSA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MERCED	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MERCED	Eskaton Properties Inc.	5105 Manzanita Ave.	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
MERCED	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
MONTEREY	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
MONTEREY	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
MONTEREY	South County Housing, Inc.	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
NAPA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
ORANGE	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
ORANGE	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
PLACER	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
PLACER	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
PLACER	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
RIVERSIDE	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Bill Bolstad		(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
RIVERSIDE	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SACRAMENTO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SACRAMENTO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SACRAMENTO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN BENITO	South County Housing, Inc.	7455 Carmel St.	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SAN BERNARDIN	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN BERNARDIN	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SAN DIEGO	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Harvey Mandel	hmandel@neighbor.org	(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
SAN DIEGO	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
SAN FRANCISCC	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN JOAQUIN	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SAN JOAQUIN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SAN MATEO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN MATEO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN MATEO	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CLARA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CRUZ	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SISKIYOU	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SOLANO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SOLANO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SOLANO	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
SOLANO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SONOMA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
STANISLAUS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
STANISLAUS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TULARE	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TUOLUMNE	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
VENTURA	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
YOLO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
YOLO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
ALL COUNTIES	BRIDGE Housing Corporation	345 Spear Strett, Suite 700	San Francisco	CA	94105	(415) 989-1111	Brad Wiblin		(415) 495-489	Local, regional, national public agenc	X	12/24/10	12/28/98
AMADOR	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CALAVERAS	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CONTRA COSTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
EL DORADO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
GLENN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
LOS ANGELES	FAME Corporation	1968 W. Adams Blvd.	Los Angeles	CA	90018	(323) 730-7727	Sandra Hernandez	sandrah@famecorporations.org	(323) 737-571	Local, regional, national nonprofit org	X	8/14/14	12/28/98
NAPA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
NEVADA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
PLACER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SACRAMENTO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SAN JOAQUIN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SHASTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SUTTER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
TEHAMA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YOLO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YUBA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
RIVERSIDE	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SACRAMENTO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
SAN BERNARDIN	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SAN FRANCISCC	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SOLANO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
YOLO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
ALL COUNTIES	Foundation for Affordable Housi	384 Forest Ave., Suite 14	Laguna Beach	CA	92651	(949) 443-9101	Darrin Willard		(949) 443-913	Local, regional, national nonprofit org	X	8/14/14	12/30/98
BUTTE	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
GLENN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
LASSEN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
PLUMAS	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SHASTA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SUTTER	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
TEHAMA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
ALAMEDA	East Bay Asian Local Developm	310 Eighth Street, Ste. 200	Oakland	CA	94607		Lynette Jung Lee	ljunglee@ebaldc.com	(510) 763-414	Local, regional, national nonprofit org.		5/9/17	1/5/99
CONTRA COSTA	East Bay Asian Local Developm	310 Eighth Street, Suite 200	Oakland	CA	94607	(510) 287-5353			(510) 763-414	Local, regional, national nonprofit org.		6/5/17	1/5/99
FRESNO	Fresno Co. Economic Opportun	3120 W. Nielsen Ave., Ste. 102	Fresno	CA	93706	(559) 485-3733	George Egawa	eocnlsn@psnw.com	(559) 485-373	Local, regional, national nonprofit org.		6/14/17	1/5/99
SOLANO	Fairfield Redevelopment Agency	1000 WebSte.r St., 2nd Floor	Fairfield	CA	94533	(707) 428-7688	Lark Solis	lsolis@ci.fairfield.ca	(707) 428-762	Local, regional, national nonprofit org	X		1/5/99
EL DORADO	El Dorado County Housing Auth	937 Spring St	Placerville	CA	95667	(530) 621-6167	Joyce Aldrich	jaldrich@innercite.com		Local, regional, national nonprofit org.		6/14/17	1/6/99
LOS ANGELES	American Family Housing	15161 Jackson St.	Midway City	CA	92655	(714) 897-3221	Donna Gallup	info@compuall.net	(714) 893-685	Local, regional, national nonprofit org	X	1/5/17	1/6/99
SAN FRANCISCC	Bernal Heights Neighborhood C	515 Cortland Ave	San Francisco	CA	94110	(415) 206-2140	Housing Director		(415) 648-079	Local, regional, national nonprofit org	X		1/6/99
SAN FRANCISCC	Mission Housing Development C	474 Valencia St, Ste. 280	San Francisco	CA	94103	(415) 864-6432	Philip Dockow		(415) 864-037	Local, regional, national nonprofit org	X		1/8/99
STANISLAUS	Modesto Redevelopment Agenc	940 11th St	Modesto	CA	95355	(209) 577-5247	Bill Cooper	bcooper@ci.modesto.ca.us	(209) 544-398	Local, regional, national nonprofit org	X		1/8/99
SAN FRANCISCC	Chinatown Community Develop	1525 Grant Ave	San Francisco	CA	94133	(415) 984-1450	Joanne Lee	cchd@hooked.net	(415) 984-149	Local, regional, national nonprofit org	X		1/11/99
ALL COUNTIES	The Trinity Housing Foundation	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	2/26/14	1/12/99
LOS ANGELES	The Long Beach Housing Devel	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	PICO Union Housing Corporatio	1038 Venice Blvd.	Los Angeles	CA	90015	(213) 747-2790	Jesus Torres	jtorres@puhc.org	(213) 743-381	Local, regional, national nonprofit org	X	8/14/14	1/12/99
VENTURA	A Community of Friends	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	Korean Youth & Community Cer	680 S. Wilton Place	Los Angeles	CA	90005	(213) 365-7400	Jimmy Lee		(213) 353-128	Local, regional, national nonprofit org	X		1/19/99
CONTRA COSTA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	tomlf@earthlink.net	(925) 439-083	Local, regional, national nonprofit org	X	6/5/17	1/21/99
IMPERIAL	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
RIVERSIDE	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN BERNARDIN	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN DIEGO	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SOLANO	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	Pacomseru@aol.cn	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
SONOMA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	pacomseru@aol.com	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
ALAMEDA	Community and Economic Deve	250 Frank H. Ogawa Plaza Ste. 5	Oakland	CA	94612	(510) 238-3502	Jefferey P. Levin	jplevin@oaklandnet.com	(510) 238-369	Local, regional, national nonprofit org.		5/9/17	1/27/99
ALAMEDA	Bay Area Community Services	629 Oakland Ave	Oakland	CA	94611	(510) 499-0365	Daniel Cooperman	dcooperman@bayareacs.org	(510) 569-458	Local, regional, national nonprofit org	X	5/9/17	1/28/99
ALL COUNTIES	National Community Renaissan	9421 Haven Avenue	Rancho Cucamor	CA	91730	(909) 204-3508	Tracey Williams	twilliams@nationalcore.org	(909) 483-652	Local, regional, national public agenc	X	5/24/17	5/17/99
ALL COUNTIES	Community Housing Assistance	3803 E. Casselle Ave	Orange	CA	92869		Ken Robertson	chapahq1@aol.com	(714) 744-685	Local, regional, national public agenc	X	8/14/14	5/18/99
CONTRA COSTA	Community Housing Developme	1535 Fred Jackson Way ste A	Richmond	CA	94801	(510) 412-9290	Donald Gilmore	Dgilmore@chdcnr.com	(510) 215-927	Local, regional, national nonprofit org	X	5/24/17	5/19/99
DEL NORTE	Redwood Community Action Ag	904 G St.	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
HUMBOLDT	Redwood Community Action Ag	904 G St	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99
LOS ANGELES	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
MONTEREY	Peoples' Self-Help Housing Cor	3533 Empleo St	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ORANGE	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN BENITO	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	http://www.pshh.org/	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SAN DIEGO	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN DIEGO	Bayview CDC	5100 Federal Blvd, 2nd Floor	San Diego	CA	92105	(619) 262-8403	Stasi Williams		(619) 262-783	Local, regional, national nonprofit org	X		5/19/99
SAN LUIS OBISP	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SANTA BARBAR	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SANTA BARBAR	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
VENTURA	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	X	9/26/08	5/19/99
VENTURA	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ALL COUNTIES	DML & Associates Foundation	6043 Tampa Ave, Ste. 101A	Tarzana	CA	91356	(818) 708-2710	Myron Lieberman		(818) 708-194	Local, regional, national nonprofit org.		5/23/17	5/21/99
ALL COUNTIES	EAH, Inc.	22 Pelican Way	San Rafael	CA	94901	(415) 599-2712	Scott Johnson	scott.johnson@eahhousing.org	(415) 453-368	Local, regional, national public agenc	X	5/23/18	5/21/99
ALAMEDA	Satellite Affordable Housing Ass	1835 Alcatraz Ave.	Berkeley	CA	94703	(510) 647-0700	Susan Friedland	Susanfriedland@sahahomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
KERN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
NAPA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
ORANGE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
RIVERSIDE	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
RIVERSIDE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SACRAMENTO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SACRAMENTO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN BERNARDIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN DIEGO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN FRANCISCO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SAN FRANCISCO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN JOAQUIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN MATEO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA BARBAR	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA CLARA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SOLANO	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
SOLANO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
STANISLAUS	Housing Authority of the County	P.O. Box 581918	Modesto	CA	95358	(209) 523-0705	Rich Chubon	Rchubon@stancoha.net	(209) 522-863	Local, regional, national nonprofit org	X		6/10/99
VENTURA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Abode Communities	701 E. Third St., Ste. 400	Los Angeles	CA	90015	(213) 629-2702	Holly Benson		(213) 627-640	Local, regional, national public agenc	X	8/14/14	3/9/00
ALL COUNTIES	University River Village	7901 La Riviera Drive	Sacramento	CA	95826	(916) 381-2001	Kaci Walsh		(916) 381-732	Local, regional, national public agency		5/10/17	6/1/00
ALL COUNTIES	National Affordable Housing Tru	2335 North Bank Drive	Columbus	OH	43220	(614) 451-9929	Robert Snow	bsnow@naht.org	(614) 451-337	Local, regional, national public agency		5/24/17	6/1/00
SAN DIEGO	San Diego Co. Dept. of Housing	3989 Ruffin Road	San Diego	CA	92123	(858) 694-4805	Alfredo Ybarra	aybarrcd@co.san-diego.ca.us	(858) 694-487	Local, regional, national nonprofit org	X		9/19/00
ALL COUNTIES	California Housing Partnership C	369 Pine Street, Suite 300	San Francisco	CA	94104	(415) 433-6804	Matt Schwartz	mschwartz@chp.net	(415) 433-680	Local, regional, public agency	X	8/14/14	10/23/00
ALL COUNTIES	Solari Enterprises, Inc.	1544 W. Yale Ave	Orange	CA	92687	(714) 282-2520	Bruce Solari	solari@solari-ent.com	(714) 282-252	Profit-motivated individual or organization		5/24/17	12/29/00
LOS ANGELES	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
RIVERSIDE	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
SAN BERNARDIN	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
ALL COUNTIES	Mercy Housing, Inc.	1999 Broadway, Suite 1000	Denver	CO	80202	303-830-3300	Janet Gaf	info@mercyhousing.org	(303) 830-330	Local, regional, national public agency		5/24/17	1/17/01
ALL COUNTIES	California Community Reinvestn	100 West Broadway Ste. 1000	Glendale	CA	91210	818-844-4951	David Saltzman	david.saltzman@e-ccrc.org	(818) 550-980	Local, regional, national nonprofit org	X	5/23/17	1/18/01
FRESNO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
KERN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
LOS ANGELES	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
RIVERSIDE	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN BERNARDIN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
SAN DIEGO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
ALAMEDA	Christian Church Homes of Nort	303 Hegenberger Road, Ste. 201	Oakland	CA	94621	(510) 632-6712	William F. Pickel	bpickel@cchnc.org	(510) 632-675	Local, regional, national public agency		5/9/17	2/6/01
ALL COUNTIES	Goldrich & Kest Industries, LLC	5150 Overland Avenue	Culver City	CA	90230	(310) 204-2050	Carole Glodney	Carole@Gkind.com	(310) 280-576	Profit-motivated individual or organiz	X	8/14/14	4/25/01
LOS ANGELES	LTSC Community Development	231 East Third Street, Ste. G 106	Los Angeles	CA	90013	(213) 473-1606	Takao Suzuki	tsuzuki@ltsc.org	(213) 473-168	Local, regional, national nonprofit org	X	8/14/14	4/25/01
ALL COUNTIES	East Los Angeles Community C	530 South Boyle Avenue	Los Angeles	CA	90033	(323) 269-4214	Ernesto Espinoza		(323) 261-106	Local, regional, national nonprofit org	X	12/24/10	7/13/01
LOS ANGELES	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
ORANGE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
RIVERSIDE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN BERNARDIN	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN DIEGO	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SANTA BARBAR	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
VENTURA	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SACRAMENTO	Norwood Family Housing	630 I Street, Second Floor	Sacramento	CA	95814	(916) 440-1328	Darren Bobrowsky	dbobrowsky@shra.org	(916) 442-673	Local, regional, national nonprofit org	X		1/9/02
ALL COUNTIES	Bayside Communities	1990 North California Blvd., Ste. 1	Walnut Creek	CA	94596	(925) 482-9406	Basil Rallis	brallis@baysidecommunities.com	(510) 891-900	Profit-motivated individual or organiz	X	5/10/17	9/10/02
ALL COUNTIES	Newport Development, LLC	9 Cushing, Ste. 200	Irvine	CA	92618	(949) 923-7812	Warren Allen	wallen@newportpartners.com	(949) 585-044	Profit-motivated individual or organiz	X	5/24/17	9/10/02
ALL COUNTIES	Mercy Housing California	1360 Mission St., Suite 300	San Francisco	CA	94103	213-743-5830	Ed Holder	eholder@mercyhousing.org	(415) 553-637	Local, regional, national nonprofit org	X	5/24/17	12/9/02
ALL COUNTIES	KDF Communities, LLC	1301 Dove St., Suite 720	Newport Beach	CA	92660	(949) 622-1888	John Bernard		(949) 851-181	Profit-motivated individual or organization		5/23/17	12/13/02
SONOMA	Divine Senior Apartments	P.O. Box 148	Occidental	CA	95465	(707) 874-3538	Richard W. Blanz		(707) 874-353	Local, regional, national nonprofit org	X		5/29/03
ALL COUNTIES	California Human Development	3315 Airway Drive	Santa Rosa	CA	95403	(707) 521-4788	John M. Way	CaliforniaHumanDevelopment.org	(707) 523-377	Local, regional, national nonprofit org	X	8/14/14	6/30/03
ALL COUNTIES	Reiner Communities LLC	100 Spectrum Center Dr. Suite 83	Irvine	CA	92618	(949) 753-0555	Dylan Feliciano	df@reinerllc.com		Profit-motivated individual or organiz	X	5/16/17	6/30/03
ALL COUNTIES	Petaluma Ecumenical Properties	1400 Caulfield Lane	Petaluma	CA	94954	(707) 762-2336	Vera R. Ciammetti	pep@pephousing.org	(707) 762-465	Local, regional, national nonprofit org.		5/10/17	8/19/03
ALL COUNTIES	The John Stewert Company	1388 Sutter St., 11th Floor	San Francisco	CA	94109	(415) 345-4400	Margaret Miller	mmiller@jsw.net	(415) 614-917	State-wide, for-profit	X	5/24/17	8/19/03
ALL COUNTIES	William G. Ayyad, Inc.	9252 Chesepeake Dr., Suite 100	San Diego	CA	92123	(858) 244-0900 *	Rebecca Ayyad	rayyad@udgi.net	(858) 244-090	Profit-motivated individual or organization		5/24/17	8/19/03
MENDOCINO	CDC of Mendocino County	1076 North State Street	Ukiah	CA	95482	(707) 463-5462	Todd Crabtree	crabtret@cdchousing.org	(707) 463-418	Public housing authority		2/26/14	8/25/03
SONOMA	Sonoma County Community De	1440 Guerneville Road	Santa Rosa	CA	95403	(707) 565-7901	Nick Stewart	Nick.Stewart@sonoma-county.org				8/14/14	9/8/03
ALL COUNTIES	Linc Housing Corporation	100 Pine Avenue, # 500	Long Beach	CA	90802	(562) 684-1100	Sid Paul		(562) 684-1137			8/14/14	9/15/03
LOS ANGELES	Francis R. Hardy, Jr.	2735 W. 94th Street	Inglewood	CA	90305	(323) 756-6533	Francis R. Hardy, Jr.		(323) 756-6533				9/18/03
ALL COUNTIES	Domus Development, LLC	594 Howard St., Ste 204	San Francisco	CA	94105	(415) 856-0010	Meea Kang		(415) 856-0264		X	8/14/14	2/4/04
ALL COUNTIES	BUILD Leadership Developmen	P.O. Box 9414	Newport Beach	CA	92658	(877) 644-9422	Tracy Green		(949) 719-971	Local, regional, national nonprofit org.		5/16/17	2/4/04
ALL COUNTIES	Skyline Real Estate Developme	P.O. Box 7613	Newport Beach	CA	92658	(949) 293-4705	Lynn Miller	skylinerealestate@cox.net	(949) 719-971	Profit-motivated individual or organization		5/24/17	2/4/04
LOS ANGELES	A Community of Friends	9 Cushing, Ste. 200	Irvine	CA	92618	(415) 856-0010	Meea Kang	meea@domusd.com	(415) 856-0264		X	8/27/13	2/4/04
ALL COUNTIES	MBK Management Corporation	23586 Calabasas Road, Ste. 100	Calabasas	CA	91302	(818) 444-2100 e	Jessica Robbins	jrobbins@mbkmgmt.com	(818) 337-7578		X	5/23/17	3/4/04
ALL COUNTIES	Cabouchon Properties, LLC	Pier 9, Suite 114	San Francisco	CA	94111	(415) 433-2000	Susan Terrado		(415) 433-2000			5/23/17	4/28/04
ALL COUNTIES	Maximus Properties, LLC	23586 Calabasas Road, Ste. 103	Calabasas	CA	91302	(818)449-4004	Jeffrey S. McGuire	jmcguire@remax.net	(818) 449-4004			5/23/17	4/28/04
ALL COUNTIES	Squier Properties, LLC	1157 Lake Street	Venice	CA	90291	(310) 418-6389	Scott Richards√	gsquier@earthlink.net	(310) 418-638	Profit-motivated individual or organization		5/24/17	4/28/04
LOS ANGELES	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
LOS ANGELES	Winnetka King, LLC	23586 Calabasas Road, Ste. 100	Los Angeles	CA	91302	(818) 222-2800	Rick Macaya		(818) 222-2800				4/28/04
SANTA BARBAR	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin		(805) 496-4948				4/28/04
VENTURA	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
ALL COUNTIES	Creative Housing Coalition	4612 Alta Canyada Road	La Canada	CA	91011	(805) 736-9342	Jane Anderson		(805) 736-9342			5/23/17	5/19/04
ALL COUNTIES	Fallbrook Capital Corporation	6700 Fallbrook Avenue, #111	West Hills	CA	91307	(818) 712-6931	Brandt Blaken		(818) 712-6931			5/23/17	6/1/04
LOS ANGELES	Los Angeles Housing & Commu	1200 W.7th Street, 9th Floor	Los Angeles	CA	90017	(213) 808-8654	Franklin Campos	fcampos@lahd.lacity.org	(213) 808-8999		X	8/14/14	3/15/05
ALL COUNTIES	West Bay Housing Corporation	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
SAN DIEGO	A Community of Friends	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
ALAMEDA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878	Erin Coyle	erin.coyle@nclt.org	(510) 548-7562		X	8/14/14	6/10/05
CONTRA COSTA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
LOS ANGELES	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
MARIN	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
RIVERSIDE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600x	Todd Cottle		(714) 242-2092		X		6/10/05
SAN BERNARDIN	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN DIEGO	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
SAN FRANCISCO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
SAN MATEO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Riverside Chartable Corporation	3803 E. Casselle Ave	Orange	CA	92869	(714) 628-1650	Kenneth S. Robertson		(714) 628-1657			8/14/14	9/2/05
LOS ANGELES	Home and Community	2425 Riverside Place	Los Angeles	CA	90039	(213) 910-9738	Sabrina Williams		(213) 913-5819				11/28/05
ALL COUNTIES	Wakeland Housing & Developm	1230 Columbia St. Ste. 950	San Diego	CA	92101	(619) 326-6215	Tim Wray		(619) 235-5386		X	5/24/17	12/27/05
LOS ANGELES	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
ORANGE	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
KERN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151			6/14/17	2/8/06
KERN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936			6/14/17	2/8/06
LOS ANGELES	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
LOS ANGELES	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ORANGE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
ORANGE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
RIVERSIDE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
RIVERSIDE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN BERNARDIN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN BERNARDIN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN DIEGO	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN DIEGO	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ALL COUNTIES	Hampstead Development Group	3413 30th Street	San Diego	CA	92104	(619) 543-4200	Chris Foster		(619) 543-4220		X	8/24/11	5/5/06
KERN	Housing Authority of the County	601 24th Street	Bakersfield	CA	93301	(661) 631-8500	Stephen M. Pelz		(661) 631-9500			8/14/14	5/5/06
SANTA CRUZ	Housing Authority of the County	2931 Mission Street	Santa Cruz	CA	95060	(831) 454-5901	Ken Cole					8/14/14	5/5/06
LOS ANGELES	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ORANGE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
RIVERSIDE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
SAN BERNARDIN	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
VENTURA	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ALL COUNTIES	A. F. Evans Development, Inc.	4305 Univeristy Ave. Suite 550	San Diego	CA	92105	(619) 282-6647	Anne Wilson		(619) 282-4145		X	1/26/12	10/11/06
ALL COUNTIES	California Coalition for Rural Ho	717 K Street, Suite 400	Sacramento	CA	95814	(916) 443-4448	Alicia Sebastian	alicia@calruralhousing.org	(916) 447-0458		X	5/23/17	10/11/06
ALL COUNTIES	Chelsea Investment Corporation	725 South Coast Highway 101	Encinitas	CA	92024	(760) 456-6000	Jim Schmid		(760) 456-6001			5/23/17	10/11/06
ALL COUNTIES	Corporation for Better Housing	15303 Ventura Blvd., Suite 1100	Sherman Oaks	CA	91403	(818) 905-2430	Mary Silverstein		(818) 905-2440			5/23/17	10/11/06
ALL COUNTIES	Community HousingWorks	2815 Camino Del Rio South, Ste.	San Diego	CA	92108	(619) 858-9031	Daniel Marcus	dmarcus@chworks.org	(619) 282-414	Local, regional, national nonprofit org	X	6/7/18	10/11/06
IMPERIAL	Calexico Community Action Cou	2306 M.L. King	Calexico	CA	92231	(760) 357-2995	Steve F. Rivera		(760) 357-2923			6/14/17	10/11/06
LOS ANGELES	Clifford Beers Housing, Inc.	1200 Wilshire Blvd. Ste. 205	Los Angeles	CA	90017		James Bonar		(213) 316-0111		X		5/3/07
ALL COUNTIES	USA Properties Fund	2440 Professional Drive	Roseville	CA	95661	(916) 773-5866	Geoffrey C. Brown		(916) 773-5866			5/24/17	7/12/07
CONTRA COSTA	City of Walnut Creek	1666 N. Main Street	Walnut Creek	CA	94596	(925) 943-5899	Laura Simpson	Simpson@walnut-creek.org	(925) 256-3500		X	2/26/14	9/11/07
ALL COUNTIES	Bank of America, N.A.	555 California St., 6th Floor	San Francisco	CA	94104	(415) 953-2631	Gabriel Speyer		(415) 622-1671			5/16/17	12/4/07
ALL COUNTIES	Fairfied Residential LLC	5510 Morehouse Drive, Suite 200	San Diego	CA	92121	(858) 824-6406	Paul Kudirka	pkudirka@ffres.com	(858) 635-8606			5/23/17	12/4/07
MONTEREY	CHISPA Inc.	295 Main Street, Suite 100	Salinas	CA	93901	(831) 757-6251	Normond V. Kolpin		(831) 757-7537				5/29/08
ALL COUNTIES	Allied Pacific Development, LLC	169 Saxony Road, Suite 103	Encinitas	CA	92024	(760) 557-1480			(760) 557-1480		X		5/27/10
ALL COUNTIES	Belveron Real Estate Partners,	268 Bush St., #3534	San Francisco	CA	94104	(415) 273-6801			(415) 520-5688		X		5/27/10
DEL NORTE	Humboldt Bay Housing Develop	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Bonnie Hughes	bhughes@housinghumboldt.org	(707) 826-7319		X	8/14/14	5/27/10
HUMBOLDT	Humboldt Bay Housing Development Corporation (DBA Housing Humboldt)	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Elizabeth Matsumoto	bmatsumoto@housinghumboldt.or	(707) 826-731	Local, regional non-profit	X	8/14/14	5/27/10
ALL COUNTIES	Richman Group of California, LL	21520 Yorba Linda Blvd, Suite G-	Yorba Linda	CA	92887	(714) 837-6138	Pamela Mikus	MikusP@therichmangroup.com			X		5/28/10
ALL COUNTIES	Renaissance Housing Communi	110 Pacific Avenue, Suite 292	San Francisco	CA	94111	(415)0419-4027	David Silver		(415) 789-448		X		8/9/10
ALAMEDA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404	Linda Gardiner	linda.gardiner@ac.gov.org	(510) 670-637	Local, regional, national nonprofit org.		5/9/17	9/27/10
ALL COUNTIES	Mesa Realty Advisors	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
CONTRA COSTA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404			(510) 670-637	Local, regional, national nonprofit org	X	9/27/10	9/27/10
LOS ANGELES	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ORANGE	A Community of Friends	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
ORANGE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
RIVERSIDE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
SAN BERNARDIN	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
ALL COUNTIES	California Commercial Investme	4530 E. Thousand Oaks Blvd., St	Westlake Village	CA	91362	(805) 495-8400			(805) 495-5471		X	8/14/14	12/24/10
ALL COUNTIES	Dawson Holdings, Inc.	300 Turney Street, 2nd Floor	Sausalito	CA	94965	(801) 244-6658	Tim Fluetsch		(801) 733-6116		X	8/14/14	12/24/10
ALL COUNTIES	WNC Community Preservation I	17782 Sky Park Circle	Irvine	CA	92620	(714) 662-5565			(714) 662-4412		X		3/3/11
AMADOR	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Rachel Iskkow	rachel@mutualhousing.com	(916) 453-840	Local, regional, national public agenc	x	4/21/16	3/3/11
SOLANO	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Holly Wunder Stiles	holly@mutualhousing.com			x	8/14/14	3/3/11
ALAMEDA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
BUTTE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
CONTRA COSTA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
EL DORADO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
FRESNO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
IMPERIAL	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KINGS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
LOS ANGELES	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MADERA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MENDOCINO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MERCED	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MONTEREY	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
ORANGE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
PLACER	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
RIVERSIDE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SACRAMENTO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BENITO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BERNARDIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN DIEGO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN FRANCISCO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN JOAQUIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN LUIS OBISP	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN MATEO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA BARBAR	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CLARA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CRUZ	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
STANISLAUS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
TULARE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
VENTURA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101			6/14/17	3/28/12
LOS ANGELES	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
NAPA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
ORANGE	City of Newport Beach	100 Civic Center Drive	Newport Beach	CA	92660	(949) 644-3221	Melinda Whelan				X	8/14/14	3/28/12
ORANGE	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SAN BERNARDIN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SOLANO	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
SONOMA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
VENTURA	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
ALL COUNTIES	Preservation Partners Developn	21515 Hawthorne Blvd. Suite 125	Torrance	CA	90503	(310) 802-6681	Chuck Treatch	Chuck@preservationpartners.org	(310) 802-668	A California limited partnership, for-p	X	8/14/14	1/16/13
ALL COUNTIES	Berkadia	823 Colby Drive	Davis	CA	95616	(916) 769-7768	Al R Inouye	Al.inouye@inouyeapartments.com			X	8/1/16	2/26/14
ORANGE	Jamboree Housing Corporation	17701 Cowan Ave, #200	Irvine	CA	92614	(949) 214-2395	Roger Kinoshita	rkinoshita@jamboreehousing.com	(949)214-2395	Local, region, national, nonprofit org		4/22/16	4/22/16
ALL COUNTIES	American Community Develope	20250 Harper Avenue	Detroit	MI	48225	(313) 884-0722	Derek M. Skrzynski	derek@acdmail.com	(313) 884-072	Profit-motivated individual or organiz	X	9/2/16	9/2/16
ALL COUNTIES	Highland Property Development	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno	p.patierno@highlandcompanies.cc	(626) 698-636	Profit-motivated individual or organization			9/27/16

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ALL COUNTIES	GAL Affordable LP	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno		(626) 698-636	Profit-motivated individual or organization			10/24/16
ALL COUNTIES	Eden Housing, Inc.	22645 Grand Street	Hayward	CA	94541	(510) 582-1460	Andrea Osgood	aosgood@edenhousing.org	(510) 582-652	Local, regional, national nonprofit org	X		11/8/16
LOS ANGELES	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
ORANGE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
RIVERSIDE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN BERNARDIN	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
VENTURA	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN DIEGO	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/7/17
ALL COUNTIES	Lincoln Avenue Capitol, LLC	680 5th Avenue, 17th Floor	New York	NY	10019	(646) 585-5524	Andrew Mika	andrew@lincolnavecap.com		Profit-motivated individual or organiz	X	8/30/19	5/3/17
LOS ANGELES	Community Development Comm	700 W. Main Street	Los Angeles	CA	91801	(626) 586-1812	Larry Newnam	larry.newnam@lacdc.org	(626) 943-381	Loca., regional, national public agency		11/6/17	8/17/17
FRESNO	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org.		4/10/18	4/10/18
ALL COUNTIES	Colrich Multifamily Investments,	444 West Beach St.	San Diego	CA	92101	(858) 490-2300	Danny Gabriel	dannyg@colrich.com	(858) 490-026	Profit-motivated individual or organization			4/16/18
ALL COUNTIES	Standard Property Company, IN	1901 Avenue of the Stars, Suite 3	Los Angeles	CA	90067	(310) 553-5711	Brad Martinson	bmartinson@standard-companies.	(310) 551-166	Profit-motivated individual or organization			6/4/18
ALL COUNTIES	Jonathon Rose Companies	551 Fifth Ave, 23rd Floor	New York	NY	10176	(917) 542-3600	Nathan Taft	nathan@rosecompanies.com	(917) 542-360	Profit-motivated individual or organization			6/27/18
ALL COUNTIES	JEMCOR Development Partners	1700 El Camino Real Suite #400	Sna Mateo	CA	94402	(415) 941-5847	Michael McDermott	mmcdeormott@jemcorpartners.com		Profit-motivated individual or organization			8/8/18
ALL COUNTIES	Catalyst Housing Group, LLC	21 Ward Street, Suite 2	Larkspur	CA	94939	(415) 205-4702	Jordan Moss	Jordan@CatalystHousing.com		Profit-motivated individual or organization			12/11/18
LOS ANGELES	Los Angeles County Developme	700 W. Main Street	Alhambra	CA	91801	(626) 586-1816	KeAndra Cylear-Dod	keandra.cyleardodds@lacda.org		Local, regional, national public agency			4/18/19
ALL COUNTIES	Veritas Urban Properties LLC	2050 Hancock Street, Suite B	San Diego	CA	92110	(619) 746-5191	Gilman Bishop	gbishop@bishopventures.com		Profit-motivated individual or organization			4/24/19
LOS ANGELES	Santa Fe Art Colony Tenants As	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	CA	90058	(310) 663-6665	Sylvia Tidwell	sylvia@sylviatidwell.net		Tenants' Association			5/2/19
SANTA CLARA	Silicon Valley at Home	350 West Julian Street, Building 5	San Jose	CA	95110	(669) 254-1009	Mathew Reed	mathew@siliconvalleyathome.org		Local, regional, national nonprofit org.			7/10/19
LOS ANGELES	San Gabriel Valley Habitat for H	400 S Irwindale Ave	Azusa	CA	91702	(626) 709-3277	Mark Van Lue	mvanlue@sgvhabitat.org		Local, regional, national nonprofit org.			8/12/2019

Appendix E:
Accessory Dwelling Unit Projection Methodology

Analysis for projecting accessory dwelling units as part of meeting South Pasadena's Regional Housing Needs Allocation (*Revised: March 2022*)

As part of the Housing Element Update for the City of South Pasadena (City) and to ensure that the City is able to meet the Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments (SCAG), the City may project the number of Accessory Dwelling Units (ADUs) that is expected to be built over the course of the 6th Round Housing Element Cycle. The California Department of Housing and Community Development (HCD) recognizes that ADUs have become more popular in recent years and expects the trend to continue. ADUs are seen as an attractive option for developing housing given their affordability to lower-income renters, relatively low cost to construct, and their ability to provide income and alternative housing options to homeowners.

Assuming a certain number of ADUs will be developed over the course of housing element implementation has been acceptable to the State of California since ADU law was instituted in 2003. These projections are based on recent past ADU development trends in the jurisdiction and the current market rents for ADUs in the jurisdiction. State law regulating ADUs has changed significantly since 2016, requiring local jurisdictions to allow ADUs more broadly across a jurisdiction and with development standards and other regulations that reduce cost and other barriers to ADU development. This includes changes to require less on-site parking, allow fewer fees to be charged related to ADUs, and allow conversion of existing structures to ADUs.

HCD "Safe Harbor" Calculation

HCD's Housing Element Site Inventory Guidebook, finalized in June 2020, has clarified parameters for analyzing ADU past performance and using it to project the number of ADUs expected to be developed as part of meeting the City's RHNA. HCD has explained that the quantity of ADU building permits issued in previous years, particularly since 2018 as effects of the changes to the law began having more impact, may be used as a baseline for making the calculations. According to HCD, to project the number of ADUs expected, there are two methods that are acceptable to arrive at a 'safe harbor' number for projected ADUs. Both are based on past approvals of ADUs in a jurisdiction. Based on preliminary discussions with HCD for South Pasadena, the safe harbor number can be relied on in the 6th Round Housing Element in combination with programs to comply with state ADU regulations and monitor ADU production. The two options for 'safe harbor' analysis are described here:

- Use the number of ADU building permits in the jurisdiction since January 2018 to estimate new production. Take the average number of ADUs that have received building permits per year since the beginning of 2018. That average number can be assumed to be the average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029). The 6th Cycle RHNA projection period begins June 30, 2021.
- Assume an average increase of five times the previous planning period ADU construction trends prior to 2018. Take the average number of ADUs with building permits issued per year between January 1, 2014, and December 31, 2017, which is the part of the 5th Housing Element RHNA projection period occurring before January 1, 2018, when many of the new ADU laws began to take effect. Multiply that average by five. That average number can be assumed to be the

average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029).

A jurisdiction may choose to use one or the other of these approaches if better data is available for one of the timeframes. Before 2018, South Pasadena only approved one ADU during the 5th Cycle. During that time, the ADU regulations in the City were much more limiting and ADUs were only allowed on parcels larger than 12,000 square feet. Once the new state laws took effect, the ADU numbers began to increase. Between January 1, 2018, and the present (mid-2021), an average of 12 ADUs received planning permits per year with an increase every year.

Four ADUs received building permits in 2018, seven in 2019, eight in 2020, and 32 in 2021, for an average of 13 (12.75) ADUs per year receiving building permits during that timeframe.

When 13 ADUs per year on average are projected through the end of the projection period, the City estimates a safe harbor number of 106 ADUs between June 30, 2021, and October 15, 2029.

Projection Based on Data Reflecting South Pasadena's Specific Circumstances

If a jurisdiction expects a higher number of ADU approvals in the 6th Cycle than what is projected using one of the safe harbor options, additional data, analysis of trends, and supporting programs, including a monitoring program, must be included in the Housing Element. The City of South Pasadena does expect a higher number of ADUs will be permitted than the safe harbor number of 101 ADUs, because of the recent upward trajectory following updates to the City's ADU zoning regulations that went into effect in early June and December 2021, and based on the results of other ADU programs and initiatives that have been implemented or are planned at the City.

Over five years, ADU building permit activity has increased as follows:

- 2017 to 2018 – increase from 1 to 4 ADUs that received building permits
- 2018 to 2019 – increase from 4 to 7 ADUs that received building permits
- 2019 to 2020 – increase from 7 to 8 ADUs that received building permits
- 2020 to 2021 – increase from 8 to 32 ADUs that received building permits

The 32 permits issued in 2021 far exceeded the City's earlier (Public Review Draft) projection of 12 ADU permits. The increase can be attributed to two important policy actions taken by the City Council:

- Adoption in June 2021 of a new, less restrictive, ADU ordinance with more clearly defined parameters that support a faster approval process.
- Online application process that ensures complete applications for faster processing.

Furthermore, in December 2021, the Council adopted an urgency ordinance with standards for constructing ADUs on historic properties, along with comprehensive design guidelines that pave an administrative (by-right) path for owners of historic properties to build an ADU. Council adopted the same ordinance permanently into the Municipal Code on February 2, 2022. This resolves issues that have delayed approval of ADUs and reduced applications. Staff immediately noticed an increase in interest and new applications with approval of the new standards.

At the end of 2021, the City added four new Planning staff to increase permit processing capacity, including ADU applications. With increased staffing and clear, objective Code standards, the City is already seeing ADU applications trending higher at a faster pace than projected earlier. The City has already initiated several of the programs in this 2021-2029 Housing Element, including homeowner

education and assistance and the ADU amnesty program for property owners with an existing unpermitted ADU on their property to legalize based on compliance with the Building Code. A list of the programs and initiatives the City is undertaking related to ADUs is included at the end of this memo.

The trend in ADU application submittals since the Code was amended supports an assumption that the "safe harbor" is far below reasonably projected numbers, and given the City's RHNA, it is important to us a projection that is reflective of the permit activity experienced over the past year since conditions changed. The City received 67 Planning applications for ADUs in 2021, more than double the 30 received in 2020. A record 45 Planning approvals were issued, and the year ended with 22 Planning applications pending. The revised projection below now incorporates the sharp increase that followed adoption of the new ordinance and assumes that application numbers will increase only slightly in the next two years, leveling off at 55 Planning approvals annually. (This contrasts with a later, but higher, peak of 68 in the previous draft). Based on the 2021 data and increased staffing level, the revised analysis assumes that 70 percent of projects with Planning approval will receive building permits throughout the 8.3-year Housing Element cycle, for a total projection of 318 ADUs (including the actual building permit numbers from the second half of 2021).

It is quite possible that this projection is too low, as market trends show growing popularity and there is pent-up demand to build ADUs in South Pasadena due to the prior limitations in the Code. Applications on historic properties in particular have been on hold pending the recently adopted ordinance and are just beginning to be submitted. For informational purposes, a second, more robust, scenario is included in Table 3 that projects a growth trend based on continuing the upward trajectory in 2020 and 2021. Nevertheless, the more conservative number (Table 1) has been used for the sites inventory based on HCD comments that indicated concern about projecting growth using only two years as a baseline. Accordingly, the City is projecting 297 ADUs between January 1, 2022, and October 15, 2029, as detailed in Table 1, in addition to the 21 units permitted during the second half of 2021, which are separately counted toward the RHNA.

Table 1. Accessory Dwelling Unit Projection

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	45	32
Issued after June 30, 2021 (Actual)	28	21
2022	50	35
2023	55	39
2024	55	39
2025	55	39
2026	55	39
2027	55	39
2028	55	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	**420**	**297**

ADU Affordability Analysis

SCAG prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability

levels of ADUs, including those that do not reach the rental market. ADU research conducted by the University of California, Berkeley's Center for Community Innovation[i] indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or below-market rental rates. SCAG conservatively estimated that 15 percent of the ADUs in their region would be in this category and thus rented to the extremely low-income category of households. Table 2 lists the projected 297 ADUs by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena.

Table 2. Projected ADUs - Affordability

Percentage	Number of ADUs	Income Category Affordable To:
15%	45	Extremely Low Income
9%	27	Very Low Income
44%	131	Low Income
2%	6	Moderate Income
30%	89	Above Moderate Income
100%	**297**	**Total**

An Alternative Projection Based on 2020-2021 ADU Permit Trend

Table 3 presents a scenario that reflects the actual number of approved ADU Planning applications and building permits issued in 2021, assumes a 10-percent annual increase in applications beginning in 2022 that continues for the next five years before leveling off, and assumes that 75 percent of approved Planning applications will receive building permits. Based on these assumptions, this more robust scenario projects a total of 383 ADUs between January 1, 2022, and October 15, 2029.

Table 3. Possible Higher Accessory Dwelling Unit Projection

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2020	30	8	Actual
2021	45	32	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	21	Actual
2022	50	38	Assumption of 10% increase in applications and 50% moving forward to building permits
2023	55	41	Assumption of 10% increase in applications and 60% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	
2026	72	54	
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022-October 15, 2029	**510**	**383**	

Projections Relative to Existing Single-family Housing Stock

In 2019, South Pasadena's single-family housing stock consisted of 5,642 units. 31 ADU permits were issued in the previous housing element cycle, including the first half of 2021.

Tables 1 and 3 each contain projections for many more ADUs, and for context, it is informative to consider the number of single-family properties within the city and whether those projections make sense within that context. Table 4 shows that as a percentage of the existing housing stock, the more conservative projection would result in 6.1 percent of single-family properties that have ADUs. The more aggressive scenario results in less than 8 percent. In either case, more than 92 percent of single-family properties remain unaffected.

Table 4: Percentage of ADUs Projected Relative to Housing Stock			
Housing Stock (5,642 units)	5,642	Additional ADUs as a % of housing stock	Total ADUs as a % of housing stock
Table 1 ADUS	318	5.6%	6.1%
Table 3 ADUs	404	7.2%	7.7%

Additionally, the estimate does not take into account multifamily ADUs, which are estimated to become more popular as apartment building owners get savvier regarding ADU law. Furthermore, the City's program creating an amnesty process for illegal units, to recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on this information, it can be concluded that both of the ADU projection scenarios are realistic within the context of the overall existing housing stock.

City of South Pasadena ADU Initiatives and Programs for 2021-2029

Program 3.f – Allow and Facilitate ADUs

Program 3.g – Monitor ADU Production

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

Program 3.i – ADU Amnesty Program

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Program 3.k – ADU Education and Promotion and Homeowner Outreach

[i] Chapple et al. 2017. *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver*. University of California, Berkeley's Center for Community Innovation.

Appendix F:
Realistic Capacity Analysis

Justification of the 95 percent Realistic Capacity Assumption Applied to Downtown and Mixed-Use Sites

Much of the City of South Pasadena's lower-income Regional Housing Needs Assessment (RHNA) is proposed to be accommodated in the Draft Downtown Specific Plan (DTSP) area and the mixed-use Neighborhood Centers proposed in the General Plan Update. These sites are included in the set of sites with detailed exhibits and descriptions in Appendix A. Where full redevelopment of a site or adding to existing structures is assumed for the Housing Element analysis, a realistic development capacity of 95 percent is assumed. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity and by new policies requiring inclusionary housing and providing design incentives, FAR bonuses, height concessions and other options to increase density (state density bonus) for projects on these sites. This appendix is included to provide the background and analysis to support that 95-percent assumption.

Multi-unit Housing: Trending Upward in South Pasadena and Regionally

The City of South Pasadena is nearly built out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of sites that include a portion or all of the site with new residential units.

After a hiatus following construction of South Pasadena's first new mixed-use, transit-adjacent development in 2005, several multiple-unit residential or mixed-use projects containing higher density housing have recently been constructed or approved in South Pasadena (see Table 1), demonstrating an increasing interest to construct multi-family housing in the city. These are all on sites that were previously developed. The Mission Bell Project, approved in 2020, includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was approved in 2020 under the City's first state density bonus application. The Seven Patios Project, with 60 housing units, was approved in 2021. All three projects were able to achieve higher densities with a range from 22 to 50 dwelling units per acre (du/ac) without accounting for removal of the nonresidential portions of the project from the total parcel or site in the case of the mixed-use projects. All three projects achieved higher than 95 percent of allowed development capacity and two achieved higher than 100 percent. While the trend toward higher density, mixed-use development in South Pasadena is more recent, it is consistent with what is happening in the region, where projects containing multi-family housing of various densities, unit sizes, and architectural styles are being developed at 100 percent or higher percent of allowed capacity on previously developed sites (See Housing Element Tables VI-44 and 42). Most are receiving the entitlements with the inclusion of dedicated affordable units as a prerequisite to receiving significant density bonuses that are attractive to developers and make the project feasible.

Table 1. Representative Projects on Non-Vacant Sites in South Pasadena

Address/ Project Name	Assessor's Parcel Numbers	Acres	Entitled, Under Construction, or Completed?	Zone	Previously Developed With/ Existing Uses	Project Description	Total Number of Dwelling Units	Density	Percentage of Allowed Capacity	Similar Sites in Table VI-46 (and Site ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; Construction anticipated in 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-use, transit-oriented development (TOD), multifamily housing (studios, lofts, flats, and townhomes), and street-fronting commercial uses (restaurant and retail).	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.45 FAR	Odd-shaped sites near transit: Gold Line Storage (10); North side of Mission (8, 11, 13, 14); Other sites near rail transit: City Yard (9); Fremont/Mission (13, 14), Arco (9)
Mission Bell 1101, 1107, 1115 Mission Street	5315-008-045 5315-008-043	0.72	Entitled in 2020; Construction anticipated in 2022	MSSP	A portion of the existing historic building to be demolished and the other portion adaptively reused Two parcels were consolidated	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.48 FAR	School Site -12 (historic resource); Site Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined);
Eight Twenty 820 Mission Street	5315-017-094 5315-017-082 5315-017-067 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses.	38	20	109% of allowed FAR (allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined)
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in spring 2020	CO	Commercial retail with underutilized parking lot No parcel consolidation for redevelopment	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (17, 18, 22, 23, 24)
Mission Meridian Village Meridian Avenue and Mission Street	5315-021-001 5315-021-079 5315-021-047	1.6	Built in 2005	MSSP	Lower-density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre.	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 11)

Source: PlaceWorks and City of South Pasadena, 2021

Why this trend will continue and likely increase: Inclusionary Housing and Density Bonus

Chapter 6.5 (Housing Development Resources) provides a full narrative of the inclusionary housing ordinance (see *Zoning Provisions to Encourage Affordable Housing*), which Council adopted in May 2021. The projects in Table 1 were developed prior to the City's adoption of this ordinance. Only one of them voluntarily included affordable units and received bonus density and height, achieving 138% of the underlying density (allowed capacity), the highest of the five projects. Now that the inclusionary units are required, coupled with by-right density bonus, this has become a central component of the strategy to build affordable units and forms an important component of the basis for anticipating the 95-percent realistic capacity.

Because the properties identified in the Sites Inventory (Appendix A) with a 95-percent realistic capacity assumption are eligible for the design incentives in the adopted Inclusionary Housing Ordinance and because the Inclusionary Housing regulations apply to all residential projects of more than three units, the realistic capacity on these sites takes the Inclusionary Housing regulations into consideration.

The inclusionary housing regulations streamline use of the State Density Bonus to increase the amount of affordable housing approved in the City. This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan, both currently being updated, to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. These changes will be adopted at or near the same time as Housing Element adoption. Zoning updates to codify those changes will occur shortly after the General Plan and Downtown Specific Plan are adopted. The City has been conducting outreach and gathering input from the community and decision makers since early 2019 and support has been expressed for the proposed increased density.

State and Local Regulations encourage full development of allowed capacity for project feasibility

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects with 20% affordable units as required by the ordinance. The City has not been made aware of any pending applications that were cancelled due to adoption of the inclusionary housing regulations. In fact, the effect thus far has been as anticipated; the City has received more inquiries from developers since adopting the inclusionary housing regulations.

In September 2021, the City received the first Design Review application subject to the inclusionary housing code, for 108 one- and two-bedroom condominium units in a mixed-use, 84,198 square-foot, 50-foot height project. The proposed project would include 20% of its base units as affordable. The applicant is requesting to comply with the streamlined density bonus provisions and receive Code-allowed concessions. However, staff understands that many developers need to wait for density increases in the forthcoming General Plan and Downtown Specific Plan before submitting applications.

Ongoing Analysis and Monitoring

In July 2021, the City contracted with EPS, an economics consultant firm, to prepare an Inclusionary Housing In-Lieu Fee Study and develop Affordable Housing Program Recommendations. This work will analyze the inclusionary housing regulations and make recommendations for the City's affordable housing program or participation in a regional affordable housing production program. The analysis will also support the City's understanding of housing production trends and confirm the assumptions that it is realistic to anticipate that developments will be proposed at 95 percent of the zoning capacity. The City has committed in the programs section of this Housing Element to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if needed at that point.

Conclusion

Based on the trends and regulations analyzed, the assumption of 95 percent of realistic development capacity on the DTSP and mixed-use sites is reasonable and potentially conservative based on the fact that the most recently approved and developed multifamily and mixed-use with multifamily projects are developing at a higher percentage of allowed capacity. Table 2 shows the number of units on these sites at 95, 100, and 110 percent of allowed capacity under the proposed DTSP and General Plan. Note that the figures include the small number of sites that have a lower-capacity assumption in the DTSP and mixed-use areas. The realistic capacity percentages are lower on those sites because of existing uses that are anticipated to remain on part of the sites.

While 95 percent is the assumption used for this housing element, the number of units potentially possible at 100 and 110 percent of capacity are included in Table 2 to demonstrate what could easily happen if the recent trends to take advantage of state density bonus law for multifamily projects in South Pasadena continue.

Table 2. Capacity Assumption Alternatives

	95% Capacity	100% Capacity	110% Capacity
Units	1,545	1,623	1,781

City of SOUTH PASADENA

CITY OF SOUTH PASADENA

2021-2029 GENERAL PLAN HOUSING ELEMENT

REVISED Public Review Draft | April 2022

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City of South Pasadena
2021-2029 HOUSING ELEMENT

6.1 EXECUTIVE SUMMARY

A New Approach to Increased and Inclusive Housing Production

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

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

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

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

New State Housing Legislation

The governor signed three significant housing bills in September 2021, as the draft housing element was undergoing its final administrative review for public release. Due to the timing, for the most part, these bills, known as SB 8, SB 9 and SB 10, were not included in the body of analysis in terms of potential housing sites to comply with the RHNA. Nevertheless, the City anticipates that the expanded development potential that the state has offered~~bestowed~~ through this legislation will likely result in additional~~more~~ units in some single-family neighborhoods, which would contribute toward housing element implementation, as reported annually to HCD.

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

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

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

The Public Outreach Process

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

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

From the outset, it was clear that the housing element update needed to be approached as a broader discussion about housing initiatives that would be needed to develop a housing element that would comply with State certification criteria. Meetings to inform and involve the community about the housing element and related initiatives commenced~~were conducted~~ in the spring of 2020 (see Appendix B). These meetings were held in an on-line format due to restrictions imposed by COVID-19 pandemic emergency orders. The Planning Commission hosted numerous subsequent study sessions on the housing element, with opportunities for public input. Staff also presented updates to Council on a regular basis, as well as public hearings to adopt South Pasadena's first inclusionary housing ordinance ((South Pasadena Municipal Code (SPMC) ~~(Zoning Ordinance Division~~ 36.375) and to revise the ADU provisions in the zoning code. Public meetings on inclusionary housing and ADUs consistently connected the relationship of these initiatives to the wider housing element strategy. Planning Commission study sessions and public hearings of the Commission and Council for recommendation and adoption provided multiple opportunities for public involvement. The Planning Division received written comments from community members and housing advocacy groups related to the housing element and to the zoning ordinance changes. These public comments resulted in several meaningful modifications to the final ordinances.

Quantified Objectives

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

Table VI-1
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED	REHABILITATED
Extremely Low/ Very Low Income	757	7~~2~~	8
Low Income	398	9~~3~~	8
Moderate Income	334	4	9
Above Moderate	578	0	10
Total	**2,067**	**20~~5~~**	**35**

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

Summary of the Housing Plan

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

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

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.				
Program 1.a - Energy Efficiency The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, ~~and~~ Southern California Edison, and Clean Power Alliance programs.	Ensure consistency with State green building standards triennially when the California Building Code is adopted.	General Fund; grants	City Manager's Office	Every three years; next building code adoption expected in 2023.
Program 1.b - Housing Acquisition The City will partner with and support affordable housing developers to create new and rehabilitated, deed-restricted, affordable housing units on the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.	Complete a~~the~~ feasibility study and use the recommendations to support decision-making regarding possible partnerships with~~and provide technical assistance to~~ non-profit affordable housing developers pursuing acquisition and rehabilitation ~~as affordable housing~~ of the~~any Caltrans-declared~~ surplus properties as affordable housing to expand housing mobility opportunities for lower-income households and revitalize underused areas~~in the 710 surface route corridor~~.	Measure H	Community Development Department/City Manager's Office	Conduct feasibility study in~~by~~ 2022; technical assistance and work with nonprofits at least annually~~ongoing~~ throughout planning period. More specific timing pending State implementation processes.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 1.c - Housing Rehabilitation and Code Enforcement The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise.~~.~~ The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy. That will augment the already established code enforcement work.	Correction and abatement of all identified Code violations; with particular effort to address the 46~~40~~ units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.~~rehabilitated based on funding sources~~	CDBG, HOME, SB 2 PHLA, others	Community Development Department/ City Manager's Office	Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Develop Occupancy Inspection Program and Policy in fiscal year 2022/2023.~~Ongoing~~
Program 1.d – Assisted Housing Unit Preservation The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that there are no affordable housing units with deed-restrictions and~~(No~~ subsidized funding~~units~~ currently ~~exist~~ in South Pasadena.~~,)~~ The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions: ▪ Monitor the status of affordable projects, rental projects, and manufactured~~mobile~~ homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability. ▪ If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources. Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring	Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.	General Fund	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives. If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing. When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.				
Program 1.e – Environmental Health Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will continue to implement mitigation measures at City water~~meet with water providers to identify~~ sources in San Gabriel ~~of contamination for drinking water contamination~~ and San Marino.~~develop strategies to reduces sources.~~ As needed, the City will provide assistance to water providers to apply for funding for	Determine whether there are existing sources of water contamination and mitigate as appropriate.	General Fund	Community Development Department	Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and groundwater contamination to reduce exposure to these environmental threats.				
Goal 2.0 Encourage and Assist in the Provision of Affordable Housing Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.				
Program 2.a – Provide Technical Assistance for Projects with Affordable Housing The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency. The City is a member of~~will also continue to participate in~~ the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for~~support more~~ affordable housing in South Pasadena and~~development within~~ the ~~city and~~ region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.	Expand housing mobility opportunities through affordable housing and encourage affordable development in high resource areas by facilitating~~Facilitate~~ timely review of development proposals that include affordable housing and continuing~~continue~~ to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.	General Fund	Community Development Department	Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.
Program 2.b - Affordable Housing Production The City will establish~~s~~ a ~~member of the San Gabriel Valley Regional~~ Housing Division within the Community Development Department ~~Trust (SGVRHT) to leverage resources and increase funding for~~	Fund and build 100 affordable units, at least 40 of which are in high resource areas within the City, such as near commercial	Inclusionary in-lieu fees; General Fund; grant funding	City Manager's Office; Community	Participation in SGVRHT is ongoing; ~~consider establishing or partnering with a~~

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
~~affordable housing in South Pasadena and the region. The City will continue to work with this partnership, and may also create an in-house program with City staff~~ to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.	corridors along Mission Street and Fair Oaks Avenue, and at least 30 in affluent neighborhoods to facilitate housing mobility in mixed-income neighborhoods.~~Fund and build affordable units.~~		Development Department	~~housing authority by December 2023; if determined to be feasible, join or~~ establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually~~housing authority by June 2024~~.
Program 2.c - CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners.~~.~~ The program is administered for the City by the Housing Rights Center.	Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households whenever possible to facilitate housing mobility for a minimum of five low-income and five very low-income households to receive assistance during the 2021-2029 planning period.	CalHome	State of California/City Manager's Office; Housing Rights Center	Ongoing as NOFAs are released for CalHome; Housing Rights Center will conduct outreach at least once a year.
Program 2.d **- Section 8 Housing Choice Voucher Program for Rental Assistance** The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.	Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract HRC to provide a biannual educational workshop, beginning in 2023, for landlords, property managers, and other housing providers on the benefits of marketing units to HCV holders with the objective of at least 5 housing providers pricing their units to be eligible for HCV.	HUD	Los Angeles County Development Authority	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 2.e - Facilitate Density Bonus for Projects with On-site Affordable Housing The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.	Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.	General Fund	Community Development Department	Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing
Program 2.f - Offer Services to People without Housing The City will continue its emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help~~investigate entering into participation agreements~~ with temporary rental assistance~~neighboring cities~~ and/or utility payments~~Councils of Governments that operate emergency shelter programs to expand services to assist the unhoused population residing in South Pasadena~~.	Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.	General Fund and grants	Police Department	Coordinate a meeting with neighboring jurisdictions by February 2023 to identify strategies and translate materials on homeless services to Spanish by May 2023. ~~Ongoing~~
Program 2.g – Expand Senior Housing Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.	Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable~~allow~~ them to remain in their community.	General Fund and grants	Community Development Department	Ongoing
Program 2.h - Incentivize Special-Needs Housing ~~The~~ City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out~~seek~~ to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support~~meet these~~ special housing needs through a combination of regulatory incentives, zoning standards~~, new housing construction~~	Assist with creation of 30 units for those with special needs to reduce displacement risk and expand mobility opportunities.	Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, and other State and federal programs designated specifically for special-needs groups	Community Development Department, City Council	Prepare reasonable accommodation procedure handout and application form and post on website by December 2022; Train staff to process reasonable accommodations by December 2022; Seek funding opportunities

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
~~programs,~~ and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications~~modification~~ or exceptions~~exception~~ to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications ~~for funding~~ under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.				beginning in 2022 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act by December 2022.
Program 2.i - Inclusionary Housing Regulations – Monitor for Effectiveness To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code~~regulations~~ (SPMC 36.375) in May 2021. The requirements~~regulations~~ emphasize developing on-site inclusionary units as part of all projects with three or more residential units. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375~~The ordinance~~ encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards. On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units and provide an evaluation of the program's effectiveness and any recommended revisions to increase the effectiveness of the program. The review will occur by April of each year starting in 2022 and if revisions are deemed necessary, they will be made when such needs are identified.	Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.	General Fund (Code development); developer obligation (implementation)	Community Development Department	Continue to implement the Inclusionary Housing requirements~~regulations~~ and facilitate the production of 600 lower-income and 300 moderate-income units during the planning period. Review effectiveness of the ordinance~~regulations~~ at producing affordable housing units annually starting in April 2023~~of 2022~~. If revisions to the ordinance~~regulations~~ are deemed necessary after that review, update zoning by the end of 2023~~2022~~, then annually thereafter as revisions are needed.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 2.j – General Plan Affordable Housing Overlay The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.	Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.	General Fund, (for staff resources)	Community Development Department	Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element~~, early 2022~~.
Program 2.k – Affordable Housing Overlay Zone The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.	Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.	General Fund	Community Development Department	Amend zoning to include overlay by October 15, 2024.
Program 2.l – Facilitate Affordable Housing on City-Owned Property The City will utilize~~review all~~ City-owned sites ~~for potential~~ to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low~~, including City Hall~~, and lower income households. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with~~select~~ affordable housing developers that can ~~to act as project partners to~~ maximize the opportunities and~~potential~~ number of ~~affordable~~ units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the first RFP will be issued by 2024, in order to begin construction within two years and complete within the housing element cycle period. A second RFP on an additional inventory site will be issued by 2026. Projects under this program will be expedited in compliance with the SB 35~~SB35~~ streamlined ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives. ~~-~~The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are:	Issuance of building permits for two projects, for a total~~Encourage development~~ of at least 70 ELI, VLI and LI~~60~~ units~~ of affordable housing during the planning period on sites owned by the City~~.	General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications. ~~General Fund~~	Community Development Department (Housing Division)	City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP in 2024 and second RFP in 2026. Building Permit issuance for first project by 2025; two building permits issued by 2029.~~Partner with a developer by 2022 on at least one project and issue building permits by 2025. Create surplus property list by 2023.~~

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
▪ Site 9: Public works yard site ▪ Site 14: City-Owned Parking Lot site (City owns three of the four parcels) The City is already coordinating with the owner of the other parcel on Site 14. Site 9 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 13 in Table VI-50 and will coordinate with the owner of the other parcel on Site 13 to encourage development of housing on that sites ~~will also create a surplus property list~~.				
Goal 3.0 Provide opportunities to increase housing production Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.				
Program 3.a - Rezone and Redesignate Sites to Meet RHNA Redesignating and rezoning the parcels listed in Table VI-50~~46~~ and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 20-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will ~~then~~ implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review.~~the adopted policies.~~ The rezoning of the vacant parcels must be completed within one year~~three years~~ of the	Rezone sufficient sites to address 938~~884~~ units (31.3~~29.5~~ acres) in the lower-income RHNA categories.	General Fund	Community Development Department	Latest ~~Anticipated in 2022; latest~~ date to complete General Plan amendments and rezoning: October 15, 2022~~2024~~

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022~~2024~~. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j~~3.l~~ and 2.k~~3.m~~) in the General Plan and Zoning Code are also addressed by this program.				
Program 3.b - Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan in 2022. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing.	Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.	General Fund	Community Development Department	Ongoing and adopt updated General Plan, ~~and~~ Downtown Specific Plan, and other needed zoning changes by 2022. See also Program 3.a.
Program 3.c – Replacement of Lost Units from Residential Demolitions In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to: ▪ Non-vacant sites ▪ Vacant sites with previous residential uses that have been vacated or demolished.	Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.	General Fund	Community Development Department	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Program 3.d – Enable Parcel Assemblage To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property	Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.	General Fund (legislative efforts); Grant funding (implementation)	City Manager's Office; Community Development Department	Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers/owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2022, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.				property owners, add incentives as appropriate within six months. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Program 3.e – Develop an Electronic Permitting System Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.	All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.	General Fund and grants	Community Development Department	Contract for EPS system – December 2022; approve and implement a system by September 2023~~December 2024~~; ongoing maintenance and system updates as needed.
Program 3.f – Allow and Facilitate ADUs The Zoning Code was amended in May 2021 and again in December~~(effective June~~ 2021~~)~~ to encourage~~allow~~ the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish ~~. The City is also preparing~~ objective design standards and supporting guidelines to apply to ADUs on historic properties. The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties~~will be adopted prior to or shortly after adoption of the Housing Element~~. The City provided ~~a~~ supporting brochures~~brochure~~ that explain~~explains~~ the process and key provisions of the ADU ordinance and the historic preservation provisions. Application ~~, and application~~	Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 383~~368~~ ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029). ~~-~~	General Fund; SCAG grant	Community Development Department	Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.~~Update ADU ordinance Phase 2 (historic properties) by December 2021. Begin~~

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forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time. This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include: ~~▪ Receive technical assistance through SCAG to evaluate permitting practices for ADUs and JADUs and implement improvements~~ ▪ Online application process with staff intake for quality control ▪ Maintain and amend~~develop~~ materials for better applicant guidance, as needed ▪ Provide consistent staff training and support ▪ Look for all opportunities to provide certainty earlier in the process ▪ Reduce the number of steps and shorten timeframes, and ~~▪~~ Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.				~~implementation of improvements based on Southern California Association of Governments (SCAG) technical assistance program grant by June 2022.~~
Program 3.g – Monitor ADU Production The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been	Approve an additional 297 ADUs between January 1, 2022~~2021~~ and October 15, 2029.	General Fund	Community Development Department	Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones~~that~~ if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits

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produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient~~based on the survey to determine whether the rate is 90 percent or more of the total needed~~ to match the projected trendline of 954~~9~~ ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85~~44~~ ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).				then barriers will be identified and rezoning will be completed as called for in Program 3.h.
Program 3.h – Back-up to Address Shortfall in Anticipated ADUs The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its~~their~~ RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval~~completed~~ by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.	Address lower-income RHNA if ADU numbers aren't as high as projected.	General Fund	Community Development Department	Assess barriers including~~Complete~~ any need for~~needed~~ rezoning by the end of 2023 and present to Council for approval by the end of 2024.~~2024.~~ Determine whether other additional programs are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.
Program 3.i – ADU Amnesty Program To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under~~Senate Bill 13 requires under~~ certain circumstances specified by SB 13 and other provisions,~~state law, that~~ enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify~~make~~ the necessary upgrades to bring the unit up to minimum building code health and safety standards. In	Convert all known existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.	General Fund (for staff resources)	Community Development Department	Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach.

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addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.				
Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.	Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.	General Fund	Community Development Department	Develop affordability covenant program and amend fees by July 1, 2023.
Program 3.k – ADU Education, Promotion and Homeowner Outreach A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides~~leads~~ applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc. The City will also make the following efforts to promote ADU development: ▪ Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with	Facilitate the process of ADU development through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.	General Fund, grant funding	Community Development Department	Created~~Create~~ historic property guidelines and brochure. Built~~ by September 2021. Build~~ up the Virtual Planning Desk with complete ADU information~~ by December 31, 2021~~, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

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

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construction costs and inform~~connect~~ ADU owners and renters of such~~with that~~ information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development. ▪ Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly. ▪ Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs. ▪ Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage. ▪ Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.				
Program 3.1 – Increase and Maintain Planning and Housing Staff Resources The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.	Augment and support staff resources to expedite housing projects and implement housing programs.	General Fund	Community Development Department, City Council	City has already advertised~~Advertise~~ new Planning positions ~~by December 2021~~ and aims to be fully-staffed by June 2022. Include the housing division in the 2022-2023 budget and add new staff by December 2022.
Program 3.m – Implement SB 9 and SB 10 These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two	Administration of SB 9 ordinance is ongoing; specific administrative~~Develop a~~ process~~, materials~~ and guidelines for SB	General Fund	Community Development Department	SB 9 implementation began in December 2021~~, by January 2022 and~~ material preparation

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dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption. The City took action by urgency ordinance to establish objective standards in December 2021.~~The City will develop application forms~~ and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. The City will also adopt~~informational materials to create~~ a user-friendly and objective administrative process in compliance with SB 9 within~~and in~~ the context of other City development requirements. The City will also review the provisions of SB 10 to explore whether and how these might be utilized to enhance housing construction, pursuant to a full and extensive public process. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual report to HCD.	9~~objective standards~~ to be developed by December 2022~~accommodate all interested applicants on single-family properties~~; explore potential zoning code amendments pursuant to SB 10.			by December 2022; SB 10 review and consideration by December 2024
Goal 4.0 Compliance with State Housing Laws Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.				
Program 4.a – Land Use Controls – Emergency Shelters In accordance with State law, the City allows~~Zoning Code regulations establishing buffer distances for an~~ emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code ~~are limited~~ to update standards for ~~the establishment of a 300-foot separation distance between~~ emergency shelters in Section 36.350.250 for consistency with Government~~, and Zoning~~ Code Section 65583(a)(4))~~regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population.~~	The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law~~delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use~~ and to establish the maximum number of beds permitted in any one emergency shelter at 30~~46~~ beds.	General Fund	Community Development Department	Adopt zoning amendments within one year of Housing Element adoption.
Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 ~~[—~~2018~~]),~~ the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional	The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.	General Fund	Community Development Department	Complete amendments to Zoning Code by December 2022.

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housing is allowed and if needed, to address AB 2162 for supportive housing. Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.				
Program 4.c – Land Use Controls – Flexible Zoning Regulations The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.	The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.	General Fund	Community Development Department	Ongoing as applications are received.
Program 4.d – ADA Accessibility Standards Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.	Facilitate expanded housing mobility for persons with disabilities by ensuring~~Ensure~~ that new mixed-use and medium- to large-scale residential projects are ADA compliant and~~,~~ provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals.	General Fund	Community Development Department	Amend zoning by 2024.
Program 4.e –Universal Design Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with	Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design.	Community Development Department~~ of Planning and Building~~	General fund, grants	Three years for development of zoning standards and incentives; ongoing application and enforcement of accessibility requirements; ongoing education efforts.

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disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member.				
Program 4.f – Senate Bill 35 Procedure or Policy Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.	Streamline housing projects as required by SB 35.	General Fund	Community Development Department	Complete in 2022.
Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.				
Program 5.a – Fair Housing Education, Outreach, and Services Provide Fair Housing education, outreach, mediation, and referral services through the City Manager's office and the Housing Rights Center (HRC) and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate~~relevant~~. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.	Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with HRC staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.	General fund, State, and federal funds	City Manager's Office; Community Development Department, Housing Rights Center, federal and State agencies	Ongoing
Program 5.b – Encourage a Variety of Housing Types Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts	Diversify~~New~~ housing types in new development throughout South Pasadena ~~includes diverse housing types~~, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.	Community Development Department	General fund, State, and federal funds	Amend zoning for Residential Care Facilities by June 2022. Incorporate the provisions of SB 9 in single-family zones by December 2022. Make additional zoning revisions within three years of Housing

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and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements.						Element adoption; ongoing monitoring and encouragement.
Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide In the 1940's, covenants that restricted the sale of property to Whites or Caucasians only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office.	Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.	General Fund; grants if offered through a State or County program	Community Development Department; Los Angeles County Recorder	Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2022; encouragement of removal from private properties: ongoing.		

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The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.						

6.2 INTRODUCTION

6.2.1 Overview

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

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

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

6.2.2 Purpose and Authority of the Housing Element

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

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

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

Housing Needs Assessment (Section 6.3)

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

Fair Housing Assessment (6.4)

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

Analysis of Constraints on Housing (6.5)

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

Site Inventory and Analysis (Section 6.6)

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

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

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

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

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

Housing Programs (Housing Plan) (Section 6.8)

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

Quantified Objectives

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

6.2.3 Authority and Scope of the Housing Element

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

6.2.4 Public Participation

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

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

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

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

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

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

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

6.2.5 California Environmental Quality Act

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

6.2.6 Relationship to Other General Plan Elements

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

6.3 HOUSING NEEDS ASSESSMENT

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

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

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

6.3.1 Community Profile

The characteristics of a city's population are important factors affecting the housing market in the community. Issues such as population growth, age, race, ethnicity, and employment all help determine the city's housing needs. Table VI-3 compares the population estimates of the City of South Pasadena and Los Angeles County from 1970 to 2019 and shows the projected increase in population growth by 2045. The 1970, 1980, 1990, 2000, and 2010 figures are provided by the U.S. Census and the 2019 figures are an estimate provided by the California DOF. The 2045 figure comes from SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City's population increased between 1970 and 2019 by 14.2 percent with an average annual growth of 0.2 percent. In 2019, the City's population was 26,245. The City's population has represented a small percentage of the County's population at an average of 3 percent since 1970. Since 2010, however, the City's share of the County's population has substantially decreased, indicating that South Pasadena has grown at a slower rate than many other jurisdictions in the County. From the high-level regional perspective provided by SCAG in its local housing data profile for South Pasadena, the city experienced continuous population growth through from 2000 to 2015, increasing by an average of 2.3 percent every five years across this 15-year period, until the population declined slightly by approximately 2.2 percent from 2015 to 2020. The six-county jurisdictional area of SCAG as a whole, on the other hand, has continued to see continuous population growth rate from the beginning of the 21st Century to the year 2020, increasing by an average of 3.6 percent every five years across this 20-year period. Overall, from 2000 to 2020 both the city and the SCAG region saw their populations increase by approximately 4.6 percent and 15.2 percent, respectively. Figure VI-1is a chart from SCAG's Pre-Certified Local Housing Data prepared for South Pasadena showing the population growth trends for the city and compares them with the entire SCAG region. Based on projections from SCAG in the 2020 Regional Transportation Plan/Sustainable Communities Strategy, by 2045, South Pasadena's population could increase to 27,200 residents, an approximate 3.7 percent increase from 2019.

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

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

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

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

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

Table VI-4 describes the population's age composition as provided by the 2010 U.S. Census and 2015-2019 ACS. According to the 2019 ACS, persons aged 18 to 6964 make up the largest age demographic (6764.9 percent) in the City, followed by youth ages 0 to 17 (26.1 percent). The median age of the City's population as of 2019 was 40.1 years.

Table VI-4
POPULATION CHARACTERISTICS

CITY OF SOUTH PASADENA	2010		2019		
	PERSONS	% POP.		PERSONS	% POP.
Total Population:	25,619	100%	Total Population:	25,661	100%
Age Structure:			Age Structure:		
0-17	3,354	23%	0-9	3,453	13%
			10-19	3,234	13%
18-6964	16,032	67%	20-29	2,416	9%
			30-39	3,667	14%
			40-49	4,693	18%
			50-59	3,424	13%
			60-69	2,465	10%
65+	2,772	12%	70-79	1,313	5%
			80+	996	4%
Median Age:	40.1	--	Median age (years)	40.1	--

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

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

Table VI-5
RACE AND ETHNICITY CHARACTERISTICS

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

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

6.3.2 Employment Trends

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

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

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

Source: 2015-2019 ACS DP03: Selected Economic Characteristics

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

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

Source: 2020 SCAG RTP/SCS

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

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

6.3.3 Household Characteristics

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

Household Composition and Size

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

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

Table VI-8
PERSONS PER HOUSEHOLD – 2019

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

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

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

Table VI-9
AVERAGE HOUSEHOLD SIZE

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

Source: California DOF (2007, 2012, 2019)

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

Overcrowding

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

Table VI-10
TENURE BY HOUSEHOLD SIZE

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

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

Table VI-11 identifies the number of persons per room by owner and rental units. Approximately 97 percent of all occupied units had one or less than one person per room in 2018. As a whole, South Pasadena had a relatively low rate of overcrowding in 2018 with approximately 2 percent of all households considered overcrowded, and only 1 percent considered severely overcrowded. Of the renter-occupied units, 213 units (about 4 percent) were overcrowded, , and 66 (about 1 percent) were severely overcrowded. Of the owner-occupied units, 42 units (less than 1 percent) were overcrowded, and 18 units were severely overcrowded. Given such low percentages, it is evident that overcrowding is not a significant housing problem in South Pasadena.

Table VI-11
PERSONS PER ROOM

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

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

Household Income and Income Distribution

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

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

Table VI-12
2018 HOUSEHOLD INCOME BY TENURE

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

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

Table VI-13
HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER

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

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

Support for Lower Income Households

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

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

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

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

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

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

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

6.3.4 Regional Housing Needs Assessment

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

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

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

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

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

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

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

Source: SCAG RHNA, Adopted March 3, 2021

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

6.3.5 Extremely Low-Income Households

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

For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of 757 very low-income units (378 units) represents the additional housing needed to be provided for extremely low-income households. Some extremely low-income households could include household members with mental, physical or developmental disabilities, and special needs. A single senior citizen on a limited amount of fixed income, such as SSI, could also be considered extremely low income. As detailed earlier in this chapter, a greater percentage of extremely low-income households in the city are renter households. Extremely low income households are second only to very low income households in terms of paying more than 30 percent of monthly income towards housing. To address the needs of extremely low-income households with mental, physical, or developmental disabilities, the Housing Element includes a program for providing for housing types for this special-needs group (see Program 2.h) in addition to other programs that would also address extremely low-income households (Programs 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance, Program 2.f - Offer Services to People without Housing, Program 2.g – Expand Senior Housing, Program 2.j – General Plan Affordable Housing Overlay, Program 2.k – Affordable Housing Overlay Zone, Program 3.f – Allow and Facilitate ADUs and the other ADU-related programs, Program 4.a – Land Use Controls – Emergency Shelters, Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers, Program 4.d – ADA Accessibility Standards, Program 4.e – Universal Design, and Program 5.a - Fair Housing Education, Outreach, and Services)).

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

- The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.

- The City adopted an amendment to the Zoning Code to add clarifying language to the definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This will be amended to continue to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.
- Housing Choice Vouchers: Information about Section 8 vouchers, accessible through Los Angeles County, is available on the City's website with this link to County website: https://www.southpasadenaca.gov/residents/housing/.
- The "Housing" webpage was relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.
- HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. According to LACDA, there are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.
- Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.

6.3.6 Special-Needs Groups

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

Table VI-16
HOUSEHOLDS WITH SPECIAL HOUSING NEEDS

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

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

Persons with Disabilities

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

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

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

employment characteristics of this group within the context of the overall South Pasadena labor force.

Table VI-17
DISABILITIES BY TYPE AND AGE OF RESIDENT

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

Source: 2015-2019 ACS: S1810 Disability Characteristics.

Table VI-18
EMPLOYMENT AMONG POPULATION WITH DISABILITY

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

Source: ACS, 2015-2019: S1810 Disability Characteristics

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

the zoning code to allow residential care facilities with seven or more persons to be permitted with the same requirements that apply to other residential uses in the same zone.

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

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

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

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

Persons with Developmental Disabilities

State law also requires that the Housing Element address the housing needs of persons with developmental disabilities. As defined by federal law, "developmental disability" means a severe,

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

Table VI-19
PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE

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

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

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

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

Senior Households

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

According to the 2015-2019 ACS, in 2019, the City of South Pasadena had 3,574 persons aged 65 and over, of which 2,167 were "householders," the primary rent or mortgage payer in a household. The senior population represents approximately 19 percent of the total City population and 22.1%

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

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

AGE	UNITS	PERCENT
OWNER-OCCUPIED		
15 to 24 Years	0	0%
25 to 44 Years	811	17%
45 to 64 Years	2,255	48%
65 Years or older	1593	34%
Total Units	4,659	100%
RENTER-OCCUPIED		
15 to 24 Years	103	2%
25 to 44 Years	2,655	51%
45 to 64 Years	1,836	36%
65 Years or older	574	11%
Total Units	5,168	100%
HOUSEHOLD INCOME	**SENIOR HOUSEHOLDS**	**PERCENT**
Less than $25,000	386	18%
$25,000 to $59,999	539	25%
$60,000 to $99,999	396	18%
$100,000 or more	846	39%
Total Senior Householders	2,167	100%
Total Households	9,827	22.1% (Senior Households of all Households)

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

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

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

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

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

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

Farmworkers

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

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

Large Households

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

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

Single-Parent Households

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

Table VI-21 provides a detailed breakdown of the City of South Pasadena's household composition in 2018. The total number of single-parent households with children in South Pasadena is 766, approximately 12 percent of all family households in the City. This represents a decline of approximately 17 percent from the 924 single-parent households reported in 2010. Female-headed households with children represent 480 or approximately 8 percent of all family households. Male-headed households with children represent 286 or approximately 4 percent of all family households. ~~These data mark significant declines in these populations from the previous housing element planning period.~~ Specifically, female householders with children declined by an approximate 31 percent from 2010 to 2018. Female householders with no children also declined approximately 21 percent over the same period. Single-male householders with children, on the other hand, increased approximately 24 percent from 2010 to 2018, though male-headed households without children declined by approximately 19 percent over the same period. These contrasting trends indicate that all kinds of female-headed households have chosen to leave South Pasadena along with single-male householders without children over the last decade though the motivations for these decisions are unknown. Housing opportunities for lower-income single-parent households with children can primarily be

addressed through rental assistance and the provision of affordable rental units. Program 2.d specifically addresses the need for vouchers for rental assistance and multiple other programs in this Housing Element address the provision of affordable rental units.

Table VI-21
FAMILY HOUSEHOLD COMPOSITION

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

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

Unhoused (Homeless) Persons

In January 2020, the Greater Los Angeles Homeless Count was conducted by the Los Angeles Homeless Services Authority (LAHSA). This Point in Time (PIT) study identified a total population of 15 unsheltered persons in the seven census tracts that comprise the City (Figure VI-2). The 2021 Count was cancelled due to the COVID-19 pandemic. However, the SPPD, which has a continuous program to assist people to find housing when they are present in the city, estimates that approximately 20-25 individuals were sleeping outdoors throughout the City in 2021, with a daytime population of about 30-35 unhoused individuals who choose to receive services in South Pasadena, such as the County's Shower of Hope or Holy Family weekday meal distribution.

Although the PIT count was cancelled in in 2021, LAHSA conducted a count in 2022, which was delayed until February 22nd through 24th. The official results are pending, but South Pasadena police, who participated, indicated that 28 individuals were counted within the City limits. Program 4.a has been updated to ensure that the Code allows for emergency shelters to accommodate the increased number.

Figure VI-2
2020 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA

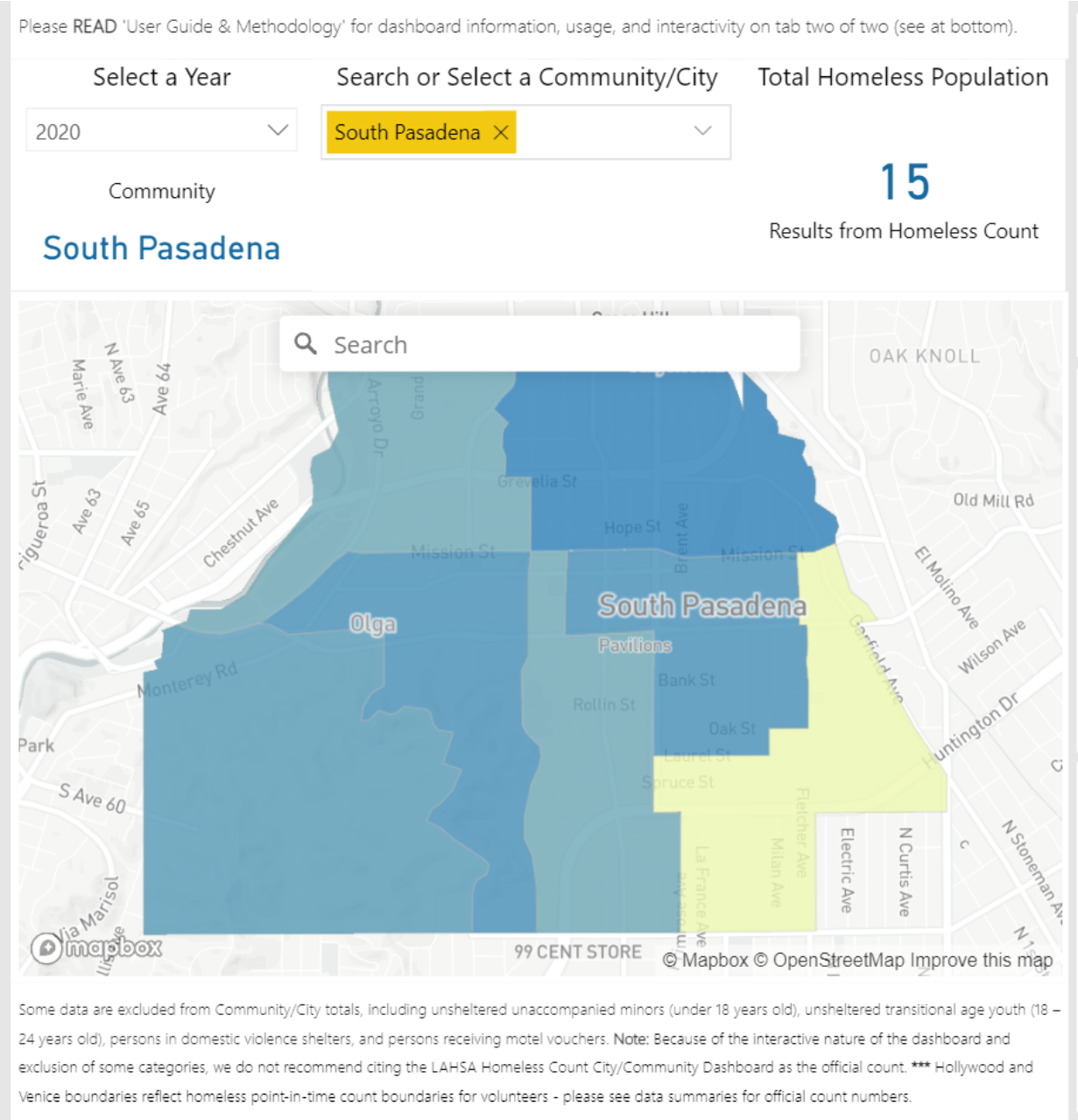
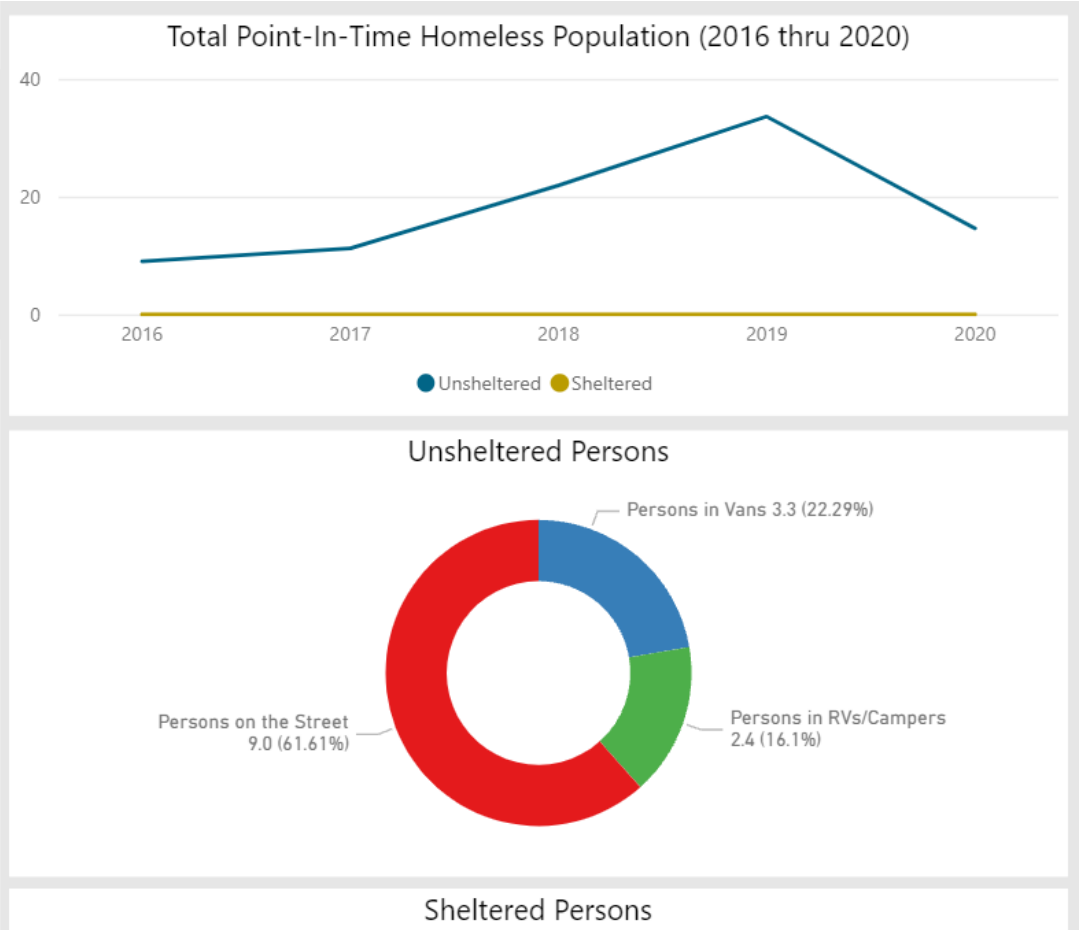


Figure VI-2 (continued)
2020 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA



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

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

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

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

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

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

~~In response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. This led to many unsheltered persons making contact with service providers and finding additional appropriate resources.~~

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

6.3.7 Housing Profile

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

Number of Housing Units

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

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

Table VI-22
HOUSING UNITS BY OCCUPANCY STATUS

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

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

Housing Growth

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

Table VI-23
HISTORIC HOUSING TRENDS: 1980-2019

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

Source: California DOF, 2019, 2020

South Pasadena has high standards for architecture and landscape preservation, and its residents take pride in its appearance. Much of the planning over the last few decades has utilized highly discretionary processes, which may have slowed residential development. Development may have also been hindered by the City's decades-long struggle to reverse the planned 71 Freeway extension, which was finally cancelled by Caltrans. Today, South Pasadena's leadership is taking a different approach to encouraging housing as reflected in the housing programs in this document. Although many discretionary processes are still in place, the City has already implemented quicker and more ministerial permitting through the inclusionary housing ordinance to provide more flexibility for residential projects, particularly through encouraging concessions along with density bonuses for projects that provide affordable housing units. These concessions include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects.

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

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

Housing Type and Tenure

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

Table VI-24
HOUSING UNITS BY TYPE AND OCCUPANCY STATUS

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

Source: California DOF, 2019

Age and Condition of Housing Stock

Compared to more recently planned and developed cities in the state, South Pasadena has a disproportionately older housing stock, due to its proximity to central Los Angeles and early availability of public transportation. It was incorporated in 1888, among the first cities to do so in Los Angeles County.~~therefore having been developed as an early suburb.~~ This can have implications on the overall condition of the housing stock regarding maintenance and repair needs. Policies beginning fifty years ago placed a value on historic preservation of those early built single-family homes, also contributing to the continued presence of many of these older structures, which were

not required to be built to the standards required by more recent building codes for energy efficiency and seismic safety.

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

As illustrated in Table VI-25, approximately 45.9 percent of the city's occupied housing units were built prior to 1949. Since the last housing element, 315 housing units from this era (about 6 percent) have been demolished. Today, nearly 94 percent of the occupied housing stock is over 30 years old, indicating likely rehabilitation needs.

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

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

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

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

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

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

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

The City has authority to enforce ~~and can become deteriorated, creating potential public nuisance. The~~ Code violations on~~Enforcement Division is charged with enforcing~~ residential properties exhibiting characteristics of blight. In the past, enforcement has mostly proceeded based on receiving a complaint. Property owners are first informed to bring the property into compliance with city~~City~~ codes, with additional steps and citations issued if necessary to achieve compliance. Where homeowners are eligible, the City strives to identify programs and to assist lower-income and elderly homeowners to access them.

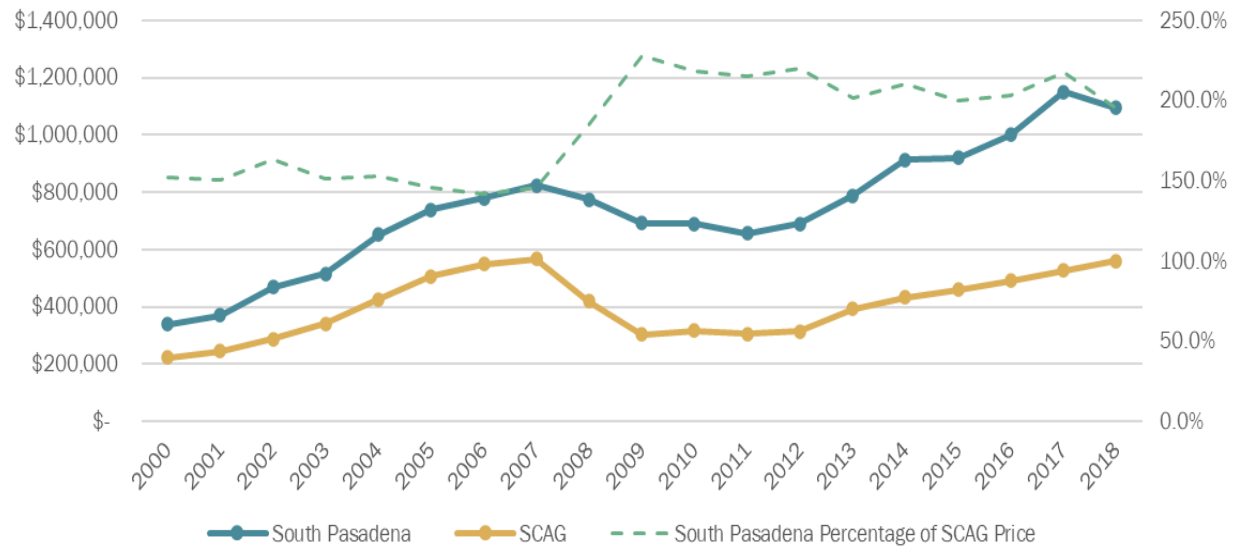
The City is moving toward having the capacity to proactively seek compliance for residential habitability.~~.~~ Program 1.c aims to address the condition of properties identified as being in need of repair, particularly the 46 properties identified below as moderate, substantial and dilapidated, as well as other properties identified over the coming years~~is proposed to ensure units in need of rehabilitation are identified via code enforcement and to identify resources and pursue funding for rehabilitation~~.

~~Home Prices~~

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

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

~~Figure VI-3~~
~~Median Home Sales Price for Existing Homes~~



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

~~*Rental Rates*~~

~~As a snapshot of rental rates for properties in South Pasadena, a search of Zillow.com listings was conducted in April 2020 and again in June 2021, in order to see whether the COVID-19 pandemic had measurably impacted housing affordability in one direction or the other. As seen in Table VI-26, there were some minor fluctuations, with a reduction in the lower end of one-bedroom apartments, from $1,675 to $1,400. However, there was little change in two-bedroom units and the lower end of three-bedroom unit rates had increased. The number of units advertised for rent was nearly the same. While the market was relatively stable during the pandemic throughout the emergency order period, it remains to be seen whether this situation will change with the removal of emergency orders, government subsidies and the eviction moratorium.~~

Table VI-26
HOUSING CONDITION SURVEY SUMMARY 2022~~RESIDENTIAL RENTAL PRICES~~

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

Source: City of South Pasadena Community Development Department, 2022

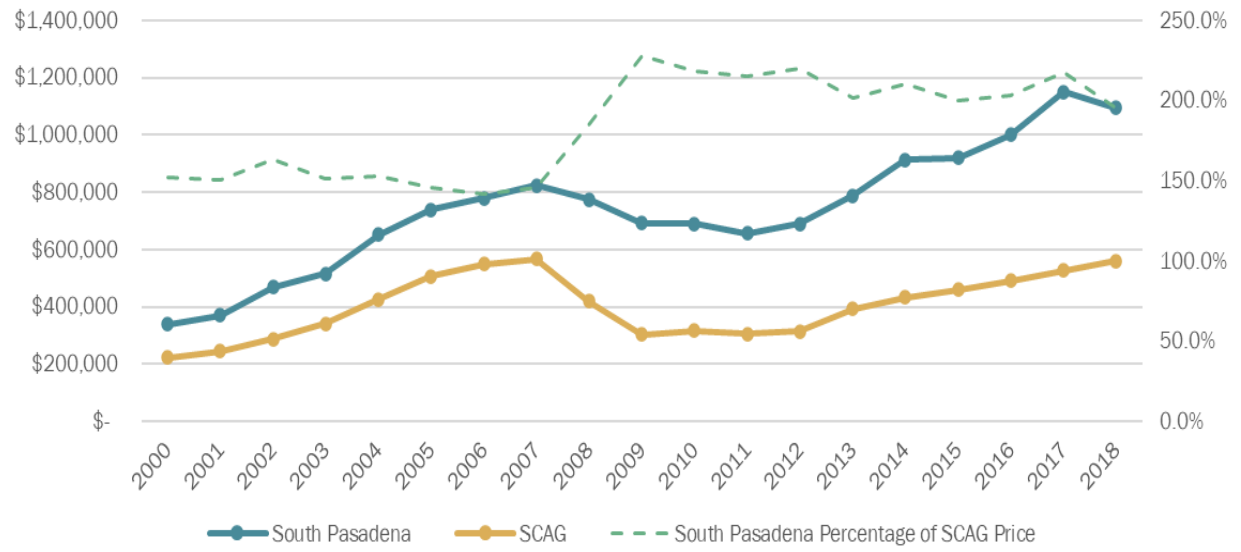
Home Prices

Income is a major factor influencing the demand for housing and to a large extent, reflects the affordability of housing in a community. Between 2000 and 2018, median home sale prices in South

Pasadena increased 223 percent, while prices in the SCAG region increased 151 percent (see Figure VI-3). Prices in South Pasadena have ranged from a low of 142.1 percent of the SCAG region median in 2006 and a high of 228.1 percent of the SCAG region median in 2009.

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

Figure VI-3
MEDIAN HOME SALES PRICE FOR EXISTING HOMES



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

Rental Rates

As a snapshot ~~Online survey~~ of rental rates for properties in South Pasadena, a search of Zillow.com ~~price~~ listings was conducted in ~~on Zillow (accessed~~ April ~~2,~~ 2020 and again in June 2021, in order to see whether the COVID-19 pandemic had measurably impacted housing affordability in one direction or the other. As seen in Table VI-27, there were some minor fluctuations, with a reduction in the lower end of one-bedroom apartments, from $1,675 to $1,400. However, there was little change in two-bedroom units and the lower end of three-bedroom unit rates had increased. The number of units advertised for rent was nearly the same. While the market was relatively stable during the pandemic throughout the emergency order period, it remains to be seen whether this situation will change with the removal of emergency orders, government subsidies and the eviction moratorium. ~~2, 2021).~~

~~***Housing Costs and Affordability***~~

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

~~income groups. The tables use Tables VI-27 and VI-28 examine the costs of home ownership or renting compared to the HUD household income categories to get a picture of housing affordability in South Pasadena based on 2014-2018 CHAS data, the most recent data available that is broken down to support this type of analysis. The tables show the overpayment burdens by housing costs that are either 30 percent and above, moderate overpayment or 50 percent and above, severe overpayment (the moderate overpayment data includes people severely overpaying). The data show that more than 73% of very low and low income households that own their homes overpay and are therefore burdened by housing costs. Many may be fixed-income seniors, given the high percentage of seniors in the home ownership data. The rental burden is even higher, with 95 percent of very low and 77 percent of low-income households paying more than 30 percent of their incomes for housing.~~

Table VI-27
RESIDENTIAL RENTAL PRICES

~~**Table VI-27**~~
~~**HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018**~~
~~**OWNER-OCCUPIED HOUSING UNITS**~~

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

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

Housing Costs and Affordability

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

Tables VI-28 and VI-29 examine the costs of home ownership or renting compared to the HUD household income categories to get a picture of housing affordability in South Pasadena based on 2014-2018 CHAS data, the most recent data available that is broken down to support this type of analysis. The tables show the overpayment burdens by housing costs that are either 30 percent and above, moderate overpayment or 50 percent and above, severe overpayment (the moderate overpayment data includes people severely overpaying). The data show that more than 85 percent of extremely low, 94 percent of very low, and 59 percent of low income households that own their homes pay more than 30 percent of their incomes for housing and are therefore burdened by housing costs. Many may be fixed-income seniors, given the high percentage of seniors in the home ownership data. The rental burden is higher, with 77 percent of extremely low, 95 percent of very low and 77 percent of low-income households paying more than 30 percent of their incomes for housing. ~~, 2020 HCD Income Limits~~

Table VI-28
HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018 OWNER~~2016~~
~~RENTER~~-OCCUPIED HOUSING UNITS

INCOME GROUP	TOTAL	MORE THAN 30% ~~OR MORE~~		MORE THAN 50% ~~OR MORE~~	
EXTREMELY LOW-INCOME	265	225	85%	175	66%
Less than $33,800					
VERY LOW-INCOME:	250~~1195~~	235~~999~~	94~~84~~%	205~~835~~	82~~70~~%
Between $33,801 and~~Less than~~ $56,300					
LOW-INCOME:	365~~755~~	215~~585~~	59~~77~~%	130~~90~~	36~~12~~%
Between $56,301 and $90,100					
MODERATE-INCOME:	335~~725~~	130~~390~~	39~~54~~%	80~~45~~	24~~6~~%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	4,670~~2,665~~	1,370~~10 0~~	29~~4~~%	680~~0~~	15~~0~~%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

~~Table VI-29 provides regional household incomes and maximum housing costs that are considered affordable for Extremely Low/Very Low /Lower/Moderate Income households applicable to Los Angeles County jurisdictions. A typical four-person extremely low-income household can afford no more than a maximum sales price of $83,666, a four-person very-low income household can afford no more than $184,513, a four-person low-income household can afford no more than $335,494, and a four-person moderate-income household can afford no more than $403,212 on a home for sale. Table VI-27 shows projected affordable housing costs for extremely low-income, very low-income, low-income, and moderate-income households in South Pasadena by household size.~~

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

~~**Table VI-29**~~
~~**AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS**~~

INCOME GROUP	TOTAL	30% OR MORE		50% OR MORE	
EXTREMELY LOW-INCOME	760	584	77%	580	76%
Less than $33,800					
VERY LOW-INCOME:	435~~1195~~	415~~999~~	95~~84~~%	255~~835~~	59~~70~~%
Between $33,801 and ~~Less than~~ $56,300					
LOW-INCOME:	755	585	77%	90	12%
Between $56,301 and $90,100					
MODERATE-INCOME:	725	390	54%	45	6%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	2,665	100	4%	0	0%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

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

~~*Assisted Housing at Risk of Conversion*~~

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

~~There are a few smaller projects with deed-restricted affordable units, however, including one entitled in 2020. As new projects are developed in compliance with the recently-adopted Inclusionary Housing Ordinance requirements, and when affordable projects built by non-profit housing corporations build based on new incentives, the City will update and maintain a list of all dwellings in the City that are subsidized by government funding or low-income housing developed through local regulations or incentives and their covenant expiration dates (Program 1.d), in compliance with state law. The City will contact all property owners and notify them of the legal requirements to~~

~~provide notice prior to the conversion of any units for lower-income households to market-rate units, although this will not be within the planning period of this housing element.~~

~~6.3.8 Summary of Housing Needs~~

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

~~Table VI-31~~
Table VI-30
AFFORDABLE~~SUMMARY OF EXISTING AND PROJECTED~~ HOUSING INCOME LIMITS AND COST PROJECTIONS~~NEEDS~~

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

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

Assisted Housing at Risk of Conversion

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

There are a few smaller projects with deed-restricted affordable units, however, including one entitled in 2020. As new projects are developed in compliance with the recently-adopted Inclusionary Housing Ordinance requirements, and when affordable projects built by non-profit housing corporations build based on new incentives, the City will update and maintain a list of all dwellings in the City that are subsidized by government funding or low-income housing developed through local regulations or incentives and their covenant expiration dates (Program 1.d), in compliance with state law. The City will contact all property owners and notify them of the legal requirements to

provide notice prior to the conversion of any units for lower-income households to market-rate units, although this will not be within the planning period of this housing element.

6.3.8 Summary of Housing Needs

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

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

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

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

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

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

~~**Housing Affordability for Low to Moderate Income Households –** Affordability projections (Table IV-29) indicate that home ownership is not feasible for households that fall into the categories of extremely low-income, very-low income, or lower-income. Moderate income households may be able to pay just over $400,000, a price that would require subsidy through the inclusionary housing requirement or an affordable housing developer. Rental prices in South Pasadena are similarly not feasible for lower income households, although the lower end of available rentals is within reach for moderate income households. This analysis is consistent with the high level of overpayment shown by the data for lower income households.~~

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

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

6.4 FAIR HOUSING ASSESSMENT

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

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

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

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

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

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

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

6.4.1 Outreach

As discussed in Section 6.2.5, Public Participation, multiple workshops, surveys, and hearings were conducted in conjunction with the preparation of this Housing Element. Translation was offered to participants; however no translation requests were received for meetings for the Housing Element Update. Two rounds of workshops were held in spring and fall of 2020 and six hearings took place between July 2020 and January 2021, five of which took place at the Planning Commission and one of which took place at a meeting of the City Council. All events were open to all members of the public, organizations providing community service in the City, and affordable housing developers. Additionally, two surveys were conducted, one of which ran from May to September of 2020, with the second running from September through October of 2020. Letters were received from members of the public, including some that described issues related to housing discrimination, urging the City to acknowledge and address the history and a legacy of fostering a community that lacks diversity.

6.4.2 South Pasadena History

Like many cities in the state, South Pasadena's disproportionately low percentage of people of color relative to the local County median was the result of policies throughout the early 20th century, which – though legal at the time – prohibited home ownership by non-whites. The following history

provides some context and acknowledgement of discrimination in the past to recognize that South Pasadena must affirmatively advance equality in housing opportunities to all persons regardless of ethnic group or race, so that all are offered the opportunity to live in and benefit from the high level of resources and quality of life available in South Pasadena.

Incorporated in 1888, South Pasadena was one of the first municipalities in the Los Angeles area and has featured relatively stable boundaries since initial incorporation, even as its population has grown dramatically. With roots as an agricultural community growing mostly citrus, South Pasadena eventually become a streetcar suburb of Los Angeles with the extension of a Pacific Electric transit line to the City in the early twentieth century. The City grew quickly, seeing high double-digit and even triple-digit decadal growth rates between 1900 and 1930. Low double-digit decadal growth continued until the mid-twentieth century, when most of South Pasadena's land was almost completely built out. Since this time, the population of South Pasadena has generally fluctuated within a range of approximately 22,000 to 25,000 residents. These historical trends are reflected in South Pasadena's development pattern, with the oldest neighborhoods lying close to the former streetcar lines and newer development in more distant and hilly areas that would, in earlier times, have been less accessible. The more central portions of the City that were close to the historical streetcar lines are also the areas that feature most of the City's multifamily housing, including units that may be more affordable to households with medium or lower incomes. Additional areas of multifamily housing are found in the northern and especially northeastern areas of the City.[2]

Though racial covenants at one time were allowed under the law, lawsuits in South Pasadena and communities across the country eventually led to the Supreme Court overturning covenants with restrictions based on race and religion. However, though not allowed to be enforced by the courts, action by private sellers persisted covertly throughout the Los Angeles region for many years afterward in the mid-twentieth century, and it was not until the 1960s that non-whites slowly began to be able to buy homes in areas with histories of overt racial exclusion, including South Pasadena. Although such government-sanctioned forms of discrimination have long-since been eliminated and the population in South Pasadena has diversified over time, remnants of the previously discriminatory policies remain in the distribution of populations throughout many areas of the City compared to what is seen in other nearby communities. With the current high residential property values discussed earlier in this chapter, the cost of moving into South Pasadena is now the primary barrier for households seeking to locate within South Pasadena.

6.4.3 Assessment of Fair Housing Issues

California Government Code Section 65583(c)(1)(C)(10)(A)(ii) requires the City of South Pasadena to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. According to the California Tax Credit Allocation Committee (TCAC)/HCD 2020 Opportunity Areas Map, the entirety of the City of South Pasadena is considered a "Highest Resource" area (Figure VI-4). Highest Resource areas are those with the highest index scores for a variety of educational, environmental, and economic indicators. Some of these indicators include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentrations of poverty, and low levels of environmental pollutants, among other factors. The universal designation of Highest Resource areas across the entirety of South Pasadena is likely a result

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

of strong educational institutions and good environmental indicators in most, if not all, of the City, which have resulted in high property values.

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

Unless otherwise noted, the following maps and analysis rely on data provided at the Census-tract level by various state and federal agencies, including the California Tax Credit Allocation Committee and Department of Housing and Community Development[3]; 2010 Census[4]; 2006-2010[5], 2010-2014[6], and 2015-2019[7] American Community Surveys; Esri's 2018 Updated Demographic estimates[8]; California School Campus Database (CSCD)[9]; 2014 Longitudinal Employer-Household Dynamics (LEHD)[10]; and the California Health and Human Services Agency[11]. All data presented in the maps included in this assessment was collected through the AFFH Data Viewer mapping tool, a tool developed and approved by HCD for use in assessment of fair housing analyses as the most current and accurate data available[12]. The tract level was selected because geospatial and demographic data were most consistently available at this scale for South Pasadena, and the scale remained detailed enough to allow for neighborhood-level consideration of fair housing issues. This approach was developed in consultation with HCD and in conjunction with efforts to develop standardized statewide datasets for fair housing analyses.

6.4.4 Patterns of Integration and Segregation

Since 2017, the California Tax Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, including proximity to job opportunities; quality of schools; environmental health and safety; and other economic, social, and environmental indicators—in an effort to provide evidence for policy recommendations[13]. This effort has been dubbed "opportunity mapping," and it is available to all jurisdictions in California to evaluate access to opportunities within their communities. As previously stated, the City of South Pasadena has been categorized as "highest resource" by TCAC and HCD, compared to Los Angeles County (see Figure VI-4), meaning that South Pasadena has been identified as having strong educational opportunities, a balanced jobs-housing ratio, high property values, a

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

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

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

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

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

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

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

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

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

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

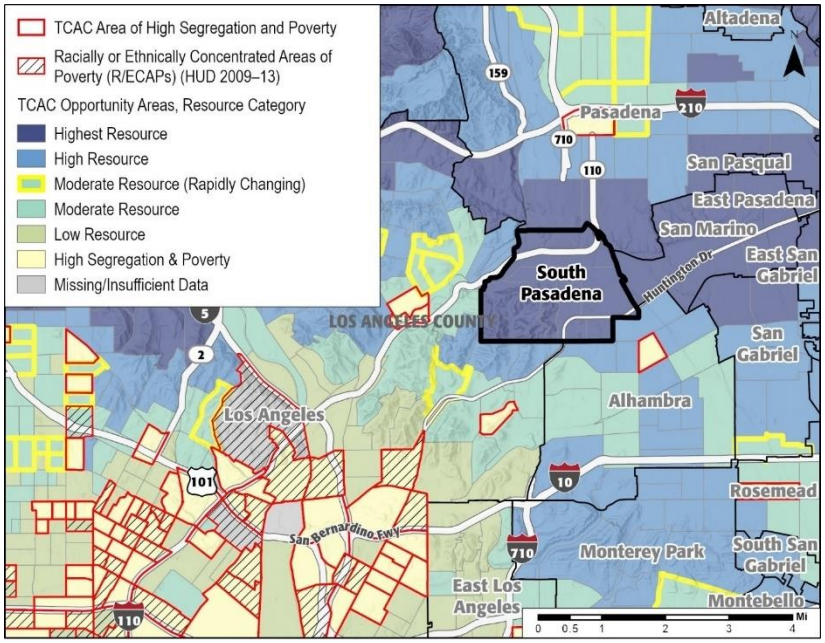
[13] California Tax Credit Allocation Committee and Housing and Community Development Department. *California Housing Task Force: Methodology for the 2020 TCAC/HCD Opportunity Map*, June 2020. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf

high median income, and other positive conditions. In areas with lower resource designations than South Pasadena, these indicators of success do not present as strong of opportunities, which may include more limited access to jobs, lower home values, a shortage of outdoor recreational space, and more. The trends and factors that resulted in these patterns of access to resources and other fair housing issues may stem from historical patterns or current practices.

6.4.5 Areas of High Segregation and Poverty

Figure VI-4 also shows that South Pasadena does not include any federally designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)[14] or TCAC-designated Areas of High Segregation and Poverty. However, there are some TCAC Areas of High Segregation and Poverty located in relatively close proximity to South Pasadena, and numerous Areas of High Segregation and Poverty as well as R/ECAPs located further to the south and west in the City of Los Angeles. As shown in Figures VI-5 through VI-7, the City of South Pasadena has relatively low rates of poverty, especially when compared to the surrounding region. Areas with higher rates of poverty surrounding South Pasadena include the City of Los Angeles to the south and west; Pasadena to the north; Glendale to the northwest; and Alhambra, San Gabriel, and Rosemead to the south and east. San Marino to the east has poverty rates that are roughly equivalent to or lower than South Pasadena.

Figure VI-4
TCAC/HCD Opportunity Areas



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

The City of South Pasadena does not have racially concentrated areas of affluence (RCAAs). RCAAs are in direct contrast to R/ECAPs and are defined as a census tract in which 80 percent or more of the population is white and has a median income greater than $125,000 annually[15]. While the median

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

[15] Edward G. Goetz, et al, "Racially Concentrated Areas of Affluence: A Preliminary Investigation," *Cityscape: A Journal of Policy Development and Research* Volume 21, Number 1 (2019): 99.

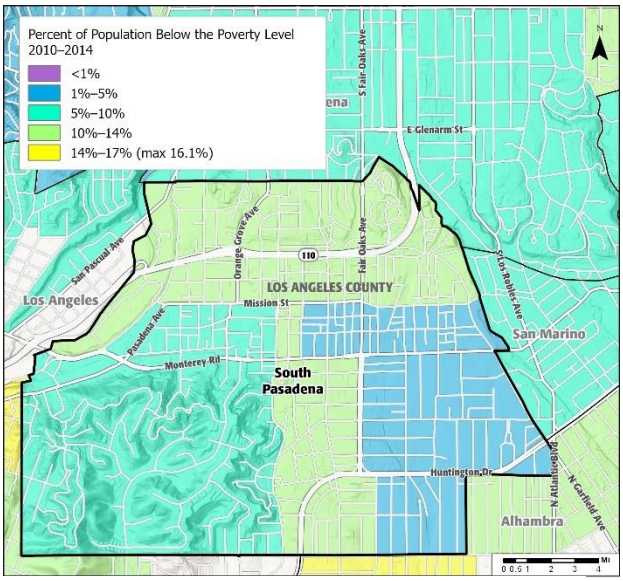
~~income varies across block groups in South Pasadena, no areas of concentrated affluences are tied with areas of extremely low diversity. Most RCAAs in the SCAG region are located in coastal communities while inland suburban communities do not reflect this pattern.~~

~~6.4.6 Poverty Rates~~

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

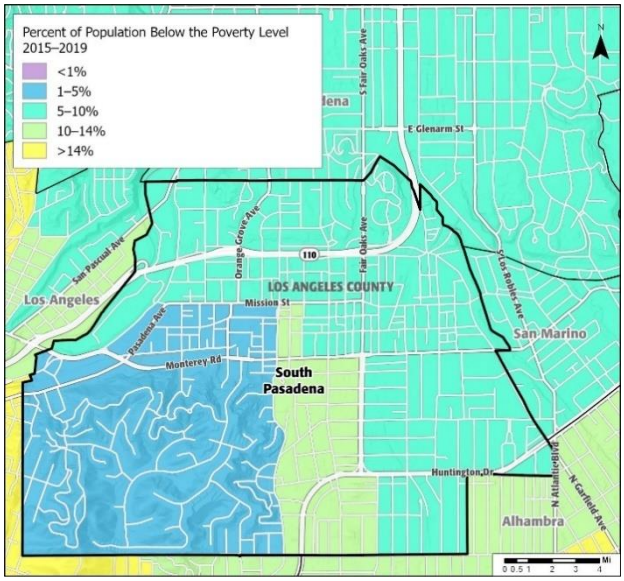
~~The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less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

~~Figure VI-5~~
~~Local Poverty Rates 2010–2014~~



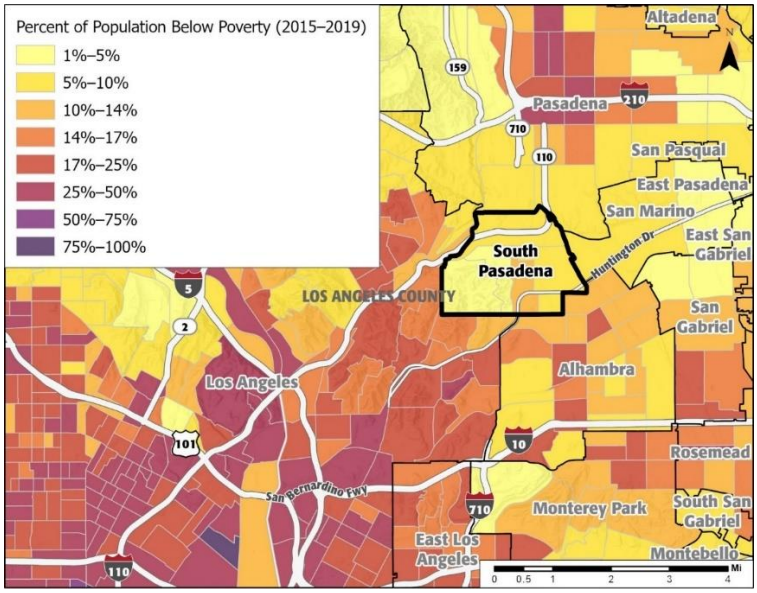
~~Source: U.S. Census Bureau, 2010-2014 American Community Survey~~[7]

~~Figure VI-6~~
~~Local Poverty Rates 2015–2019~~



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

Figure VI-7
Regional Poverty Rates 2015-2019

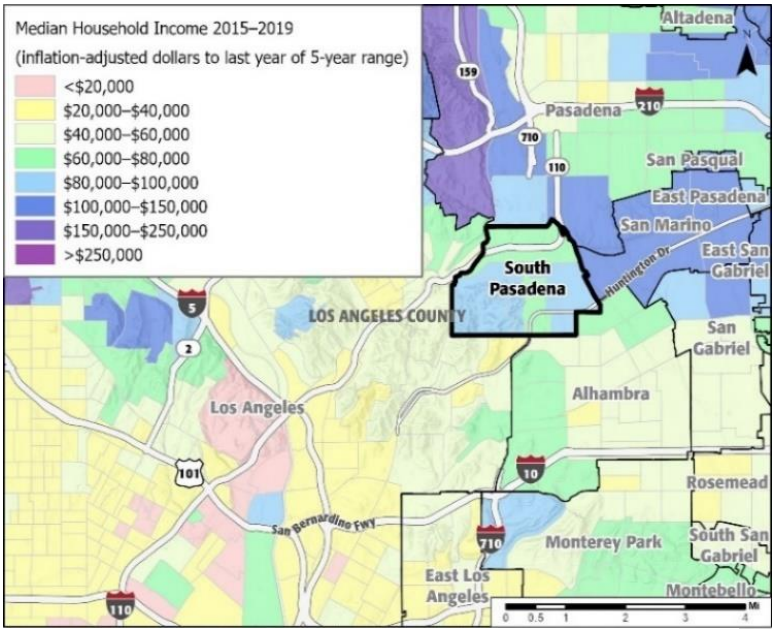


Source: U.S. Census Bureau, 2015-2019 American Community Survey

6.4.7 South Pasadena Household Income and Affordability as a Fair Housing Consideration

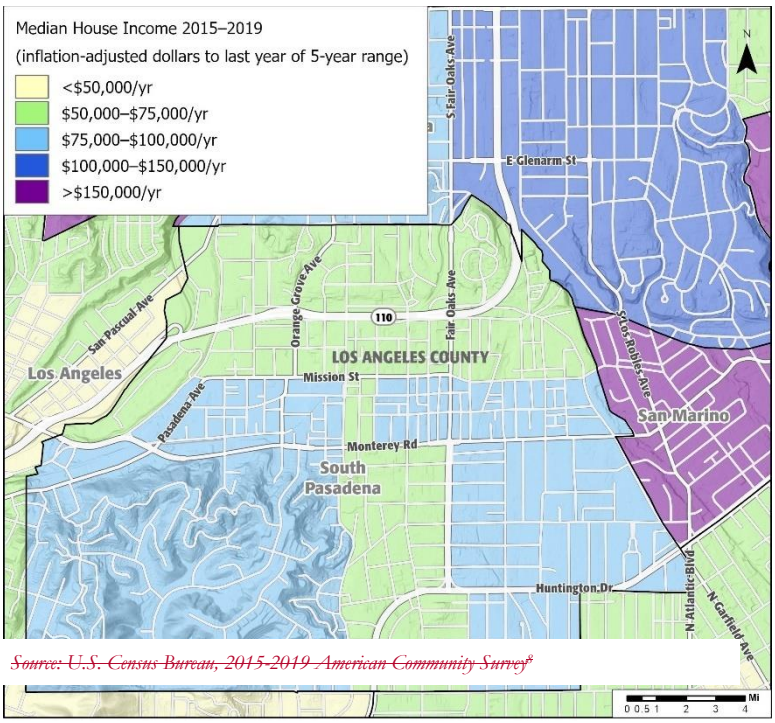
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes tend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

~~Figure VI-8~~
~~Regional Median Income 2015-2019~~



~~Source: U.S. Census Bureau, 2015-2019 American Community Survey~~

~~Figure VI-9~~
~~Local Median Income 2015-2019~~



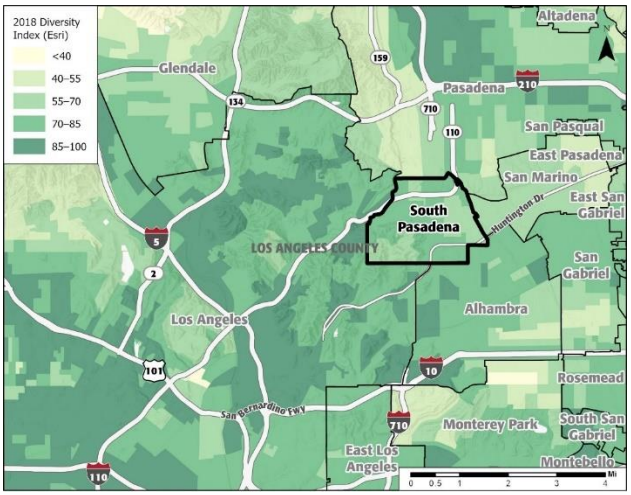
~~Source: U.S. Census Bureau, 2015-2019 American Community Survey~~

~~6.4.8 Ethnic Diversity~~

~~With respect to ethnic diversity, as shown in Figure VI-10, most areas of Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the north, such as Pasadena. Additionally, Figure VI-10 shows that in much of South Pasadena, the white~~

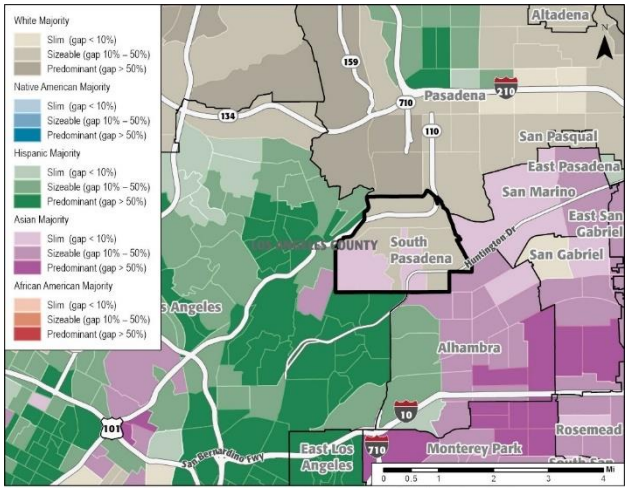
~~population is a majority in terms of ethnic composition, with some areas featuring Asians as a majority. This contrasts with cities and communities within the City of Los Angeles to the south and west of the City of South Pasadena, which tend to have more significant majorities of Asian and Latino populations. Of note, in contrast to its neighboring cities, South Pasadena does not have any ethnic group that shows up as a "predominant" gap (more than 50% of the population) as shown in Figure VI-11, although about three-quarters of the city has a "sizeable" gap of white population (between 10% and 50%). As shown in Figure VI-12; the emerging trend is that South Pasadena is experiencing rising levels of diversity, with most of the City seeing increases in diversity index levels from 2010 to 2018. To ensure that racial/ethnic background does not present a barrier to fair housing opportunities, the City will continue to partner with regional organizations to educate tenants, property managers, and real estate professionals about fair housing regulations, serve to mediate/enforce with respect to fair housing issues, as described in Program 5.a, Fair Housing Education, Outreach, and Services.~~

~~Figure VI-10~~
~~Regional Diversity Index 2018~~



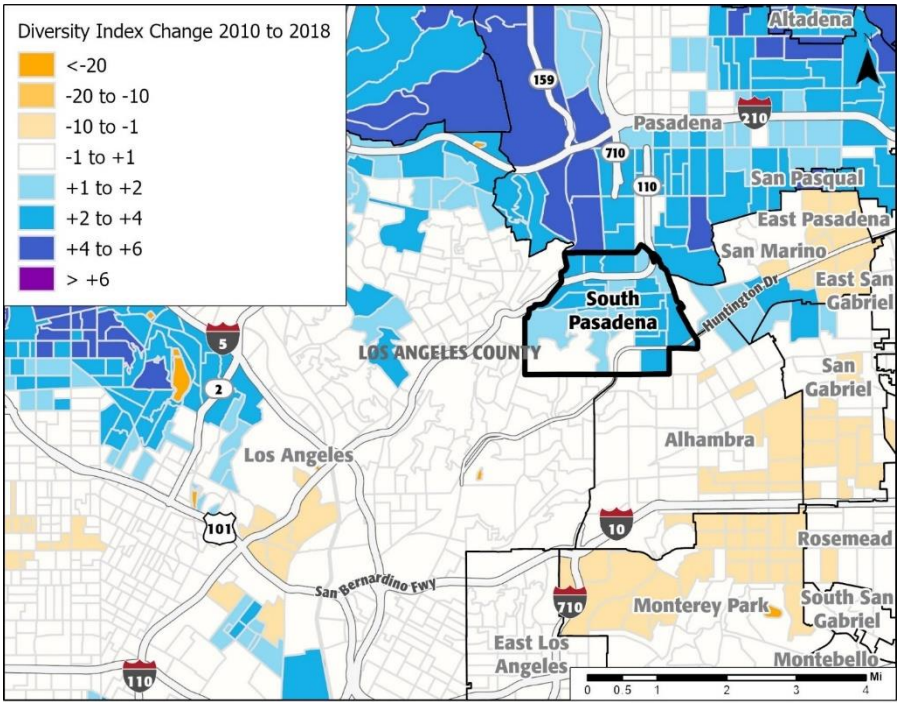
~~*Source: Esri, 2018/2023 Updated Demographic Estimates*~~[4]

~~Figure VI-11~~
~~Regional Ethnic Predominance~~



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

~~Figure VI-12~~
~~Regional change in Diversity Index 2010-2018~~

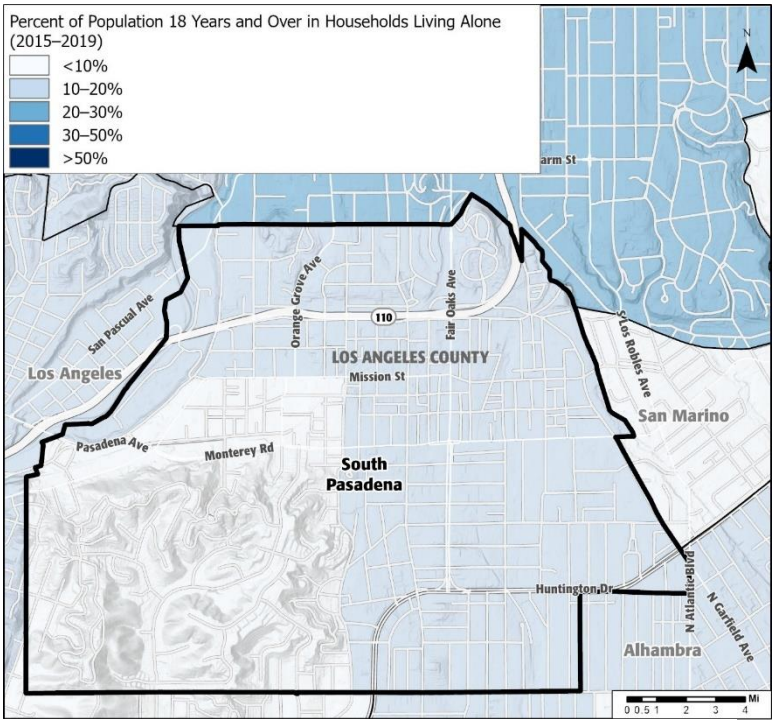


~~Source: Esri, 2018/2023 Updated Demographic Estimates~~

~~6.4.9 Single-Person Household Distribution~~

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

~~Figure VI-13~~
~~Percent of Population 18 years and Over in Households Living Alone~~

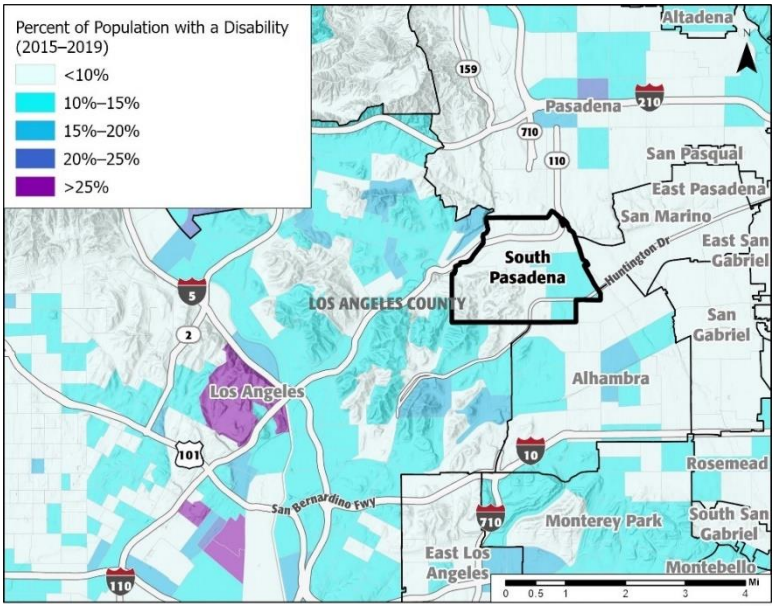


*~~Source: U.S. Census Bureau, 2015-2019 American Community Survey~~**

~~6.4.10 Fair Housing for Persons Living with Disabilities~~

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

Figure VI-14
Regional Percent of Population Living with a Disability



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

6.4.11 Fair Housing for Seniors

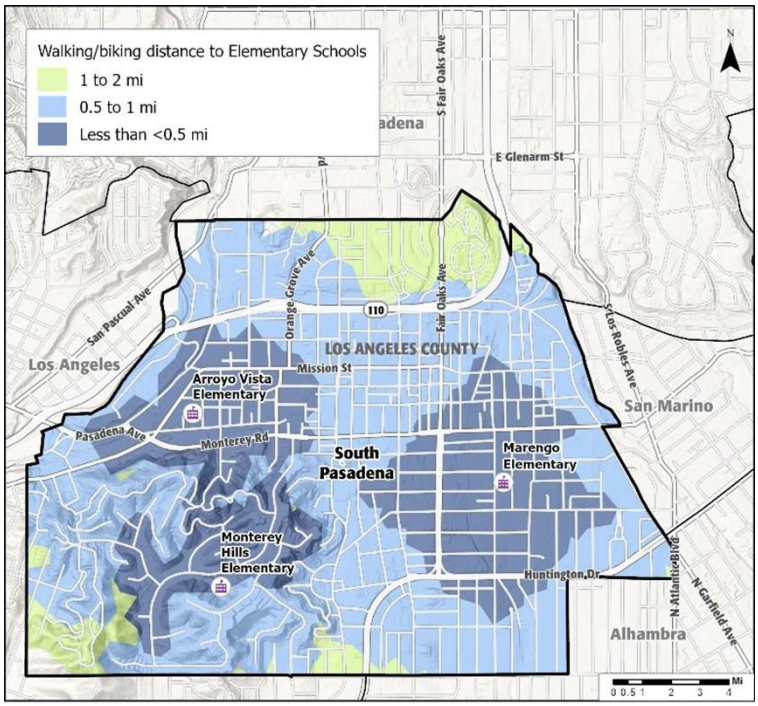
To meet the needs of the older population and other individuals with disabilities, there are three assisted living facilities in South Pasadena, all located near the historic Downtown. Additional assisted living facilities are available in surrounding communities. Additionally, the City of South Pasadena offers "Dial-A-Ride," a reservation-based, curb-to-curb paratransit service, to residents within City limits, with service to some medical offices in Pasadena, San Marino, Arcadia, and Alhambra. The City requires new developments to comply with Title 24 of the California Building Code to ensure that all new construction meets accessible design standards, thus ensuring that all new multifamily housing is accessible for all residents regardless of disability and promoting accessibility in all housing design. Furthermore, the City ensures that existing housing that may not meet the same accessibility requirements can be adapted as needed through their reasonable accommodation process, discussed in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.12 Access to Opportunity: Education Resources

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

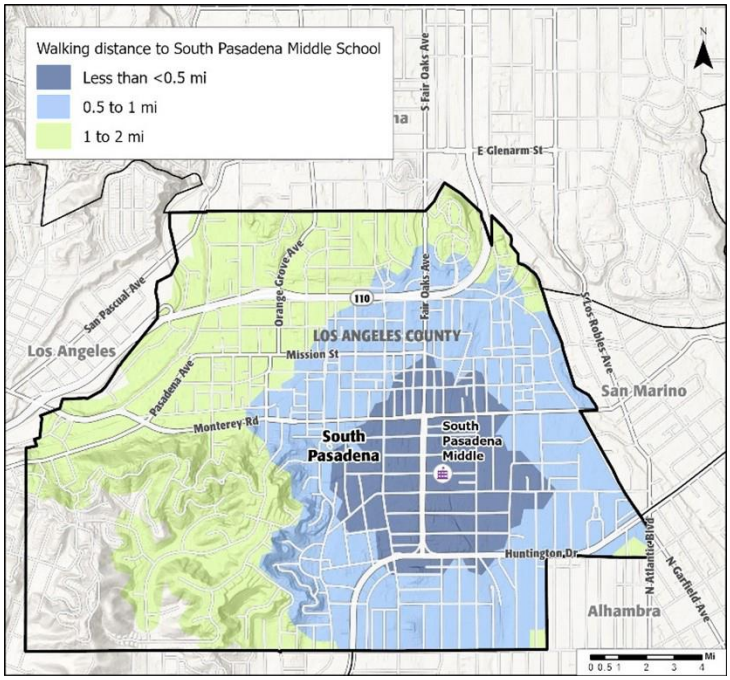
~~Angeles; and the California Institute of Technology; among others. Altogether, this means that virtually the entirety of South Pasadena enjoys strong access to educational opportunity at all grades and education levels.~~

~~Figure VI-15~~
~~Approximate Walking Distance to South Pasadena Elementary Schools~~



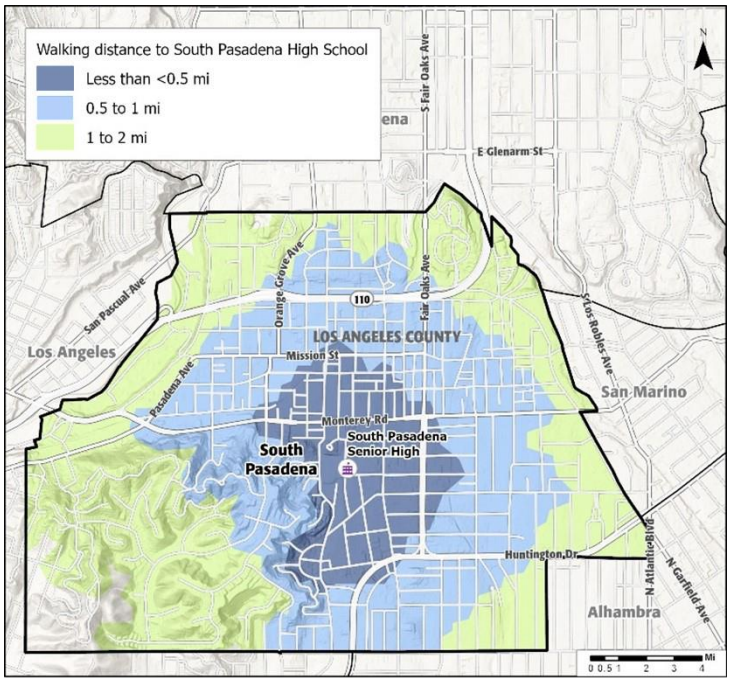
~~Source: GreenInfo Network, California School Campus Database, 2021~~[40]

~~Figure VI-16~~
~~Approximate Walking Distance to South Pasadena Middle School~~



~~Source: GreenInfo Network, California School Campus Database, 2021~~[40]

Figure VI-17
Approximate Walking Distance to South Pasadena High School



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

6.4.13 Access to Opportunity: Public Transportation Resources

South Pasadena residents are served by the Los Angeles County Metropolitan Transportation Authority (Metro) system, which offers light rail, rapid bus, and local/limited bus lines serving South Pasadena and the surrounding area. A variety of transit types and routes are available to residents of South Pasadena to connect them to the historic Downtown, downtown Los Angeles, and crosstown destinations such as medical facilities, jobs, and other services and resources. Areas along Fair Oaks Avenue and Mission Street, especially near the Metro L Line stop, tend to have the best transit service in South Pasadena, while areas in the Monterey Hills neighborhood in the southwest portion of the City have less accessibility to public transportation. However, despite these minor differences in access to transit, AllTransit has given transit in the City of South Pasadena a performance score of 8.5 out of 10, compared to scores of 6.8 in Los Angeles County overall and 5.5 for the SCAG region as a whole[16]. In addition to a strong transit performance score, LA Metro has also approved and begun to implement a program to phase in free travel for all patrons by 2023, as opposed to a standard far of $1.75 for buses and trains currently or discounted rates for seniors, individuals with disabilities, and college and K-12 students.

With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station in Downtown Los Angeles is approximately 17 minutes from South Pasadena and approximately 6 minutes to Pasadena on weekdays. The 260/762 Rapid lines provide service from roughly 5 a.m. to 11 p.m. on weekdays, with later starts on weekends and Sundays, and peak headways

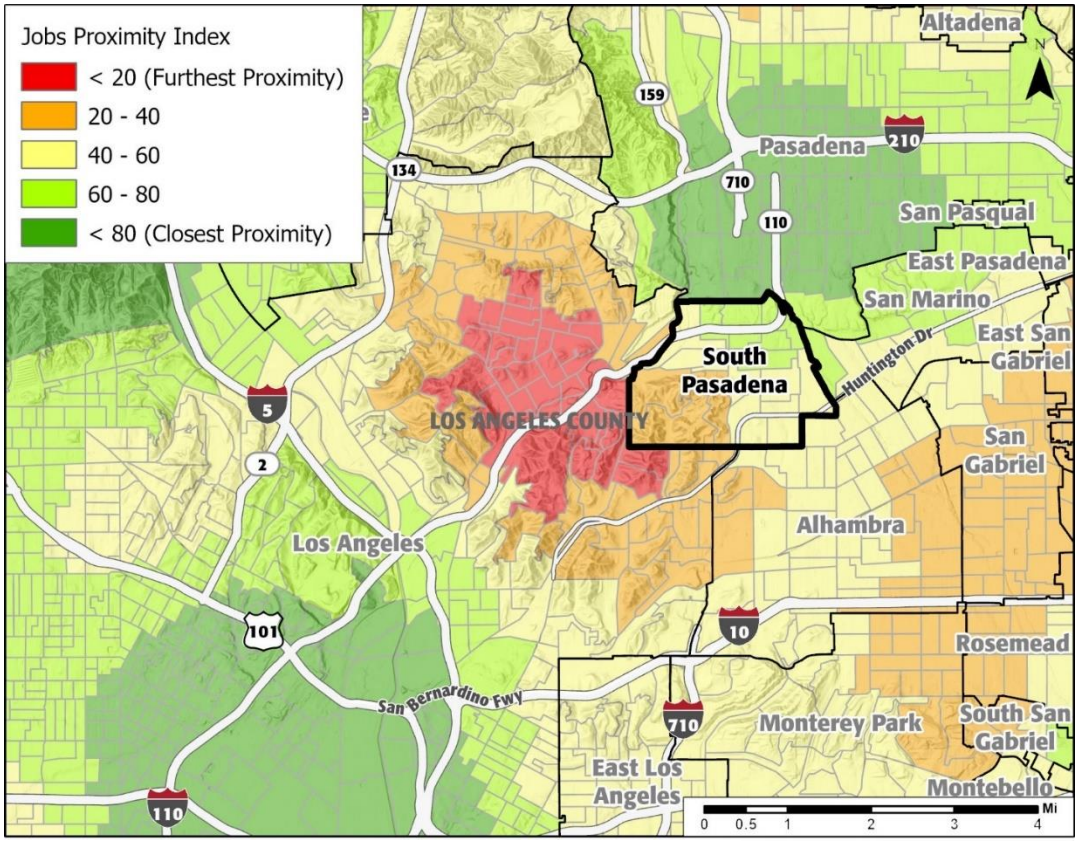
[16] AllTransit is a data tool developed by the Center for Neighborhood Technology (CNT) that includes stop, route, and frequency information for 902 transit agencies in metropolitan areas. https://alltransit.cnt.org/about-the-data/

of roughly 20 minutes and off-peak headways of roughly 30 minutes. Overall, much of the City's planned housing, including affordable housing, is in close proximity to these transit lines.

6.4.14 Access to Opportunity: Employment Proximity

In 2017, HUD developed the Jobs Proximity Index as an assessment of accessibility to jobs from a given residential census block neighborhood[17]. The index measures the distance to jobs from each neighborhood, placing a higher weight on larger employment centers that offer more job opportunities. This function provides a general estimate of residential neighborhoods proximity to a large number of job opportunities. As shown in Figure VI-18, most residential neighborhoods in South Pasadena have moderate access to jobs compared to the region, with no areas of the City having the "closest" or "furthest" proximity to jobs. The southwest portions of the City have the most limited access to jobs according to HUD's analysis, and areas in the northern portions of the City have closer access, most notably to job centers to the north in Pasadena. With an average commute time of 31 minutes, South Pasadena has somewhat longer commutes than the national average, but a similar average to Los Angeles County and California overall, according to American Community Survey estimates. Neighboring cities, including Los Angeles, San Marino, and Pasadena, have respective average commute times of approximately 31, 30, and 29 minutes.

Figure VI-18
Regional Jobs Proximity Index



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

[17] United States Housing and Urban Development Department. *Jobs Proximity Index*, August 10, 2017. https://www.arcgis.com/home/item.html?id=4e2ef54b88084fb5a2554281b2d89a8b

6.4.15 Fair Housing: Environmental Health Concerns

A disadvantaged community or environmental justice community ("EJ Community") is identified by the California Environmental Protection Agency ("Cal EPA") as "areas that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need.[18] In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25 percent highest score census tracts) are those that have been designated as disadvantaged communities under SB 535.[19] The cumulative score for each census tract includes an exposure score, with a low score being a positive outcome, for each of the following:

- "Ozone concentrations
- PM2.5 concentrations
- Diesel particulate matter emissions
- Drinking water contaminants
- Children's lead risk from housing for children
- Use of certain high-hazard, high-volatility pesticides
- Toxic releases from facilities
- Traffic impacts[20]"

Communities that are identified as disadvantaged communities based on their cumulative pollution exposure score are targeted for investment through the State cap-and-trade program. However, the condition of these communities pose fair housing concerns due to disproportionate exposure to unhealthy living conditions. In the City of South Pasadena, the cumulative scores of each census tract range from a high of the 30th percentile (south of Monterey Road between Meridian Avenue and Fair Oaks Avenue/Primrose Avenue) to a low of the 9th percentile (southwestern corner of the city and southeastern corner of the city). These scores indicate that there are no areas within the City of Pasadena that meet the criteria to be identified as a disadvantaged community by COEHHA and CalEPA and are not disproportionately exposed to high levels of pollutants compared to other census tracts in the State.

While most census tracts in Los Angeles County have worse cumulative pollution exposure scores than neighborhoods in the City of South Pasadena, there are still many sites in South Pasadena that are disproportionately exposed to impaired drinking water, diesel particulate matter, and threats to groundwater. Throughout the City, all census tracts score in the 84th percentile or higher for impaired drinking water, while groundwater threats are isolated to the southeastern portion of the City (south of Mission Street and east of Meridian Avenue) and diesel particulate matter exposure is concentrated

[18] California Health and Safety Code § 39711

[19] California Office of Environmental Health Hazard Assessment. *SB 535 Disadvantaged* Communities, June 2017. https://oehha.ca.gov/calenviroscreen/sb535

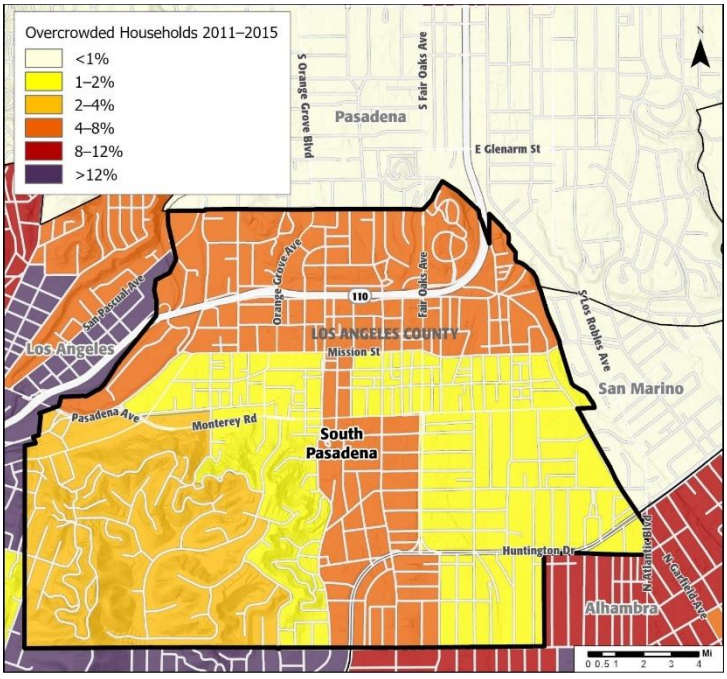
[20] California Environmental Protection Agency, California Office of Environmental Health Hazard Assessments. *Update to the California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0 Public Review Draft*, February 2021. https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40reportd12021.pdf

in the northern portion of South Pasadena (north of Mission Street). Exposure to these pollutants and environmental effects can have a negative impact on residential uses and living conditions. In order to address the potential for negative living conditions and fair housing concerns that may be associated with the concentrations of these environmental conditions and pollutants, the City will meet with water providers to identify strategies to improve the condition of drinking water and will provide assistance in applying for funding for necessary improvements (Program 1.e). The City will also review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and groundwater contamination to reduce exposure to these environmental threats (Program 1.e).

6.4.16 Overcrowding as a Fair Housing Issue

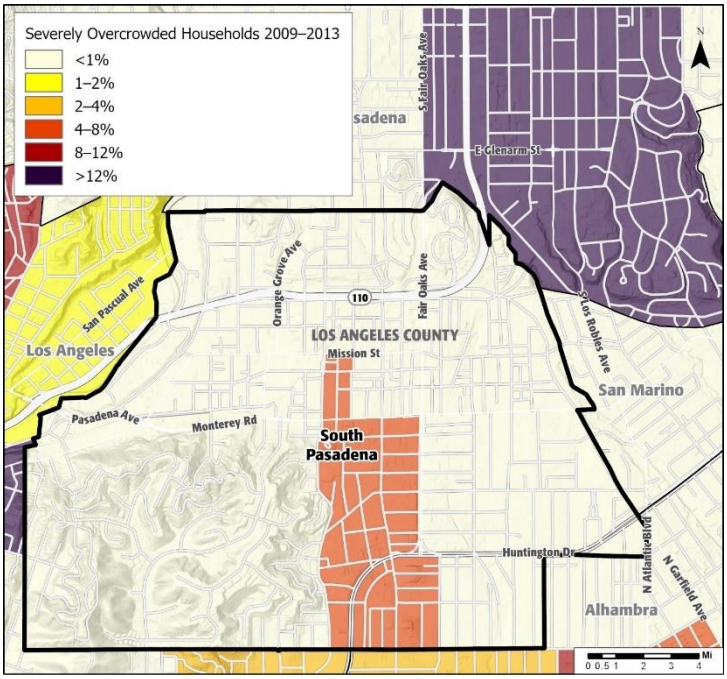
As discussed in Section 6.4.3, overcrowding is not a significant issue in South Pasadena, with less than 2 percent of households living in an overcrowded situation citywide. Although it is a minor difference that is not statistically significant, overcrowding is more prevalent among renter households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

Figure VI-19
Local Housing Overcrowding



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

Figure VI-20
Local Severe Housing Overcrowding



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

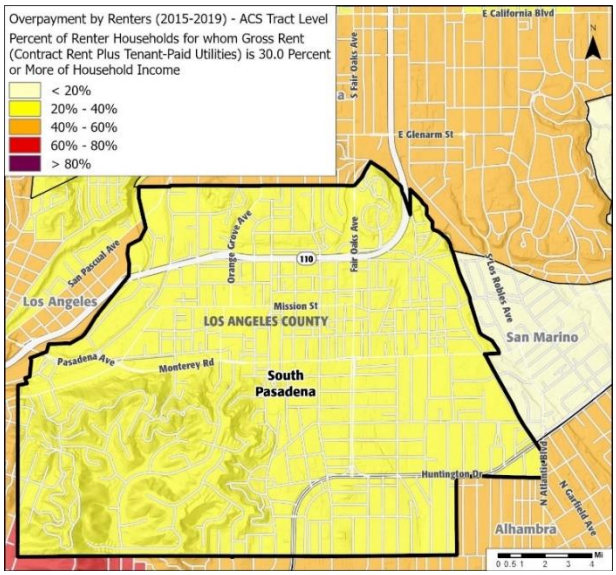
6.4.17 Overpayment for Housing as a Fair Housing Issue

Not surprisingly, overpayment for housing, which increases a household's risk of displacement, is most commonly experienced by lower income households in South Pasadena, as shown in Tables VI-27 and VI-28, above. For these income groups, more than 86% of owners and more than 72% of renters are considered to be overpaying for shelter, defined as spending more than 30% of their incomes on housing. Geographically, as seen in Figure VI-21, below, the rate of renter households overpaying for housing is within the same range, with an estimated 20–40 percent overpaying for housing. As Figure VI-21 shows, overpayment for this group has decreased over the last five years, except in the southwestern portion of the city where overpayment as increased 0-5%.

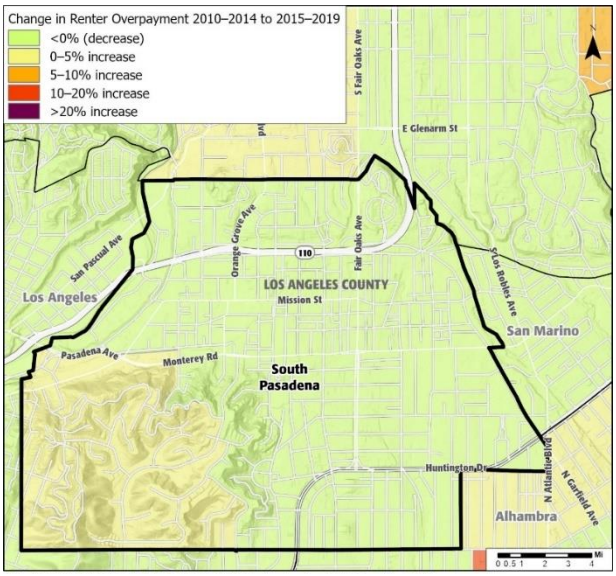
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-21). As shown in Figure VI-22, overpayment for housing has increased in two areas of the city, in the central corridor by less than 5%, and in southeast area where the percentage of overpaying households rose 5 to 10 percentage points. The City will seek to address overpayment by creating below-market-rate housing and addressing the overall need for increased housing and affordability. The following programs, enumerated in greater detail in other sections, are designed to work together to address housing creation and affordability through land use changes, inclusionary housing requirements, density bonuses, zoning overlays, Section 8 rental assistance, and other means: Programs 1.b, 1.c, 2.b, 2.c, 2.j, 2.k, 3.a, 3.b, 3.e, and 3.k.

Figure VI-21
Local Overpayment by Renters

Figure VI-22
Change in Renter Overpayment Over a Five-Year Period

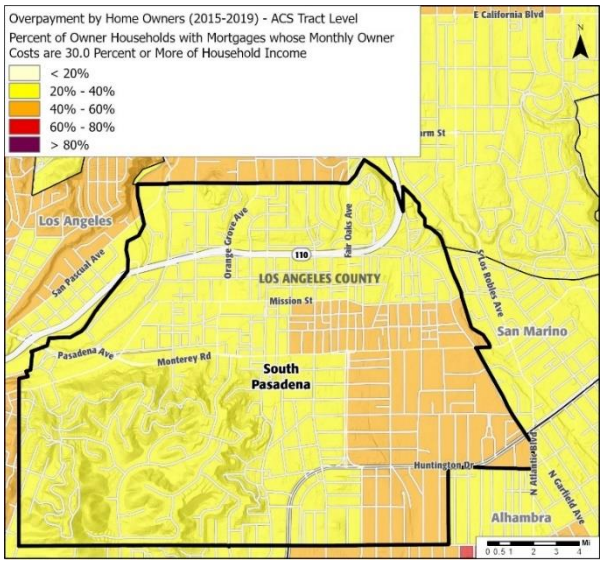


Source: U.S. Census Bureau, 2015-2019 American Community Survey[6]



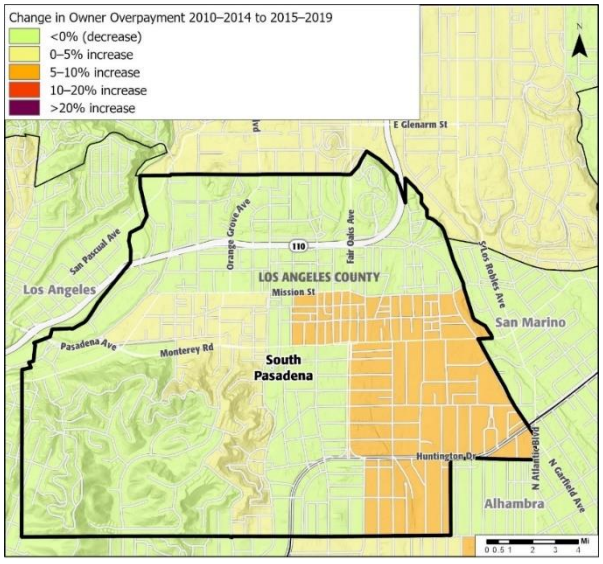
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7,8]

Figure VI-23
Local Overpayment by Owners



Source: U.S. Census Bureau, 2015-2019 American Community Survey[6]

Figure VI-24
Change in Owner Overpayment Over a Five-Year Period



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

6.4.18 Housing Stock Concerns for Fair Housing

Although South Pasadena's housing stock tends to be somewhat older, the City is not characterized by major deficiencies regarding housing deterioration or livability issues. As discussed previously in this section (see "Age and Condition of Housing Stock"), approximately 37 percent of the City's housing units were built in 1939 or earlier and 94 percent of the housing stock is over 30 years old, with 1952 being the median year of construction (see Table VI-26). Nevertheless, the majority of

South Pasadena's housing stock is well maintained and in good condition, with only some instances of residential properties with signs of deterioration and deferred maintenance. As the housing stock ages, need for repair and rehabilitation may become more common, thus increasing the risk of displacement for occupants of those units, and in particular for low-income seniors. This would be addressed with a Housing Rehabilitation for low- and moderate-income households, and other programs designed to support seniors to stay in their homes or to find other housing within South Pasadena that meets their needs (Programs 1.c and 2.g). Additionally, the City will continue to use its code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena (Policy 1.2), particularly for rental units. On behalf of the City, the County also provides residential rehabilitation loans to low- and moderate-income homeowners in South Pasadena who need assistance to rehabilitate or repair their homes. Additionally, the Housing Rights Center (HRC) assists tenants with disabilities by enforcing Fair Housing requirements to grant reasonable accommodation or modification requests.

6.4.19 Enforcement of Fair Housing and Outreach Capacity

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

The HRC serves residents in Los Angeles County, including South Pasadena, with issues regarding tenants' rights, fair housing, and other related needs. As noted on the HRC's website:

> *"The Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing. HRC was founded in 1968, the same year that Congress passed the Fair Housing Act (FHA). Our mission is to actively support and promote freedom of residence through education, advocacy, and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law."*

Policies that reinforce fair housing through access to sound and affordable housing consistent with the goals of this housing element update (Goal 5) will be adopted in association with the General Plan update, the Downtown Specific Plan, or other policy documents, and implemented through approval of individual development proposals.

In addition to assessing fair housing issues related to development standards, fair housing issues can include disproportionate loan rates by race; housing design that is a barrier to individuals with a disability; discrimination against race, national origin, familial status, disability, religion, or sex when renting or selling a housing unit; and more. It is known that in the past these practices were widespread in the region, including in South Pasadena. Through developing affordable housing and providing the units to income-qualifying households through a fair and non-discriminatory process, the City can begin to address the impacts of past housing discrimination. Equal access to affordable housing is legally required and will be integrated into future plans and policy documents , and into ordinances that apply to future development proposals.

The HRC replied to a set of questions about fair housing issues in South Pasadena. The HRC indicated that for fiscal year 2019–2020, the organization had 20 inquiries based on fair housing complaints, mostly from prospective or sitting tenants, and that no cases were filed against the City, County, or any public housing authority for South Pasadena.

The HRC further indicated that in South Pasadena for the fiscal year 2019–2020, the top three reasons for complaints received were discrimination based on physical disability, mental disability, and familial status, in that order, with physical disability being far and away the most common reason for complaint.

As part of the Fair Housing Assistance Program (FHAP), the California Department of Fair Employment & Housing (DFEH) files fair housing cases with HUD's Region IX Office of Fair Housing and with the Equal Opportunity (FHEO); HUD FHEO reported that just 10 cases were filed by residents of the City of South Pasadena between January 1, 2013, and March 23, 2021. Among these cases, four were based on disability, three were based on national origin, two were based on familial status, and one was based on familial status and race.

Of these 10 cases, 8 resulted in a no-cause determination, one was withdrawn after external settlement, and one, which was based on a complaint regarding physical disability, had a successful conciliation/settlement.

None of these fair housing agencies provided specific location information for cases, either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, for these reasons, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Policy 5.1 has been included to participate in the programs offered by the HRC and provide public information at City Hall or through the City's website, regarding fair housing issues and HRC consultation.

6.4.20 Analysis of Sites Inventory for Fair Housing

The locations of South Pasadena's proposed housing opportunity sites are not anticipated to contribute to the reinforcement or worsening of any fair housing issues. (A full listing and descriptions of South Pasadena's housing sites are contained in Tables VI-41, VI-47 and Appendix A, Sites Exhibits.) All census tracts within South Pasadena feature at least one larger housing opportunity site (Figure A-1 in Appendix A), with some degree of concentration as mixed-use developments in central areas that feature access to jobs, transit, and schools, as well as higher levels of large vacant or underutilized parcels. Although the moderate concentration of housing opportunity sites in central areas of South Pasadena could be perceived as less equitable than a more even or purely random distribution of housing sites, this alternative approach could serve to worsen fair housing issues by placing new homes further from access to transit, jobs, educational opportunity, and walkable neighborhoods. Additionally, attempting to place housing opportunity sites in areas without larger vacant or underutilized parcels would likely involve more displacement of existing residents and could negatively impact the ability of sites to be feasibly redeveloped within the horizon year of the Housing Element.

The locations of South Pasadena's housing opportunity sites are not anticipated to reinforce or exacerbate patterns of segregation and integration, whether with respect to race or economic status. As discussed previously, South Pasadena has relatively low rates of poverty; and although there are modest differences in poverty rates and household income between South Pasadena's census tracts, housing opportunity sites are located across all of South Pasadena's census tracts, thereby serving to

dilute any potential effects with respect to concentration of poverty. The inclusionary housing requirement will also ensure that new developments serve a variety of household income categories within the same site.

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

With respect to access to opportunity, the locations of South Pasadena's housing opportunity sites would serve to maximize resident access to economic and educational opportunity. As shown in Figure VI-4, the entirety of South Pasadena is identified as a Highest Resource area, indicating high levels of opportunity throughout the City. Additionally, regional place- and people-based indices indicate that South Pasadena features a high level of opportunity in all census tracts. Based on the data presented in Figure VI-18, the majority of South Pasadena's housing opportunity sites would feature moderate to good access to jobs, and would also have good access to bus stops along Fair Oaks Avenue, as well as the South Pasadena Gold Line light rail station. Furthermore, as shown in Figures VI-15 through VI-17, much of South Pasadena is in close proximity to well-rated schools. Finally, the majority of South Pasadena's housing opportunity sites are located in existing mixed-use/commercial areas, ensuring that residents of new housing as planned in this housing element would have access to jobs and walkable retail and entertainment opportunities.

Finally, South Pasadena's housing opportunity sites are not anticipated to exacerbate or otherwise negatively impact disproportionate housing needs and displacement risks. As shown in Figures VI-21 and VI-22, there are no census tracts within South Pasadena where large majorities of homeowners or renters are overpaying for housing, and Figures VI-23 and VI-24 indicate that overpayment by renters has generally held steady in recent years. By creating additional multifamily and affordable housing in the central portions of South Pasadena with good access to schools, transit, and commercial districts, the City could serve to alleviate pressure for households to relocate to less accessible and/or less affordable areas of the City. Although Figure VI-24 indicates that homeowners have seen an increase in overpayment in the southeastern portions of the City, the increase in households experiencing this is only 5–10 percent. Additionally, since homeownership costs contribute to home equity, minor increases in overpayment are potentially a less acute indicator of displacement risk than increases in overpayment for renters. Furthermore, Figures VI-19 and VI-20 demonstrate that levels of overcrowding and severe overcrowding in South Pasadena are generally low. Although there is a moderately higher rate of overcrowding in the area between Fair Oaks Avenue and the eastern edge of the Monterey Hills neighborhood, as well as in the northern areas of the City, even in these areas, overcrowded households account for less than 10 percent of total households. This, combined with the fact that South Pasadena's housing opportunity sites are located across all City census tracts, tends to indicate that patterns of planned new housing development would not serve to exacerbate existing overcrowding issues and may actually serve to reverse them.

Altogether, these various considerations and analyses tend to indicate that South Pasadena's planned housing opportunity sites would not only avoid exacerbating fair housing issues, but would actually serve to improve fair housing outcomes by: (1) avoiding concentrating new housing and affordable

~~housing in areas characterized by economic/racial segregation; (2) placing new housing and affordable housing in areas with access to jobs, transit, and educational opportunity; and (3) allowing more housing in South Pasadena in general, thereby giving additional families access to the City's extensive high-resource areas.~~

~~6.4.21 Contributing Factors to Fair Housing Issues~~

~~The overall regional shortage of housing in the Los Angeles area, combined with insufficient subsidized and affordable housing units at a range of sizes to meet the needs of all persons, along with the demographic imbalance, are the primary contributing factors to fair housing issues in South Pasadena. Additionally, high rental rates and sales prices, along with limited local housing options for seniors and individuals living with a disability, contribute to housing issues for these vulnerable segments of the community. Section 6.8 (Programs and Policies) includes actions to address these factors and all issues identified in this assessment. Additionally, specific policies relating to providing education, mediation, and other services relating to fair housing issues, with an emphasis on addressing and reversing historical trends of discrimination, are included with the goal of promoting more integrated patterns of development in South Pasadena through development of affordable housing benefiting both the local and regional population.~~

~~In summary, based on discussions with community members, fair housing advocates, and the above assessment of data related to fair housing, several factors that contribute to fair housing issues in South Pasadena have been identified. Table VI-30 lists these contributing factors and the Housing Element programs that will be most relevant to addressing them.~~

Table VI-31
SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS

~~Table VI-30~~
~~FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES~~

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

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

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

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

of their incomes for housing costs. More than 72 percent of low-income households who own their homes overpay for housing.

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

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

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

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

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

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

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

6.4 FAIR ~~5~~ HOUSING ASSESSMENT~~CONSTRAINTS~~

~~Market conditions, as well as governmental programs and regulations, affect the provision of adequate and affordable housing. Housing Element law requires an assessment of potential and actual governmental and non-governmental constraints affecting the development of new housing and the maintenance of existing units for all income levels. Potential market, governmental, and environmental constraints that contribute to housing development costs in South Pasadena are addressed herein.~~ Assembly Bill (AB) 686 requires that all Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

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

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

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

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

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

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

6.4.1 Outreach

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

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

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

Workshops

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

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

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

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

- Initiate more proactive code enforcement;
- Address the limited rental housing availability and affordability issues;
- Address the demand for more permanent supportive housing as well as housing designed for specific populations.
- Implement more tenant protections; and
- Recognize and condemn previous race-based exclusionary practices of redlining and other racist practices that were prevalent in South Pasadena.

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

Community Surveys

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

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

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

that development adjacent to transit is financially unattainable for populations most dependent on public transportation for access to employment.

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

Public Hearings

The City also presented on or discussed the Housing Element at 10 public hearings. At each of these meetings, the public was invited to attend and share comments on the Housing Element update and process.

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

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

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

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

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

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

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

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

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

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

Outreach Summary

Throughout the Housing Element update process, feedback was received from members of the public, stakeholders, elected officials, and others. With respect to barriers to access affordable housing, attendees at the four workshops identified that a need to increase the supply of affordable housing, while at the same time emphasizing the desire to maintain the historic small-town character and single family nature of South Pasadena. Respondents to surveys, phone call messages, and attendees at meetings focused primarily on the RHNA process, potential sites, strategies for meeting

the RHNA, and ADUs. While some workshop attendees noted the needs of sensitive populations, issues faced by lower-income residents, and potential for displacement at a high level, they were not commented on or discussed further by attendees.

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

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

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

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

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

6.4.2 Assessment of Fair Housing Issues

California Government Code Section 65583(c)(1)(C)(10)(A)(ii) requires the City of South Pasadena to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. According to the California Tax Credit Allocation Committee (TCAC)/HCD 2020 Opportunity Areas Map, the entirety of the City of South Pasadena is considered a "Highest Resource" area (Figure VI-4). Highest Resource areas are those with the highest index scores for a variety of educational, environmental, and economic indicators. Some of these indicators include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low

concentrations of poverty, and low levels of environmental pollutants, among other factors. The universal designation of Highest Resource areas across the entirety of South Pasadena is likely a result of strong educational institutions and good environmental indicators in most, if not all, of the City, which have resulted in high property values.

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

Unless otherwise noted, the following maps and analysis rely on data provided at the Census-tract level by various state and federal agencies, including the California Tax Credit Allocation Committee and Department of Housing and Community Development[21]; 2010 Census[22]; 2006-2010[23], 2010-2014[24], and 2015-2019[25] American Community Surveys; Esri's 2018 Updated Demographic estimates[26]; California School Campus Database (CSCD)[27]; 2014 Longitudinal Employer-Household Dynamics (LEHD)[28]; and the California Health and Human Services Agency[29]. All data presented in the maps included in this assessment was collected through the AFFH Data Viewer mapping tool, a tool developed and approved by HCD for use in assessment of fair housing analyses as the most current and accurate data available[30]. The tract level was selected because geospatial and demographic data were most consistently available at this scale for South Pasadena, and the scale remained detailed enough to allow for neighborhood-level consideration of fair housing issues. This approach was developed in consultation with HCD and in conjunction with efforts to develop standardized state-wide datasets for fair housing analyses.

6.4.3 Patterns of Integration and Segregation

Since 2017, the California Tax Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, including proximity to job opportunities; quality of schools; environmental health and safety; and other economic, social, and environmental indicators—in an effort to provide evidence for policy

[21] California Tax Credit Allocation Committee and Housing and Community Development Department. *2020 TCAC/HCD Opportunity Map*, 2020. https://belonging.berkeley.edu/tcac-opportunity-map-2020
[22] U.S. Census Bureau. *2010 Decennial Census*. 2020. https://hudgis-hud.opendata.arcgis.com/
[23] U.S. Census Bureau. *2006-2010 American Community Survey*. 2010. https://hudgis-hud.opendata.arcgis.com/
[24] U.S. Census Bureau. *2010-2014 American Community Survey*. 2014. https://hudgis-hud.opendata.arcgis.com/
[25] U.S. Census Bureau. *2015-2019 American Community Survey*. 2019. https://hudgis-hud.opendata.arcgis.com/
[26] Esri. *Methodology Statement: 2018/2023 Esri US Updated Demographics*. July 2018. https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2018-2023_Esri_US_Demographic_Updates.pdf
[27] GreenInfo Network. *California School Campus Database*. 2021. http://www.mapcollaborator.org/mapcollab_cscd/?base=map&y=37.34396&x=-123.48633&z=6&layers=notes%2Cpolygons%2Cschoolboundaries%2Cschoolcentroids&opacs=100%2C25%2C100%2C100
[28] U.S. Census Bureau. *Longitudinal Employer-Household Dynamics*. 2014. https://lehd.ces.census.gov/
[29] California Health & Human Services Agency. *Percent of Household Overcrowding (> 1.0 persons per room) and Severe Overcrowding (> 1.5 persons per room)*. October 2020. https://data.chhs.ca.gov/dataset/housing-crowding
[30] California Department of Housing and Community Development. *Affirmatively Furthering Fair Housing Data and Mapping Resources*. 2021. https://affh-data-resources-cahcd.hub.arcgis.com/

recommendations[31]. This effort has been dubbed "opportunity mapping," and it is available to all jurisdictions in California to evaluate access to opportunities within their communities. As previously stated, the City of South Pasadena has been categorized as "highest resource" by TCAC and HCD, compared to Los Angeles County (see Figure VI-4), meaning that South Pasadena has been identified as having strong educational opportunities, a balanced jobs-housing ratio, high property values, a high median income, and other positive conditions. In areas with lower resource designations than South Pasadena, these indicators of success do not present as strong of opportunities, which may include more limited access to jobs, lower home values, a shortage of outdoor recreational space, and more. The trends and factors that resulted in these patterns of access to resources and other fair housing issues may stem from historical patterns or current practices.

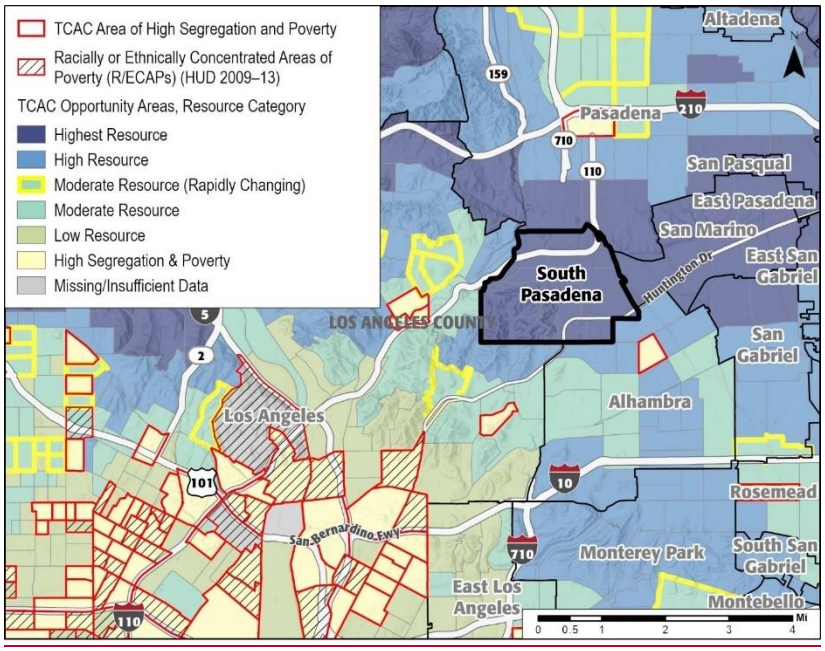
Areas of High Segregation and Poverty

Figure VI-4 also shows that South Pasadena does not include any federally designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)[32] or TCAC-designated Areas of High Segregation and Poverty. However, there are some TCAC Areas of High Segregation and Poverty located in relatively close proximity to South Pasadena, and numerous Areas of High Segregation and Poverty as well as R/ECAPs located further to the south and west in the City of Los Angeles. As shown in Figures VI-5 through VI-7, the City of South Pasadena has relatively low rates of poverty, especially when compared to the surrounding region. Areas with higher rates of poverty surrounding South Pasadena include the City of Los Angeles to the south and west; Pasadena to the north; Glendale to the northwest; and Alhambra, San Gabriel, and Rosemead to the south and east. San Marino to the east has poverty rates that are roughly equivalent to or lower than South Pasadena.

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

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

Figure VI-4
TCAC/HCD OPPORTUNITY AREAS



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

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

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

- **Program 1.b.** Purchase surplus properties and support affordable housing developers to create new and rehabilitated deed-restricted, affordable housing units, using any profit from the proceeds of historic properties to generate additional affordable housing.
- **Program 2.b.** Increase funding for affordable housing through the City's membership with the San Gabriel Valley Regional Housing Trust (SGVRHT).
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.

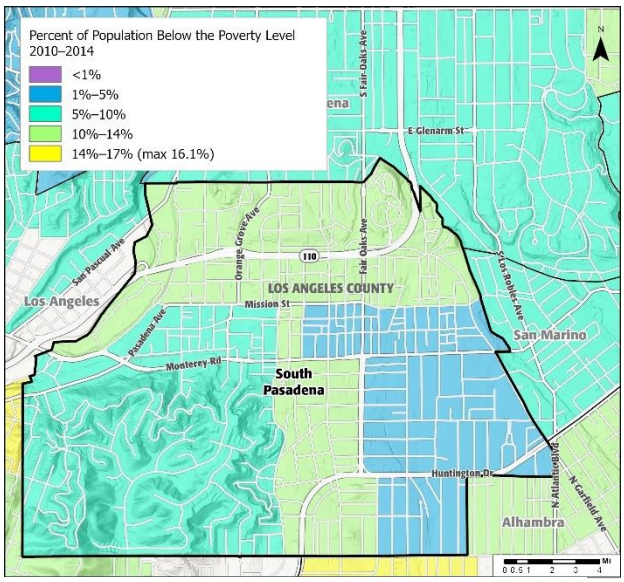
- **Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.
- **Programs 3.h and 3.k.** Encourage the construction of ADUs and monitor construction to track affordability
- **Program 4.d.** Revise the zoning code to require a minimum proportion of units in new construction be ADA accessible.

Poverty Rates

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

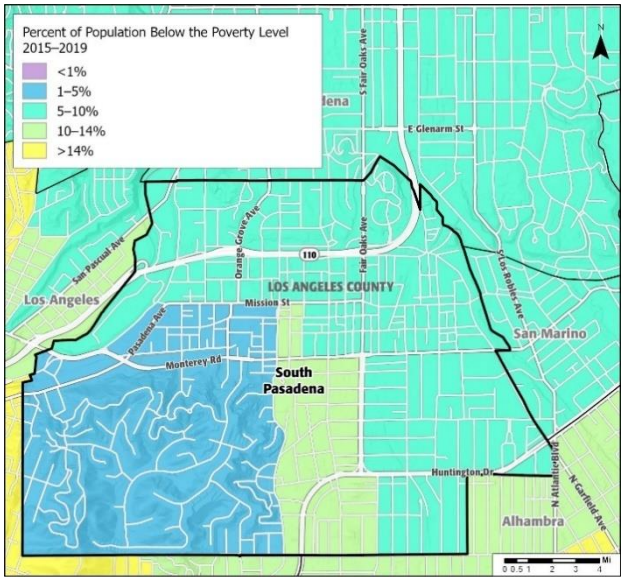
The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less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

Figure VI-5
LOCAL POVERTY RATES 2010–2014



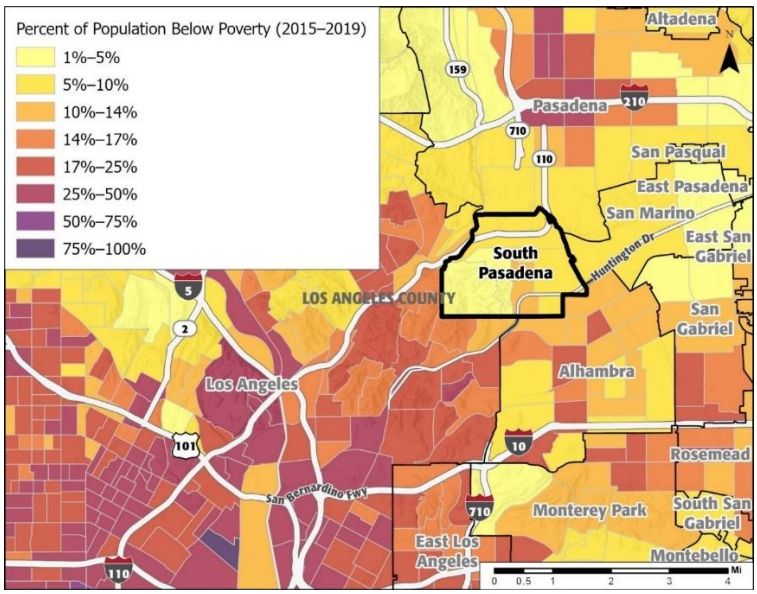
Source: U.S. Census Bureau, 2010-2014 American Community Survey[7]

Figure VI-6
LOCAL POVERTY RATES 2015–2019



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

Figure VI-7
REGIONAL POVERTY RATES 2015–2019

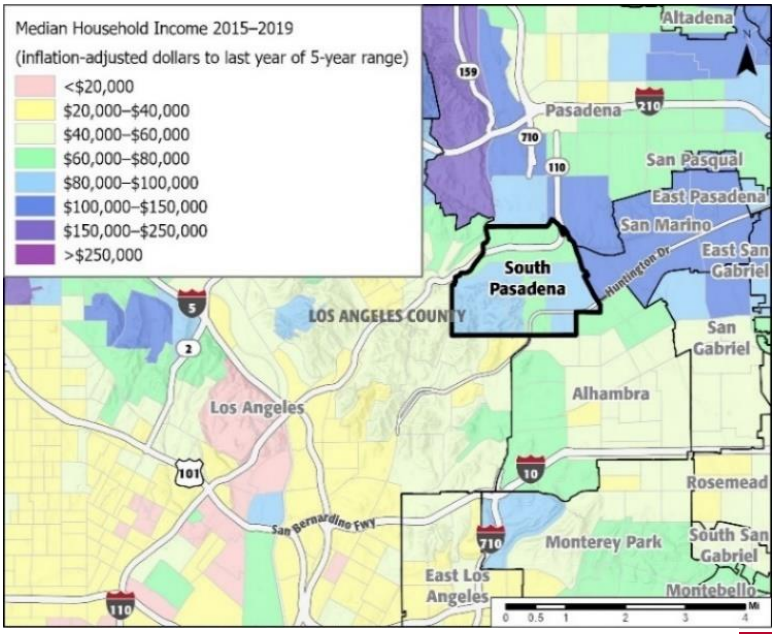


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

South Pasadena Household Income and Affordability as a Fair Housing Consideration

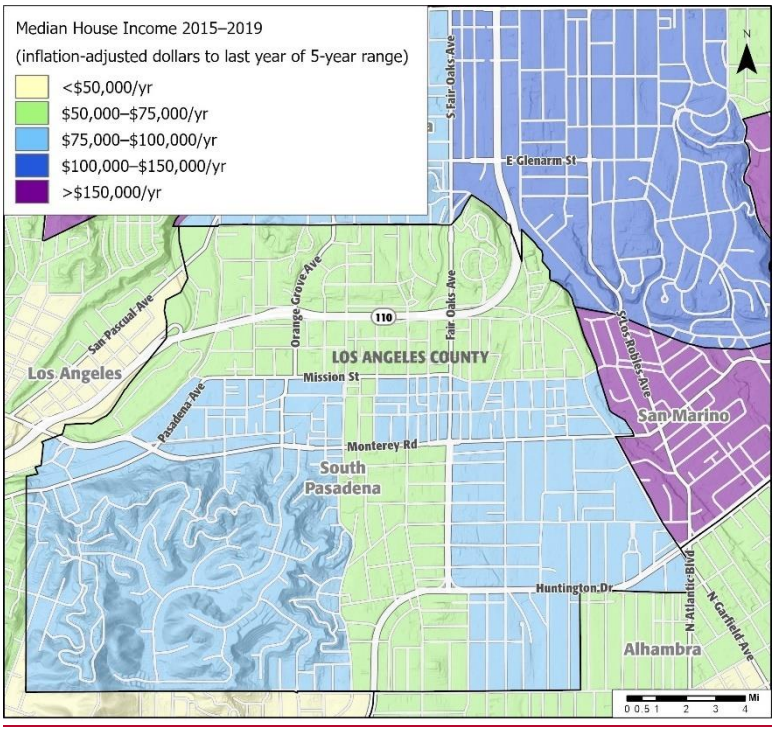
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes are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

Figure VI-8
REGIONAL MEDIAN INCOME 2015–2019



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

Figure VI-9
LOCAL MEDIAN INCOME 2015–2019

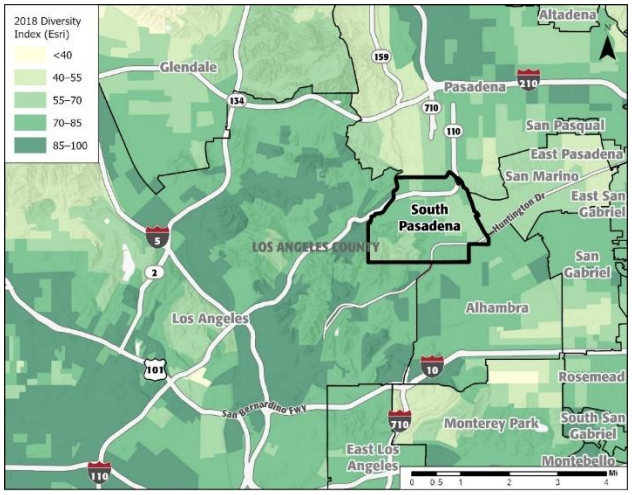


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Ethnic Diversity

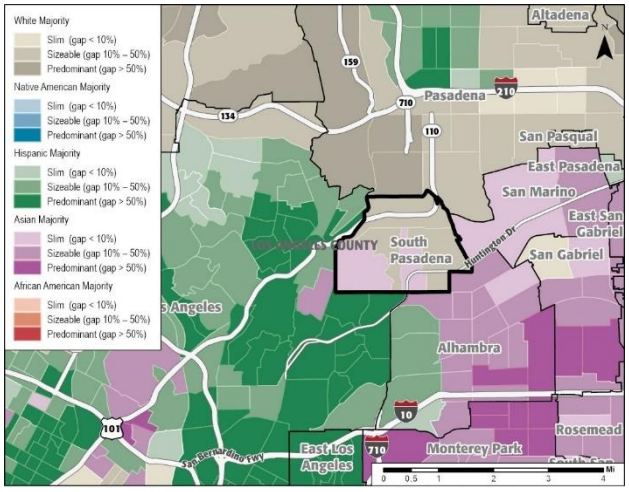
With respect to ethnic diversity, as shown in Figure VI-10, most areas of Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the north,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

Figure VI-10
REGIONAL DIVERSITY INDEX 2018



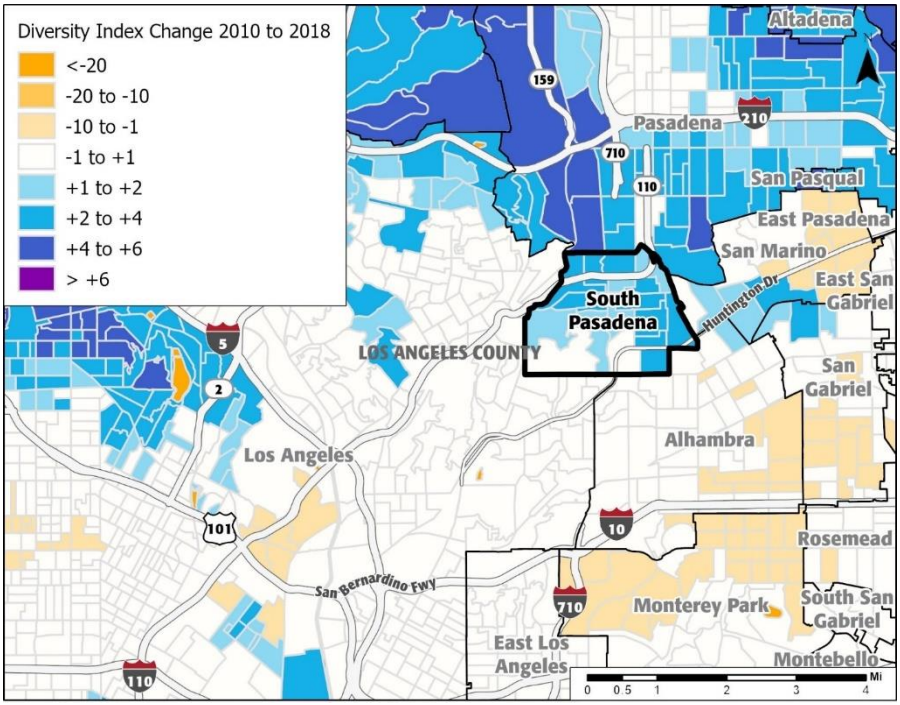
Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Figure VI-11
REGIONAL ETHNIC PREDOMINANCE



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

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

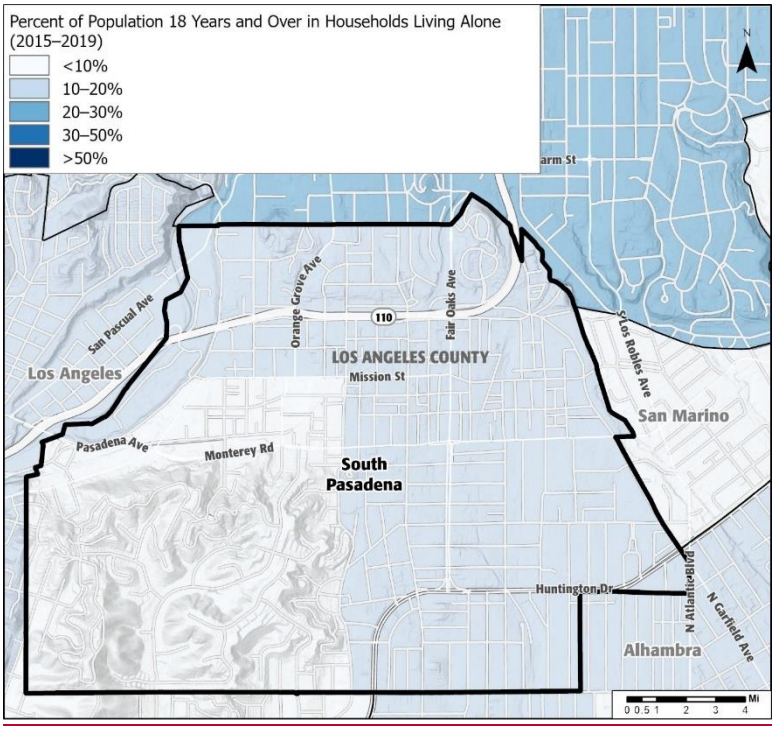


Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Single-Person Household Distribution

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

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

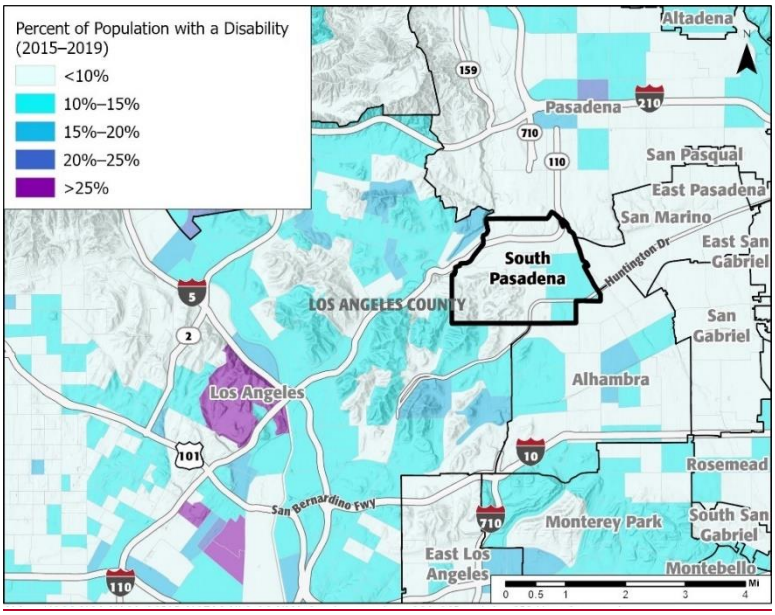


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Persons Living with Disabilities

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

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



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

Fair Housing for Seniors

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

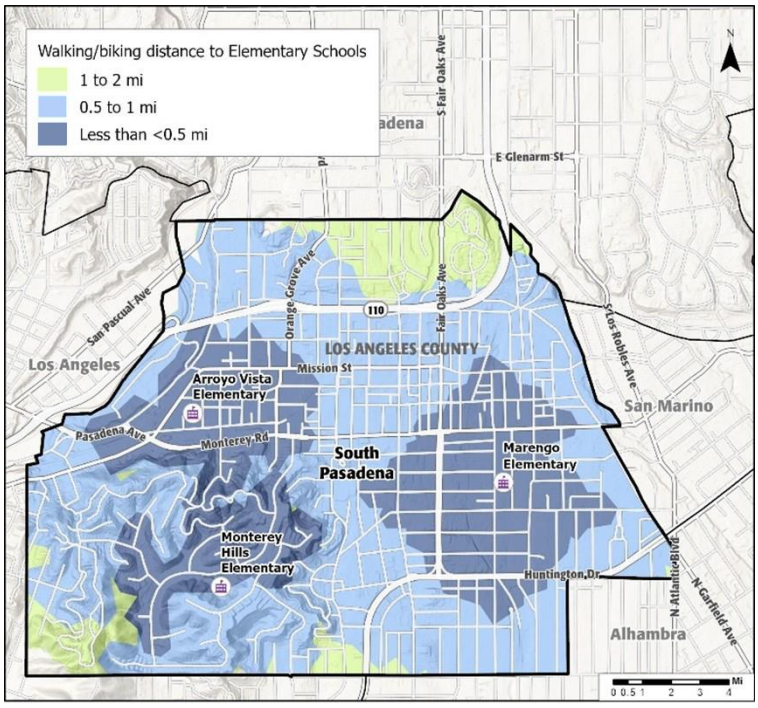
in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.4 Access to Opportunity

Education Resources

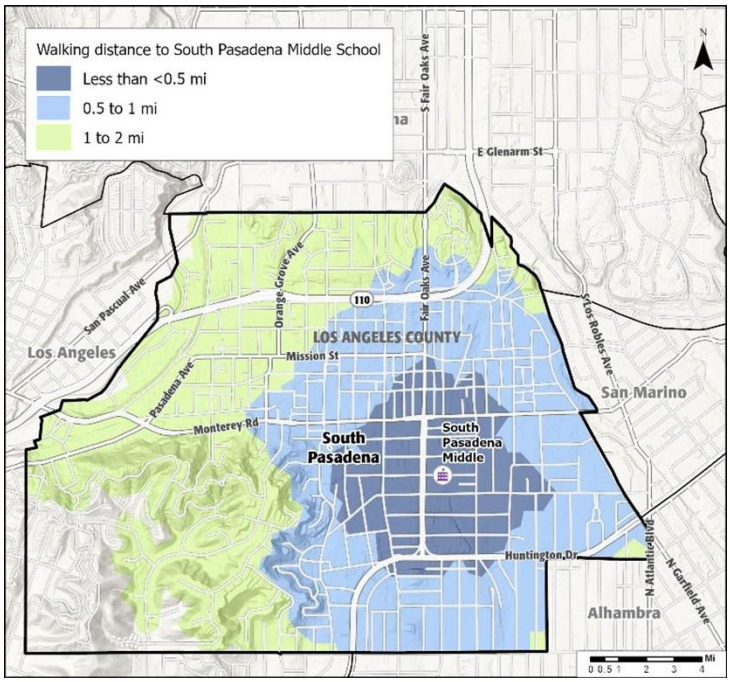
In a statewide review of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, all of South Pasadena's public schools, including all of its elementary schools as well as its middle and high school, are ranked in the 95th percentile or higher.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

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



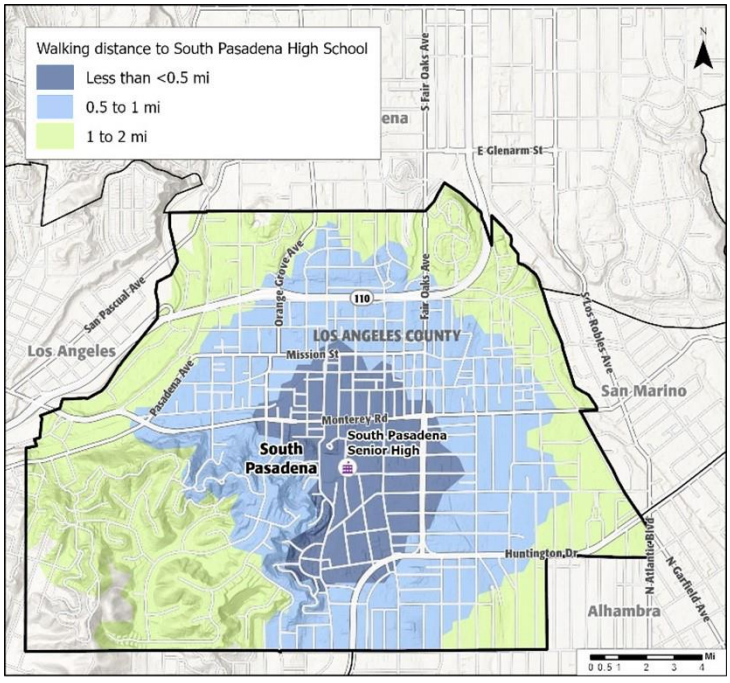
Source: GreenInfo Network, California School Campus Database, 2021[10]

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



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

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



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

Public Transportation Resources

South Pasadena residents are served by the Los Angeles County Metropolitan Transportation Authority (Metro) system, which offers light rail, rapid bus, and local/limited bus lines serving South Pasadena and the surrounding area. A variety of transit types and routes are available to residents of South Pasadena to connect them to the historic Downtown, downtown Los Angeles, and crosstown destinations such as medical facilities, jobs, and other services and resources. Areas along Fair Oaks Avenue and Mission Street, especially near the Metro L Line stop, tend to have the best transit service in South Pasadena, while areas in the Monterey Hills neighborhood in the southwest portion of the City have less accessibility to public transportation. However, despite these minor differences in access to transit, AllTransit has given transit in the City of South Pasadena a performance score of 8.5 out of 10, compared to scores of 6.8 in Los Angeles County overall and 5.5 for the SCAG region as a whole[33]. In addition to a strong transit performance score, LA Metro has also approved and begun to implement a program to phase in free travel for all patrons by 2023, as opposed to a standard fare of $1.75 for buses and trains currently or discounted rates for seniors, individuals with disabilities, and college and K-12 students.

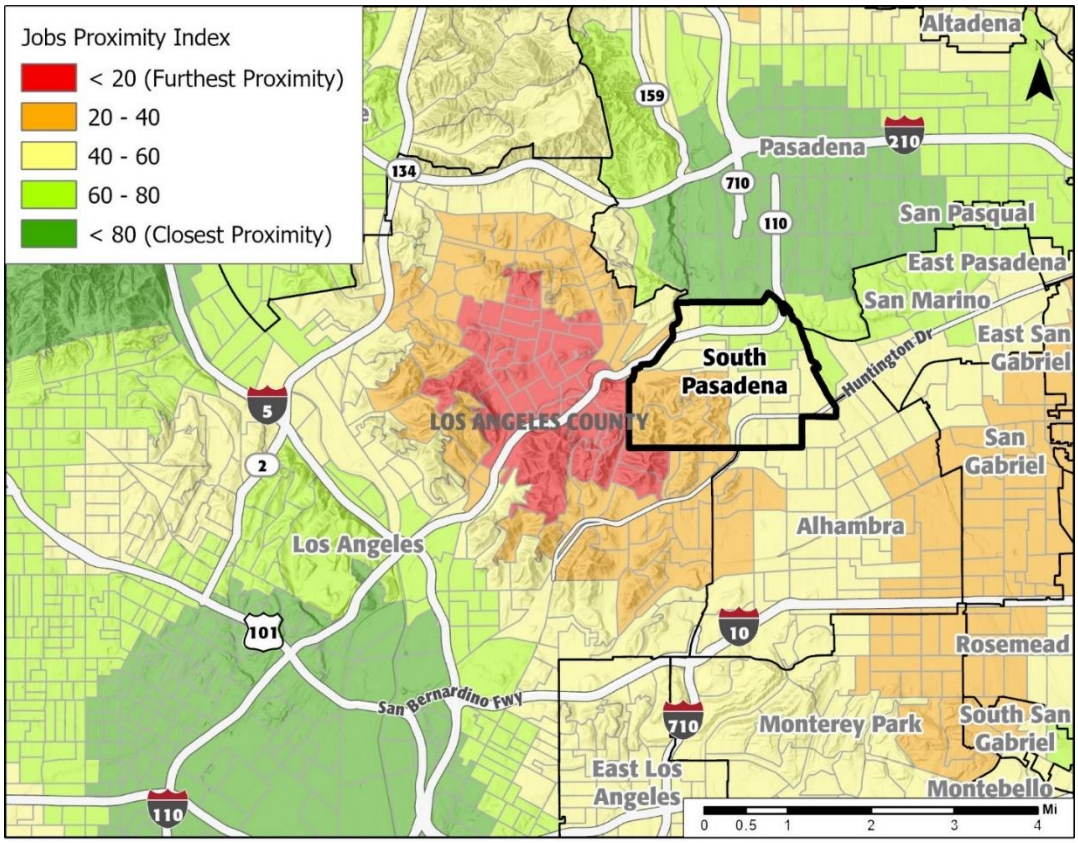
With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station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

Employment Proximity

In 2017, HUD developed the Jobs Proximity Index as an assessment of accessibility to jobs from a given residential census block neighborhood[34]. The index measures the distance to jobs from each neighborhood, placing a higher weight on larger employment centers that offer more job opportunities. This function provides a general estimate of residential neighborhoods proximity to a large number of job opportunities. As shown in Figure VI-18, most residential neighborhoods in South Pasadena have moderate access to jobs compared to the region, with no areas of the City having the "closest" or "furthest" proximity to jobs. The southwest portions of the City have the most limited access to jobs according to HUD's analysis, and areas in the northern portions of the City have closer access, most notably to job centers to the north in Pasadena. With an average commute time of 31 minutes, South Pasadena has somewhat longer commutes than the national average, but a similar average to Los Angeles County and California overall, according to American Community Survey estimates. Neighboring cities, including Los Angeles, San Marino, and Pasadena, have respective average commute times of approximately 31, 30, and 29 minutes.

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

Figure VI-18
REGIONAL JOBS PROXIMITY INDEX



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

Environmental Health

A disadvantaged community or environmental justice community ("EJ Community") is identified by the California Environmental Protection Agency ("Cal EPA") as "areas that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need.[35] In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25 percent highest score census tracts) are those that have been designated as disadvantaged communities under SB 535.[36] The cumulative score for each census tract includes an exposure score, with a low score being a positive outcome, for each of the following:

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

- "Ozone concentrations
- PM2.5 concentrations
- Diesel particulate matter emissions
- Drinking water contaminants
- Children's lead risk from housing for children
- Use of certain high-hazard, high-volatility pesticides
- Toxic releases from facilities
- Traffic impacts[37]"

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

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

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

Board Proposition 68 Grant Fund for the Wilson Reservoir treatment construction and operations and ~~governmental constraints affecting the development of new housing and the~~ maintenance costs.

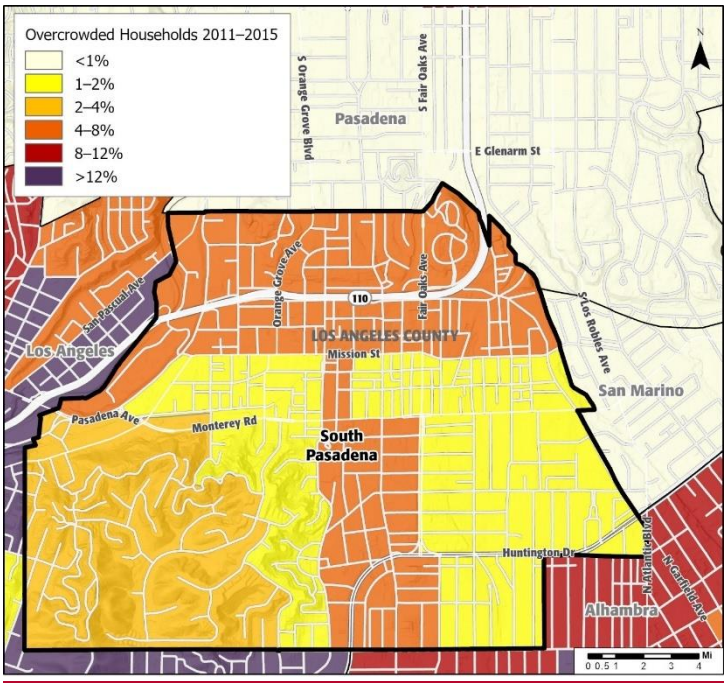
In order to address the potential for any negative living conditions and fair housing concerns that may continue to result from environmental hazards and pollutants, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino (Program 1.e). The City will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

6.4.5 Disproportionate Housing Need and Displacement Risk

Overcrowding as a Fair Housing Issue

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

Figure VI-19
LOCAL HOUSING OVERCROWDING



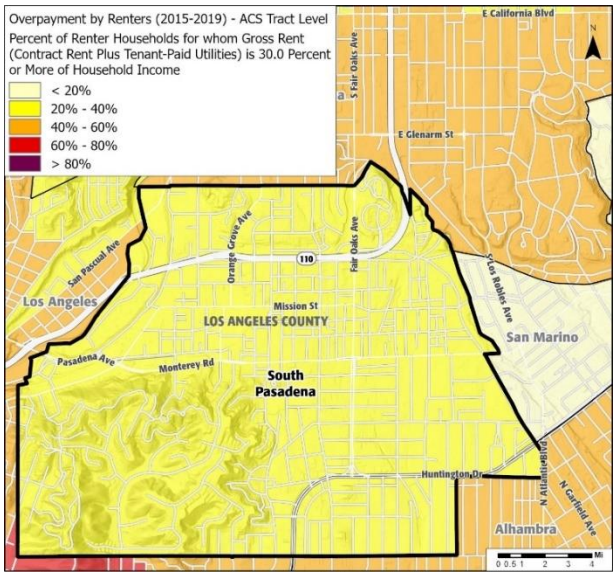
Source: California Health & Human Services Agency, 2020[12]

Overpayment for Housing as a Fair Housing Issue

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

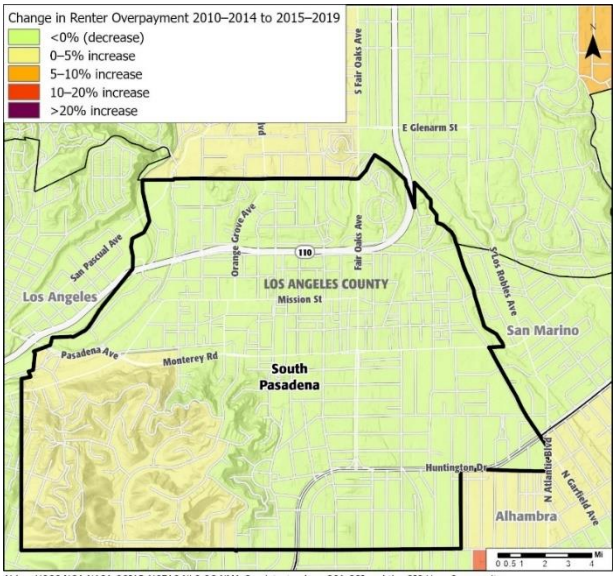
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-20). As shown in Figures VI-20 through VI-23, overpayment for housing has increased in two areas of the city, in the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

Figure VI-20
LOCAL OVERPAYMENT BY RENTERS



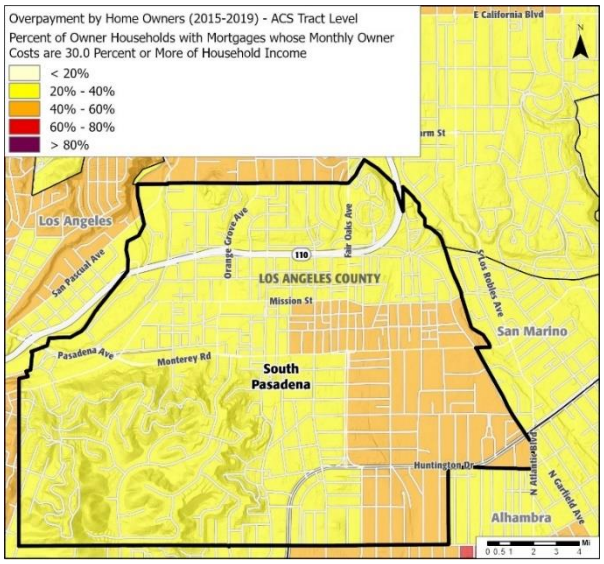
Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

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



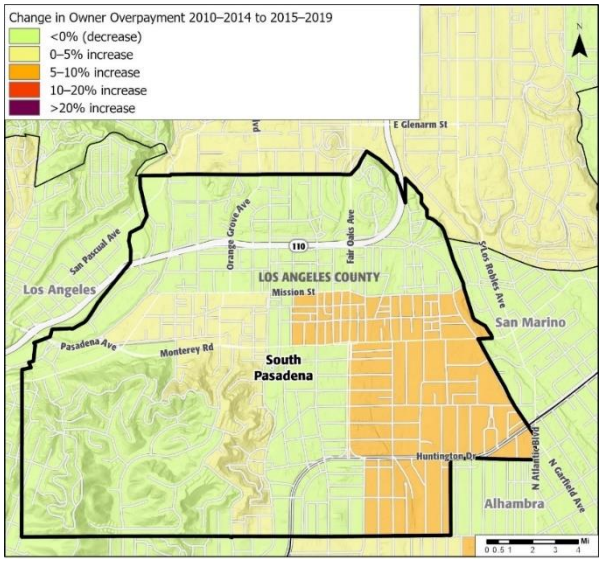
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Figure VI-22
LOCAL OVERPAYMENT BY OWNERS



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

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



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

Housing Stock Concerns for Fair Housing

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

Homelessness

The Los Angeles Homeless Services Authority (LAHSA) divides Los Angeles County into eight Service Planning Areas (SPAs) so the organization and individual jurisdictions can better serve and meet the needs of the communities in these areas. The City of South Pasadena is within Service Planning Area 3 (SPA-3): San Gabriel Valley, which includes communities located in the eastern portion of Los Angeles County. The 2020 Homeless Point-in-Time (PIT) count conducted by LAHSA counted a total of 4,555 homeless persons in SPA-3, of which 15 identified as residing in the City of South Pasadena (less than 0.01 percent of the SPA-3 homeless population). Approximately 66 percent of the total homeless population of SPA-3, or 3,027 people, were considered unsheltered and 33 percent, or 1,528 people, were sheltered. Additionally, approximately 940 people in SPA-3, or 20 percent of the population, were households with at least one child under 18 and one adult over 18; there were no unaccompanied minors recorded. In February 2022, LAHSA conducted a PIT to update these numbers, with participation from City of South Pasadena police. While the detailed results of this survey were not yet released at the time of this draft, police indicated that 28 homeless individuals were counted within the City. Without having the details about this population, the City completed this assessment based on the demographic composition of the 2020 homeless population.

According to the LAHSA in 2020, approximately 49 percent of the total homeless population in SPA-3 identified as Hispanic or Latino, 23 percent identified as Black or African American, three percent identified as American Indian, Alaska Native, Asian, and multi-racial. Additionally, 28 percent were experiencing serious mentally illness, 25 percent had a physical disability, seven percent had a developmental disability, 8 percent were seniors, and four percent were veterans. Of the homeless population in SPA-3, two percent identified as gay or lesbian, two percent as bisexual, and five percent as sexual orientation non-conforming. Given the small size of South Pasadena's homeless population, it is unlikely that all of these protected classes are represented. However, without data available at the city-level, it is assumed that the percentages of each protected class applies to the 15-person homeless population in the city. Under this assumption, the following groups may be disproportionately represented as part of the homeless population compared to the total city population:

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

Citywide data regarding sexual orientation is unavailable to compare to the percentage of the SPA-3 homeless population. However, while the percentages of each protected class identified here may not be the exact demographic composition of the homeless population in South Pasadena, as part of the SPA-3 region, there is a need for targeted assistance and outreach of each of these populations.

In order to address the needs of the homeless population, the City has identified Program 2.f to continue its emergency shelter referral program and use multi-jurisdictional grand funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. Additionally, under Policy 4.4., the City will incentivize housing providers to meet the housing needs of extremely low-income persons, persons with mental and physical disabilities, and other special needs groups. Moreover, the City has included Program 4.b to amend the Zoning Code to fully address SB 2 requirements regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Gentrification and Displacement Risk

The Urban Displacement Project identified neighborhoods in the Los Angeles region that have experienced gentrification since 2000 as a part of their project to predict trends of gentrification and displacement based on a community-engaged research process of market trends, housing, and jobs growth. The Urban Displacement Project defines gentrification as "a process of neighborhood change that includes economic change in a historically disinvested neighborhood — by means of real estate investment and new higher-income residents moving in — as well as demographic change — not only in terms of income level, but also in terms of changes in the education level or racial make-up of residents".[1] Renewed interest in city neighborhoods can lead to or accelerate the displacement of residents, typically low-income communities of color, due to rising commercial and residential rents and property values.

In South Pasadena, the Urban Displacement Project identified the area east of Fair Oaks Avenue and the area south of Mission Street between Meridian Avenue and Indiana Avenue as "Stable/Advanced Exclusive," meaning that the census tracts in these areas are high income, housing is only affordable to high-income households, and there has been a notable increase in housing costs since 2000. These neighborhoods are noted to have already gentrified and to exclude lower- and moderate-income households. The remaining areas south of Mission Street, west of Indiana Avenue and between Meridian and Fair Oaks Avenues, are considered "At Risk of Becoming Exclusive" and "Becoming Exclusive," respectively. These both indicate a trend toward moderate- and high-income households, increasing housing costs, and increasing unaffordability. All of these areas suggest historic displacement of lower- and moderate-income households as neighborhoods gentrified, and now may present a barrier to entry for these households. Paired with racially and ethnically exclusive practices discussed in Section 6.4.6, displacement of lower- and moderate-income minority households was particularly exacerbated during the mid-20th century. While the area north of Mission Street and west

of Fair Oaks Avenue is considered "Stable Moderate/Mixed Income," suggesting lower displacement risks due to housing costs and incomes, most of the City of South Pasadena is exclusive or becoming exclusive according to the Urban Displacement Project.

Displacement risk can also be identified by comparing annual rates of increase in average home value or rental price compared with annual changes in the average income. If home costs outpace wage increases, displacement risk increases. As shown in Figure VI-3 of Section 6.3.7 of this Housing Element, the median home sales price in South Pasadena increased 223 percent between 2000 and 2018, compared to 151 percent in the SCAG region. This results in an average annual increase of 12.4 percent in South Pasadena and 8.4 percent in the SCAG region. Rental prices have also increased significantly since 2015, with an average annual increase ranging from 5.7 percent for studio apartments to 8.7 percent for 3-bedrooms according to Zumper, an online database of rental prices for houses, condominiums, apartments, and other housing types. Currently, home prices for ownership units are affordable only to above moderate-income households while studio and one-bedroom units priced at the lower end of the spectrum are affordable to lower-income households while all larger units are affordable only to above moderate-income households.

In comparison to housing prices, wages have increased at a slower rate. The median income in South Pasadena has increased approximately 3.4 percent annually, from $82,340 in 2010 to $109,927 in 2020 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in South Pasadena, as is the case throughout the region and state. In order to address affordability challenges, the City has identified the following programs to incentivize development of affordable units, facilitate mobility options, and reduce displacement risk for lower- and moderate-income households throughout South Pasadena:

- **Program 1.c.** Proactively pursue abatement of substandard housing conditions to reduce displacement of tenants from these units.
- **Program 1.d.** Monitor deed-restricted housing units in the city and work with property owners and, if necessary, local service providers to preserve affordability.
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.
- **Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.
- **Programs 3.h and 3.g.** Encourage the construction of ADUs and monitor construction to track affordability

6.4.6 South Pasadena History

The following history provides some context and acknowledgement of discrimination in the past to recognize that South Pasadena must reckon with past racism within the community that precluded the opportunity to become a homeowner in the City based on race, as discussed further below. The City Council acknowledged and condemned these past practices in Resolution No. 7750 (The "Sundown Town" resolution), which was unanimously adopted on February 2, 2022. The Council directed staff to take specific steps, including removal of racially-based restrictive covenants that may still exist (but are not enforced) on property titles throughout the city, beginning with those owned by the City (see Program 5.c). This important step of acknowledgement demonstrates a shift that has occurred within the community over time, and the Council's growing commitment to affirmatively advance equality in housing opportunities to all persons regardless of ethnic group or race, so that all are offered the opportunity to live in and benefit from the high level of resources and quality of life available in South Pasadena.

Historic Land Development Patterns

Incorporated in 1888, South Pasadena was one of the first municipalities in the Los Angeles area and has featured relatively stable boundaries since initial incorporation, even as its population has grown dramatically. With roots as an agricultural community growing mostly citrus, South Pasadena eventually become a streetcar suburb of Los Angeles with the extension of a Pacific Electric transit line to the City in the early twentieth century. The City grew quickly, seeing high double-digit and even triple-digit decadal growth rates between 1900 and 1930. Low double-digit decadal growth continued until the mid-twentieth century, when most of South Pasadena's land was almost completely built out. Since that time, the population of South Pasadena has generally fluctuated within a range of approximately 22,000 to 25,000 residents. These historical trends are reflected in South Pasadena's development pattern, with the oldest neighborhoods lying close to the former streetcar lines and newer development in more distant and hilly areas that would, in earlier times, have been less accessible or not feasible for construction. The more central portions of the City that were close to the historical streetcar lines are also the areas that feature most of the City's multifamily housing, including units that may be more affordable to households with medium or lower incomes. Additional areas of multifamily housing are found in the northern and especially northeastern areas of the City.[38]

Mid-20h Century Racial Exclusion

Historically, "Sundown Towns" are communities, neighborhoods, or counties that excluded African Americans and other minority groups through the use of discriminatory laws, harassment, and the threat or use of violence. The name is derived from the posted and verbal warnings issued to such groups – particularly African Americans – that although they might be allowed to work or travel in a community during the daytime, they must leave by sundown. No official ordinance or law of the City of South Pasadena has been found imposing sundown restrictions, but the collective oral and written history, public accounts, and newspaper articles explicitly demonstrates South Pasadena's history as a "sundown town" for a significant portion of the 20th century.

[38] City of South Pasadena. "History." City of South Pasadena Website. Retrieved February 22, 2021. https://www.southpasadenaca.gov/visitors/history

The years during and after the Second World War witnessed open racial exclusion in the South Pasadena community. A newspaper account that appeared in the California Eagle on Thursday, September 12, 1946, *(So. Pasadena for 'Whites Only,' Says City Mgr. Telling of Racial Bars*) reported that South Pasadena City Manager Frank Clough had revealed that week that since 1941, the City had been "writing restrictive covenants into the deeds of all property obtained by the city through delinquent taxes." The article further quotes Clough as saying:

> "We do not have any negroes nor do we have any other non-Caucasian people in South Pasadena. To insure the continuance of this policy, several years ago the city council instructed the city attorney to draw up a restrictive clause and insert it into all properties coming into possession of the city."

Clough acknowledged that the Council had not officially adopted such a policy and indicated that the actions had been requested through an internal memo to the city manager and city attorney.

The article goes on to refer to a campaign conducted by a group called the South Pasadenans, which Clough said was "headed by some prominent persons" to develop a system of racial exclusion through property deed restrictions. That campaign is also noted in an article in the South Pasadena Review (*Satisfactory Progress Being Made in Race Restriction Campaign*, December 26, 1941), which reports, from a very different perspective than The Eagle, that South Pasadenans Inc., a city-wide non-profit organization "with a membership of several hundred civic-minded citizens for the purpose of sponsoring an improvement program" that would "restrict the use of property in South Pasadena to members of the Caucasian race" had met at city hall. At that time, prior to the 1948 Supreme Court ruling in Shelley v. Kraemer, these covenants were not illegal, as the leader of South Pasadenans, Inc. assured property owners in the South Pasadena Review. According to the California Eagle article, by 1946, the City Manager announced that 85% of all land in the city had been recorded with the restrictive deeds, for which property owners paid the South Pasadenans a fee of $5 "for the recording and operating expenses of the group." Two years later, those deeds became legally unenforceable, but were not necessarily removed.

Earlier in the decade, in 1942, in response to Executive Order 9066 requiring the relocation of persons of Japanese ancestry to internment camps, 165 Japanese-American residents of South Pasadena were forced to evacuate South Pasadena. There is not clarity as to what happened to homes that were evacuated by these residents. The South Pasadena Review (*What will Become of Homes Vacated By Japanese Families?*, April 3, 1942) reported on a Chamber of Commerce meeting at which the attendees' primary concern in regard to the imminent deportation of the Japanese community that would leave 47 homes vacant was the prospect that these homes would become occupied by "undesirables" and would "soon be snapped up by colored families moving down from Pasadena or surrounding communities." Mayor Andrew O. Porter, present at the meeting, responded to suggestions that properties be improved so as to be too expensive for such families, by saying that the City cannot exercise any control over these properties and that the responsibility for improvement rests with the owner of the property. The group's effort to keep blacks and other minority groups out of South Pasadena appears to have been effective, given City Manager Clough's declaration in 1946 (above) in regard to the racial profile of the city's residents.

Though racial covenants had been allowed and upheld by earlier Supreme Court rulings, they were challenged through many lawsuits, and the 1948 Supreme Court ruling in Shelley v. Kraemer determined them to be a violation of the 14th amendment, which guarantees equal protection under the law. While existing covenants were not allowed to be enforced by the courts, actions by private sellers persisted covertly throughout the Los Angeles region for many years afterward in the mid-twentieth century, and it took many years for non-whites to slowly begin to be able to buy homes in areas with histories of overt racial exclusion, including South Pasadena. Such government-sanctioned forms of discrimination have long-since been eliminated and the racial and ethnic population in South Pasadena has significantly diversified over time. However, the prior race- and ethnic-based socio-economic discrimination had a long-term impact on racial diversity in the City. With the current high residential property values discussed earlier in this chapter, the cost of moving into South Pasadena is now the primary barrier for households seeking to locate within South Pasadena.

6.4.7 Enforcement of Fair Housing and Outreach Capacity

The City enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of City policies and code for compliance with California law and referring fair housing complaints to appropriate agencies. The City of South Pasadena refers fair housing complaints to the Housing Rights Center (HRC) in Pasadena and maintains a Housing Support page on the City's website to assist access for community members. The role of the HRC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the HRC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs.

The HRC serves residents in Los Angeles County, including South Pasadena, with issues regarding tenants' rights, fair housing, and other related needs. As noted on the HRC's website:

> *"The Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing. HRC was founded in 1968, the same year that Congress passed the Fair Housing Act (FHA). Our mission is to actively support and promote freedom of residence through education, advocacy, and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law."*

As part of outreach efforts, HRC provided the City with fair housing cases and inquiries managed by the organization in the last 5 years to identify patterns and specific housing needs. Discrimination towards those with mental and physical disabilities was the most common subject of inquiries and cases across all years, as shown in Table VI-32. Discrimination cases have remained relatively low since fiscal year 2016/2017, with a peak of 7 cases during fiscal year 2019/2020. While cases and inquiries specifically related to discrimination are relatively low in South Pasadena, HRC provided other housing services to 410 individuals during the five year period. These services included providing information and counseling on a variety of tenant-landlord rights and obligations, including, but not limited to, rent increases, lease terms, repairs, and pets. The most common issue raised is regarding noticing (20 percent of questions), followed by rent increases (17 percent) and substandard conditions (13 percent). Across both housing issues and discrimination cases and

inquiries, approximately 84 percent of calls were made to HRC by in-place tenants, followed by seven percent of calls from those seeking rental housing. HRC also received calls from landlords, realtors, managers, and homebuyers. Of the hundreds of South Pasadena cases and inquiries, the HRC confirmed that none were made against the City of South Pasadena, LA County, or any public housing authority.

As part of the Fair Housing Assistance Program (FHAP), the California Department of Fair Employment & Housing (DFEH) files fair housing cases with HUD's Region IX Office of Fair Housing and with the Equal Opportunity (FHEO); HUD FHEO reported that just 10 cases were filed by residents of the City of South Pasadena between January 1, 2013, and March 23, 2021. Among these cases, four were based on disability, three were based on national origin, two were based on familial status, and one was based on familial status and race. Of these 10 cases, 8 resulted in a no-cause determination, one was withdrawn after external settlement, and one, which was based on a complaint regarding physical disability, had a successful conciliation/settlement. No cases were made against the City or other public entities in South Pasadena.

None of these fair housing agencies provided specific location information for cases, either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Policy 5.1 has been included to participate in the programs offered by the HRC and provide public information at City Hall or through the City's website, regarding fair housing issues and HRC consultation.

6.5.1 Market Constraints

Construction Costs

Construction costs can constitute a constraint to affordable housing in the City that is largely outside of the City's control. Labor and materials costs have a direct impact as they comprise the main component of housing costs. If labor or material costs increase substantially, the cost of construction in the City could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and rehabilitation of existing housing.

The cost of construction is influenced by market demand and market-based changes in the cost of materials, which may also be affected by Building Code requirements. The cost of construction depends on the type of unit being built and on the quality of the product being produced. Labor-saving materials and construction techniques are available but they tend to reduce the quality of the finished product. The type of product largely determines the cost of construction. The cost of labor is based on a number of factors, including housing demand, the number of contractors in an area, and whether construction workers are being paid based on union scales. Estimates of construction costs in the Los Angeles region from an online source (Building-Cost.net), published by the Craftsman Book Company, indicate that a typical 2,000-square-foot, wood-frame, single-family residence costs approximately $284,203 total (or approximately $142 per square foot) for labor and materials, not inclusive of land.[39] It is likely that construction costs in the City of South Pasadena would exceed this figure based on the high quality of design standards required by the community. In March 2020, the City estimated that the typical cost of construction for multifamily housing was $112.76 per square foot[40], although this figure is likely to have increased in the past 18 months. Reducing amenities and the quality of building materials, while maintaining the minimum requirements for health, safety, and performance, would reduce costs but would bring the developer a lower sales price.

The constraint of construction costs can be mitigated to some extent through economies of scale, reducing the overall cost per unit when a project contains a higher number of units. Components of the housing plan that increase unit density and facilitate state density bonuses in conjunction with the provision of affordable housing directly address the market-based constraint of housing cost.

Another component of construction cost is the cost associated with infrastructure improvements to serve the new development. New residential development projects are required to provide on-site water and sewer lateral connections to existing City mains and to construct new storm drain improvements, including National Pollutant Discharge Elimination System (NPDES) required components, and are factored into the usual cost of construction.

Existing City services, including water, sewer, and storm drain facilities, are available to serve new housing development. The Program Environmental Impact Report being prepared for the Housing Element and the rest of the General Plan Update will further analyze the sufficiency of City services to address all of the units planned for in the Housing Element. Dry utilities are also available to serve all the sites in the inventory.

[39] This estimate includes a two-car garage and forced air heating.
[40] M. Lin, personal communication, March 31, 2020.

In January 2015, the City Council adopted new development impact fees for new water and sewer connections for new developments. Previously, the common practice was for the cost of new connections to be absorbed by the service charges paid by existing South Pasadena utility customers, but changes in state law no longer allow this former practice to be conducted. Chapter 16B of the City's Municipal Code provides the legal basis for the imposition of development impact fees on development, describes which developments are exempt from the fee, and details how the fee should be calculated. When the Council adopted the connection fees in 2015, the cost for a new equivalent meter size of 5/8 by 3/4 inches—the most common household water connection—was $7,916. New sewer connection fees cost $2,094 per dwelling unit. California Government Code Section 66000 et seq. allows local jurisdictions, like South Pasadena, to charge water connection fees and South Pasadena's fees are similar to surrounding jurisdictions, like Pasadena to the north. These connection fees do not place a constraint on new housing development in South Pasadena.

Some of the vacant single-family parcels on the inventory are located in hillside areas, where an additional construction cost is incurred for required grading in association with stepping of the pad and providing retaining walls. There are a few hillside properties that may be appropriate for multifamily housing and the need to provide for multi-stepped pads on those sites could constitute a constraint.

Land Costs

The price of land is a key component of the total housing cost, and land prices in South Pasadena have risen. According to a survey of vacant residential land sales on Zillow in September 2021, vacant land costs range from $34-$118 per square foot in the City, depending on location, development capacity of the land, and whether planning approval has been approved for the project. This is not substantially changed as compared with $40-$100 per square foot documented in the 2013-2021 Housing Element. Over the past housing element period, most of the new housing units have been single-family homes and ADUs, with a few smaller multi-family projects completed. Many of these new homes were built in vacant, hillside areas, or replaced existing structures. The policies of this housing element focus on different land resources throughout the city, with an expectation of replacing non-residential uses with multi-family or mixed-use residential development. This will undoubtedly have an effect on land prices as the market adjusts to the changes in opportunity for land in different parts of the city.

Mortgage Financing

National policies and economic conditions determine interest rates, and there is little that local governments can do to affect these rates. First-time homebuyers are the group impacted the most by financing requirements. As of December 2020, interest rates for mortgages in South Pasadena generally ranged from 2 percent for a fixed-rate 15-year loan to 2.7 percent for a 7/6-month adjustable-rate mortgage. With interest rates remaining low for an extended period, sales prices have steadily increased, which, along with changes in lending practices in the last 10 years, has created a constraint to housing for some potential purchasers. Another more critical impediment to homeownership is the ability of potential buyers to fulfill down payment requirements, and the ability of buyers to receive a favorable credit rating. A conventional home loan typically requires 20 percent of the sale price as a down payment, which is the largest constraint to first-time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment required and a potential homeowner's available funds. The availability of financing for

developers under current economic conditions also poses a constraint on development that is outside of the City's control. Historically, jurisdictions could offer interest rate write-downs to extend home purchasing opportunities to a broader economic segment of the population through the use of state and federal financing programs, when available.

6.5.2 Governmental Constraints

Housing affordability is also affected by the actions and policies through which the City and State can have an impact on the production of housing. Land use controls, site improvement requirements, California building codes, fees, and other local programs intended to improve the overall quality of housing may serve as constraints to the development of affordable housing.

General Plan Land Use Element and the Mission Street Specific Plan

The South Pasadena General Plan Land Use Element sets forth the City's policies for guiding local development by establishing the amount and distribution of land to be allocated for different uses within the City. The current (1998) General Plan Land Use Element acts as a constraint on housing production through limitations that preclude mixed-use and higher density multi-family housing. The comprehensive revision of the General Plan and preparation of a new Downtown Specific Plan that will replace the Mission Street Specific Plan will play a major role in addressing this constraint. The draft General Plan presents a community vision for South Pasadena through 2040 that aligns with the programs in this housing element. Adoption is anticipated in early 2022.

South Pasadena's current General Plan residential land use densities are shown in Table VI-32.

Table VI-32

HRC DISCRIMINATION INQUIRIES AND CASES~~GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES~~

PROTECTED CLASS	FISCAL YEAR 2016/2017		FISCAL YEAR 2017/2018		FISCAL YEAR 2018/2019		FISCAL YEAR 2019/2020		FISCAL YEAR 2020/2021	
	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL
Discrimination Inquiries										
Gender	0	0%	0	0%	1	14%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	1	5%	0	0%
Mental Disability	4	44%	2	18%	1	14%	5	25%	1	13%
Physical Disability	3	33%	6	55%	5	71%	10	50%	5	63%
Familial Status	0	0%	3	27%	0	0%	4	20%	2	25%
Race	1	11%	0	0%	0	0%	0	0%	0	0%
Other	1	11%	0	0%	0	0%	0	0%	0	0%
Total	9	100%	11	100%	7	100%	20	100%	8	100%
Discrimination Cases										
Gender	0	0%	0	0%	1	50%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	0	0%	0	0%
Mental Disability	1	50%	0	0%	0	0%	2	29%	0	0%
Physical Disability	0	0%	1	100%	1	50%	3	43%	0	0%
Familial Status	0	0%	0	0%	0	0%	2	29%	1	100%
Race	1	50%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	100%	1	100%	2	100%	7	100%	1	100%

Source: Housing Rights Center, 2016-2021

While historically, exclusionary policies and practices may have resulted in fair housing lawsuits against the City, this has not been the case in recent decades. As described in Section 6.4.6, the City is actively addressing historically exclusive policies and has set the path for an inclusive city. These efforts are furthered by policies that reinforce fair housing through access to sound and affordable housing consistent with the goals of this housing element update (Goal 5). These goals, policies, and programs will be adopted in association with the General Plan update, the Downtown Specific Plan, or other policy documents, and implemented through approval of individual development proposals.

In addition to direct actions to affirmatively further fair housing, the City demonstrates compliance or intention to comply with fair housing law through the following:

- Although the City implements Density Bonus Law (Gov. Code, §65915.) per recent legislative updates, the City has included Program 2.e to update the Zoning Code to reflect the changes and comply with current State law.
- The City intends to comply with No-Net-Loss (Gov. Code §65863) through identifying a surplus of sites available to meet the City's RHNA allocation. In total, the City's surplus unit capacity is 289, composed of 13 lower-income units, 96 moderate-income units, and 180 above moderate-income units.
- The City complies with the Housing Accountability Act (Gov. Code, § 65589.5) by allowing emergency shelters by right in the Business Park (BP) zone district.
- The City will comply with SB 35 (Gov. Code §65913.4) by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by March 2023 (Program 4.f).
- The City complies with SB 330 (Gov. Code § 65589.5) with an established pre-application process for development projects.
- The City complies with the California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act of 1968 by referring fair housing cases to HRC, prohibiting enforcement of racially restrictive covenants still in place, and including Program 5.c in this Housing Element to proactively remove these covenants from property deeds citywide.

6.4.8 Analysis of Sites Inventory for Fair Housing

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 and AB 1304 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. As shown in Figure VI-4, all of~~Land Use & Community Design Chapter,~~ South Pasadena is designated as a highest opportunity area, though access to opportunity varies slightly throughout the community as identified in this assessment of fair housing.~~*General Plan*, October 1998~~

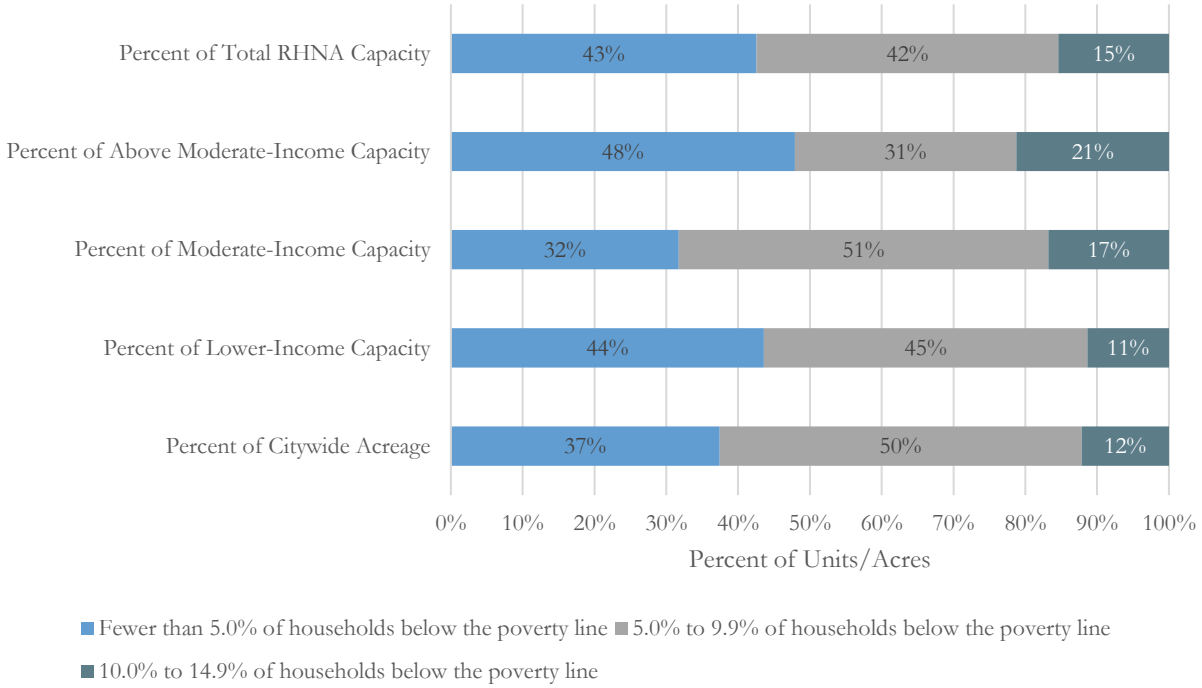
The locations of South Pasadena's proposed housing opportunity sites are not anticipated to contribute to the reinforcement or worsening of any fair housing issues. (A full listing and descriptions of South Pasadena's housing sites are contained in Tables VI-44, VI-50 and Appendix A, Sites Exhibits.) All census tracts within South Pasadena feature at least one larger housing opportunity site (Figure A-1 in Appendix A), with some degree of concentration as mixed-use developments in central areas that feature access to jobs, transit, and schools, as well as higher levels of large vacant or underutilized parcels. Although the moderate concentration of housing opportunity sites in central areas of South Pasadena could be perceived as less equitable than a more even or purely random distribution of housing sites, this alternative approach could serve to worsen fair housing issues by placing new homes further from access to transit, jobs, educational opportunity, and walkable neighborhoods. Additionally, attempting to place housing opportunity sites in areas without larger vacant or underutilized parcels would likely involve more displacement of existing residents and could negatively impact the ability of sites to be feasibly redeveloped within the horizon year of the Housing Element.

Potential Effects on Patterns of Integration and Segregation

Income

The locations of South Pasadena's housing opportunity sites are not anticipated to reinforce or exacerbate patterns of segregation and integration, whether with respect to race or economic status. As shown in Figure VI-24, South Pasadena has relatively low rates of poverty, with approximately 87 percent of the city's geographical area having a poverty rate of less than 10 percent. While poverty rates are slightly higher in the central portion of the city south of Mission Street (Figure VI-6), housing opportunity sites are located across South Pasadena in a distribution that closely reflects the rate of poverty in the city, with approximately 15 percent of the projected RHNA capacity located in areas with a poverty rate of greater than 10 percent, compared to 12 percent of the city's land falling into this category. Approximately 89 percent of lower-income units are projected in neighborhoods with fewer than 10 percent of households below the poverty line, ensuring that future lower-income units are not concentrated in areas of higher poverty rates, thus affirmatively furthering fair housing by facilitating housing mobility to areas of affluence. The few sites for lower-income units identified in an area with a higher poverty rate are all located along major transit corridors, as shown in Figures A-1.a through A-1.g, thus providing the best possible access to transit, direct access to employment opportunities, and other resources. As Figure VI-24 demonstrates, although there are modest differences in poverty rates throughout South Pasadena, housing opportunity sites are distributed in such a manner as to promote mixed-income communities and encourage lower-income units in areas of affluence and moderate and above-moderate units in areas with slightly lower median incomes, thereby serving to dilute any potential effects with respect to concentration of poverty. The inclusionary housing requirement will also ensure that new developments serve a variety of household income categories within the same site.

Figure VI-24
UNITS AND CITY ACREAGE BY POVERTY RATE



Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

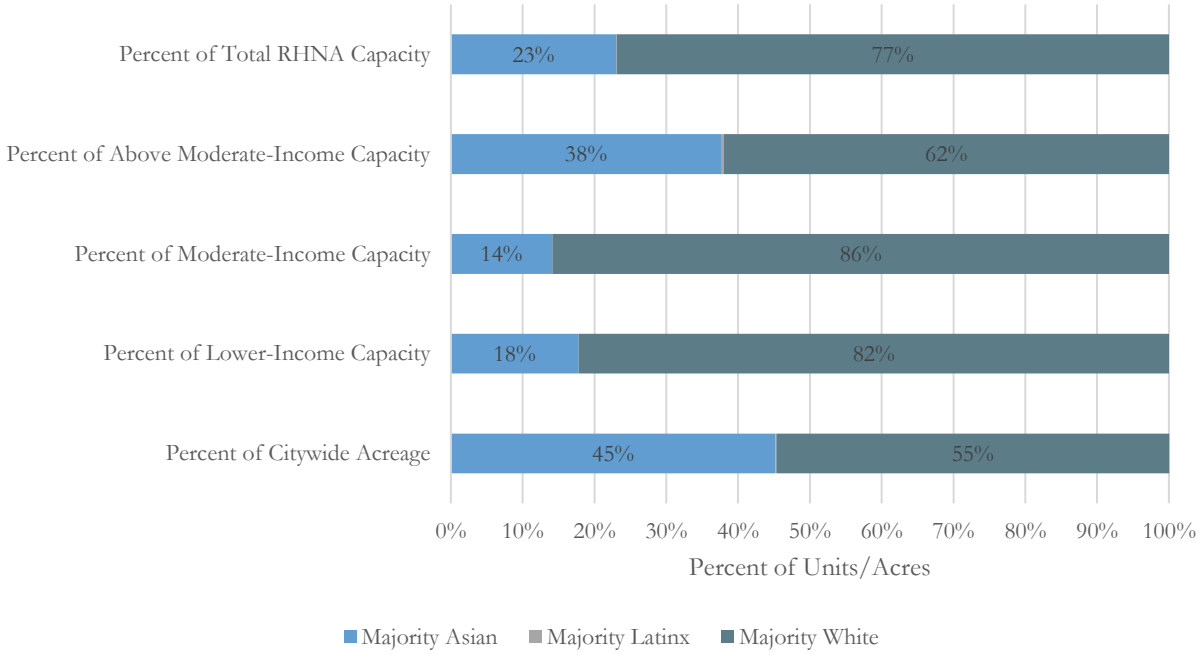
Race and Ethnicity

The sites inventory includes housing opportunity sites for all income categories across all of the South Pasadena census tracts, to avoid the potential of reinforcing or exacerbating any patterns of racial segregation. Although population trends in South Pasadena historically had strong patterns of racial disparity, diversity indices within all South Pasadena census tracts are currently holding steady or increasing (Figure VI-12), and no census tracts currently feature racial majority gaps in the "predominant" category (Figure VI-11). Additionally, because there are neither any TCAC identified Areas of High Segregation or Poverty nor any HUD-identified R/ECAPs in South Pasadena (Figure VI-2), the location of the City's housing opportunity sites would not affect any issues relating to these classifications.

While there is a concentration of Asian residents in the southern portion of the city, south of Mission Street (Figure VI-11), other indicators in this area such as quality of schools, median income, and familial status suggest that this population is not negatively isolated and has equal access to economic, educational, and environmental opportunities compared with residents of other areas of the city. As presented in Figure VI-25 the majority of the population identify as Asian in approximately 45 percent of the city, while the majority of residents identify as White in the remaining 55 percent. While 82 percent of lower-income units and 86-percent of moderate-income units are identified in

areas that are a majority White, these areas also offer quality schools, have higher jobs proximity index scores than the southwestern portion of the city, and are closer to commercial corridors along Fair Oaks Avenue and Mission Street, indicating strong access to resources, services, and amenities.

Figure VI-25
UNITS AND CITY ACREAGE BY MAJORITY POPULATION

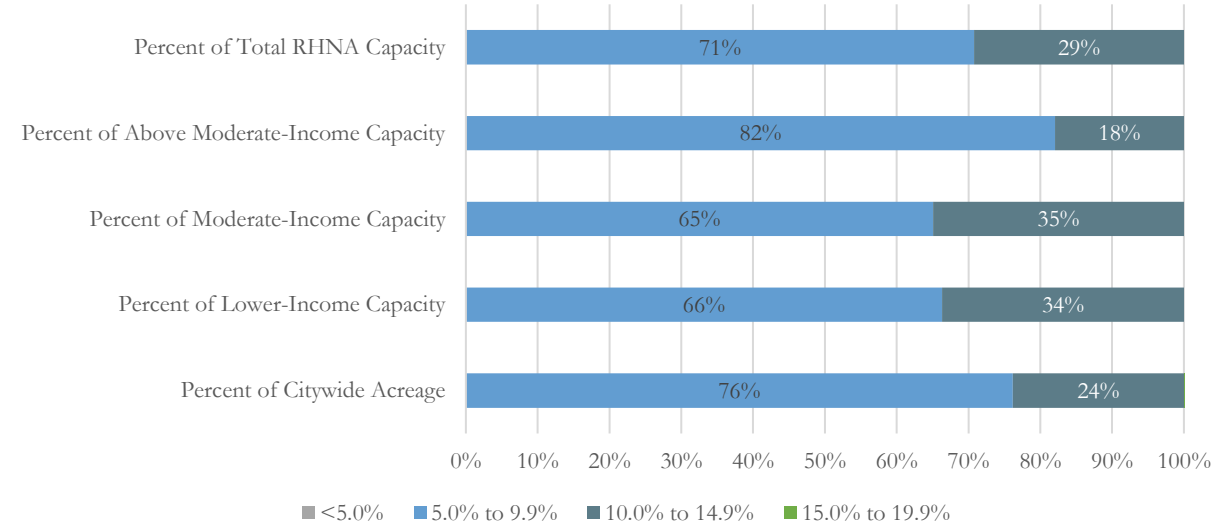


Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

Disability

Approximately seven percent of South Pasadena's population lives with at least one disability, a rate that is relatively low compared to the region. As shown in Figure VI-26, approximately 71 percent of the total RHNA capacity identified in the sites inventory is in areas in which 5.0 to 9.9 percent of residents have a disability, closely reflecting the distribution of land in South Pasadena by disability rate. Locating units affordable to lower- and moderate-income residents near and along commercial corridors will help to improve access for, and accommodate the needs of, persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit. Additionally, mixed housing types viable in the high-density and mixed-use zones can help accommodate the needs of residents living with disabilities by integrating services or amenities on-site.

Figure VI-26
UNITS AND CITY ACREAGE BY DISABILITY RATE



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 5.0 percent or more than 14.9 percent of the population has a disability.

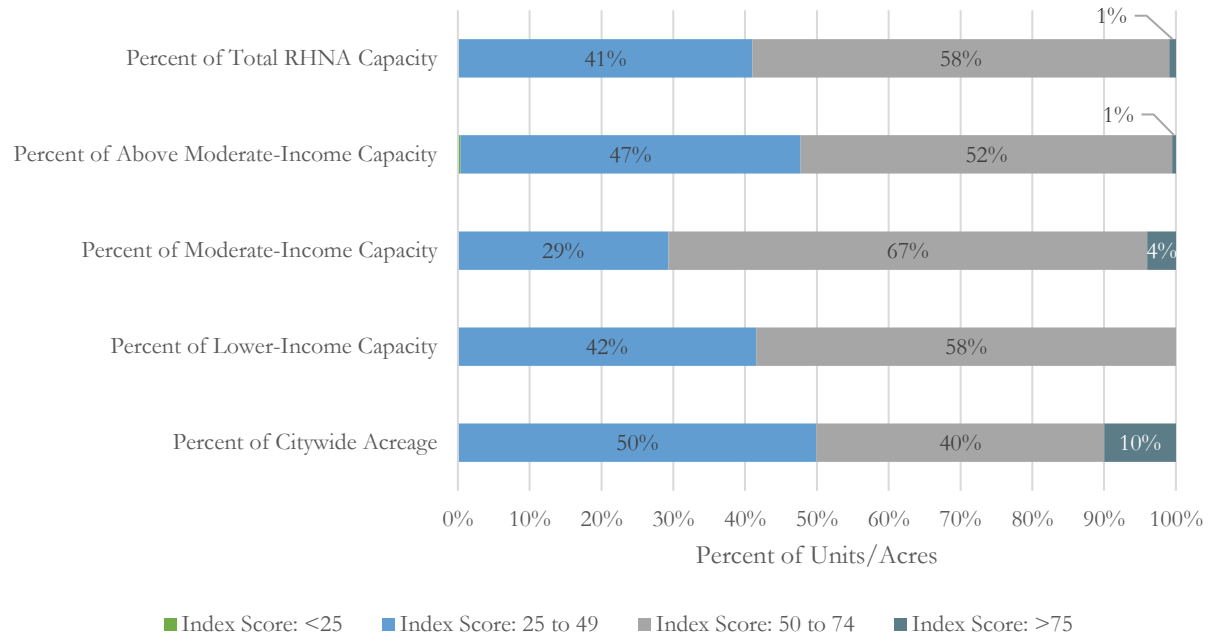
Potential Effects on Access to Opportunity

With respect to access to opportunity, the locations of South Pasadena's housing opportunity sites would serve to maximize resident access to economic and educational opportunity. As shown in Figure VI-4, the entirety of South Pasadena is identified as a Highest Resource area, indicating high levels of opportunity throughout the City. Additionally, regional place- and people-based indices indicate that South Pasadena features a high level of opportunity in all census tracts.

Jobs and Transit Proximity

Based on the data presented in Figure VI-18, the majority of South Pasadena's housing opportunity sites would feature moderate to good access to jobs, and would also have good access to bus stops along Fair Oaks Avenue, as well as the South Pasadena Metro L Line light rail station. As shown in Figure VI-27, a slightly larger share of the RHNA capacity is located in areas scoring 50 or above for job proximity (58 percent) than the citywide acreage (50 percent). Approximately 58 percent of lower-income units and 71 percent of moderate-income units are located in areas scoring 50 or above, suggesting that these units will offer strong access to employment opportunities. While not all units are planned in the areas of highest job proximity, the remaining units offer mobility opportunities for households that choose to live further from existing job opportunities. The location of several lower-income sites along the Fair Oaks Avenue and Mission Street corridors will provide close proximity to employment opportunities in these areas as well as the regular transit stops located along both of these thoroughfares.

Figure VI-27
UNITS AND CITY ACREAGE BY JOB PROXIMITY INDEX SCORE



Source: 2014-2017 HUD; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which fewer the jobs proximity index score is less than 25.

Educational Opportunities

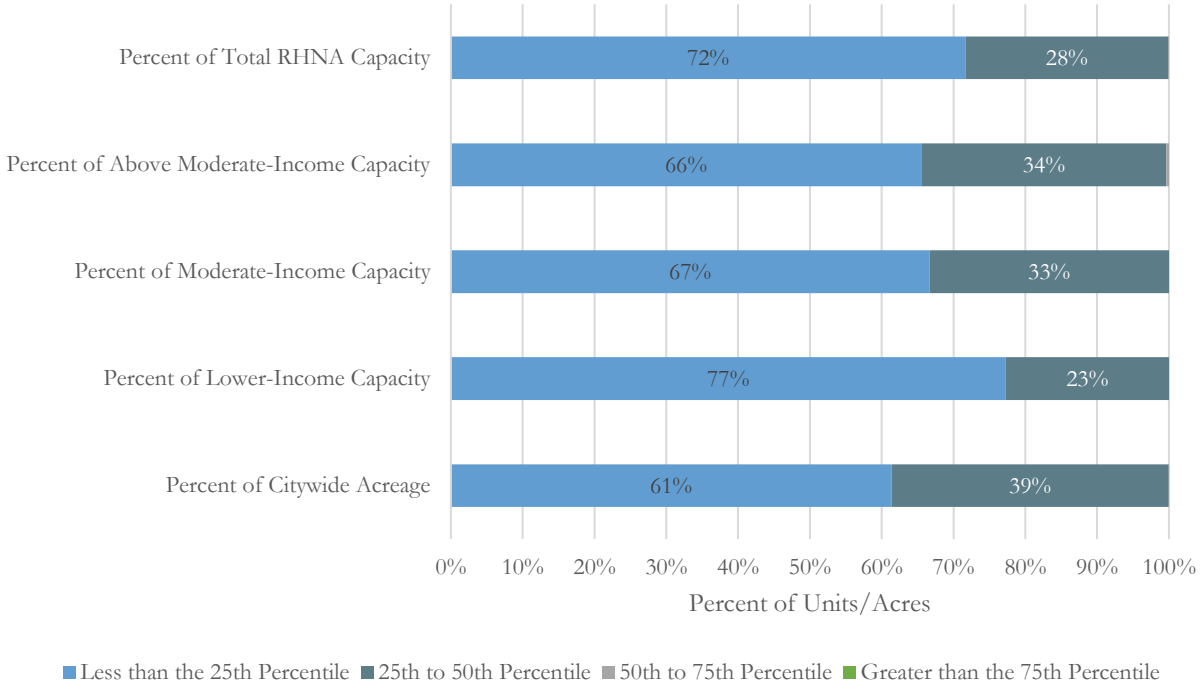
As discussed in Section 6.4.4 (Access to Opportunity), all public schools in the City of South Pasadena score in the 95th percentile or higher compared to the rest of the state. Additionally, Figures VI-15 through VI-17 demonstrate that nearly all parcels in the city are located within a mile of an elementary school and that the middle and high schools are centrally located. Given the location, access, and proficiency of schools in South Pasadena, the sites identified in this Housing Element to meet the RHNA will provide housing opportunities for new and existing households, including lower-income households, near good schools. TCAC and HCD have identified all of South Pasadena as scoring in the 82nd percentile or higher, further supporting that the location of sites will not limit access to proficient schools for any socioeconomic group.

Environmental Health

Despite historic contamination of drinking water sources, all census tracts in South Pasadena score between the 9th and 34th percentiles for OEHHA's assessment of environmental pollution, likely as a result of extensive efforts to mitigate past contamination in the San Gabriel Valley. As shown in Figure VI-28, 72 percent of the unit capacity to meet the City's RHNA is located in areas that score below the 25th percentile, or the best environmental conditions. This includes 77 percent of lower-income units and 67 percent of moderate-income units. Though 28 percent of the RHNA capacity is located in areas with slightly higher scores, the generally low scores throughout the City

indicate that all residents across the City will have similar access to healthy environmental conditions. The distribution of units at each affordability level will not create a discrepancy in access to positive environmental conditions.

Figure VI-28
UNITS AND CITY ACREAGE BY CALENVIROSCREEN PERCENTILE



Source: CalEnviroScreen 4.0, 2021; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena that score above the 34th percentile.

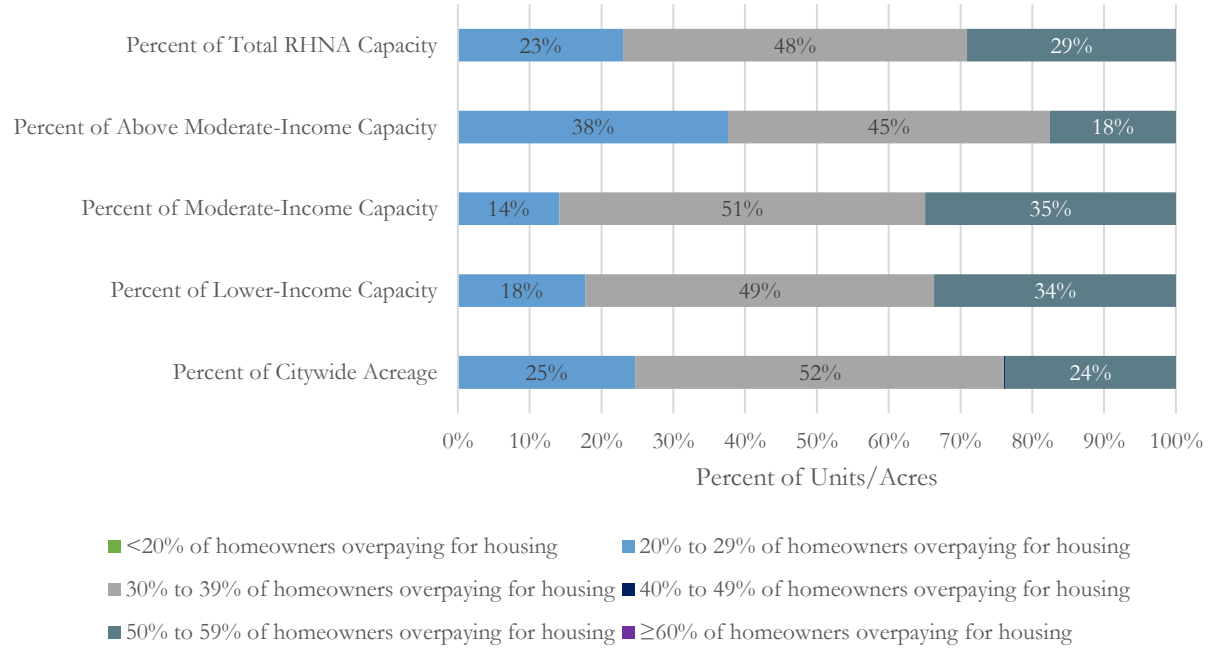
Potential Effects on Disproportionate Housing Need

Overpayment

While overpayment rates are lower in South Pasadena than many nearby jurisdictions, as shown in Figures VI-20 and VI-22, owners and renters throughout the city, and the greater Los Angeles area, are overpaying for housing because of rapidly increasing housing costs that outpace wage increases. With a large supply of lower- and moderate-income households in the central portions of South Pasadena with good access to schools, transit, and commercial districts, the sites inventory guides new housing toward opportunities to alleviate pressure for households to relocate to less accessible and/or less affordable areas of the City due to housing costs. As shown in Figure VI-2, the allocation of the total RHNA capacity closely reflects the patterns of overpayment among homeowners. A greater percentage of the units to meet the lower- and moderate-income RHNA have been identified on sites located in areas in which more than 30 percent of homeowners are overpaying for housing, therefore reducing displacement risk for these households by expanding the supply where there is

greatest need. In contrast, there is a larger share of above moderate-income units (38 percent) in the southwestern portion of the city where overpayment is lower, likely due to the high median income. Approximately 18 percent of lower-income units have also been identified in areas of lower homeowner overpayment rates, including along Monterey Road and Pasadena Avenue, to encourage mixed-income neighborhoods and facilitate housing mobility opportunities for these households.

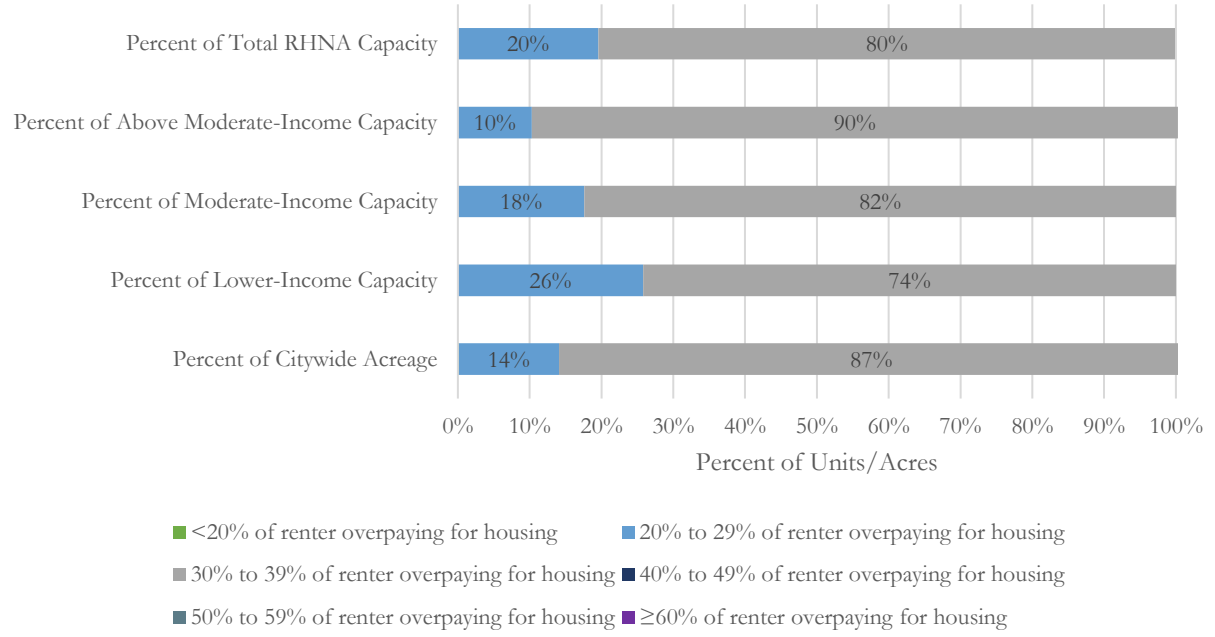
Figure VI-29
UNITS AND CITY ACREAGE BY RATE OF HOMEOWNER OVERPAYMENT



Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 59 percent of homeowners are overpaying for housing.

Renter overpayment in South Pasadena is notably lower than in surrounding jurisdictions, as seen in Figure VI-21. The rate of overpayment among renters ranges from 20 to 39 percent throughout the City (Figure VI-30). As with homeowner overpayment, the distribution of the total RHNA capacity by renter overpayment rates closely mirrors the citywide rates, with approximately 20 percent of units in areas in which 20 to 29 percent of renters are cost burdened and 80 percent in areas in which 30 to 39 percent of renters are cost burdened. Relatively low overpayment rates among renters likely reflect a barrier to entry to the South Pasadena housing market for lower- and moderate-income households, given the shortage of affordable rental housing. As such, the plan to build more rental housing specifically for these income groups will increase mobility opportunities while minimizing displacement risk due to overpayment.

Figure VI-30
UNITS AND CITY ACREAGE BY RATE OF RENTER OVERPAYMENT



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 39 percent of homeowners are overpaying for housing.

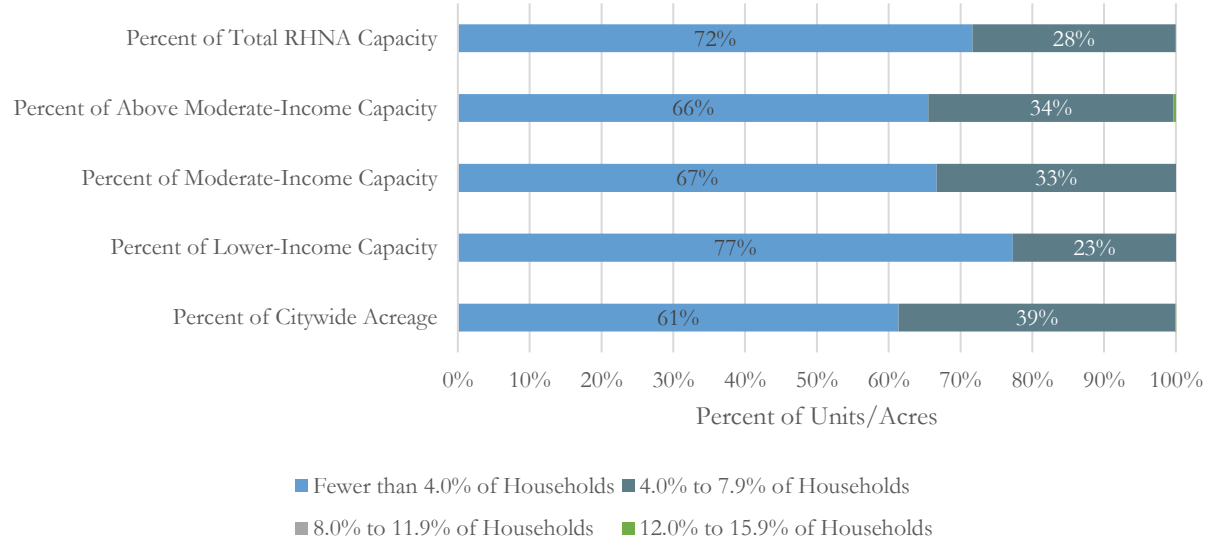
Typically, above-moderate income ownership units are unaffordable to lower- and moderate-income households in South Pasadena, although inclusionary units in ownership projects may offer those opportunities for moderate-income households in the coming years. Sites for new units have been identified across all geographic areas of the City where a range of overpayment levels exist for both owners and renters. The overall intent is to reduce risk of displacement due to overpayment for all South Pasadena residents.

Overcrowding

As discussed previously, overcrowding is not a significant problem in South Pasadena, with rates below eight percent throughout the City, as shown in Figures VI-19 and VI-20. The highest rate of overcrowding occurs in the area between Fair Oaks Avenue and the eastern edge of the Monterey Hills neighborhood, as well as in the northern areas of the City. However, even in these areas, overcrowded households account for less than eight percent of total households. This, combined with the fact that South Pasadena's housing opportunity sites are located across all City census tracts, demonstrates that patterns of planned new housing development would not serve to exacerbate existing overcrowding issues and may actually serve to reverse them.

The distribution of moderate income and above-moderate income units closely follows overcrowding patterns, with 66 percent of moderate-income unit capacity and 66 percent of above-moderate income unit capacity in areas where fewer than four percent of households are overcrowded. Approximately 77 percent of lower-income units are located in these areas, with the remaining 23 percent along Fair Oaks Avenue, where overcrowding is currently slightly higher. Given the low rates of overcrowding throughout the City, the identification of sites in all census tracts will help to alleviate overcrowding through increased mobility opportunities and a larger supply of lower- and moderate-income housing units in general, particularly near commercial corridors. Additionally, the construction of more above-moderate income units will expand the housing stock, offering new market-rate housing opportunities to potentially reduce displacement and overcrowding for these households as well.

Figure VI-31
UNITS AND CITY ACREAGE BY RATE OF OVERCROWDING



Source: CHHS, 2020; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 6.2 percent of households are overcrowded.

Altogether, these various considerations and analyses indicate that South Pasadena's planned housing opportunity sites would not only avoid exacerbating fair housing issues, but would actually serve to improve fair housing outcomes by: (1) avoiding concentrating new housing and affordable housing in areas characterized by economic/racial segregation; (2) placing new housing and affordable housing in areas with access to jobs, transit, and educational opportunity; and (3) allowing more housing in South Pasadena in general, thereby giving additional families access to the City's extensive high-resource areas.

6.4.9 Contributing Factors to Fair Housing Issues

The overall housing shortage in the Los Angeles region, and particularly the shortage of subsidized, affordable housing units with a range of sizes to meet the needs of all persons, is a contributing fair housing factor for South Pasadena and for all its surrounding jurisdictions. South Pasadena is part of a bigger housing market for above-moderate and for moderate and lower income households. The Housing Plan in Section 6.8 addresses South Pasadena's obligation to contribute its fair share toward addressing the regional shortage by identifying the local factors that contribute toward it.

Based on this assessment of fair housing, the priority issue that has emerged for South Pasadena is the lack of housing for lower- and moderate-income households, and the historic denial of access to the black community and others due to past-century racist practices. Addressing the continuing effects of exclusionary housing policies has been identified as the highest priority action to affirmatively further fair housing in South Pasadena.

It should also be noted that high rental rates and sales prices limit local housing options for seniors and individuals living with a disability, resulting in housing pressures for these vulnerable segments of the community. Housing for these groups is also of high importance and several strategies are identified in Section 6.8 to support them.

Prioritized contributing factors are **bolded** in Table VI-33 and associated actions to meaningfully affirmatively further fair housing related to these factors are ***bolded and italicized***.

~~The new plans anticipated to be adopted in 2022 will allow a range of densities, including mixed-use zoning with 30-70 dwelling units per acre.~~

~~***Residential Zoning Regulations***~~

~~Residential site development standards are summarized by zoning district in Table VI-33.~~

Table VI-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES
~~**RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT**~~

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Displacement/exclusion of lower-income residents and overpayment for housing by renters and homeowners	**Housing shortages in the City ~~Los Angeles region~~** **Lack of affordable and assisted housing units** Unaffordable rents and home prices Cost of rehabilitation or repair Shortage of ~~Need for~~ sites that could be feasibly redeveloped **~~Need for~~Currently limited partnerships with affordable housing developers**	Program 1.c - Housing Rehabilitation and Code Enforcement Program 2.a - Planning Assistance and Permit Processing Program 2.b - Affordable Housing Production/Inclusionary Housing Program 2.c - CalHome Program Program 2.d - Section 8 Rental Assistance Program 2.e - Density Bonus Program 2.f - Homeless Services Program 2.k - Affordable Housing Overlay Zone Program 3.a - Rezone and Redesignate Sites to Meet RHNA Program 3.c – Replacement of Lost Units from Residential Demolitions Program 3.f - Allow and Facilitate ADUs Program 3.g - Monitor ADU Production ***Program 3.k - General Plan Affordable Housing Overlay*** Program 4.a - Land Use Controls – Emergency Shelters Program 4.b - Land Use Controls – Transitional and Supportive Housing Program 5.a - Fair Housing Education, Outreach, and Services
Modest overcrowding in central and northern areas of the City	Availability of affordable units in a range of sizes	Program 3.b - Mixed-Use Developments and Adaptive Re-Use Program 3.d - Parcel Assemblage Program 3.f - Allow and Facilitate ADUs Program 5.b - Encouraging a Variety of Housing Types
~~Older housing stock that may be in need of~~Displacement risk due to repair and rehabilitation need to~~to~~ maintain habitability and/or ~~may not readily accommodate individuals with disabilities~~lack of accessibility for seniors and persons with disabilities	~~South Pasadena has an older~~Aging housing stock **Cost of rehabilitation or repair** **Cost of retrofitting existing properties** **Shortage of accessible units** Need for higher levels of new, ADA-compliant development	Program 1.b - Housing Acquisition ***Program 1.c - Housing Rehabilitation and Code Enforcement*** Program 2.g - Senior Housing Program 3.f - Allow and Facilitate ADUs ***Program 4.d - ADA Accessibility Standards*** Program 4.e - Universal Design
~~Limited housing options for elderly and/or individuals living with a disability, especially those requiring support~~	~~Presence of only three retirement/assisted living facilities in South Pasadena~~ ~~Housing stock~~	~~Program 2.g - Senior Housing~~ ~~Program 3.f - Allow and Facilitate ADUs~~ ~~Program 4.d - ADA Accessibility Standards~~ ~~Program 4.e - Universal Design~~

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Potential housing discrimination against protected classes	**Existing racially restrictive covenants, though not enforced** **Historic discriminatory practices** Lack of education and mediation services for renters, buyers, property owners, and real estate professionals	Program 4.d - ADA Accessibility Standards ***Program 5.a - Fair Housing Education, Outreach, and Services*** ***Program 5.c - Removal of Racially Restrictive Covenants from Property Deeds Citywide***

6.5 HOUSING CONSTRAINTS

Market conditions, as well as governmental programs and regulations, affect the provision of adequate and affordable housing. Housing Element law requires an assessment of potential and actual governmental and non-governmental constraints affecting the development of new housing and the maintenance of existing units for all income levels. Potential market, governmental, and environmental constraints that contribute to housing development costs in South Pasadena are addressed herein.

6.5.1 Market Constraints

Construction Costs

Construction costs can constitute a constraint to affordable housing in the City that is largely outside of the City's control. Labor and materials costs have a direct impact as they comprise the main component of housing costs. If labor or material costs increase substantially, the cost of construction in the City could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and rehabilitation of existing housing.

The cost of construction is influenced by market demand and market-based changes in the cost of materials, which may also be affected by Building Code requirements. The cost of construction depends on the type of unit being built and on the quality of the product being produced. Labor-saving materials and construction techniques are available but they tend to reduce the quality of the finished product. The type of product largely determines the cost of construction. The cost of labor is based on a number of factors, including housing demand, competition for other construction projects, the number of contractors in an area, and whether construction workers are being paid based on union scales. Estimates of construction costs in the Los Angeles region from an online source (Building-Cost.net), published by the Craftsman Book Company, indicate that a typical 2,000-square-foot, wood-frame, single-family residence costs approximately $284,203 total (or approximately $142 per square foot) for labor and materials, not inclusive of land.[41] It is likely that construction costs in the City of South Pasadena would exceed this figure based on the high quality of design standards required by the community. In March 2020, the City estimated that the typical cost of construction for multifamily housing was $112.76 per square foot[42], although this figure is likely to have increased in the past 18 months. Reducing amenities and the quality of building materials, while maintaining the minimum requirements for health, safety, and performance, would reduce costs but would bring the developer a lower sales price.

The constraint of construction costs can be mitigated to some extent through economies of scale, reducing the overall cost per unit when a project contains a higher number of units. Components of the housing plan that increase unit density and facilitate state density bonuses in conjunction with the provision of affordable housing directly address the market-based constraint of housing cost.

[41] This estimate includes a two-car garage and forced air heating.
[42] M. Lin, personal communication, March 31, 2020.

Another component of construction cost is the cost associated with infrastructure improvements to serve the new development. New residential development projects are required to provide on-site water and sewer lateral connections to existing City mains and to construct new storm drain improvements, including National Pollutant Discharge Elimination System (NPDES) required components, and are factored into the usual cost of construction. In addition the City's Low Impact Development ordinance required by the regional water quality control board requires all developments of one acre or more to provide for subterranean drainage of stormwater, which is more expensive than connection to a storm drain.

Existing City services, including water, sewer, and storm drain facilities, are available to serve new housing development. The Program Environmental Impact Report being prepared for the Housing Element and the rest of the General Plan Update will further analyze the sufficiency of City services to address all of the units planned for in the Housing Element. Dry utilities (electrical and internet service) are also available to serve all the sites in the inventory.

In January 2015, the City Council adopted new development impact fees for new water and sewer connections for new developments. Previously, the common practice was for the cost of new connections to be absorbed by the service charges paid by existing South Pasadena utility customers, but changes in state law no longer allow this former practice to be conducted. Chapter 16B of the City's Municipal Code provides the legal basis for the imposition of development impact fees on development, describes which developments are exempt from the fee, and details how the fee should be calculated. When the Council adopted the connection fees in 2015, the cost for a new equivalent meter size of 5/8 by 3/4 inches—the most common household water connection—was $7,916. New sewer connection fees cost $2,094 per dwelling unit. California Government Code Section 66000 et seq. allows local jurisdictions, like South Pasadena, to charge water connection fees and South Pasadena's fees are similar to surrounding jurisdictions, like Pasadena to the north. These connection fees do not place a constraint on new housing development in South Pasadena.

Some of the vacant single-family parcels on the inventory are located in hillside areas, where an additional construction cost is incurred for required grading in association with stepping of the pad and providing retaining walls. There are a few hillside properties that may be appropriate for multifamily housing and the need to provide for multi-stepped pads on those sites could constitute a constraint.

Land Costs

The price of land is a key component of the total housing cost, and land prices in South Pasadena are high, and continue to increase. According to a survey of vacant residential land sales on Zillow in September 2021, vacant land costs range from $34-$118 per square foot in the City, depending on location, development capacity of the land, and whether planning approval has been approved for the project. This is not substantially changed as compared with $40-$100 per square foot documented in the 2013-2021 Housing Element. Over the past housing element period, most of the new housing units have been single-family homes and ADUs, with a few smaller multi-family projects completed. Many of these new homes were built in vacant, hillside areas, or replaced existing structures. The policies of this housing element focus on different land resources throughout the city, with an expectation of replacing non-residential uses with multi-family or mixed-use residential development. This will undoubtedly have an effect on land prices as the market adjusts to the changes in opportunity for land in different parts of the city.

Mortgage Financing

National policies and economic conditions determine interest rates, and there is little that local governments can do to affect these rates. First-time homebuyers is the group impacted the most by financing requirements. As of December 2020, interest rates for mortgages in South Pasadena generally ranged from 2 percent for a fixed-rate 15-year loan to 2.7 percent for a 7/6-month adjustable-rate mortgage. With interest rates remaining low for an extended period, sales prices have steadily increased, which, along with changes in lending practices in the last 10 years, has created a constraint to housing for some potential purchasers. Another more critical impediment to homeownership is the ability of potential buyers to fulfill down payment requirements, and the ability of buyers to receive a favorable credit rating. A conventional home loan typically requires 20 percent of the sale price as a down payment, which is the largest constraint to first-time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment required and a potential homeowner's available funds. The availability of financing for developers under current economic conditions also poses a constraint on development that is outside of the City's control. Historically, jurisdictions could offer interest rate write-downs to extend home purchasing opportunities to a broader economic segment of the population through the use of state and federal financing programs, when available.

6.5.2 Governmental Constraints

Housing affordability is also affected by the actions and policies through which the City and State can have an impact on the production of housing. Land use controls, site improvement requirements, California building codes, fees, and other local programs intended to improve the overall quality of housing may serve as constraints to the development of affordable housing.

General Plan Land Use Element and the Mission Street Specific Plan

The South Pasadena General Plan Land Use Element sets forth the City's policies for guiding local development by establishing the amount and distribution of land to be allocated for different uses within the City. The current (1998) General Plan Land Use Element acts as a constraint on housing production through limitations that preclude mixed-use and higher density multi-family housing. The comprehensive revision of the General Plan and preparation of a new Downtown Specific Plan that will replace the Mission Street Specific Plan will play a major role in addressing this constraint. The draft General Plan presents a community vision for South Pasadena through 2040 that aligns with the programs in this housing element. Adoption is anticipated at the same time as Housing Element adoption.

South Pasadena's current General Plan residential land use densities are shown in Table VI-34.

~~***Residential Parking Requirements***~~

~~The City's parking requirements are based on unit type and size and are shown in Table VI-34. Program 3.f updates the City's ADU ordinance, including parking requirements, to comply with current California law (already adopted in May 2021). The inclusionary housing ordinance (SPMC Chapter 36.350) also includes a streamlined process to waive parking requirements in conjunction with providing affordable housing units and utilizing the state density bonus.~~

Table VI-34
GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES~~PARKING REQUIREMENTS~~

RESIDENTIAL LAND USE DESIGNATIONS	DENSITY (DWELLING UNITS PER ACRE)
Estate & Very Low-Density Residential	1 – 3.5
Low-Density Residential	3.5 – 6
Medium-Density Residential	6 – 14
High-Density Residential	14 – 24
Altos De Monterey (Overlay Zone)	1 unit per lot

Source: Land Use & Community Design Chapter, ~~Zoning Code, City of~~ *South Pasadena General Plan*, October 1998

The new plans anticipated to be adopted ~~, accessed~~ in 2022 will allow a range of densities, including mixed-use zoning with 30-70 dwelling units per acre.~~2020 and 2021~~

Residential Zoning Regulations

Residential ~~***Standards: Flexibility for Projects with On***~~-site development standards are summarized by zoning district in Table VI-35. The City maintains the current Zoning Code with zoning and development standards on the City website.

~~***Affordable Housing***~~

~~Compliance with all of the City's Zoning Code regulations, such as maximum height regulations, lot coverage, and/or floor area ratio restrictions, and parking standards could potentially present difficulties for the development of affordable multifamily housing. The South Pasadena Zoning Ordinance now includes two processes that offer waivers from strict application of the standards for projects that include affordable housing. These are:~~

- ~~SPMC 36.375.080, Streamlined State Density Bonus Review. These provisions adopted with the inclusionary housing ordinance provide projects with on-site affordable housing the opportunity to incorporate strong architectural design and in return receive automatic approval of certain waivers including a height bonus, height averaging, parking reductions and flexibility in the unit size of the project's affordable units. The approach is standards-based to reduce discretionary approval, and is not a separate permit (no additional permit fee required).~~
- ~~SPMC 36.410.100, Planned Development Permit. The planned development permit process allows the approving body to modify any development standard, such as the number of required parking spaces and maximum floor area ratio, to provide a quality design and facilitate the development of affordable housing.~~

With the ability to modify standards that can act as constraints to construction of housing, and by offering these waivers through a ministerial process for projects with affordable housing or through a process that is processed together with other required discretionary permits, the City's development standards and parking requirements would not impede residential development.

Hillside Development: The City's Zoning Code includes provisions for hillside protection applicable to lots with an average slope of 20 percent or greater. The City views its hillsides as a valuable resource to the community, and therefore, the hillside protection provisions of the Zoning Code are intended to ensure safe and minimally damaging development of lots located on the City's hillsides through the application of strict development standards. Issuance of building or grading permits for the construction of any structure on any hillside lot requires prior approval of the project by the Design Review Board and approval by the Planning Commission of a hillside development permit for the project.

Development of the hillside area is costly due to the cost of grading, geotechnical engineering issues, the nature of the construction required, the public services that must be provided to these areas, and in some cases, substandard conditions of existing infrastructure available to serve the site. Some of these higher costs are attributable to provision of water for both consumption and fire prevention and compliance with strict construction standards. In addition, public and private access to hillside sites is expensive to construct and maintain. Despite the constraints associated with hillside development, the City continues to receive applications for homes on sloped lots. Seven recently approved and constructed and some currently proposed projects have included homes on slopes between 22 and 54 percent.

Building Codes and Enforcement

In addition to land use controls, California building codes also affect the cost of housing. The City has adopted and enforces the 2019 California Building Code and has made no local amendments. Program 1.c calls for the City to continue its code enforcement program.

Development and Planning Fees

The City collects various fees from applicants to cover the costs of processing permits and providing necessary services and infrastructure. Table VI-35 describes South Pasadena's 2021 planning fee schedule.

Table VI-35
RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT~~2021 PLANNING FEE AND IMPACT FEE SCHEDULE~~

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Minimum lot size	***Minimum area and width for new parcels.***				
Area	12,500 sf	10,000 sf	10,000 sf	10,000 sf	As shown on Final Tract Map 25588, except for mergers and lot line adjustments, provided that such actions shall not cause any significant gain or loss in the area of the tract. The subdivision of any existing lot is prohibited.
Width	75 ft; 85 ft for a corner lot	50 ft; 60 ft for a corner lot		60 ft; 80 ft for a corner lot	Regular lots: 30 ft. Flag lot "pole": frontage width may be 25 feet for parcels 306 and 307 to accommodate a 10-foot wide path parallel to the flag lot stem.
Residential density	***Maximum number of dwelling units allowed in a project. The actual number of units allowed will be determined by the City through subdivision or land use permit approval, as applicable.***				
Allowable density	1 - 3.5 du/acre	3.51 - 6 du/acre	6.1 - 14 du/acre	14.1- 24 du/acre	1 du/lot
Minimum density allowed	Each legal parcel in a residential zoning district will be allowed one single-family dwelling regardless of lot area; parcels in zoning districts that allow single-family and multifamily residential districts may also be allowed an accessory dwelling unit in compliance with Section 36.350.200 (Residential Uses - Accessory Dwelling Units).				
Minimum lot area/ multifamily unit	N.A.		3,200 - 7,300 sf	1,900 - 3,200 sf	N.A.
Setbacks	***Minimum and, where noted, maximum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.***				
Front	25% of lot depth, with a minimum of 25 ft, and a maximum requirement of 35 ft		20 ft	20 ft; 85 ft from street centerline on Huntington Drive	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Front exception	If 60 percent or more of the lots on the same block face have structures with front setbacks different from the above, the required front setback shall be the average of the existing front setbacks, provided that no more than 45 feet shall be required in the RE district, and 35 ft shall be required elsewhere.				N.A
Sides, each	10% of lot width	10% of lot width, 4 ft minimum		10 ft	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Side, street side	20% of lot width, to a maximum requirement of 15 ft			15 ft	
Rear	25 ft		20 ft	15 ft, or 5 ft if abuts an alley.	25 ft
Garage	An attached garage shall be set back a minimum of 10 ft from the front of the main structure				N.A.

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Accessory structures	As required for primary structures, except that: A structure of 120 sf or less may be placed within a required side or rear setback, but not a front setback or in front of the frontmost dwelling unit on the lot; • A detached garage or carport or other accessory residential structure shall be located at least 5 ft from a side and/or rear property line, except if the required side yard setback for the dwelling/s is less than 5 ft, in which case the lesser side yard setback may be used for a detached garage or carport only. Such structures cannot be located in the front setback or in front of the frontmost dwelling unit on the lot; • Accessory structures shall be located at or beyond the required street-facing side yard setback for the dwelling/s, except if the Director determines that a lesser setback can be approved using the Administrative Use Permit process detailed in Section 36.350.170(C)(3)(e); • Private residential recreational facilities shall be located at least 5 ft from a side and/or rear property line and cannot be located in the front setback, or in front of the frontmost dwelling unit on the lot or in the street-facing side setback of a corner lot.				N.A.
Building separation	10 ft between structures on the same site.				
Lot coverage	***Maximum percentage of total lot area that may be covered by structures.***				
	40%		50%	60%	40%
Floor area ratio	***Maximum allowable ratio of building floor area to lot area. See Article 7 (Glossary) for a definition and illustration.***				
Requirement	0.35		0.50	Single-family dwellings - 0.40 Multifamily projects - 0.50	0.35 for main building area for multi-floor structures, maximum
Exception	Each dwelling unit may have an attached or detached garage or carport of up to 500 sf in addition to the above-listed FAR. Any square footage in excess of 500 sf is included in the FAR calculation.				N.A.
Height limit	***Maximum allowable height of structures in other than hillside areas (see Division 36.340 (Hillside Protection) for height limits in hillside areas). See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements. See also Section 36.350.170 (Residential Uses—Accessory Residential Structures).***				***Maximum height of structures, measured from a point 6 inches above the high point of the existing grade line at the existing, previously set front yard setback line to the highest point of the roof or parapet wall.***
Maximum Height	35 ft			45 ft	Primary Structure: 25 ft Detached Accessory Structure: 15 ft

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Multiple story exception	No portion of a structure shall encroach through a 45 degree angle projected perpendicularly from the front property line toward the rear property line. See Figure 2-1, page 14. Building height in addition to the above limits may be authorized by the DRB through Design Review (Section 36.410.040) to accommodate dormer windows and/or non-habitable roof structures where appropriate to the architectural style of the dwelling.				N.A.
Open Space	N.A.		As required by Section 36.350.190 (Multifamily Project Standards) and listed below this table		N.A.
Landscaping	As required by Division 36.330 (Landscaping Standards)				As required by Division 36.330 (Landscaping Standards). No impervious surface shall be allowed in a required front or street side setback area, except for a driveway or approved drainage structure. All trees shall comply with the requirements of Ordinance No. 1991.
Parking	As required by Division 36.310 (Parking and Loading) **(see detailed discussion on residential parking requirements below)**				• Dwellings require 3 off-street spaces (2 in a garage or carport), that are a minimum of 10 ft wide by 20 ft long, and entirely located to the rear of the front setback line. • No vehicle, trailer, boat, or component thereof shall be stored on any parking space or driveway, or access thereto, except in a garage or carport, or behind a solid wall or fence that screens the stored object from public view.
Signs	As required by Division 36.320 (Signs)				No more than one commercial sign with a maximum area of 6 square feet shall be displayed on any lot; non-commercial signs are not subject to this limitation.

Source: Zoning Code, City of South Pasadena, accessed in ~~July 2021 Master Fee Schedule, SPUSD 2019~~ 2020 and 2021~~Statutory School Fees, South Pasadena Building Division Estimated Fees for Residential Development, South Pasadena Public Works Department.~~

Note: This table has not yet incorporated any changes that may be required based on the adoption of Senate Bill 9.

Multi-Family Open Space Requirements

The following are the open space requirements for multi-family projects excerpted from SPMC Section 36.350.190.C.

"All multi-family residential projects except duplexes shall provide permanently maintained outdoor open space for each dwelling unit (private space), and for all residents (common space).

1. Area required. Private open space shall be provided at a ratio of 200 square feet per dwelling unit. Common open space shall be provided based on the size of the project, as follows in Table VI-36.

~~South Pasadena's development fee schedule is tied to the cost of providing necessary services. City fees may be waived as part of the incentive package for affordable housing or ADUs.~~

~~As discussed in the section above on construction costs, developers are required to pay development impact fees for City maintenance and improvement of the city's aging infrastructure of streets, sewers, storm drains, and water lines.~~

~~Typical Residential Project Fee Estimate~~
~~Table VI-36 includes an estimate for the development costs of single-family and multifamily housing scenarios in South Pasadena. The estimated totals assume one 1,200-square-foot single-family home or an 86-unit multifamily complex. To develop the single-family home, it would cost approximately $32,293 in fees. To develop an 86-unit multifamily complex consisting of 87,328 square feet of general living area, it would cost approximately $714,000 total in fees ($8,302 for each unit). In terms of total cost (i.e., fees, construction, and land costs), it would cost $330,495 per single-family unit and $548,449 per multifamily unit. The proportion of the fees to the total development cost of the multifamily scenario is less than 2 percent and would make up approximately 10 percent of the total development cost for the single-family scenario.~~

Table VI-36
MULTI-FAMILY COMMON OPEN SPACE~~ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING*~~

PROJECT SIZE	COMMON OPEN SPACE REQUIRED	PRIVATE OPEN SPACE REQUIRED
3 to 4 units~~DEVELOPMENT COST FOR A TYPICAL UNIT~~	200 sf~~SINGLE FAMILY (1,200 SQUARE FOOT HOME)~~	200 sf per unit~~MULTIFAMILY (86 UNIT COMPLEX)~~
~~Total Estimated Fees Per Unit~~	~~$32,293.70~~	~~$8,302.33~~
~~Estimated Development Cost Per Unit~~	~~$330,495.50~~	~~$548,449.45~~
5 to 10 units~~Estimated Proportion of Fee Cost to Overall Development Cost Per Unit~~	500 sf~~10%~~	~~1.51%~~
11 to 30 units	1,000 sf	
31 and more units	2,000 sf	

~~* Fees estimated at time of housing element preparation; should be considered approximate and will vary by project.~~

1. Configuration of open space.

    a. Location on site. Required open space areas:

        i. Shall be located adjacent to the primary entrance;

        ii. Shall be provided as continuous, usable site elements, which shall not include setback areas but may be contiguous to required setbacks; and

        iii. Private open space shall be at the same level as, and immediately accessible from, a kitchen, dining room, family room, master bedroom, or living room within the unit. Variations from these dimensional and locational standards may be allowed where it can be shown that the required private open space meets the intent and purpose of this Section. Provision of private open space shall not reduce the common open space requirements of this Section.

    b. Dimensions. All open space areas shall be of sufficient size to be usable by residents.

        i. Private open space areas shall have a minimum dimension of eight feet on any side, and a configuration that would accommodate a rectangle of at least 100 square feet.

        ii. Common open space areas shall have a minimum dimension of 20 feet on any side.

    c. Elevation. A minimum of 60 percent of the required common open space shall be located at grade or the level of the first habitable floor.

    d. Uncovered areas required. At least 33 percent of the perimeter of the private open space of each unit, or 100 percent of the roof of the open space of each unit, shall be open to the outdoors. Reference to this requirement shall be included in the Covenants, Conditions, and Restrictions of any common interest development.

2. Allowed uses. Required common open space:

    a. Shall be available for passive and active outdoor recreational purposes for the enjoyment of all residents of each multi-family project; and

    b. Shall not include driveways, setbacks, public or private streets, or utility easements where the ground surface cannot be used appropriately for open space, parking spaces, or other areas primarily designed for other operational functions.

3. Maintenance and control of common open space. Required common open space shall be controlled and permanently maintained by the owner of the property or by a homeowners' association. Provisions for control and maintenance shall be included in any property covenants of common interest developments.

4. Surfacing. Open space areas shall be surfaced with any practical combination of lawn, paving, decking, concrete, or other serviceable material.

5. Landscaping. The applicant shall submit a landscape plan for approval. Landscape design, installation, and maintenance shall comply with Division 36.330 (Landscaping Standards).

6. Slope. Required open space areas shall not exceed a slope of 10 percent."

The City will evaluate the SPMC Section 36.350.190.C standards as part of the zoning work called for in Program 3.a in Chapter 6.8 of this Housing Element and revise as needed to assure feasibility of projects at proposed densities on the sites in Table VI-50.

Residential Parking Requirements

~~***Regulations Impacting Housing Supply***~~

~~The City's The City's 2021 inclusionary housing regulations will have a meaningful impact on the supply of affordable housing. Additionally, the 2021 ADU ordinance amendments, and the Phase II regulations for historic properties pending adoption, are expected to increase ADU development. ADUs are prohibited for use as short-term rentals in order to keep them in the housing stock for year-round residential use. There are no other recent ordinances in the City that affect the cost and supply of housing.~~

The City's parking requirements are based on unit type and size and are shown in Table VI-37. Program 3.f updates the City's ADU ordinance, including parking requirements, to comply with current California law (already adopted in May 2021). The inclusionary housing ordinance (SPMC Chapter 36.350) also includes a streamlined process to waive parking requirements in conjunction with providing affordable housing units and utilizing the state density bonus.

Although subterranean parking is not required for residential developments, to achieve maximum densities and provide required parking, it is sometimes the only viable option. The visual simulation modeling conducted on selected sites in the proposed Housing Element inventory assumed underground garage parking in order to achieve multifamily projects under the highest densities allowed. Reduced parking is already offered as an incentive in the Code's provisions for inclusionary housing. As part of the review of zoning standards and revisions to zoning standards called for in Program 3.a in Chapter 6.8, the City will adopt parking requirements that facilitate the proposed maximum residential densities, for the sites listed in Table VI-50.

~~*Local Review and Permit Procedures*~~

~~The Zoning Code stipulates the residential types permitted, permitted with an administrative use permit, conditionally permitted, or prohibited in each residential zone. Permitted uses are those uses allowed without discretionary review.~~

~~Typically, developers in South Pasadena build the maximum number of units allowed in the relevant zoning district. Until now, typical built density for RS sites has been one unit per buildable lot, but the development potential has recently changed with the enactment of SB9. In zones that allow higher densities, parcels usually develop to the density allowed in that zone. One example is the Raymond Hill area, which has developed more recently than some other parts of the City, where residential projects have uniformly been built at the maximum density allowed. It is too early to tell~~

~~how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local codes.~~

~~Table VI-37 describes the allowable uses in each residential zone.~~

Table VI-37
~~ALLOWED~~ RESIDENTIAL PARKING~~USES AND PERMIT~~ REQUIREMENTS

Duplex	4 spaces within a garage or carport, plus 1 guest space.
Live/work unit	2 spaces for each 1,000 sf of combined floor area.
Mixed-use development	As required for each individual land use.
Multifamily dwelling, condominiums, and other attached dwellings	1 bedroom unit—1 space; 2 bedrooms and/or greater—2 spaces within a garage or carport for each unit, plus 1 guest space per each 2 units. (1)
Organizational house	1 space for each bed.
Single-family housing	2 covered spaces
Accessory dwelling unit	1 space, covered or uncovered, unless within one-half mile of a transit stop (exempt from requirement) .
Senior citizen residential Assisted living and group homes Independent Living	0.5 space for each residential unit, plus 1 space for each 4 units for guests and employees. 1 covered space for each unit, plus 1 uncovered guest parking space for each 10 units

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021
~~Notes:~~
~~(1) See Article 7 for land use definitions.~~
~~(2) Allowable locations restricted to El Centro Street between Fremont and Diamond; Fair Oaks Avenue; Fremont Avenue north of Monterey Road; and Huntington Drive.~~
~~(3) Permit required determined by Section 36.350.170.~~
~~(4) Per Article 7 of Chapter 36 of the South Pasadena Municipal Code, manufactured homes on permanent foundations are considered single-family land uses.~~

Zoning Standards: Flexibility for Projects with On-site Affordable Housing

Compliance with all of the City's Zoning Code regulations, such as maximum height regulations, lot coverage, and/or floor area ratio restrictions, and parking standards could potentially present difficulties for the development of affordable multifamily housing. The South Pasadena Zoning Ordinance now includes two processes that offer waivers from strict application of the standards for projects that include affordable housing. These are:

- SPMC 36.375.080, Streamlined State Density Bonus Review. These provisions adopted with the inclusionary housing ordinance provide projects with on-site affordable housing the opportunity to incorporate strong architectural design and in return receive automatic approval of certain waivers including a height bonus, height averaging, parking reductions and flexibility in the unit size of the project's affordable units. The approach is standards-

based to reduce discretionary approval, and is not a separate permit (no additional permit fee required).

- SPMC 36.410.100, Planned Development Permit. The planned development permit process allows the approving body to modify any development standard, such as the number of required parking spaces and maximum floor area ratio, to provide a quality design and facilitate the development of affordable housing.

With the ability to modify standards that can act as constraints to construction of housing, and by offering these waivers through a ministerial process for projects with affordable housing or through a process that is processed together with other required discretionary permits, the City's development standards and parking requirements would not impede residential development.

Hillside Development: The City's Zoning Code includes provisions for hillside protection applicable to lots with an average slope of 20 percent or greater. The City views its hillsides as a valuable resource to the community, and therefore, the hillside protection provisions of the Zoning Code are intended to ensure safe and minimally damaging development of lots located on the City's hillsides through the application of strict development standards. Issuance of building or grading permits for the construction of any structure on any hillside lot requires approval by the Planning Commission of a hillside development permit for the project.

Development of the hillside area is costly due to the cost of grading, geotechnical engineering issues, the nature of the construction required, the public services that must be provided to these areas, and in some cases, substandard conditions of existing infrastructure available to serve the site. Some of these higher costs are attributable to provision of water for both consumption and fire prevention and compliance with strict construction standards. In addition, public and private access to hillside sites is expensive to construct and maintain. Despite the constraints associated with hillside development, the City continues to receive applications for homes on sloped lots. Seven recently approved and constructed and some currently proposed projects have included homes on slopes between 22 and 54 percent.

Building Codes and Enforcement

In addition to land use controls, California building codes also affect the cost of housing. The City has adopted and enforces the 2019 California Building Code and has made no local amendments. Program 1.c calls for the City to continue its complaint-based code enforcement program and to address identified sub-standard housing conditions surveyed in 2022. In addition, in the City's 2021-2026 Strategic Plan adopted in December 2021, an action was included to develop and present an Occupancy Inspection Program and Policy to the City Council. That work has been included in the Fiscal Year 2022-2023 workplan.

Development and Planning Fees

The City collects various fees from applicants to cover the costs of processing permits and providing necessary services and infrastructure. Table VI-38 describes South Pasadena's 2021 planning fee schedule. The City fee schedule is available on the City website.

Permit Processing

The processing time needed to obtain development permits and governmental approvals contributes to the high cost of housing. Additional time may be necessary for environmental review (CEQA), depending on the location and nature of a project. In response to California law, many cities have been working to improve the efficiency of permit and review processes by providing "one-stop processing," thereby reducing or eliminating duplication of effort.

The City's Director of Community Development has the authority to approve an Administrative Use Permit for development of new structures otherwise permitted, which allows the City to ensure compliance with regulations that support basic health and safety, and general welfare concerns. The City has three regulatory bodies with authority to review housing projects depending on the type and nature of a project. These bodies include the Design Review Board, Cultural Heritage Commission, and Planning Commission. Design review (discretionary) is required of all new structures and additions, with the exception of ADUs, emergency shelters, and single-room occupancy housing for the homeless. Where the Zoning Code requires a conditional-use permit for a use, the Planning Commission is the approving body unless appealed. Projects appealed to the City Council receive priority scheduling. Typical findings of a conditional-use permit include findings that the project is consistent with the General Plan and any Specific Plan, the use is compatible with surrounding uses, the use addresses basic public health and safety, and that general welfare concerns are addressed.

The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the nature of the project. Some projects on properties deemed historically or culturally significant require design review by the Cultural Heritage Commission for conformance of the project with the requirements of the City's Cultural Preservation Ordinance. In these instances, the Cultural Heritage Commission serves as a design review body recommending to the Planning Commission, which has final approval authority for the project.

The time required to process a project varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. Table VI-38 identifies the typical processing time most common in the entitlement process. It should be noted that each project does not necessarily have to complete each step in the process (i.e., small-scale projects consistent with General Plan and zoning designations do not generally require an Environmental Impact Report [EIR], General Plan Amendment, Rezone, or Variance). Also, certain review and approval procedures may run concurrently. For example, a ministerial review for a single-family home would be processed concurrently with the design review. The majority of projects requiring an EIR include a General Plan Amendment, Zone Change, and/or conditional-use permit request, which are processed simultaneously. The City also requires the joint processing of related applications for a single project. As an example, a conditional-use permit or planned development permit application is reviewed in conjunction with the required site plan, a tentative tract map, and any necessary variances. Such procedures save time, money, and effort for both the public and private sector and serve to decrease the costs for the developer. Applications for building permits are usually submitted within one year once a project is fully entitled.

Table VI-38

2021 PLANNING FEE AND IMPACT FEE SCHEDULE~~TYPICAL TIMELINES FOR PERMIT PROCEDURES~~

PLANNING APPLICATION	FEE
Variance	$3,446.00 (first); $2,431.00 (each additional)
Conditional Use Permit; with first variance	$3,655.00; $4,700
Administrative Use Permit	$1,625.00
Temporary Use Permit (non-profit)	$240.00
Temporary Use Permit	$481.00
Tentative Parcel Map	$3,877.00
Tentative Tract Map	$10,513.00
Lot Line Adjustment/Parcel Merger/Certificate of Compliance	$ 2,089.00
Hillside Development Review; with variance	$2,089.00; $3,133.00
General Plan Amendment	$20,887.00
Vacation-Easements, Alley's, Streets	$1,842.00
Zone Clearance	$65.00
Cultural Heritage Commission-Landmark Review	$1,567.00
Cultural Heritage Certificate of Appropriateness for Additions/ Alterations	$1,567.00 (single-family); $3,133.00 to $9,399.00 (multifamily (3-8 to 100+ units))
Categorical Exemption	$147.00
Initial Study	$5,222.00
Environmental Impact Report	$26,109.00
Negative Declaration	$295.00
Mitigation Monitoring Inspection & Administrative Fee	Actual Cost
Zoning Text & Map Amendments	$10,443.00
Specific Plan Application	$10,443.00
Specific Plan Amendment	$20,887.00
Development Agreement Review	$10,443.00
Planned Development	$10,443.00
Technology Surcharge (Percentage Applied to Fire, Building, Engineering, and Planning Permits)	10%
General Plan Maintenance Fee (Percentage of Building Permit Feet)	15%
DEVELOPMENT IMPACT FEES	
Residential	$1.64 per sq. ft.
Park Impact Fee -- Residential	$7.65 per sq. ft.
Park Impact Fee – Residential Remodel	$7.65 per sq. ft. > 250 sq. ft.
Park Impact Fee – Senior Housing	$2.95 per sq. ft.
Public Art Development Fee – on-site	1% of total building valuation
Public Art Development Fee – in-lieu	1.5% of total building valuation
School Fees	$4.08 per sq. ft.
Water Connection	$7,916.00 per unit
Sewer Connection	$2,094.00 per unit
Los Angeles County Sanitation District	$3,980.00

Source: City of South Pasadena July 2021 Master Fee Schedule, SPUSD 2019-2020 Statutory School Fees, South Pasadena Building Division Estimated Fees for Residential Development, South Pasadena Public Works Department.

South Pasadena's development fee schedule is tied to the cost of providing necessary services. City fees may be waived as part of the incentive package for affordable housing or ADUs.

As discussed in the section above on construction costs, developers are required to pay development impact fees for City maintenance and improvement of the city's aging infrastructure of streets, sewers, storm drains, and water lines.

Typical Residential Project Fee Estimate

Table VI-39 includes an estimate for the development costs of single-family and multifamily housing scenarios in South Pasadena. The estimated totals assume one 1,200-square-foot single-family home or an 86-unit multifamily complex. To develop the single-family home, it would cost approximately $32,293 in fees. To develop an 86-unit multifamily complex consisting of 87,328 square feet of general living area, it would cost approximately $714,000 total in fees ($8,302 for each unit). In terms of total cost (i.e., fees, construction, and land costs), it would cost $330,495 per single-family unit and $548,449 per multifamily unit. The proportion of the fees to the total development cost of the multifamily scenario is less than 2 percent and would make up approximately 10 percent of the total development cost for the single-family scenario.

~~The City works closely with developers to expedite approval procedures to reduce the likelihood of unnecessary timing constraints on development. For a typical project, an initial pre-consultation meeting with the Planning and Community Development Department is arranged to discuss the development proposal. The application submitted by the developer, which should contain a site plan, floor plans, elevations, landscape plan, and, in some cases a subdivision map, is first reviewed by the Planning Division and other agencies, such as Public Works, for consistency with City ordinances and the General Plan. Depending on the complexity of the project and required entitlements, a single-family project is generally approved within four to six weeks from date that the application is deemed complete provided no variances, exceptions, or zone changes are needed. After the project is approved, the Building and Safety Division performs plan checks and issues building permits. With the exception of residential second units, emergency shelters, and single-room occupancy housing, all applications for new construction are subject to design review by either the Design Review Board, Cultural Heritage Commission, or Planning Commission, depending on the nature of the project. With the exception of historic properties, the design review entity is also the final approval authority for the project. Larger mixed-use projects requiring a conditional-use permit or applying for a planned development permit are sent to the Planning Commission for design review and approval. Throughout construction, the Building Division will perform building checks to monitor the progress of the project. This process does not seem to put an undue time constraint on most developments because of the close working relationship between City staff, developers, and the decision-making body.~~

~~Multifamily Residential Project Review Procedures~~

~~The City Council amended the Zoning Code in 2013 to eliminate the requirement for approval of a conditional use permit for multifamily residential projects in the RM and RH zoning districts, requiring that these projects be subject only to Design Review. Pursuant to the State Permit Streamlining Act, the City's timeframe for project processing is dependent upon the CEQA determination for the proposed project and can range from 120 days for a project deemed to be exempt, up to 12 months for a project requiring preparation of an EIR. The permitting process for~~

a new multifamily residential housing project, if determined to be exempt pursuant to CEQA, could be approved within approximately three to four months.

Permits to Encourage Development of Affordable Residential Projects

The Zoning Code provides for flexibility in the application of Zoning Code standards through the planned development permit process for multifamily projects that include a certain percentage of the project as affordable housing. The purpose of the planned development permit is to allow consideration of innovation in site planning and other aspects of project design and more effective design responses to site features, uses on adjoining properties, and environmental impacts than the Zoning Code standards would produce without adjustment. Planned development permit approval may be requested for an affordable multifamily housing, mixed-use commercial, and multifamily residential development, or senior housing project and requires approval of a conditional use permit. Planned development permit approval may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, such as floor area ratio, building height, setbacks, parking, and street layout.

Affordable housing projects may also qualify for the granting of a density bonus and incentives and/or concessions that can include deviations or waivers from certain development standards, as established in the Zoning Code for multifamily development. Program 2.e is proposed to update the City's zoning to comply with current state density bonus law. Other programs that will address the need to streamline the development process include Programs 2.a, 2.k, 3.a, 3.e, and 3.l.

6.5.3 Environmental Constraints

While the City of South Pasadena is predominantly developed, there are vacant and underutilized parcels on which development can be accommodated. Many of these parcels, however, are impacted by environmental constraints and sensitivities.

Topography

The largest concentration of undeveloped land for new residential development is located in the City's hillside area referred to as the Southwest Monterey Hills. Development in this area is constrained due to steep slopes, substandard lots, unimproved roads, and geologic and seismic-related issues. Historically, development has varied in the degree and sensitivity to which it has accounted for these constraints. Some developments have sited housing units in ways to maintain the hillside's unique landform while others have used extensive grading to alter the natural landform. The extent to which development will be permitted on the City's hillsides in the future is of particular concern.

The remaining undeveloped or primarily undisturbed open space in the City, located primarily in the following areas, represents opportunities for conservation, habitat protection, and open space use:

- The canyons, hillsides, and steep topography in the Southwest Monterey Hills, and the primarily City-owned vacant, undeveloped lands in the southwest corner of the Southwest Monterey Hills;
- The Arroyo Seco and adjacent areas;

- Upper slopes in the Monterey Road/Pasadena Avenue/Kolle Avenue/Brunswick Avenue/Oak Hill Avenue residential areas;
- Raymond Hill Site

The following are more detailed discussions of the City's environmental constraints and hazards that affect, in varying degrees, existing and future residential developments.

Slope Stability

The Safety Element of the General Plan identifies landslide areas in the Repetto Hills just inside the City's western boundary. The Monterey Road Landslide area, in the southwest portion of the City, is a particular area of concern. Although small in geographic extent, the landslide area is extremely unstable in certain portions and is located in or near the majority of remaining undeveloped land in the City. Liquefaction of the soil is of secondary concern. The Los Angeles County General Plan Safety Element indicates that South Pasadena is at low risk for liquefaction.

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only active faults of local significance extending through South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along either has the potential to generate surface rupture that would affect structures on and adjacent to the fault.

Flooding

The City of South Pasadena is located within Zone X of the National Flood Insurance Rate Maps (FIRM), which designates areas of minimal (.2% Annual Chance) flooding. As there are no floodplain areas within the City, there are no pertinent flood hazards.

Fire Hazards

The California Department of Forestry and Fire Protection has identified all the land in adjacent Los Angeles along South Pasadena's western and southwestern boundaries as being a "very high fire hazard severity zone." Although the state did not include South Pasadena in this fire area, it is possible, given the right prevailing weather conditions, that a fire starting in the neighboring Los Angeles neighborhoods of Garvanza, Highland Park, Montecito Heights, or Newtown Park, could spread into the Monterey Hills community of South Pasadena, threatening homes there. In February 2020, the Council adopted Ordinance 2342, which established a "High Risk Fire Area… defined as those properties located South of Monterey Road, extending to the City border, and West of Meridian Avenue, extending to the City border."

~~Climate change is anticipated to increase the frequency and severity of fire events across California, including in Los Angeles County. SB 99 (2019), passed in response to the destruction of Paradise, California, in the 2018 Camp Fire, requires that all local jurisdictions ensure that all residential developments in a hazard area have a minimum of two evacuation routes. The City is required by this law to ensure that residents of Monterey Hills can effectively evacuate in the event of an emergency given the community's proximity to a fire hazard severity zone. To reduce the threat of fire in the hillside areas, more restrictive building standards are applied to new residential developments, including accessory dwelling units (ADUs), requiring fire sprinklers and specific roofing materials. This requirement increases the cost of developing new residential structures but is warranted by the fire risk given the circumstances of this area.~~

~~Open Space~~

~~Constraints to development include sensitive environmental resources. Zoning regulations are designed so that development in the hillside areas protects the "view-shed" both to and from the hillsides and retains as much remaining natural vegetation as possible. The City's Zoning Code encourages sensitive forms of development, which complement the natural and visual character of the City and its hillsides.~~

~~There are some open space areas that do not lend themselves to development. These areas have been left in their natural state and are maintained under private ownership. Such open space lands include the undeveloped portions of the hillsides, steeply sloping topography and canyons in the Southwest Monterey Hills, portions of the Altos de Monterey, and Raymond Hill.~~

~~The City owns 15.89 acres of unimproved land in the Altos de Monterey hillside residential tract, referred to as Lot 117. This area is considered an open-space resource to the neighborhood and is not intended for future development.~~

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multifamily rental housing, emergency shelters, mobile homes, and transitional and supportive housing. The following is a discussion of the Zoning Code regulations that serve to encourage and facilitate a variety of housing types.

Multifamily Residential Districts

South Pasadena's current Zoning Code provides for a Residential Medium Density (RM) district allowing for development of 6 to 14 dwelling units per acre and a Residential High Density (RH) district allowing for development of multiple dwellings of 14 to 24 units per acre. Multifamily residential units are permitted in the RM and RH zoning districts and do not require a conditional use permit (CUP). Multifamily housing is also allowed in the Mission Street Specific Plan (MSSP) district. Programs in this Housing Element and changes proposed in other elements of the General Plan will allow multifamily housing in more areas of South Pasadena and at higher densities, including the proposed Mixed-Use District and proposed Downtown Specific Plan (see Programs 2.j, 2.k, and 3.a).

Mixed-Use Zoning Code Provisions

Mixed-use development projects are those that integrate retail and/or office commercial uses with residential uses on the same parcel. Mixed use is allowed in the Commercial General (CG) zoning district and the MSSP zoning district subject to approval of a CUP. The Zoning Code requires commercial and residential uses within a mixed-use project to be fully separated, with residential units limited to the rear portion of the first story, and/or on the second and higher stories. The maximum allowable density for the residential component of a mixed-use project in a CG zoning district is 24 dwelling units per acre and up to 48 dwelling units per acre in the MSSP zoning district. On Bonus Sites on which additional parking is provided, up to one dwelling unit for each 900 square feet of lot area is permitted. On all other sites, up to one dwelling unit for each 1,500 square feet is permitted.

The General Plan Update and Downtown Specific Plan will amplify the role of mixed-use development in South Pasadena. In order to facilitate implementation of the housing plan, Zoning Code amendments will be considered that would change the processes and standards for mixed-use projects, significantly increasing the land resources available for mixed-use development.

The Zoning Code allows for waivers to development standards for mixed-use commercial and residential uses that include an affordable housing component consistent with the inclusionary housing ordinance. Some modifications may be allowed through a planned development permit.

Mixed-Use Development Regulations in the CG Zoning District

When applying development regulations to mixed-use development projects in the CG zone, the RH zoning district requirements, as described in Table VI-33, Residential Site Development Standards by Zoning District, apply to the residential component and the CG zoning district requirements, as described in Table VI-39, Commercial, Mixed-Use, and Business Park District Development Standards," apply to the commercial component.

Mixed-Use Development Regulations in the MSSP Zoning District

Mixed-use development projects in the MSSP zoning district are subject to the regulations as specified for the subject parcel in the MSSP (see Table VI-39). Development capacity for a project site within the MSSP is determined by a number of factors. A maximum of a 0.8 floor area ratio (FAR) is allowed to derive the total square footage permitted for development, but if public parking spaces are provided as part of the project, the project would be eligible to receive a density bonus to increase the development capacity of the site up to 1.5 FAR. The total number of units allowed within a mixed-use project in the MSSP is derived by dividing the total allowable square feet of development, based on permitted FAR, by 763 square feet, which was the average size of a residential unit within the MSSP when the plan was prepared. Limitations on the total number of units that can be realistically developed in the MSSP include the citywide maximum height restriction of 45 feet, physical dimensions and configuration of the project site, and whether required parking is proposed to be surface or subsurface level.

Program 3.a calls for adoption of the Downtown Specific Plan (DTSP), which will update the zoning and regulations throughout the existing MSSP and into other areas of the Downtown. The DTSP proposes to allow 50 dwelling units to the acre on Mission Street and 60 dwelling units to the acre in the rest of the Specific Plan Area. Multifamily residential uses will be allowed without discretionary review in any location on a site. This will include projects with 100 percent residential uses.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are permitted as either attached or detached units in zoning districts that allow single-family and multifamily dwellings. Junior accessory dwelling units (JADUs) are also allowed in the City. The ADU regulations (SPMC Section 36.350.200) were last updated in June 2021 to comply with State law by allowing their construction in all residential locations, providing objective standards and clarifying the approval process. An illustrated, explanatory brochure explaining the ADU process was published together with the new regulations to assist interested homeowners.

South Pasadena has an extensive historic preservation program, including many historic districts with single-family zoning. These districts are subject to State and local historic preservation laws as well as the ADU statutes. The City received a grant from the State Office of Historic Preservation to develop ADU standards and guidelines that would bridge the requirements of both with the purpose of encouraging ADUs with appropriate design requirements. The second phase of the ADU update, which will provide objective standards and guidelines to allow ADUs on historic properties, was pending approval at the time of release of this housing element. The City is committed to supporting the construction and legalization of ADUs, as described in Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k.

Manufactured Homes

Residential single-family detached housing makes up about half of the housing stock in the City and includes a small number of mobile homes. The City's Zoning Code considers a manufactured home that may or may not be on a permanent foundation to be a single-family dwelling and, as such, it is a permitted use in the Residential Estate (RE), Residential Single Family (RS), RM, and RH zoning districts subject to the same development regulations as established for conventional "stick built," single-family detached residential units. Because manufactured housing is permitted in all of the residential zoning districts, and the zoning regulations governing construction of manufactured housing are the same as those established for conventionally constructed housing, suitable opportunities are provided in the residential zoning districts for development of this housing type.

Housing for Persons with Disabilities

Group homes or residential care facilities represent a viable housing type for persons living with a disability and for seniors, providing a supervised group home environment with personal services and assistance with daily activities on-site. The Zoning Code includes provisions for group homes for persons with disabilities and residential care facilities for the elderly. The Zoning Code (SPMC 36.700.020 - Definitions) defines a group home as follows:

> "A dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour non-medical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Includes: children's homes; orphanages; rehabilitation centers; self-help group homes."

SPMC 36.700.020 – Definitions defines a Residential Care Facility for the Elderly (RCFE) as follows:

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.

2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.

3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

Pursuant to State law, SPMC 36.220.030 (Table 2-2) - Residential Zoning District Land Uses and Permit Requirements permits residential care facilities of six or fewer residents in any residential district of South Pasadena subject to the same development regulations as are applied to residential uses of the same type in the same zone, as described in Table VI-33. Consistent with State law, the Zoning Code does not define family, does not establish a maximum concentration requirement for residential care facilities, and does not impose any special development standards for residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, which could constrain the provision of residential care facilities for the elderly or persons with disabilities.

The City's Zoning Code allows for residential care facilities for the elderly and residential care facilities of seven or more residents within the RM and RH zoning districts subject to the development standards described in Table VI-33 and approval of a CUP. In the case of residential care facilities providing assisted living for seven or more residents, the Zoning Code establishes special development standards for these facilities, as summarized below:

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.

- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

Because the Zoning Code permits residential care facilities of six or fewer residents in any residential district of the city and does not impose any special development standards for these residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, the Zoning Code does not impose any constraints to the provision of residential care facilities for the elderly or persons with disabilities. Because the City's Zoning Code allows for residential care facilities for elderly and residential care facilities of seven or more residents within the RM and RH zoning districts subject to the development standards described in Table VI-33 and subject to reasonable conditions through the approval of a CUP, the Zoning Code does not impose any undue constraints to the provision of residential care facilities of seven or more residents for persons with disabilities or the elderly.

SPMC 36.410.110 - Reasonable Accommodation provides for granting a reasonable accommodation by the Director of Planning and Building for a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability an equal opportunity to the housing of their choice. The granting of a reasonable accommodation is subject to the following findings (SPMC 36.410.110.G):

4. The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws and entitled to a reasonable accommodation;

    a. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;

    b. The reasonable accommodation will not impose an undue financial or administrative burden on the City;

c. The requested accommodation will not result in a fundamental alteration in the nature of a City program or law, including, but not limited to, the General Plan, Zoning Code, design guidelines, and any specific plans; and

d. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

To further address the housing needs of individuals with disabilities, this Housing Element includes a program objective to explore options for requiring that a percentage of all new multifamily residential projects in South Pasadena be universally accessible (see Program 4.c).

Emergency Shelters, Transitional and Supportive Housing, and Single-Room Occupancy

Emergency shelter means housing with minimal supportive services for unhoused persons that is limited to occupancy of six months or less by an individual. No individual or household may be denied emergency shelter because of an inability to pay. Transitional housing is defined by the State as rental housing for stays of at least six months operated under program requirements that call for the termination of assistance and recirculation of the housing unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Transitional housing is a type of housing used to facilitate the movement of unhoused individuals and families to permanent housing. Supportive housing is housing with no limit on length of stay for the target population, often homeless, that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

In July 2019, the Governor signed AB 101, which allows Low Barrier Navigation Centers to be approved by right, without CEQA review required. Government Code Section 65660 defines "Low Barrier Navigation Center" as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry…"

As a form of transitional and supportive housing, this use is already permitted in residential zoning districts (SPMC 36.220.030, Table 2), and the definition defaults to the State law referenced above. However, the City has not yet incorporated a specific definition of Low Barrier Navigation Centers, which would clarify compliance with State law. Policy 4.4 and Program 4.b address the need to update the Code to include a definition of low-barrier navigation centers and expand to allow them within mixed-use zoning districts within one year.

Single-Room Occupancy (SRO) housing can provide a valuable form of affordable private housing for lower-income individuals. An SRO unit is generally between 200 and 350 square feet in size. These units provide a valuable source of affordable housing and can serve as an entry point into the housing market for people transitioning into permanent housing. SROs are allowed by right in the BP zoning district and specific development regulations govern development of SROs requiring that SROs not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school; establishes a minimum lot size of 10,000 square feet and a maximum

~~density of one unit per 1,600 square feet of gross floor area; establishes setback requirements; and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Director of Planning and Community Development prior to occupancy and operations.~~

~~There are currently no emergency shelters or transitional housing or supportive housing facilities within South Pasadena. Currently there are no SRO units in the city. The City's Homeless Outreach Team has a referral program to connect individuals living on South Pasadena's streets and open spaces to shelters in the City of Pasadena, which participates with the City of South Pasadena to provide services to these individuals. The Team provides transportation to the shelter for individuals desiring to go to the shelter and monitors the location and conditions of individuals identified to be without housing in the city (see Program 2.f).~~

~~Emergency shelters are permitted in the Business Park (BP) zoning district, to permit development of emergency shelters and SROs through a ministerial process. Within the BP zoning district, there are multiple sites that offer opportunities for development of emergency shelters. There are more than 12 acres of land on 19 parcels in the BP zone. The parcels range in size from 0.06 to 2.33 acres. In addition to this existing capacity in the BP district, once the General Plan is adopted, the existing BP zone will be redesignated as the Ostrich Farm Zone and will allow a density of 60 dwelling units/acre, an increase from what is currently allowed, creating more residential capacity.~~

~~Sites within the BP zoning district are within walking distance to the Los Angeles Metropolitan Authority (MTA) Gold Line's South Pasadena station with connections to retail areas and job centers along the route. The City is in compliance with recent updates to California law requiring that the parking standards for emergency shelters do not require more parking than other residential or commercial uses within the same zone. The development standards and regulations applicable to all projects located within the BP zoning district and other nonresidential districts are described in Table VI-39.~~

~~Table VI-39~~
~~COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040)~~

Table VI-39
ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING*

DEVELOPMENT COST FOR A TYPICAL UNIT	SINGLE-FAMILY (1,200-SQUARE-FOOT HOME)	MULTIFAMILY (86-UNIT COMPLEX)
Total Estimated Fees Per Unit	$32,293.70	$8,302.33
Estimated Development Cost Per Unit	$330,495.50	$548,449.45
Estimated Proportion of Fee Cost to Overall Development Cost Per Unit	10%	1.51%

* Fees estimated at time of housing element preparation; should be considered approximate and will vary by project.

Regulations Impacting Housing Supply

The City's 2021 inclusionary housing regulations will have a meaningful impact on the supply of affordable housing. They are discussed in detail in Section 6.6.1 of this Housing Element under Zoning Provisions to Encourage Affordable Housing. Impacts of the inclusionary housing requirements on development costs and affordable housing are included in that section. Additionally, the 2021 ADU ordinance amendments, including the Phase II regulations for historic properties, are expected to continue to increase ADU development. ADUs are prohibited for use as short-term rentals in order to keep them in the housing stock for year-round residential use. The City does not regulate short-term rentals in other ways. There are no other recent ordinances in the City that affect the cost and supply of housing. The other city regulation that impacts housing supply is the citywide height limit, discussed in more detail below.

City Height Limit Initiative

On July 12, 1983, the voters in South Pasadena approved a citywide height limit of 45 feet in a special municipal election (see Section 36.300.040 of the SPMC). This ballot initiative can only be amended or rescinded through another vote of the electorate. However, some projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, may request and receive a height increase beyond the ballot initiative limit, in order to comply with State law, which takes precedence.

The citywide height limit could act as a constraint on housing development. Sites proposed to receive the Affordable Housing Overlay to increase the options for density with affordable housing projects are discussed in Section 6.6.2 under Sites to Address the Lower Income RHNA. The other sites proposed for density increases are currently zoned Business Park (BP), Commercial General (CG), Residential Medium Density (RM) or are in the Mission Street Specific Plan (MSSP) district. All of these zoning districts currently have a maximum height of 35 feet (See Tables VI-35 and VI-42).

This section discusses the research that the City conducted to ensure that proposed density increases for sites to accommodate the lower-income RHNA (Section 6.6.2) are feasible in light of this constraint. The analysis accounted for existing height limits as well as increases proposed in the DTSP or through other zoning changes.

As part of the early outreach for the Housing Element Update, surveys and meetings were conducted to gauge public interest in a potential ballot initiative to increase the maximum allowed height in the city above 45 feet either citywide or in certain areas. The process to place an initiative on the ballot takes months of lead time so this was a priority for the early outreach as a positive result would have required placing the measure on the November 2020 ballot in order to maintain the housing element project timeline. Discussions with the Planning Commission in July 2020 and public testimony did not indicate support for pursuing a ballot measure. Rather, it was considered to be a better direction to research the potential for development within current limitations.

Following that decision, the analysis of increased densities for certain sites being considered for the Housing Element sites inventory focused on densities that could be accommodated within the existing 45 foot height limit. All types of multifamily or mixed use development on sites in the draft Downtown Specific Plan (DTSP) Area are proposed to allow 3 stories or 35 feet in height. In

addition, the draft DTSP contains a height bonus for projects that include at least 20 percent deed-restricted affordable units of up to 45 feet, consistent with the inclusionary housing ordinance.For sites in Table VI-50 currently designated BP, CG and RM, outside of the proposed DTSP, development standards are proposed to be amended to increase the maximum height to 45 feet.

The project team undertook detailed analysis of higher density precedent projects, visual simulations of potential housing sites in South Pasadena, and mathematical analysis to determine feasible densities within the existing citywide height limit. Presentations about this analysis were made at multiple public hearings and workshops during the second half of 2020. The review of precedent projects in South Pasadena and throughout the region was one of the first steps in the analysis, reviewing more than 40 projects in the 2 to 3-story range, another 40 projects in the 4-story range, and dozens of others that were 5-stories or taller. The average density on the 2 to 3-story projects was 39 units per acre. The average density on the 4-story projects was 72 units per acre.

The City also analyzed the impact of the 45 foot height limitation on unit sizes and examined the development standards (besides height) that would be needed to achieve high quality design while achieving densities of 70 or 80 units to the acre. Two actual projects, one in Santa Monica (100% affordable) and one in Hercules (market rate) in northern California were modeled for this analysis (see Figure VI-32). Both projects include a range of bedroom types. The Hercules project that was built at 76 units per acre average had an average unit size of 825 square feet. At 80 units per acre, the Santa Monica project had a smaller average unit size (732 square feet) although it included units with up to three bedrooms. Both projects achieved a level of design that avoided boxy massing that would not be compatible with South Pasadena's urban form. The analysis confirms that the densities and heights proposed in the sites inventory, to be implemented through rezoning, are reasonable and feasible.

Figure VI-32
HIGHER DENSITY PRECENT PROJECTS WITHIN 45 FOOT-BUILDINGS

76* du/ac Hercules, CA

**actual building is 4-stories, but 76 du/ac calculated as if it were 3 -stories*

» **Precedents and unit sizes of 3-story buildings with density maximized, within 45 feet height**

ACHIEVABLE HOUSING DENSITIES IN A THREE-STORY BUILDING

Max Density (du/ac)	Unit Size (Square Feet)			Example								
	Average	High	Low	Project	Acres	Tot Bldg Area	Total Units	Unit Mix				Afford-able
								Studio	1 bdrm	2 bdrm	3 bdrm	
80	732	1,054	554	Las Flores, Santa Monica	0.65	40,270	55	0	26	14	14	100%
76	825			Hercules, CA	2.2	151,932	172	32	92	48	0	Market

80 du/ac Los Flores, Santa Monica

Source: PlaceWorks, 2020

Visual simulation analyses were performed on representative inventory sites including the vacant site in Ostrich Farm (Site 1), the Tyco site in Ostrich Farm (Site 4), Meridian site (Site 10), Vons site (Site 20), and Ralphs site (Site 24). Site numbers in parentheses correspond to the numbering in Appendix A and Table VI-50. The analysis included modeling multiple densities and heights on each site. It also included identifying precedent projects from the list mentioned earlier in this section that could be suitable for the site in terms of design, scale and massing. These sites occur in different areas of the city and have different contexts so were chosen to represent what could happen on the whole range of sites chosen to receive higher densities. All of the representative sites analyzed are proposed to receive a maximum allowed density of 70 units per acre which is the highest base density proposed for sites in the Housing Element and in the city overall in the proposed General Plan Update. Some of the other sites with proposed density increases have lower proposed maximum densities so could also feasibly develop within the 45 foot height limit based on the analysis of higher density projects.

Based on the analysis and information above, the 45 foot height limit does not constrain the development of projects with densities of up to 70 units per acre.

Local Review and Permit Procedures

The Zoning Code stipulates the residential types permitted, permitted with an administrative use permit, conditionally permitted, or prohibited in each residential zone. Permitted uses are those uses allowed without discretionary review.

Typically, developers in South Pasadena build the maximum number of units allowed in the relevant zoning district. Until now, typical built density for RS sites has been one unit per buildable lot, but the development potential has recently changed with the enactment of SB 9. In zones that allow higher densities, parcels usually develop to the density allowed in that zone. It is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local codes.

Table VI-40 describes the allowable uses in each residential zone.

~~The City has existing standards concerning that emergency shelters that complied with State law when adopted; however, changes in State law no longer allow for certain local regulations, such as establishment of buffering standards between an emergency shelter and other land uses. State law allows for Zoning Code regulations to govern the operations of an emergency shelter, including the establishment of a maximum number of beds in any one shelter provided the maximum adequately addresses the City's homeless population need. SPMC 36.350.250 – Emergency Shelters establishes location requirements that prohibit an emergency shelter from being located any closer than 300 feet to another emergency shelter or within 300 feet of a residential use, public park, or public school; establishes a maximum number of 12 beds plus a residential unit for a full-time manager per shelter. The Code requires on-site facilities, such as laundry, cooking, and bathroom facilities; provision of support services; parking standards, security lighting requirements, and submittal of a management plan to the City prior to occupancy and operations. For the City's Zoning Code regulations to fully comply with State law, the Housing Element includes a program objective for the City to amend the Zoning Code to eliminate the requirement for a minimum 300-foot distance separation between an emergency shelter and a residential use, public park, or public school and to increase the maximum number of beds within an emergency shelter to 16 beds (see Program 4.a).~~

State law also requires that the Zoning Code consider transitional and supportive housing as residential uses in zones where residential uses are allowed subject to the same development regulations as similar residential uses in the same zone. While the City's Zoning Code lists transitional and supportive housing as permitted uses in all residential zones, the Zoning Code does not specifically list transitional and supportive housing as allowed residential land uses in other zones that allow for mixed-use residential and commercial development. The Housing Element includes a program to amend the Zoning Code to allow transitional and supportive housing in compliance with current State law (see Program 4.b).

Zoning Provisions to Encourage Affordable Housing

In addition to the areas of the City where higher-density housing is allowed or is proposed to be allowed without discretionary review, the City's Zoning Code includes permitting procedures and incentive programs to encourage the development of affordable housing by allowing for flexibility in the application of development regulations and standards and through the approval of density bonuses for projects containing an affordable housing component. These zoning provisions are discussed herein.

a. Planned Development Permit

The City's Zoning Code provides flexibility in the application of development standards for a project containing an affordable housing or senior housing component pursuant to the approval of a planned development permit (see Municipal Code Section 36.410.100). Planned development permit approval may be requested for an affordable housing, mixed-use, or senior housing project to modify or adjust any applicable development standard of the Zoning Code. Approval of a planned development permit may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, including, but not limited to, FAR, building height, setbacks, parking, and street layout. Planned development permits are approved by the Planning Commission at a public hearing and pursuant to findings summarized below.

5. The project must be consistent with the actions, goals, objectives, policies, and programs of the General Plan and any applicable specific plan, allowed within the applicable zoning district, and comply with all applicable provisions of the Zoning Code and adopted design guidelines other than those modified by the planned development permit, and be adequately served by public facilities, services, and utilities.

6. The approved modifications to the development standards of the Zoning Code are found to be necessary and appropriate to accommodate the superior design of the proposed project, its compatibility with adjacent land uses, and its successful mitigation of environmental impacts.

7. The location, size, planning concepts, design features, and operating characteristics of the project are and will be compatible with the character of the site, and the land uses and development intended for the surrounding neighborhood by the General Plan.

8. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the use.

9. The establishment, maintenance, or operation of the use would not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood of the proposed use, any neighborhood improvements, or the citywide welfare.

The Planning Commission may impose any conditions deemed reasonable and necessary to ensure that the project will comply with the findings. Standard conditions of approval applied by the Planning Commission as part of an approval for a planned development permit are summarized below.

10. Appropriate City building permits are required prior to construction.

11. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.

12. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.

13. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.

14. A demolition permit is required for any existing buildings to be demolished.

15. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.

16. CAL-OSHA permits are required to be obtained where required.

17. Compliance with all State of California disability access regulations for accessibility and adaptability is required.

18. Plan check for electrical, mechanical, plumbing, and sewer is required.

19. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.

20. A soils report is required.

21. A grading and drainage plan approved by the City is required prior to issuance of the building permit.

22. Structural and energy calculations are required to be provided.

23. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.

24. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.

25. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

Depending on workload review and approval of a planned development permit by the Planning Commission can be completed within 6 to 12 months. The Housing Element includes Program 4.c to maintain the Zoning Code provision allowing approval of a planned development permit for projects proposing development of affordable housing to encourage its development.

b. Affordable Housing Incentives

The Council adopted SPMC Section 36.370 (Affordable Housing Incentives) in 2013 to incorporate State requirements to grant density bonuses and incentives and/or concessions for affordable housing by right. The "Affordable Housing Incentives" provisions of the Zoning Code allow for the granting of a density bonus to eligible projects upon approval by the Director of Planning and Building and the granting of affordable housing incentives and/or concessions to eligible projects by the Planning Commission. State density bonus law has been updated since 2013 expanding the amount of bonus (up to 50 percent for many projects and up to 80 percent for 100 percent affordable projects), increasing the number of incentives and concessions the City must offer, and expanding the list of types of projects that are eligible for a State density bonus. Although the City implements state density bonus law as it is updated, the City has included Program 2.e in this Housing Element to update the Zoning Code to comply with current State density bonus law.

In 2021, SPMC Section 36.375 (Inclusionary Housing) was adopted.

Some of the central components of the affordable housing incentives in SPMC 36.370 are a ministerial approval process for eligible projects; reduced parking requirements and allowing tandem parking or uncovered parking on the project site; a process for inclusion of a Child Care Facility and requirements to ensure unit quality. The location of the designated dwelling units within projects receiving a density bonus or incentives and/or concessions is at the discretion of the City with the goal to integrate the units into the overall project with designated dwelling units reasonably dispersed throughout the development, where feasible. Furthermore, the affordable units must contain on average the same number of bedrooms as the market rate units, and must be compatible with the design or use of the remaining units in terms of appearance, materials, and finish quality. If a project is to be phased, the affordable units must be phased in the same proportion as the market rate units, or phased in another sequence acceptable to the City. Alternatively, the City may authorize some or all of the designated dwelling units associated with one housing development to be produced and operated on an alternative development site.

As part of the approval of a density bonus and incentive and/or concession, the developer is required to enter into an agreement with the City that ensures that continued affordability of the designated units is maintained.

c. Inclusionary Housing Ordinance

City Council directed staff to explore policies to proactively increase the production of affordable housing in 2018. Beginning in 2019, at the City Council's direction, the Community Development Department began outreach in the community, and heard strong support from the community for an inclusionary housing policy. After extensive outreach, and some delay due to the pandemic, on March 9, 2021, the Planning Commission recommended adoption of a draft inclusionary housing ordinance. The City adopted the inclusionary housing regulations (Ordinance 2355) ordinance on May 5, 2021.

This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. Those changes will be adopted at or near the same time as Housing

~~Element adoption. Zoning updates to codify those changes will occur after the General Plan and Downtown Specific Plan are adopted.~~

~~The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).~~

~~*Inclusionary Requirements*~~

~~The inclusionary regulations require any project with three or more residential units proposed in South Pasadena to include at least 20 percent of the base number of units in the project as affordable to lower- or moderate-income households. Applicants may pay an in-lieu fee instead of providing units only for projects containing three or four residential units, for any ownership project, or for fractional units calculated as part of the inclusionary requirement. The in-lieu fee option is described further in the next section.~~

~~The inclusionary requirement would change as the number of units in a project increases. Only rental projects between 3 and 10 units may include moderate-income units as part of the inclusionary mix. Larger projects with rental units would need to include a mix of lower-income and very/extremely low-income units, as detailed in the ordinance. Ownership (condominium) projects containing for-sale inclusionary units would provide them as moderate-income units.~~

~~Table VI-40 summarizes the implementation alternatives allowed by SPMC 36.375.050 – Inclusionary Unit Requirement for different types of residential projects.~~

~~Table VI-40~~
~~INCLUSIONARY HOUSING REQUIREMENT OPTIONS~~

Table VI-40
ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS

ALLOWED USES AND PERMIT REQUIREMENTS FOR ZONING DISTRICTS THAT ALLOW RESIDENTIAL DEVELOPMENT	P - Permitted Use CUP – Conditional-Use Permit Required AUP – Administrative-Use Permit Required, Use not allowed.											
LAND USE (1)	**CF**	**OS**	**AM**	**MSSP**	**CO**	**CG**	**BP**	**RE**	**RS**	**RM**	**RH**	**SPECIFIC REGULATIONS**
Accessory dwelling unit	--	--	CUP	--	--	--		P	P	P	—	36.350.200
Accessory residential uses and structures	--	--	--	--	--	--		P(3)	P(3)	P(3)	P(3)	36.350.170
Bed & breakfast inn (B&B)	--	--	--	P	--	--		CUP	CUP	CUP	CUP	36.350.070
Child daycare center	--	--	--	--	--	CUP	CUP	—	—	CUP	CUP	36.350.080
Child daycare—Small family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Child day care—Large family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Emergency Shelter	--	--	--		--	--	P	--	--	--	--	36.350.250
Home occupation	--	--	--	--	--	--		P	P	P	P	36.410.030
Manufactured Homes (4)	--	--	P	P	--	--		P	P	P	P	
Medical services—Extended care	--	--	--	--	--	--	--	—	—	—	CUP(2)	
Mixed-use projects	--	--	--	P	CUP	CUP	--	--	--	--	--	36.350.120
Mobile Home Parks	--	--	--	--	--	--	--	--	--	--	--	
Multifamily dwellings	--	--	--	P	--	--		—	—	P	P	36.350.180, 190
Organizational house (sorority, convent, etc.)	--	--	--	--	--	--		—	—	CUP	CUP	
Residential care facility, 6 persons or less	--	--	--	--	--	--		P	P	P	P	
Residential care facility, 7 persons or more	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Residential care facility for the elderly (RCFE)	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Single-family dwelling	--	--	P	P	--	--		P	P	P	P	
Single room occupancy	--	--	--	--	--	--	P	--	--	--	--	36.350.260
Transitional and Supportive Housing	--	--	--	--	--	--		P	P	P (multifamily types located in the RM district are subject to specific use regulations 36.350.180,190)	P (multifamily types located in the RH district are subject to specific use regulations 36.350.180,190)	

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021
Notes:

(1) See Article 7 for land use definitions.
(2) Allowable locations restricted to El Centro Street between Fremont and Diamond; Fair Oaks Avenue; Fremont Avenue north of Monterey Road; and Huntington Drive.
(3) Permit required determined by Section 36.350.170.
(4) Per Article 7 of Chapter 36 "Zoning" of the South Pasadena Municipal Code, manufactured homes on permanent foundations are considered single-family land uses.

Permit Processing

The time it takes to process development permits and other governmental approvals contributes to the high cost of housing and is thus considered a constraint for housing development. In response to California law and the need to support more housing for the community, South Pasadena has been shifting toward more efficient permit review processes, reducing the number of hearing bodies involved in project approval and improving inter-departmental coordination to streamline the entitlement process.

Discretionary Design Review: Efforts to Streamline

Single- and all multi-family housing uses are permitted by right (P) in districts that allow residential uses. However, design review (discretionary) is required of all new structures and additions, with the exception of ADUs, emergency shelters, and single-room occupancy housing. City Planning staff reviews residential projects to confirm Code compliance in preparation to present them to the design review approval body. The City has three regulatory bodies with authority to review housing projects depending on the type and nature of a project: the Design Review Board (DRB), Cultural Heritage Commission (CHC), and Planning Commission (PC). Residential project applications with up to six units that are exempt from CEQA are heard by the DRB, and those with seven or more units (or not CEQA-exempt) require approval by the Planning Commission. Where the Zoning Code requires a conditional use permit for a use, the Planning Commission is the approving body. Projects may be appealed, and those that are appealed to the City Council receive priority scheduling. The required findings for design review located in SPMC Section 36.410.040.I are for the reviewing body to find that the design and layout of the proposed development:

1. Is consistent with the General Plan, any adopted design guidelines and any applicable design criteria for specialized areas (e.g., designated historic or other special districts, plan developments, or specific plans);

2. Will adequately accommodate the functions and activities proposed for the site, will not unreasonably interfere with the use and enjoyment of neighboring, existing, or future developments, and will not create adverse pedestrian or traffic hazards;

3. Is compatible with the existing character of the surrounding neighborhood and that all reasonable design efforts have been made to maintain the attractive, harmonious, and orderly development contemplated by this section and the General Plan; and

4. Would provide a desirable environment for its occupants and neighbors, and is aesthetically of good composition, materials, and texture that would remain aesthetically appealing with a reasonable level of maintenance and upkeep.

As part of the zoning work called for in Program 3.a in Chapter 6.8, the City will evaluate whether any of the above findings is subjective and a constraint to development of additional multifamily housing in the City on the sites identified in this Housing Element. Revisions will be made to the City's zoning regulations to address these constraints as part of implementation of Program 3.a. The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review hearing and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the project type. This

makes it possible for housing projects to be approved at one public hearing unless the project is continued for revisions or appealed. The exception is for properties deemed historically or culturally significant, which require design review by the CHC followed by the Planning Commission. The intent is to expedite most housing applications through an easier permit process.

The processes listed in Table VI-41 generally run concurrently. Most residential projects do not require a Negative Declaration (ND/MND) or an EIR. Projects typically requiring a ND/MND or an EIR include a General Plan Amendment, Zone Change, and/or larger projects not qualified under CEQA exemptions. The City also requires the joint processing of related applications for a single project. As an example, a conditional use permit or planned development permit application is reviewed in conjunction with a tentative tract map, requested variances and design review. Such procedures save time, money, and effort for both the public and the developer. Applications for building permits are usually submitted within one year once a project is fully entitled. To the City's knowledge, no requests have been made to develop any site in the existing Housing Element sites inventory at lower densities than anticipated in the inventory.

Application Processing Times

The time required to process an application varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. The timeframes that are generally typical for the City's entitlement processes, based on normal conditions, are shown in Table VI-41, below. Depending on the complexity of the project and required entitlements, Planning aims to approve a single-family project within four to six weeks from the date that the application is deemed complete provided no variances, exceptions, or zone changes are needed. For multi-family projects, pursuant to the State Permit Streamlining Act, the City's processing timeframe is based on the CEQA determination for the proposed project and can range from 120 days for a project deemed to be exempt, up to 12 months for a project requiring preparation of an EIR.

Nevertheless, over the past three years, between 2019 and 2021, the department sustained an unusually high amount of staff turnover at all levels, which disrupted these timeframes and delayed several housing projects. This was exacerbated by the COVID-19 pandemic, which interrupted the work environment and the public hearing processes. Despite the pandemic, in 2020, the City prioritized addressing the application backlog and three important multi-family housing projects were approved in 2020-21, including the City's first project with affordable housing based on State density bonus law (prior to adoption of the inclusionary housing ordinance). The City also prioritized the adoption of Code amendments to support housing, including the inclusionary housing ordinance and a comprehensive update to the ADU ordinance. The ADU ordinance updates in particular have simplified review of ADUs, establishing clear, objective standards for staff-level approval. These applications represent a high percentage of recent Planning applications and processing time was greatly reduced in 2021.

To prioritize more efficient application review and approval, the Council approved an increase to the Community Development Department budget in 2021, adding new staff positions. The recognition of the relationship between staff enhancements and more efficient processing is expressed in this housing element through Program 3.l, which commits to increasing staff resources and creating a dedicated housing division within the Community Development Department. Additionally,

application processing time will be reduced when the City acquires the electronic permitting system (Program 3.e).

~~Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to promote clarity regarding the City's expectations for quality and contextual design for all projects, providing more certainty to applicants, particularly those on a large enough scale to have a stronger effect on the surrounding area. All of the sites included in the sites inventory to address the lower-income RHNA are of sufficient size to derive strong benefit from taking advantage of the proposed design incentives in the inclusionary regulations. The incentives offered exceed guarantees offered under State Density Bonus law. Incentives are offered for height, minimum unit size, and parking. Based on the recently adopted regulations, the City expects an increase in higher-density residential development with on-site affordable units. Program 2.i calls for implementation and monitoring of the Inclusionary Housing ordinance.~~

~~*In-Lieu Fee Option*~~

~~The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. Once the in-lieu fee study is complete, the City Council shall establish the fee by resolution, then adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.~~

~~*Alternatives to Building Inclusionary Units On-Site*~~

~~There are a few alternatives to building the inclusionary units on-site for rental projects with five or more units. These include building the units on another site, donating land, or rehabilitating existing residential units and deed-restricting them as affordable housing. Use of these alternatives is subject to Planning Commission approval.~~

~~*Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing*~~

~~In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects as required by the ordinance.~~

Since the inclusionary regulations were recently adopted, the City has not yet been able to collect data to analyze its effect. Program 2.i commits the City to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if and when this is deemed necessary for greater effectiveness.

6.6.2 Land Resources

This section describes the resources available for the development, rehabilitation, and preservation of housing in the City of South Pasadena. This section includes an inventory of sites zoned for residential development that are suitable for future housing development in South Pasadena and an evaluation of the City's ability to provide adequate sites to address its identified share of future housing needs.

Availability of Sites for Housing

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. Opportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), and Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily residential, which would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.
- Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; parcels are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

All sites discussed in this section are shown on maps in Appendix A of this Housing Element.

~~***Sites Inventory***~~

~~Table VI-41 describes the vacant sites remaining in the City that can accommodate residential development. All these sites are suitable for development of moderate and above-moderate residential development. One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so is included in Table VI-46, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).~~

~~In determining the realistic unit capacity for sites listed in Table VI-41 that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. It should also be noted that 90 percent of the sites in Table VI-41 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption of SB 9, which allows duplex development on single-family parcels statewide. Accordingly, realistic capacity on those sites has been considered to be 100 percent (one unit). With the recent adoption of SB 9, the potential density on these sites could be considered to be doubled. Therefore, vacant parcels greater than .20 acres in Table VI-41 that would have allowed only one unit on the parcel before passage of SB 9 are now shown to allow two units.~~

~~A small number of the sites in this table are in nonresidential zones. The changes to allow greater density on many nonresidential sites and incentivize housing development via the City's inclusionary regulations will further encourage housing development on non-residentially zoned properties. The realistic development capacity for each site can be increased with approval of a density bonus as part of a development application. Zoning Code provisions applicable to the zoning district for each site, as described in the Constraints section, were assumed and no density bonuses or the inclusionary housing regulations were applied. This is for consistency with state guidance as stated in the HCD 2020 Housing Element Site Inventory Guidebook:~~

~~"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."~~

~~Table VI-41~~
~~VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE~~

Table VI-41
TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES

APPROVAL	TYPICAL PROCESSING TIME	APPROVAL BODY
Planning Clearance (Site Plan Review)	2 - 6 weeks	City Staff
Accessory Dwelling Units	30 - 60 days	City Staff
Administrative Use Permit	1 - 2 months	Community Development Director
Conditional Use Permit	4 - 6 months	Planning Commission
Planned Development Permit	6 - 12 months	Planning Commission
Variance	4 - 6 months	Planning Commission
Zone Change	6 - 12 months	City Council
General Plan Amendment	6 - 12 months	City Council
Design Review	4 - 6 months	Cultural Heritage Commission/ Design Review Board/Planning Commission
Tentative Tract Map	4 - 12 months	Planning Commission
Parcel Maps	4 - 6 months	Planning Commission
Negative Declaration	6 - 8 months	Planning Commission or City Council*
Environmental Impact Report	8 - 12 months	Planning Commission

Source: ~~City of~~ South Pasadena Community Development Department, 2022~~, 2021~~

* Depending on entitlement and significance of impact

City Staff Assistance in the Permit Process

City staff assists developers to provide information and guidance on the entitlement process in order to expedite approval procedures and reduce the likelihood of unnecessary timing constraints on development. A project often begins with an informal, courtesy meeting, at which the developer can present the concept to Community Development staff and get feedback and guidance for complying with requirements of the Code and the design review process. Once the developer submits an application, with the required components, such as a site plan, floor plans, elevations, landscape plan, and, in some cases a subdivision map, the Planning Division, Building and Safety Division and other agencies, such as Public Works and the Fire Department, will review for Code consistency and flag concerns in order to avert problems that might otherwise not be detected until building permit review later on.

After the project is entitled, the Building and Safety Division performs plan checks and issues building permits. Throughout construction, the building inspector inspects the project site to ensure compliance with requirements and to monitor progress. This process is typical and does not impose an undue time constraint on most developments. ~~for development~~

Permits to Encourage Development of Affordable Residential Projects

The Zoning Code provides for flexibility in the application of Zoning Code standards through the planned development permit process for multifamily projects that include a certain percentage of the project as affordable housing. The purpose of the planned development permit is to allow consideration of innovation in site planning and other aspects of project design and more effective

design responses to site features, uses on adjoining properties, and environmental impacts than the Zoning Code standards would produce without adjustment. Planned development permit approval may be requested for an affordable multifamily housing, mixed-use commercial, and multifamily residential development, or senior housing project and requires approval of a conditional-use permit. Planned development permit approval may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, such as floor area ratio, building height (but not beyond the ballot initiative maximum of 45 feet), setbacks, parking, and street layout.

Affordable housing projects may also qualify for the granting of a density bonus and incentives and/or concessions that can include deviations or waivers from certain development standards, as established in the Zoning Code for multifamily development. Program 2.e is proposed to update the City's zoning to comply with current state density bonus law. Other programs that will address the need to streamline the development process include Programs 2.a, 2.k, 2.l, 3.a, 3.e, and 3.l.

6.5.3 Environmental Constraints

While the City of South Pasadena is predominantly developed, there are vacant and underutilized parcels on which development can be accommodated. Many of these parcels, however, are impacted by environmental constraints and sensitivities.

Topography

The largest concentration of undeveloped land for new residential development is located in the City's hillside area referred to as the Southwest Monterey Hills. Development in this area is constrained due to steep slopes, substandard lots, unimproved roads, and geologic and seismic-related issues. Historically, development has varied in the degree and sensitivity to which it has accounted for these constraints. Some developments have sited housing units in ways to maintain the hillside's unique landform while others have used extensive grading to alter the natural landform. The extent to which development will be permitted on the City's hillsides in the future is of particular concern.

The remaining undeveloped or primarily undisturbed open space in the City, located primarily in the following areas, represents opportunities for conservation, habitat protection, and open space use:

- The canyons, hillsides, and steep topography in the Southwest Monterey Hills, and the primarily City-owned vacant, undeveloped lands in the southwest corner of the Southwest Monterey Hills;
- The Arroyo Seco and adjacent areas;
- Upper slopes in the Monterey Road/Pasadena Avenue/Kolle Avenue/Brunswick Avenue/Oak Hill Avenue residential areas;
- Raymond Hill Site

The following are more detailed discussions of the City's environmental constraints and hazards that affect, in varying degrees, existing and future residential developments.

Slope Stability

The Safety Element of the General Plan identifies landslide areas in the Repetto Hills just inside the City's western boundary. The Monterey Road Landslide area, in the southwest portion of the City, is a particular area of concern. Although small in geographic extent, the landslide area is extremely unstable in certain portions and is located in or near the majority of remaining undeveloped land in the City. Liquefaction of the soil is of secondary concern. The Los Angeles County General Plan Safety Element indicates that South Pasadena is at low risk for liquefaction.

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only known active faults of local significance actually located in South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along any of these faults has the potential to generate surface ruptures that would affect structures within the city.

Flooding

The City of South Pasadena is located within Zone X of the National Flood Insurance Rate Maps (FIRM), which designates areas of minimal (.2% Annual Chance) flooding. As there are no floodplain areas within the City, there are no pertinent flood hazards.

Fire Hazards

The California Department of Forestry and Fire Protection has identified all the land in adjacent Los Angeles along South Pasadena's western and southwestern boundaries as being a "very high fire hazard severity zone." Although the state did not include South Pasadena in this fire area, a fire starting in the neighboring Los Angeles neighborhoods of Garvanza, Highland Park, Montecito Heights, or Newtown Park, could spread into the Monterey Hills community of South Pasadena under certain prevailing wind conditions. In February 2020, the Council adopted Ordinance 2342, which established a "High Risk Fire Area… defined as those properties located South of Monterey Road, extending to the City border, and West of Meridian Avenue, extending to the City border." This represents approximately 25 percent of the land area in the city.

Climate change is anticipated to increase the frequency and severity of fire events across California, including in Los Angeles County. SB 99 (2019), passed in response to the destruction of Paradise, California, in the 2018 Camp Fire, requires that all local jurisdictions ensure that all residential developments in a hazard area have a minimum of two evacuation routes. The City is required by this law to ensure that residents of Monterey Hills can effectively evacuate in the event of an emergency given the community's proximity to a fire hazard severity zone. To reduce the threat of fire in the hillside areas, more restrictive building standards are applied to new residential developments, including accessory dwelling units (ADUs), requiring fire sprinklers and specific

roofing materials. This requirement increases the cost of developing new residential structures but is warranted by the fire risk inherent in this area.

Open Space

Constraints to development include sensitive environmental resources. Zoning regulations are designed so that development in the hillside areas protects the "view-shed" both to and from the hillsides and retains as much remaining natural vegetation as possible. The City's Zoning Code encourages sensitive forms of development, which complement the natural and visual character of the City and its hillsides.

There are some open space areas that do not lend themselves to development. These areas have been left in their natural state and are maintained under private ownership. Such open space lands include the undeveloped portions of the hillsides, steeply sloping topography and canyons in the Southwest Monterey Hills, portions of the Altos de Monterey, and Raymond Hill.

The City owns 15.89 acres of unimproved land in the Altos de Monterey hillside residential tract, referred to as Lot 117. This area is considered an open-space resource to the neighborhood and is not intended for future development.

The sites identified in the Housing Element inventory can be developed with the number of units identified on each site even with environmental constraints taken into consideration.

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multifamily rental housing, emergency shelters, mobile homes, and transitional and supportive housing. The following is a discussion of the Zoning Code regulations that serve to encourage and facilitate a variety of housing types.

Multifamily Residential Districts

South Pasadena's current Zoning Code provides for a Residential Medium Density (RM) district allowing for development of 6 to 14 dwelling units per acre and a Residential High Density (RH) district allowing for development of multiple dwellings of 14 to 24 units per acre. Multifamily residential units are permitted in the RM and RH zoning districts and do not require a conditional use permit (CUP). Multifamily housing is also allowed in the Mission Street Specific Plan (MSSP) district. Programs in this Housing Element and changes proposed in other elements of the General Plan will allow multifamily housing in more areas of South Pasadena and at higher densities, including the proposed Mixed-Use District and proposed Downtown Specific Plan (see Programs 2.j, 2.k, and 3.a).

Mixed-Use Zoning Code Provisions

Mixed-use development projects are those that integrate retail and/or office commercial uses with residential uses on the same parcel. Mixed use is allowed in the Commercial General (CG) zoning district and the MSSP zoning district subject to approval of a CUP. The Zoning Code requires commercial and residential uses within a mixed-use project to be fully separated, with residential units limited to the rear portion of the first story, and/or on the second and higher stories. The maximum allowable density for the residential component of a mixed-use project in a CG zoning district is 24 dwelling units per acre and up to 48 dwelling units per acre in the MSSP zoning district. On Bonus Sites on which additional parking is provided, up to one dwelling unit for each 900 square feet of lot area is permitted. On all other sites, up to one dwelling unit for each 1,500 square feet is permitted.

The General Plan Update and Downtown Specific Plan will amplify the role of mixed-use development in South Pasadena. In order to facilitate implementation of the housing plan, Zoning Code amendments will be considered that would change the processes and standards for mixed-use projects, significantly increasing the land resources available for mixed-use development.

The Zoning Code allows for waivers to development standards for mixed-use commercial and residential uses that include an affordable housing component consistent with the inclusionary housing ordinance. Some modifications may be allowed through a planned development permit.

Mixed-Use Development Regulations in the CG Zoning District

When applying development regulations to mixed-use development projects in the CG zone, the RH zoning district requirements, as described in Table VI-35, Residential Site Development Standards by Zoning District, apply to the residential component and the CG zoning district requirements, as described in Table VI-42, Commercial, Mixed-Use, and Business Park District Development Standards," apply to the commercial component.

Mixed-Use Development Regulations in the MSSP Zoning District

Mixed-use development projects in the MSSP zoning district are subject to the regulations as specified for the subject parcel in the MSSP (see Table VI-42). Development capacity for a project site within the MSSP is determined by a number of factors. A maximum of a 0.8 floor area ratio (FAR) is allowed to derive the total square footage permitted for development, but if public parking spaces are provided as part of the project, the project would be eligible to receive a density bonus to increase the development capacity of the site up to 1.5 FAR. The total number of units allowed within a mixed-use project in the MSSP is derived by dividing the total allowable square feet of development, based on permitted FAR, by 763 square feet, which was the average size of a residential unit within the MSSP when the plan was prepared. Limitations on the total number of units that can be realistically developed in the MSSP include the citywide maximum height restriction of 45 feet, physical dimensions and configuration of the project site, and whether required parking is proposed to be surface or subsurface level.

Program 3.a calls for adoption of the Downtown Specific Plan (DTSP), which will update the zoning and regulations throughout the existing MSSP and into other areas of the Downtown. The DTSP proposes to allow 50 dwelling units to the acre on Mission Street and 60 dwelling units to the acre in the rest of the Specific Plan Area. Multifamily residential uses will be allowed without discretionary review in any location on a site. This will include projects with 100-percent residential uses.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are permitted as either attached or detached units in zoning districts that allow single-family and multifamily dwellings. Junior accessory dwelling units (JADUs) are also allowed in the City. The ADU regulations (SPMC Section 36.350.200) were last updated in June 2021 to comply with State law by allowing their construction in all residential locations, providing objective standards and clarifying the approval process. An illustrated, explanatory brochure explaining the ADU process was published and posted together with the new regulations to assist interested homeowners.

South Pasadena has an extensive historic preservation program, including many historic districts with single-family zoning. These districts are subject to State and local historic preservation laws as well as the ADU statutes. The City received a grant from the State Office of Historic Preservation to develop ADU standards and guidelines that would bridge the requirements of both with the purpose of encouraging ADUs with appropriate design requirements. The second phase of the ADU update, which provided objective standards and guidelines to allow ADUs on historic properties, was approved in December 2021. The City is committed to supporting the construction and legalization of ADUs, as described in Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k.

Manufactured Homes

Residential single-family detached housing makes up about half of the housing stock in the City and includes a small number of mobile homes. The City's Zoning Code considers a manufactured home that may or may not be on a permanent foundation to be a single-family dwelling and, as such, it is a permitted use in the Residential Estate (RE), Residential Single Family (RS), RM, and RH zoning districts subject to the same development regulations as established for conventional "stick built," single-family detached residential units. Because manufactured housing is permitted in all of the residential zoning districts, and the zoning regulations governing construction of manufactured housing are the same as those established for conventionally constructed housing, suitable opportunities are provided in the residential zoning districts for development of this housing type.

Housing for Persons with Disabilities

Group homes or residential care facilities represent a viable housing type for persons living with a disability and for seniors, providing a supervised group home environment with personal services and assistance with daily activities on-site. The Zoning Code includes provisions for group homes for persons with disabilities and residential care facilities for the elderly. The Zoning Code (SPMC 36.700.020 - Definitions) defines a group home as follows:

> "A dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour non-medical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Includes: children's homes; orphanages; rehabilitation centers; self-help group homes."

SPMC 36.700.020 – Definitions defines a Residential Care Facility for the Elderly (RCFE) as follows:

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.

2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.

3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

Pursuant to State law, SPMC 36.220.030 (Table 2-2) - Residential Zoning District Land Uses and Permit Requirements permits residential care facilities of six or fewer residents in any residential district of South Pasadena subject to the same development regulations as are applied to residential uses of the same type in the same zone, as described in Table VI-35. Consistent with State law, the Zoning Code does not define family, does not establish a maximum concentration requirement for residential care facilities, and does not impose any special development standards for residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, which could constrain the provision of residential care facilities for the elderly or persons with disabilities.

The City's Zoning Code allows for residential care facilities for the elderly and residential care facilities of seven or more residents within the RM and RH zoning districts subject to the development standards described in Table VI-35 and approval of a CUP. In the case of residential care facilities providing assisted living for seven or more residents, the Zoning Code establishes special development standards for these facilities, as summarized below:

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.

- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

Because the Zoning Code permits residential care facilities of six or fewer residents in any residential district of the city and does not impose any special development standards for these residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, the Zoning Code does not impose any constraints to the provision of residential care facilities for the elderly or persons with disabilities. Program 5.b is proposed to remove the CUP requirement for residential care facilities of more than six residents.

SPMC 36.410.110 - Reasonable Accommodation provides for granting a reasonable accommodation by the Community Development Director for a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability an equal opportunity to the housing of their choice. The granting of a reasonable accommodation is subject to the following findings (SPMC 36.410.110.G):

The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws and entitled to a reasonable accommodation;

a. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;

b. The reasonable accommodation will not impose an undue financial or administrative burden on the City;

c. The requested accommodation will not result in a fundamental alteration in the nature of a City program or law, including, but not limited to, the General Plan, Zoning Code, design guidelines, and any specific plans; and

d. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

To further address the housing needs of individuals with disabilities, this Housing Element includes a program objective to explore options for requiring that a percentage of all new multifamily residential projects in South Pasadena be universally accessible (see Program 4.e).

Emergency Shelters

The City's Zoning Code defines an emergency shelter as:

> "A residential facility, other than a residential care facility, operated by a provider that provides temporary accommodations to persons or families for a time period not to exceed six months per calendar year and which offers accommodations on a first-come first-served basis where the resident(s) must vacate each morning and have no guaranteed bed for the next night. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations to provide emergency or temporary shelter, and which may also provide meals, counseling and other services, as well as common areas for residents of the facility."

There are currently no emergency shelters within South Pasadena. Emergency shelters are permitted in the Business Park (BP) zoning district, through a ministerial process, subject to specific standards contained in SPMC Section 36.350.250, which was last revised in 2013. The standards govern the size and location of shelters; require on-site facilities, such as laundry, cooking, and bathroom facilities and provision of support services; set parking standards, security lighting requirements; and require a management plan for City approval prior to occupancy.

Sites within the BP zoning district are within walking distance to the Los Angeles Metropolitan Authority (MTA) Line L South Pasadena station with connections to retail areas and job centers along the route, making this an appropriate location for this land use. There are multiple sites in the BP zone that offer opportunities for development of emergency shelters with more than 12 acres of land on 19 parcels. The parcels range in size from 0.06 to 2.33 acres. In addition to this existing capacity in the BP district, the proposed General Plan update and subsequent Zoning Ordinance revision will designate the BP as the Ostrich Farm District, with a corresponding increase in residential capacity through higher density and development standards.

State law allows for Zoning Code regulations to govern the operations of an emergency shelter, including the establishment of a maximum number of beds in any one shelter provided the maximum adequately addresses the City's homeless population need. The standards contained in SPMC 36.350.250 are listed below:

A. Special design standards:

a) Location requirements. An emergency shelter shall not be located any closer than 300 feet to another emergency shelter or within 300 feet of a residential use, public park, or public school.

b) Maximum number of beds. The maximum number of beds for an emergency shelter shall be 12 beds plus a residential unit for a full time on-site manager. The total number of beds in operation at one time in the City shall not exceed 20 beds.

c) Maximum occupancy. Maximum occupancy at any one time shall be 12 residents plus a minimum of one on-site manager.

d) On-site facilities. Each emergency shelter shall provide central laundry and cooking facilities, a minimum of one toilet per six beds per gender, a minimum of one shower per six beds per gender, and private showers for family shelter facilities. Resident storage areas shall be provided. At least one of the following specific support services shall be provided:

i) Recreation room;
ii) Counseling center;
iii) Child care;
iv) Referral services;
v) Other similar supportive services geared to the homeless.

e) Off-street parking. One space per employee and one space per each four beds or one-half space per bedroom of a family unit with children plus up to five visitor spaces for service providers.

f) Lighting. Security lighting shall be provided. A plan for security lighting shall be submitted for review and approval by the Police Department and be installed and fully operational prior to occupancy of the facility.

g) Waiting areas. Intake areas and waiting areas shall be located to prevent queuing in the public right-of-way or a parking lot. These areas shall be screened from public view with either a six-foot high wall or landscaping reaching six feet in height.

B. Management and operations standards:

a) On-site security personnel and an on-site manager shall be present at the facility during all hours of operation.

b) Outdoor activities are limited to the hours of 8:00 a.m. to 9:00 p.m.

c) Resident check-in is permitted between the hours of 4:00 p.m. and 11:00 p.m. Residents are required to vacate the premises at 8:00 a.m. with no guaranteed bed for the next night.

d) Resident stays are limited to a maximum of six months per resident within a 12-month time period.

e) Loitering is prohibited.

f) A written management plan shall be submitted for review and approval by the Community Development Director prior to occupancy and shall address provisions for staff training, neighborhood outreach, security, screening of residents to ensure compatibility with services provided, training and treatment programs for residents, loitering control, and a staffing and services plan for assisting residents to obtain permanent shelter and income.

The City's existing standards for emergency shelters (SPMC 36.350.250) were consistent with State law when adopted in 2013; however, changes in State law (including AB 130, signed into law in September 2019) no longer allow local regulations to establish buffering standards between an emergency shelter and other land uses, restrict parking standards from requiring more than the number needed for a shelter's employees, and specify that the number of beds to be allowed in the city must be based on the most recent point-in-time count. As discussed earlier in Section 6.3.5, the 2020 LAHSA Homeless Count found 15 unsheltered individuals in South Pasadena and the 2021 count was cancelled due to the COVID-19 pandemic. The results of LAHSA's 2022 count, conducted between February 22nd and 24th, were not released at the time of this draft, but South Pasadena police, who participated, indicated that 28 individuals were counted within the City limits.

Accordingly, SPMC 36.350.250 must be revised to fully comply with State law (see Program 4.a). Revisions will include removal of current distancing requirement from other uses, revised parking requirements, a revised maximum number of beds to at least 30 to accommodate the 2022 point-in-time survey and in consideration of the cost and feasibility of providing this service, and any other changes to standards needed to comply with state law (see Program 4.a). The development standards and regulations applicable to all projects located within the BP zoning district and other nonresidential districts are described in Table VI-42.

South Pasadena maintains a Homeless Outreach Team, which operates a referral program to connect individuals living on South Pasadena's streets and open spaces to shelters in the City of Pasadena, which participates with the City of South Pasadena to provide services to these individuals. The Team provides transportation for individuals desiring to go to the shelter and monitors the location and conditions of individuals identified to be without housing in the city. Continuing commitment to provide this program is included as Program 2.f.

~~**Accessory Dwelling Unit Potential**~~

~~In the last five years, ADUs have become more broadly allowed under California law. The City's local zoning regulations have been updated regularly to reflect those changes to state law. Beginning in 2017, the City has seen steady increase year over year in permitted ADUs each year. During the 5th cycle projection period, City planning permit records indicate that an average of four ADUs were permitted per year through the end of 2020. Before 2017, no ADUs were permitted. Local interest in ADU's is significant.~~

- ~~2017 – 1 ADU was permitted~~
- ~~2018 – 4 ADUs were permitted~~
- ~~2019 – 7 ADUs were permitted~~
- ~~2020 – 17 ADUs were permitted~~
- ~~2021 – estimated that at least 20 ADUs will be permitted based on 43 applications submitted through September.~~

~~The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City's projection for increased permit issuances during that period is provided in Table VI-42. The projection assumes that ADU permits will increase at a similar rate to the increase from 2017-2021, as shown above, in the first four to five~~

~~years of the projection period because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. It should be noted that as of October 1 2021, the number of ADU building permits has already exceeded the 12 building permits estimated for 2021 in Table VI-42. This supports the conservative assumptions in Table VI-42 and the more vigorous assumptions in Table VI-43.~~

~~**Table VI-42**~~
~~**ACCESSORY DWELLING UNIT PROJECTION**~~

Table VI-42
COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040)

DEVELOPMENT FEATURE	REQUIREMENT BY ZONING DISTRICT			
	CO	CG	BP	MSSP
Minimum lot size	Minimum area and width for parcels proposed in new subdivisions.			
Area (square feet)	10,000 sf			N.A.
Width (feet)	50 ft			N.A.
Setbacks (feet)	Minimum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.			
Front	25 ft on Fremont St. between the 110 freeway and Monterey Rd., 20 ft required otherwise.	None required	25 ft	5 ft
Sides, each	15 ft if adjacent to an RS district; none required otherwise.			5 ft
Street side	None required		None required	None required
Rear	None, except if adjacent to an alley 5 ft, or if adjacent to a RS district 25 ft		None required	None required
Lot coverage	Maximum percentage of total lot area that may be covered by structures.			
	No maximum		50%	60%
Floor Area Ratio	N.A.	N.A.	N.A.	Bonus sites with extra public parking: -Mixed Use and Residential: 1.5 Other Development Sites: -Mixed Use: 0.8 -Residential: 0.5
Height limit (feet)	Maximum allowable height of structures. See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements.			
Maximum height	35 ft			35 ft
Landscaping	As required by Division 36.330 (Landscaping Standards)			As required by Section 8.6.3 (Outdoor Open Space in Residential or Mixed Use Projects) of the Mission Street Specific Plan
Parking	As required by Division 36.310 (Parking and Loading)			As required by Chapter 6.0 (Transportation and Parking) of the Mission Street Specific Plan
Signs	As required by Division 36.320 (Signs)			As required by Section 7.5.2 (Signs) of the Mission Street Specific Plan

Transitional and Supportive Housing

Transitional housing is defined by the State, and by the City's Zoning Code, as:

> "Rental housing for stays of at least six months operated under program requirements that call for the termination of assistance and recirculation of the housing unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months."

Transitional and supportive housing uses are permitted in all residential zoning districts, subject to the same design standards as other residential uses in the district. In compliance with State law, and in conjunction with the General Plan Update and Downtown Specific Plan, transitional housing will also be included as a permitted use in other zones that allow for mixed-use residential and commercial development (see Program 4.b). Currently, there are no transitional housing or supportive housing facilities in South Pasadena.

While transitional housing aims to facilitate the movement of unhoused individuals and families to permanent housing, supportive housing is distinguished by the provision of on-site or off-site services that assist the residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. This type of housing is defined as a group home in the City's Zoning Code. Program 4.b also addresses compliance with State law in regard to ensuring that supportive housing is permitted in a manner similar to other housing in all zones where housing is allowed.

In July 2019, the Governor signed AB 101, which allows Low Barrier Navigation Centers to be approved by right, without CEQA review required. Government Code Section 65660 defines "Low Barrier Navigation Center" as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry…"

As a form of transitional and supportive housing, this use is already permitted in residential zoning districts (SPMC 36.220.030, Table 2), and the definition defaults to the State law referenced above. However, the City has not yet incorporated a specific definition of Low Barrier Navigation Centers, which would clarify compliance with State law. Policy 4.4 and Program 4.b address the need to update the Code to include a definition of low-barrier navigation centers and expand to allow them within mixed-use zoning districts within one year.

Single-Room Occupancy

The City's Zoning Code defines Single-Room Occupancy (SRO) as:

> "A residential facility for homeless persons, other than a residential care facility, operated by a provider that offers housing consisting of single-room dwelling units that is the primary residence of its occupant or occupants for a period not to exceed six months per calendar year. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations

to provide SRO housing. SRO residential units must contain either food preparation or sanitary facilities or may contain both."

SROs are allowed by right in the BP zoning district, subject to the specific use standards in SPMC Section 36.350.260. South Pasadena does not currently have any SRO developments.

An SRO unit is generally between 200 and 350 square feet in size. These units provide a valuable source of housing for lower-income individuals and can serve as an entry point into the housing market for people transitioning into permanent housing. Some of the Code standards required for SROs include that they may not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school and must be developed on a minimum lot size of 10,000 square feet with a maximum density of one unit per 1,600 square feet of gross floor area. The specific standards also include requirements for establishes setbacks, parking, common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Community Development Director prior to occupancy and operations.

Zoning Provisions to Encourage Affordable Housing

In addition to the areas of the City where higher-density housing is allowed or is proposed to be allowed without discretionary review, the City's Zoning Code includes permitting procedures and incentive programs to encourage the development of affordable housing by allowing for flexibility in the application of development regulations and standards and through the approval of density bonuses for projects containing an affordable housing component. These zoning provisions are discussed herein.

a. Planned Development Permit

The City's Zoning Code provides flexibility in the application of development standards for a project containing an affordable housing or senior housing component pursuant to the approval of a planned development permit (see Municipal Code Section 36.410.100). Planned development permit approval may be requested for an affordable housing, mixed-use, or senior housing project to modify or adjust any applicable development standard of the Zoning Code. Approval of a planned development permit may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, including, but not limited to, FAR, building height, setbacks, parking, and street layout. Planned development permits are approved by the Planning Commission at a public hearing and pursuant to findings summarized below.

1. The project must be consistent with the actions, goals, objectives, policies, and programs of the General Plan and any applicable specific plan, allowed within the applicable zoning district, and comply with all applicable provisions of the Zoning Code and adopted design guidelines other than those modified by the planned development permit, and be adequately served by public facilities, services, and utilities.

2. The approved modifications to the development standards of the Zoning Code are found to be necessary and appropriate to accommodate the superior design of the proposed project, its compatibility with adjacent land uses, and its successful mitigation of environmental impacts.

3. The location, size, planning concepts, design features, and operating characteristics of the project are and will be compatible with the character of the site, and the land uses and development intended for the surrounding neighborhood by the General Plan.

4. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the use.

5. The establishment, maintenance, or operation of the use would not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood of the proposed use, any neighborhood improvements, or the citywide welfare.

The Planning Commission may impose any conditions deemed reasonable and necessary to ensure that the project will comply with the findings. Standard conditions of approval applied by the Planning Commission as part of an approval for a planned development permit are summarized below.

1. Appropriate City building permits are required prior to construction.

2. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.

3. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.

4. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.

5. A demolition permit is required for any existing buildings to be demolished.

6. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.

7. Where required, CAL-OSHA permits must be obtained.

8. Compliance with all State of California disability access regulations for accessibility and adaptability is required.

9. Plan check for electrical, mechanical, plumbing, and sewer is required.

10. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.

11. A soils report is required.

12. A grading and drainage plan approved by the City is required prior to issuance of the building permit.

13. Structural and energy calculations are required to be provided.

14. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.

15. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.

16. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

Depending on workload, review and approval of a planned development permit by the Planning Commission can be completed within 6 to 12 months. The Housing Element includes Program 4.c to maintain the Zoning Code provision allowing approval of a planned development permit for projects proposing development of affordable housing to encourage its development.

b. Affordable Housing Incentives

The Council adopted SPMC Section 36.370 (Affordable Housing Incentives) in 2013 to incorporate State requirements to grant density bonuses and incentives and/or concessions for affordable housing by right. The "Affordable Housing Incentives" provisions of the Zoning Code allow for the granting of a density bonus to eligible projects upon approval by the Community Development Director and the granting of affordable housing incentives and/or concessions to eligible projects by the Planning Commission. State density bonus law has been updated since 2013 expanding the amount of bonus (up to 50 percent for many projects and up to 80 percent for 100-percent affordable projects), increasing the number of incentives and concessions the City must offer, and expanding the list of types of projects that are eligible for a State density bonus. Although the City implements state density bonus law as it is updated, the City has included Program 2.e in this Housing Element to update the Zoning Code to comply with current State density bonus law.

Some of the central components of the affordable housing incentives in SPMC 36.370 are a ministerial approval process for eligible projects; reduced parking requirements and allowing tandem parking or uncovered parking on the project site; a process for inclusion of a Child Care Facility and requirements to ensure unit quality. The location of the designated dwelling units within projects receiving a density bonus or incentives and/or concessions is at the discretion of the City with the goal to integrate the units into the overall project with designated dwelling units reasonably dispersed throughout the development, where feasible. Furthermore, the affordable units must contain on

average the same number of bedrooms as the market-rate units, and must be compatible with the design or use of the remaining units in terms of appearance, materials, and finish quality. If a project is to be phased, the affordable units must be phased in the same proportion as the market-rate units, or phased in another sequence acceptable to the City. Alternatively, the City may authorize some or all of the designated dwelling units associated with one housing development to be produced and operated on an alternative development site.

As part of the approval of a density bonus and incentive and/or concession, the developer is required to record a deed restriction against the property that ensures that continued affordability of the designated units is maintained.

c. Inclusionary Housing Ordinance

In 2018, City Council directed staff to explore policies to proactively increase the production of affordable housing. In 2019, at the City Council's direction, the Community Development Department began outreach in the community, and heard strong support from the community for an inclusionary housing policy. After extensive outreach, and some delay due to the pandemic, on March 9, 2021, the Planning Commission recommended adoption of a draft inclusionary housing ordinance. The City adopted the inclusionary housing regulations (Ordinance 2355) ordinance on May 5, 2021.

This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. Those changes will be adopted at or near the same time as Housing Element adoption as will zoning updates to codify those changes outside of the Downtown.

The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).

Inclusionary Requirements

The inclusionary regulations require any project with three or more residential units proposed in South Pasadena to include at least 20 percent of the base number of units in the project as affordable to lower- or moderate-income households. Applicants may pay an in-lieu fee instead of providing units only for projects containing three or four residential units, for any ownership project, or for fractional units calculated as part of the inclusionary requirement. The in-lieu fee option is described further in the next section.

The inclusionary requirement would change as the number of units in a project increases. Only rental projects between 3 and 10 units may include moderate-income units as part of the inclusionary mix. Larger projects with rental units would need to include a mix of lower-income and very/extremely low income units, as detailed in the ordinance. Ownership (condominium) projects containing for-sale inclusionary units would provide them as moderate-income units.

Table VI-43 summarizes the implementation alternatives allowed by SPMC 36.375.050 – Inclusionary Unit Requirement for different types of residential projects.

~~As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between June 30, 2021, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.~~

~~Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-47provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations effective June 2021, and expects to adopt further amendments in Fall 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with state law (see Program 3.f).~~

~~The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Due to all of these efforts – some already initiated and some to be initiated during the first two years of the planning period – the City expects the ADU production numbers may be higher than 297 units. While the analysis of how the City will address the RHNA includes 297 ADUs, Table VI-43 presents a projection of 368 ADUs that represents a higher range that is also potentially achievable. This number would include seven ADUs assumed for the second half of 2021, beginning on June 30. Based on 2020 building permits issued, this approach assumes that building permits are issued for 57 percent of planning applications in 2021. After that, the assumption is that more efficient processes will increase this ratio. So, while planning applications increase at 10 percent annually, building permits increase by 25 percent. This plateaus in 2027, as shown in Table VI-43.~~

~~Table VI-43~~
~~POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION~~

Table VI-43
INCLUSIONARY HOUSING REQUIREMENT OPTIONS

	3-4 RENTAL UNITS	5-10 RENTAL UNITS	11+ RENTAL UNITS	FOR-SALE UNITS
On-site Option	20% of base # of units; affordable to extremely low, very low, low, or moderate income	20% of base # of units; Designate an affordable unit as extremely low, very low, lower, or moderate income, provided that if the project includes two affordable units, either: a. Both units shall be lower income; or b. At least one shall be a very-low income unit and the other unit may be very low, lower, or moderate.	20% of base # of units; Provide 50% of required affordable units as extremely low or very low and 50% as lower-income units. In case of an uneven number, one more unit shall be provided as very low.	20% of base # of units; Provide as moderate-income units
Off-site Option	N/A	YES	YES	YES
Rehabilitation/ Conversion of Existing Units Option	N/A	YES	YES	YES
Land Dedication Option	N/A	YES	YES	YES
In-Lieu Fee Option	YES	N/A	N/A	YES

Source: City of South Pasadena, 2021; SPMC 36.375.050

Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to promote clarity regarding the City's expectations for quality and contextual design for all projects, providing more certainty to applicants, particularly those on a large enough scale to have a stronger effect on the surrounding area. All of the sites included in the sites inventory to address the lower-income RHNA are of sufficient size to derive strong benefit from taking advantage of the proposed design incentives in the inclusionary regulations. The incentives offered exceed guarantees available under State Density Bonus law. Incentives are offered for height, minimum unit size, and parking. Based on the recently adopted regulations, the City expects an increase in higher-density residential development with on-site affordable units. Program 2.i calls for implementation and monitoring of the Inclusionary Housing ordinance.

In-Lieu Fee Option

The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for

ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. The in-lieu fee study was completed and resulted in various fee options. On March 16, 2022, the fee options were taken to City Council for review and to provide direction. On March 18, 2022, the Planning Commission reviewed and provided comments on the study and the Council's direction from the March 16th City Council meeting. The Commission's comments will be incorporated into the staff report for Council's public hearing to adopt a fee resolution tentatively scheduled for May 18, 2022. The City Council shall establish the fee by resolution, then it will adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.

Alternatives to Building Inclusionary Units On-Site

There are a few alternatives to building the inclusionary units on-site for rental projects with five or more units. These include building the units on another site, donating land, or rehabilitating existing residential units and deed-restricting them as affordable housing. Use of these alternatives is subject to Planning Commission approval.

Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects as required by the ordinance.

Since the inclusionary regulations were recently adopted, the City has not yet been able to collect data to analyze its effect. Program 2.i commits the City to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if and when this is deemed necessary for greater effectiveness.

6.6.2 Land Resources

This section describes the resources available for the development, rehabilitation, and preservation of housing in the City of South Pasadena. This section includes an inventory of sites zoned for residential development that are suitable for future housing development in South Pasadena and an evaluation of the City's ability to provide adequate sites to address its identified share of future housing needs.

Availability of Sites for Housing

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. Opportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), and Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily residential, which would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.
- Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; sites are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

All sites discussed in this section are shown on maps in Appendix A of this Housing Element.

Sites Inventory

Table VI-44 describes the vacant sites remaining in the City that can accommodate residential development. All these sites are suitable for development of moderate and above-moderate residential development. One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so it is included in Table VI-50, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).

In determining the realistic unit capacity for sites listed in Table VI-44 that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. Table VI-45 presents recent projects in medium and lower density areas of the City that

support the 80 percent assumption. All of the projects exceeded 80% of allowed unit capacity. It should also be noted that 90 percent of the sites in Table VI-45 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption of SB 9, which allows duplex development on single-family parcels statewide. Accordingly, realistic capacity on those sites has been considered to be 100 percent (one unit).

With the recent adoption of SB 9, the potential density on single-family sites could be considered to be doubled. However, a realistic approach is needed based on actual site characteristics and trends in the city, so the approach taken for the sites inventory was to count potential for more than one unit only on vacant parcels greater than .20 acres (Table VI-44). Each of these sites are assumed to have a realistic capacity for two units. Potentially, these parcels could be split and develop four units, but the City has taken a conservative approach to SB 9's potential as it has been so recently adopted and data is still unavailable. The City adopted an urgency ordinance to implement SB 9 in December 2021, which includes objective standards. The City has been monitoring interest in utilizing the provisions of SB 9 and has received a fair amount of interest but has not yet received any applications for an SB 9 project. The City is reviewing the fact sheet released by HCD in March 2022 and will use it to guide administration of state law for this type of project.

A small number of the sites in this table are in nonresidential zones. The changes to allow greater density on many nonresidential sites and incentivize housing development via the City's inclusionary regulations will further encourage housing development on non-residentially zoned properties. The realistic development capacity for each site can be increased with approval of a density bonus as part of a development application. Zoning Code provisions applicable to the zoning district for each site, as described in the Constraints section, were assumed and no density bonuses or the inclusionary housing regulations were applied. This is for consistency with state guidance as stated in the HCD 2020 Housing Element Site Inventory Guidebook:

"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

~~To provide additional context, this projection scenario forecasts that 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU over the next 10 years beginning in June 2021. Additionally, the estimate does not include multifamily ADUs, which are estimated to become more popular as apartment building owners get more savvy on the ADU law. Furthermore, the City's program to grant amnesty for illegal units and recognize them as ADUs will likely bring additional units into the housing stock, and are not contemplated in this scenario. Based on all of~~

these considerations, the City considers this ADU projection scenario to be more likely than the 297-unit projection, although the more conservative estimate is used to demonstrate RHNA compliance.

Market Trends

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance update and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.

Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-44 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.

~~Table VI-44~~
~~REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA~~

Table VI-44
VACANT AND NONVACANT SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Monterey Rd. at Pasadena Ave.	91030	5311010012[3]	Medium Density Residential	RM	N/A	14	0.28	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010007[3]	Medium Density Residential	RM	N/A	14	0.31	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010010[3]	Medium Density Residential	RM	N/A	14	0.34	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Monterey Rd. at Pasadena Ave.	91030	5311010015[3]	Medium Density Residential	RM	N/A	14	0.40	Vacant	YES - Current	Privately Owned	Available	0	4	0	4
Monterey Rd. at Pasadena Ave.	91030	5311010008[3]	Medium Density Residential	RM	N/A	14	0.65	Non-Vacant	YES - Current	Privately Owned	Available	0	4	0	4
E. State St. near Raymond Hill Rd.	91030	5317028270	Medium Density Residential	RM	N/A	14	2.73	Vacant	YES - Current	City-Owned	Available	0	15	0	15
Monterey Rd. at Pasadena Ave.	91030	5312002007[2]	High Density Residential	RH	N/A	24	0.10	Vacant	YES - Current	Privately Owned	Available	0	1	0	1
Monterey Rd. at Oak Hill Ave.	91030	5312002009[2]	High Density Residential	RH	N/A	24	0.13	Vacant	YES - Current	Privately Owned	Available	0	2	0	2
Monterey Rd. at Oak Hill Ave.	91030	5312002025[2]	High Density Residential	RH	N/A	24	0.15	Vacant	YES - Current	Privately Owned	Available	0	2	0	2
Arroyo Verde Rd. and Pasadena Ave.	91030	5311001018	General Commercial	CG	N/A	24	0.35	Vacant	YES - Current	Privately Owned	Available	0	3	0	3
Moderate							**5.48**					0	40	0	0
End of Flores de Oro	91030	5314026937	AM	RS	N/A	1 unit per parcel	0.36	Vacant	YES - Current	City-Owned	Available	0	0	2	2
End of Maycrest Ave.	91030	5310016028	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Rollin St.	91030	5314026050	AM	RS	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
La Portada St. at Via del Rey	91030	5314025021	AM	RS	N/A	1 unit per parcel	0.75	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa St.	91030	5311009056	AM	RS	N/A	1 unit per parcel	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009057	AM	RS	N/A	1 unit per parcel	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009058	AM	RS	N/A	1 unit per parcel	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Cielo at Santa Teresa	91030	5311009055	AM	RS	N/A	1 unit per parcel	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015034[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015033[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010030[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010029[3]	Estate & Very Low Density Residential	RS	N/A	3.5	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave at Blair Ave.	91030	5311010028[3]	Estate & Very Low Density Residential	RS	N/A	3.5	2.37	Vacant	YES - Current	Privately Owned	Available	0	0	6	6
Bank St. at Meridian Ave.	91030	5314020007	Estate & Very Low Density Residential	RS	N/A	3.5	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Fairview Ave. at Highland St.	91030	5317011025	Estate & Very Low Density Residential	RS	N/A	3.5	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009903	Estate & Very Low Density Residential	RS	N/A	3.5	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010027	Estate & Very Low Density Residential	RS	N/A	3.5	0.36	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308032044	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308006024	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308019034	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hanscom Dr. at Peterson Ave.	91030	5308034016	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031001	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308021008	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308023015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310022006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017021	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017020	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Fletcher Ave. at Oak St.	91030	5320030038	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023008	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Brunswick Ave.	91030	5311015016	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023004	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311010065	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308034015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Winding Ln at Huntington Dr.	91030	5320018022	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022003	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308022042	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Short Way St. at Oak Hill Ave.	91030	5312031029	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave at Oak Crest Ave.	91030	5314010005	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026010	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308024017	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017018	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023007	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. and Illinois Dr.	91030	5308021904	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022002	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Mountain View Ave. at Alta Vista Ave.	91030	5314010024	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022009	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308021012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009909	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308032012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311008033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015006	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308024033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310034900	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Ave.	91030	5308034017	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Hill Dr.	91030	5308002070	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034003	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Las Palmitas St. at Camino del Sol	91030	5308002064	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

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Camino del Sol at Hill Dr.	91030	5308002059	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026011	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034018	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Warwick Ave.	91030	5311006013	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Alta Vista Ave.	91030	5314008014	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Blair Ave. at Saint Albans Ave.	91030	5311017058	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camden Ave. at Camden Parkway	91030	5321011013	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Saint Albans Ave.	91030	5311006900	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015005	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308034004	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006001	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5314006020	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031041	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Berkshire Ave. at Valley View Rd.	91030	5310018901	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Kolle Ave. at Monterey Rd.	91030	5311007019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Cambridge Pl. at Valley View Rd.	91030	5310018903	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006904	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006025	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006053	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5306006048	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028051	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028055	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028034	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028900	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028054	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028052	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028049	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Hanscom Dr.	91030	5308027007	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028053	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028050	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028035	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5301028036	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5312016016	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5312016015	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027008	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027020	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Hanscom Dr.	91030	5308027017	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hill Dr. at Peterson Ave.	91030	5308027018	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Peterson Ave.	91030	5308027019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Kolle Ave.	91030	5311006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031040	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308021902	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	City-Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308021009	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Flores de Oro at Camino Lindo	91030	5314016064	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5311014048	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Ave.	91030	5308031039	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Collis Ave.	91030	5312017025	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave. at Indiana Ave.	91030	5314007017	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Bank St.	91030	5314019023	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031042	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Diamond Ave. at Oak St.	91030	5319031901	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Saint Albans Ave. at Blair Ave.	91030	5311008039	Low Density Residential	RS	N/A	6	0.21	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016900	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016901	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	City-Owned	Available	0	0	2	2
Alta Vista Ave. at Indiana Ave.	91030	5314006039	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Sol at Las Palmitas St.	91030	5308002072	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014042	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Warwick Pl. at South Ln.	91030	5311006028	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Kolle Ave.	91030	5311006068	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Rollin St. at Meridian Ave.	91030	5314017901	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	State-Owned	Available	0	0	2	2
Alta Vista Cir. at Indiana Ave.	91030	5314006005	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Ave. at Pinecrest Dr.	91030	5311006057	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024034	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave and Harriman Ave.	91030	5312016014	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014043	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Harriman Ave. at Hill Dr.	91030	5312017043	Low Density Residential	RS	N/A	6	0.27	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Braewood Ct.	91030	5314016044	Low Density Residential	RS	N/A	6	0.28	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308020027	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Alta Vista Cir. at Alta Vista Ave.	91030	5314005045	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Braewood Ct. at Meridian Ave.	91030	5314016075	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Collis Ave. at Hill Dr.	91030	5312017044	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Pl. at Oak Hill Ln.	91030	5312020012	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5306006905	Low Density Residential	RS	N/A	6	0.31	Vacant	YES - Current	City-Owned	Available	0	0	2	2
End of Harriman Ave.	91030	5312017042	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024031	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
End of Indiana Terrace	91030	5314005021	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Flores de Oro	91030	5314016030	Low Density Residential	RS	N/A	6	0.33	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Collis Ave. at Hill Dr.	91030	5312017049	Low Density Residential	RS	N/A	6	0.33	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hill Dr. at Warwick Pl.	91030	5308027016	Low Density Residential	RS	N/A	6	0.34	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005017	Low Density Residential	RS	N/A	6	0.35	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Oak Hill Terrace	91030	5311006055	Low Density Residential	RS	N/A	6	0.37	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308031053	Low Density Residential	RS	N/A	6	0.72	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Bank St. at Meridian Ave.	91030	5314018010	Low Density Residential	RS	N/A	6	0.73	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Peterson Ave. and Harriman Ave.	91030	5308032902	Low Density Residential	RS	N/A	6	0.78	Vacant	YES - Current	City-Owned	Available	0	0	3	3
Hanscom Dr. at Illinois Dr.	91030	5308034901	Low Density Residential	RS	N/A	6	2.43	Vacant	YES - Current	City-Owned	Available	0	0	11	11
Hanscom Dr. at Peterson Ave.	91030	5308033904	Low Density Residential	RS	N/A	6	4.14	Vacant	YES - Current	City-Owned	Available	0	0	19	19
Mission St. and Grand Ave.	91030	5313006038	Mission Street Specific Plan	MSSP	N/A	36.7	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	4	4
Mission St. and Fremont Ave.	91030	5315008042	Mission Street Specific Plan	MSSP	N/A	36	0.45	Vacant	YES - Current	Privately Owned	Available	0	0	12	12
ABOVE-MODERATE SUBTOTAL							**37.42**					**0**	**0**	**238**	**238**
TOTAL							**42.90**					**0**	**40**	**238**	**278**

Source: ~~PlaceWorks and~~ City of South Pasadena, 2021

Note 1: Available means the site has not been entitled for development

Note 2: These four parcels have the same owner and are for sale. The City has recently received developer interest in developing residential units on these parcels as one project.

Note 3: These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

~~***Regional Examples of Small Site Development***~~

~~Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-45 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. The City has also included Program 3.d to encourage and facilitate parcel assemblage.~~

Table VI-45
REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS ~~ON SMALL SITES~~ IN SOUTH PASADENA~~REGION~~

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	BUILT DENSITY	PERCENT OF ALLOWED CAPACITY
1974 Huntington Drive	5321008016	.24	Under Construction	RM	Duplex	Market rate 3-unit ownership project	3	12.5 du/acre	>100%
1413 Lyndon	5319003004	.20	Completed in 2016	RM	Single-family home	Market rate 3-unit ownership project	3	10 du/acre	> 100%
191 Monterey Rd.	5311010022	.70	Completed in 2017	RM	Single-family home	Market rate 9-unit ownership project	9	12.9 du/acre	92%
1818 Peterson Ave.	5508025027	.09	Entitled in 2021	RS	Vacant	Market rate 1,231 sf Single-family dwelling with 495 sq. ft. JADU	2	11.1 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)
807 Rollins St.	5314017901	.23	Entitled in 2021	RS	Vacant	Market rate 3411 sf Single-family dwelling, (JADU-ready, entitled in April 2022)	1	4.3 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)

Source: City of South Pasadena, 2022

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Accessory Dwelling Unit Potential

In the last five years, ADUs have become more broadly allowed under California law. The City's local zoning regulations have been updated regularly to reflect those changes to state law. Beginning in 2017, the City has seen steady increases year over year in permitted ADUs each year. Before 2017, no ADUs were permitted. Local interest in ADUs is significant. ADU building permit numbers from 2017 through 2021 are listed below.

- 2017 – 1 ADU received a building permit
- 2018 – 4 ADUs received building permits
- 2019 – 7 ADUs received building permits
- 2020 – 8 ADUs received building permits
- 2021 – 32 ADUs received building permits

The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City issued 21 building permits for ADUs in the second half of 2021 (see Table VI-46). The City's projection for permit issuances starting at the beginning of 2022 through the end of the projection period is provided in Table VI-46. (See also Appendix E for more detailed analysis). The projection assumes that ADU permits will increase at a similar rate to the increase from 2017-2021, as shown above, in 2022 and 2023 because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. This supports the conservative assumptions in Table VI-46 and the more vigorous assumptions in Table VI-47.

Table VI-46
ACCESSORY DWELLING UNIT PROJECTION~~SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA~~

YEAR	ADU PLANNING PERMITS	ADU BUILDING PERMITS
2020 - Actual	17	8
2021 - Actual	45~~20~~	32~~12~~
Issued after June 30, 2021 (Actual)	28	21
2022	50~~27~~	35~~17~~
2023	55~~40~~	39~~26~~
2024	55	39~~6~~
2025	65	39~~42~~
2026	68	39~~44~~
2027	68	39~~44~~
2028	68	39~~44~~
2029 (through October 15)	40~~60~~	28~~38~~
Total January 1~~une 30~~, 2022~~1~~-October 15, 2029	42061	297

~~***Sites to Address the Lower-Income RHNA***~~

~~To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-46). As with the one vacant site, all of these sites have proposed changes to either their General Plan Land Use designation, or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-46 to address the lower-income RHNA. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished; and Programs 2.j and 2.k address the Affordable Housing Overlay.~~

~~In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-46 about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, and suggests the property owner consider affordable housing. Staff has solicited interest from property owners of approximately five properties on the inventory, as noted in Appendix A. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C.~~

~~Because projects on all of the sites included in Table VI-46 are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 50 percent of the units were assumed to address the lower-income RHNA and the other 50 percent assumed moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus for projects on these sites supports the realistic capacity assumptions. Additional detail on why 95 percent is a realistic capacity for these sites is provided in Appendix F.~~

As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between January 1, 2022, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-51 provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Due to all of these efforts – some already initiated and some to be initiated during the first two years of the planning period – the City expects the ADU production numbers may be higher than 318 units. While the analysis of how the City will address the RHNA includes 297 additional ADUs, Table VI-47 presents a projection of 383 ADUs that represents a higher range that is also potentially achievable. This scenario reflects the actual number of approved ADU Planning applications and building permits issued in 2021, assumes a 10-percent annual increase in applications beginning in 2022 that continues for the next five years before leveling off, and assumes that 75 percent of approved Planning applications will receive building permits.

~~***Availability of Infrastructure***~~

~~Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Impact Report being prepared for the Housing Element and the update of the General Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.~~

~~***Comparison of Site Inventory with RHNA***~~

~~SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-47. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.~~

Table VI-47

POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION~~COMPARISON OF SITE CAPACITY AND RHNA~~

YEAR	ADU PLANNING APPLICATIONS	ADU BUILDING PERMITS ISSUED	NOTES
2020	30	8	Actual
2021	45	32	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	21	Actual
2022	50	38	Assumption of 10% increase in applications and 50% moving forward to building permits
2023	55	41	Assumption of 10% increase in applications and 60% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	Assumption of 10% increase in applications and 75% moving forward to building permits
2026	72	54	Assumption of 10% increase in applications and 75% moving forward to building permits
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	Assumption of steady application rate, no increase
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029

To provide additional context, this projection scenario forecasts that less than 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU over the next 10 years beginning in June 2021. Additionally, the estimate does not include multifamily ADUs, which are estimated to become more popular as apartment building owners get more savvy on the ADU law. Furthermore, the City's program to grant amnesty for illegal units and recognize them as ADUs will likely bring additional units into the housing stock, and are not contemplated in this scenario. Based on all of these considerations, the City considers this ADU projection scenario to be more likely than the 297-unit projection, although the more conservative estimate is used to demonstrate RHNA compliance.

Market Trends

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance updates and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.

Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-48 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.

~~6.6.3 Financial Resources~~

~~A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-48 describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).~~

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Table VI-48
REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-5046 (AND SITE ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Buildout starting in Summer 2021 and concluding in Fall 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail)	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.45 FAR	Odd-shaped sites near transit: ~~Gold Line Storage (10);~~ North side of Mission (8, 10~~1~~, 12~~3, 14~~) Site 14, combined with adjacent lots Other sites near rail transit: City Yard (9); Fremont/Mission (12~~3, 14~~), Arco (~~8~~9)~~;~~ *These sites are similar in size and proximity to transit; identified for rezoning to produce more units than example project.*
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	~~EIR process began in 2020~~Entitled in 2021	MSSP	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units on above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.48 FAR	School Site -11~~2~~ (historic resource); ~~Site Gold Line Storage 10;~~ Carrows site (12); Parking Lot sites -13~~5~~, 14~~6, 21~~ (rectangular; several parcels combined) *These sites are similar in size to the Mission Bell project, with structures on a portion of the lot that could be incorporated into a larger project or demolished; identified for rezoning at higher densities to produce more units than example project.*
Eight Twenty 820 Mission St.	5315-017-094, 5315-017-082, 5315-017-067, 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses	38	20	109% of allowed FAR (Allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	~~Gold Line Storage 10;~~ Parking Lot sites -13~~5~~, 14~~6, 21~~ (rectangular; several parcels combined) *Like the example project, these properties are owned by parties interested in consolidating to build a larger multi-family project (some are City-owned); identified for rezoning to produce more units than example project.*
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in Spring 2020	CO	Commercial retail with underutilized parking lot	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (Allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (16~~7~~, 17~~8~~, 20~~2~~, 21~~3~~, 22~~4~~) YMCA-owned Site (23) Monterey Road Site (3) *These sites are similar in size and have owner interest in developing a residential project that would include on-site affordable housing and receive a density bonus. One site is in consideration for affordable housing overlay zone for higher density.*
Mission Meridian Village Meridian Ave and Mission St	5315021001, 5315021079, 5315021047	1.6	Built in 2005	MSSP	Lower density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes: three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 10~~4~~) Vacant Site/Ostrich Farm (1) Tyco Site (4) School District Site (11) Ralph's Site (24) *These are larger sites, in mixed-use areas, with potential for a project with multiple structures including affordable housing per the IHO; identified for rezoning to produce more units than example project.*

Source: PlaceWorks and City of South Pasadena, 2022

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Regional Examples of Small Site Development

Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-49 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. The City has also included Program 3.d to encourage and facilitate parcel assemblage.

~~6.6.4 Opportunities for Energy Conservation~~

~~Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.~~

~~In 2014, the Council appointed nine South Pasadena residents with expertise in energy to form a Renewable Energy Council (REC), an advisory group to produce a report to guide the City's Natural Resources and Environmental Commission. The REC's task was to evaluate opportunities for the City to employ renewable energy at its facilities and to lay out ideas for stimulating a shift toward clean energy throughout the community. Their 2015 report, *A Clean Energy Pathway for South Pasadena*, primarily focused on City properties and facilities, recommending projects for generating renewable energy and accelerating the City's movement toward sustainability as a policy focus. Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use. The City has hosted numerous events and provided materials to encourage residents to plan "smart gardens," which are~~

~~The Housing Plan includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.~~

~~The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy. The City periodically arranges for product presentations by~~

manufacturers of energy-saving building materials to the Design Review Board and Cultural Heritage Commission to assist these decision-making bodies in making design recommendations to homeowners and developers during their review of new construction and addition projects.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-49
REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION

~~**Table VI-49**~~
~~**COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED**~~

ADDRESS/ PROJECT NAME~~INCOME LEVEL~~	JURISDICTION ~~RHNA ALLOCATION~~	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS ~~PERMITTED 2013-2020~~	DENSITY ~~REMAINING ALLOCATION~~
Stanford Pasadena, 150 S. Oak Knoll	Pasadena	0.23	preliminary entitled 2017	Rental	19	83
Stanford Pasadena, 139 S. Oak Knoll~~Very Low~~	Pasadena~~17~~	0.20~~1~~	preliminary entitled 2017	Rental	16	80
233 Hudson~~Low~~	Pasadena~~10~~	0.37~~3~~	entitled 2018~~7~~	Condo, 5,729 SF of retail/office	42	114
Pico Eleven, 1112 Pico Blvd~~Moderate~~	Santa Monica~~11~~	0.44~~1~~	finished 2018~~10~~	Condo	32	73
1819 Pico~~Above Moderate~~	Santa Monica~~25~~	0.49~~113~~	preliminary entitled 2020~~-~~	Condo, 4,174 SF of retail/office	48	98
3223 Wilshire~~Total~~	Santa Monica~~63~~	0.45	constructed 2020	Rental, 5,418 SF of retail/office	53	118
2225 Broadway	Santa Monica	0.22	constructed 2020	Rental, 2,751 SF of retail/office	15	68
1450 Cloverfield	Santa Monica	0.45	constructed 2020	Rental, 8,385 SF of retail/office	34	76

Source: PlaceWorks~~City of South Pasadena Annual Progress Reports, HCD~~, 2021

Sites to Address the Lower-Income RHNA

To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-50). As with the one vacant site, all of these sites would either be affected by proposed changes to their General Plan Land Use designation or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites to address the lower-income RHNA that are in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-50. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished; and Programs 2.j and 2.k address the Affordable Housing Overlay.

In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-50 about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C. The City followed up again with owners in the table who hadn't responded to the earlier rounds of outreach both via letter and phone calls in late 2021 and early 2022, yielding multiple additional responses. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, including the inclusionary housing ordinance, and suggests the property owner consider affordable housing. In addition to sites owned by the City, staff has solicited interest from property owners of approximately 16 properties on the inventory, as noted in Appendix A. Some of these have pending applications for projects that include residential units (also noted in Appendix A). In other cases, property owners or their representatives have had meetings with City staff to plan for applications following the City's adoption of the General Plan, DTSP and zoning code amendments.

Because projects on all of the sites included in Table VI-50 are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 60 percent of the units were assumed to address the lower-income RHNA and 40 percent are assumed for moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus for projects on these sites supports the realistic capacity assumptions. 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).

Site 7, the Methodist Church Site is designated and zoned as Community Facilities. Part of the more than 6-acre site is already developed with non-residential community facility uses. Based on discussions with the owners about their interest in developing unused portions of the site for multifamily housing, the likelihood of development of undeveloped portions of the site with higher density residential has been established. In addition, all sites included in Table VI-48 are examples of multifamily projects developed on sites designated to allow non-residential development.

The zoning amendments with development standards to implement the application of the Affordable Housing Overlay to this site along with Sites 3 and 6 will ensure allowed heights and other development standards to accommodate feasible development of projects with at least 30 dwelling units per acre (see Programs 2.j and 2.k). The unit assumptions on three of those sites (3, 6, and 7)

are lower than 95 percent of the maximum allowed units under the proposed density and are based on discussions with property owners about expected numbers of units they would propose on those sites. 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.

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

- Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.

- Seniors:
  - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.

- Unhoused Persons:
  - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
  - In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
  - Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
  - The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
  - The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding

~~transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.~~

~~Table VI-50 describes the City's progress in implementing the 2014-2021 Housing Element programs.~~

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Table VI-50
SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA

~~Table VI-50~~
~~2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE~~

SITE NUMBER IN APPENDIX A~~2014-2021 HOUSING ELEMENT PROGRAMS~~	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE~~PROGRESS~~ OF SHORTFALL~~PROGRAM SINCE 2014~~	PARCEL SIZE (ACRES)~~APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT~~	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
3~~*Energy Efficiency Program*~~ ~~This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program.~~ ~~**Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for~~	181, 185 and 187 Monterey Rd.~~The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements.~~ ~~For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in~~	91030	5311015035	8	0	0	8	Shortfall of Sites	0.34	Medium Density Residential	RM	Medium-Density Residential with AH Overlay~~Amend and continue with current energy-related program.~~	RM with AH Overlay	30	Non-Vacant
		91030	5311010001	7	0	0	7	Shortfall of Sites	0.33	Medium Density Residential	RM			30	Non-Vacant
		91030	5311010002	14	0	0	14	Shortfall of Sites	0.59	Medium Density Residential	RM			30	Non-Vacant

SITE NUMBER IN APPENDIX A~~2014-2021 HOUSING ELEMENT PROGRAMS~~	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE~~PROGRESS~~ OF SHORTFALL~~PROGRAM SINCE 2014~~	PARCEL SIZE (ACRES)~~APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT~~	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT
~~energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.~~	~~more enforcement of housing maintenance and support for displaced tenants.~~ ~~The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.~~														
4	Pasadena Ave.~~***Planning Assistance***~~ and Arroyo Dr~~***Permit Processing***~~ ~~The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.~~ ~~**Eight Year Objective:**~~ ~~Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period~~.	91030	5313011007	35	16	8	59	Shortfall of Sites~~The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.~~	0.89~~Continue.~~	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites~~Housing Development Program~~ ~~This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of~~	0.24~~No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel~~	Business Park/Research & Develop~~Amend substantially to reflect current City efforts and continue.~~	BP			70	Non-Vacant

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								~~Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications.~~ ~~**Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate income housing units during the 2014-2021 planning period.~~	~~Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.~~						
~~***CalHome Program***~~ ~~This program is a State Housing and Community Development~~	~~The City continues to provide information about CalHome and conducts outreach through its consultant, the Housing Rights Center. They serve as the main source of this type of~~	91030~~Continue.~~	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant

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~~program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners.~~ ~~**Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.~~	~~information and support for South Pasadena residents.~~														

5~~***Section 8 Rental Assistance***~~ ~~The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons.~~ ~~**Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.~~	Monterey Rd. at Pasadena Ave.~~Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/~~ ~~The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.~~ ~~HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.~~	91030~~C ontinue.~~	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012010 5311012011	2 2	0 0	7 4	9 6	Shortfall of Sites	0.98 0.78	Estate & Very Low Density Residential	RE	Estate & Very Low Density Residential~~***Bonu***~~	RE with AH Overlay~~The Senior Housing project at 625 Fair Oaks was approved in 2020 and~~	30~~Amend to address updates to~~	Non-Vacant

												~~*s for Affordable Housing*~~ ~~The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households.~~ ~~**Eight-year Objective:** Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist~~ with AH Overlay~~development of 21 lower income units and 5 moderate income units.~~	~~received a 35 percent density bonus. It will have 86 units with 13 units reserved for low-income households.~~ ~~The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction with adoption of an inclusionary housing ordinance, the City incorporated streamlined approval for waivers in conjunction with the density bonus for projects that include on-site inclusionary housing.~~ ~~City staff regularly provides assistance to applicants considering proposing projects using the density bonus.~~	~~state law and continue.~~	
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	100	0	0	100	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with	CF with AH Overlay~~The City received a $30,000~~	30~~Continue.~~	Non-Vacant	

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												AH Overlay~~*Homeless Services*~~ ~~The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena.~~ ~~**Eight-year Objective:** The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.~~	~~grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.~~ ~~In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental~~		

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													~~assistance to eligible low-income residents.~~ ~~Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.~~		
8~~*Senior Housing*~~ ~~The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors.~~ ~~Eight year Objective: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing~~	Mission St. and Orange Grove Ave.~~The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.~~	91030~~C ontinue.~~	5313006025	14	7	3	24	Shortfall of Sites	0.50	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant

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~~apartment buildings as affordable senior housing whenever possible.~~															
9	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	20	9	5	34	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
10	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of ~~*Vacant*~~ Sites ~~The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels.~~ ~~**Eight-year Objective:**~~ ~~Continue to maintain an inventory of vacant and underdeveloped sites for~~	0.23~~No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.~~	Mission Street Specific Plan~~Amend and continue.~~	MSSP	Downtown Mission	Mission Street	70	Non-Vacant

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								~~development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate income housing units.~~							
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
11	Mission St. and Fairview Ave.	91030	5315008900*	0	19	89	108	Shortfall of Sites	1.90	Mission Street Specific Plan~~Mixed-Use Developments and Adaptive Re-Use~~ ~~The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing~~	MSSP	Downtown Mission~~The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs~~	Mission Street~~Amend and continue.~~	50	Non-Vacant

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										~~may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations.~~ ~~**Eight-year Objective:** Continue to promote the development of housing units above ground-floor commercial uses on vacant properties located within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.~~		~~is also located in a mixed-use district.~~ ~~A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been included in the draft programs section to further facilitate housing in the mixed-use areas.~~			

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12	Mission St. and Fremont Ave.	91030	5315009051	5	0	45	50	Shortfall of Sites	0.81	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003044*	13	6	2	21	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	7	2	2	11	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant
14		91030	5315003903	6	2	2	10	Shortfall of Sites	0.18	General Commercial	CG				Non-Vacant
~~***Residential Second Units***~~ ~~The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts.~~ ~~**Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.~~	El Centro St. and Mound Ave.	91030	5315003904	~~4In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. The increased numbers have been facilitated by recent changes in California law. The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2020 addressed issues that had added complexity~~	~~2Amend and continue.~~	1	7	Shortfall of Sites	0.12	General Commercial	CG	Downtown Fair Oaks	Mixed Use	55	Non-Vacant

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				~~to ADU approval in order to further facilitate ADU production.~~											
		91030	5315003902	4	2	1	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	6	3	2	11	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant
15	Oxley St. and	91030	5315003033	6	2	2	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	55	Non-Vacant
		91030	5315003032	8	3	2	13	Shortfall of Sites	0.22	General Commercial	CG				Non-Vacant
16	Fair Oaks Ave. and Grevelia St.	91030	5315001070	33	15	8	56	Shortfall of Sites	0.85	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	70	Non-Vacant
17	Fair Oaks Ave. at Hope St.	91030	5318004019	17	8	4	29	Shortfall of Sites	0.50	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	60	Non-Vacant
18	Brent Ave. at Hope St.	91030	5318004023	7	3	2	12	Shortfall of Sites	0.41	High Density Residential	RH	High Density Residential with AH Overlay~~*Land Use Controls*~~ ~~1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit.~~ ~~**Eight-year Objective:** The City will adopt an amendment~~	RH with AH Overlay~~Objective 1: Ordinance 2253 amended the Zoning Code to remove the conditional use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household.~~ ~~Objective 2.~~ The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section.	30~~Objective 1. Delete.~~ ~~Objective 2. Amend and continue.~~ ~~Objective 3. Amend to reflect accomplishments and continue.~~ ~~Objective 4. Continue.~~ ~~Objective 5. Amend to address completed portions of the program and continue.~~ ~~Objective 6. Continue.~~	Non-Vacant

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												~~to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months.~~ ~~2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300~~	~~Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law.~~ ~~Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects.~~ ~~Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows~~		

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												~~foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population.~~ ~~**Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of~~	~~to separate ownership units, one with a covenant for a moderate income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements.~~ ~~Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.~~		

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												~~beds permitted in any one emergency shelter at 16 beds.~~ ~~3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone.~~ ~~**Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential~~			

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												~~projects to include transitional and supportive housing.~~ ~~4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs, which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area;~~			

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												~~establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Director of Planning and Building prior to occupancy and operations.~~ ~~**Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list~~			

SITE NUMBER IN APPENDIX A~~2014-2021 HOUSING ELEMENT PROGRAMS~~	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE~~PROGRESS~~ OF SHORTFALL~~PROGRAM SINCE 2014~~	PARCEL SIZE (ACRES)~~APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT~~	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT
												~~transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types.~~ ~~5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning~~			

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												~~Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements.~~ ~~**Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects.~~ ~~6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the~~			

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												~~use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.~~ ~~**Eight year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code.~~			

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												~~7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.~~ ~~**Eight-year Objective:** The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.~~			
19	Mission St. and Brent Ave.	91030	5318015017	18	7	4	29	Shortfall of Sites	0.62	General Commercial	CG	Downtown Mission	Mission Street	55	Non-Vacant
20	Fair Oaks Ave. and Monterey Rd.	91030	5315004066	14	7	3	24	Shortfall of Sites	0.36	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	70	Non-Vacant
		91030	5315004083	42	18	10~~***Provision of Technical Assistance to Developers of Affordable Housing***~~ ~~The City's Planning & Building Department currently offers handout materials and provides assistance to~~	70~~City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning~~	Shortfall of Sites~~Continue.~~	1.06	General Commercial	CG			70	Non-Vacant

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						~~applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing.~~ ~~**Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of~~	~~period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process.~~ ~~The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications~~							

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						~~affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.~~	~~are submitted with all requirements to streamline the approval process.~~ ~~The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding.~~ ~~ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster~~								

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							~~processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.~~								
		91030	5315004084	75	29	21	125	Shortfall of Sites	1.88	General Commercial	CG			70	Non-Vacant
		91030	5315004085	26	12	6	44	Shortfall of Sites	0.66	General Commercial	CG			70	Non-Vacant
21	Monterey Rd. and Fair Oaks Ave.~~***Fair Housing Program***~~ ~~The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs.~~ ~~**Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing~~	91030	5319002034	80	30	23	133	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks~~The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation.~~ ~~The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will~~	Fair Oaks~~Amend and continue.~~	70	Non-Vacant

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	~~for persons with disabilities, on a case by case basis, in order to promote equal access to housing.~~											~~administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know your rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.~~			
22~~*Promote Energy Conservation*~~ ~~The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The~~	Fair Oaks Ave. and Bank St.	91030	5319003029	30	14	6	50	Shortfall of Sites	0.89	General Commercial~~Policies are being developed as part of the General Plan Update, currently underway.~~	CG~~Combine with Energy Efficiency Program and continue.~~	Downtown SP	Fair Oaks	60	Non-Vacant

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~~application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents.~~ ~~**Eight year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either~~															

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~~adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building design guidelines and development standards, including the use of solar energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates,~~															

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~~and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.~~															
23	Garfield Ave. at E. Huntington Dr.	91030	5321015018	6	3	2	11	Shortfall of Sites	0.20	Medium Density Residential	RM	Mixed Use	Mixed Use	55	Non-Vacant
		91030	5321015017	6	2	2	10	Shortfall of Sites	0.19	Business Park/Research & Develop	RM				Non-Vacant
		91030	5321015016	5	2	1	8	Shortfall of Sites	0.16	Business Park/Research & Develop	RM				Non-Vacant
24	Garfield Ave. and E. Huntington Dr.	91030	5321019009	7	2	2	11	Shortfall of Sites	0.17	General Commercial	CG	Mixed Use	Mixed Use	70	Non-Vacant
		91030	5321019022	73	28	21	122	Shortfall of Sites	2.92	General Commercial	CG			70	Non-Vacant
	TOTAL			**972**	**344**	**338**	**1,654**		**36.84**						

~~***Housing Acquisition and Rehabilitation***~~ ~~A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing.~~ ~~**Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.~~	~~Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff has recently met with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to begin discussions of potential affordable housing strategies.~~ ~~Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).~~	~~Amend to address accomplishments and continue.~~

Source: City of South Pasadena, 2021

* Included in prior Housing Element sites inventory

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Availability of Infrastructure

Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Impact Report being prepared for the Housing Element and the update of the General Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.

Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-51. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

~~6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES~~

~~This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.~~

~~6.8.1 Goals, Policies, and Programs~~

~~The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:~~

- ~~Conserving the existing supply of affordable housing;~~
- ~~Assisting in the provision of housing;~~
- ~~Providing adequate sites to achieve a variety and diversity of housing;~~
- ~~Removing governmental constraints as necessary; and~~
- ~~Promoting equal housing opportunity.~~

~~The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.~~

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas and Southern California Edison programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: City Manager's Office

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b - Housing Acquisition

The City will partner with and support affordable housing developers to create new and rehabilitated, deed-restricted, affordable housing units on the 68 surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City has initiated a property sales program for the 710 freeway surplus properties. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete the feasibility study and use the recommendations to support and provide technical assistance to non-profit affordable housing developers pursuing acquisition and rehabilitation as affordable housing of any Caltrans-declared surplus properties in the 710 surface route corridor.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study by 2022; technical assistance and work with nonprofits ongoing throughout planning period.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will continue to monitor opportunities and pursue funds through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies.

Eight-year Objective: Correction of all identified Code violations; 40 units rehabilitated based on funding sources

Funding Source: CDBG, HOME, SB 2 PHLA, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Ongoing

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. (No subsidized units currently exist in South Pasadena.) The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and mobile homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.

- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet with water providers to identify sources of contamination for drinking water contamination and develop strategies to reduces sources. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and groundwater contamination to reduce exposure to these environmental threats.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the Housing Rights Center.

Policy 2.4 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City periodically updates applications and materials, and provides

application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City will also continue to participate in the SGVRHT to support more affordable housing development within the city and region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Facilitate timely review of development proposals that include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received.

Program 2.b – Affordable Housing Production

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. The City will continue to work with this partnership, and may also create an in-house program with City staff to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows.

Eight-year Objective: Fund and build affordable units.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; consider establishing or partnering with a housing authority by December 2023; if determined to be feasible, join or establish a housing authority by June 2024.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners. The program is administered for the City by the Housing Rights Center.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households whenever possible for a minimum of five low-income and five very low-income households to receive assistance during the 2021-2029 planning period.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; Housing Rights Center

Timeframe: Ongoing as NOFAs are released for CalHome; Housing Rights Center will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing .

Program 2.f - Offer Services to People without Housing

The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand services to assist the unhoused population residing in South Pasadena.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department

Timeframe: Ongoing

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to allow them to remain in their community.

Funding Source: General Fund (for staff resources) and grants

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special-Needs Housing

The City will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will seek to meet these special housing needs through a combination of regulatory incentives, zoning standards, new housing construction programs, and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modification or exception to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for applications for funding under state and federal programs designated specifically for special-needs groups.

Eight-year Objective: Assist with creation of 30 units for those with special needs.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December 2022; Train staff to process reasonable accommodations by December 2022; Seek funding opportunities beginning in 2022 and annually thereafter; all implementation action components are ongoing.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted Inclusionary Housing regulations (SPMC 36.375) in May 2021. The regulations emphasize developing on-site inclusionary units as part of all projects with three or more residential units. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. The ordinance encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units and provide an evaluation of the program's effectiveness and any recommended revisions to increase the effectiveness of the program. The review will occur by April of each year starting in 2022 and if revisions are deemed necessary, they will be made when such needs are identified.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: Continue to implement Inclusionary Housing regulations and facilitate the production of 600 lower-income and 300 moderate-income units during the planning period. Review effectiveness of regulations at producing affordable housing units annually starting in April of 2022. If revisions to the regulations are deemed necessary after that review, update zoning by the end of 2022, then annually thereafter as revisions are needed.

Program 2.j – General Plan Affordable Housing Overlay

The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied.

Funding Source: General Fund, (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Adopt overlay at the time of General Plan adoption, anticipated early 2022.

Program 2.k – Affordable Housing Overlay Zone

The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning to include overlay by October 15, 2024.

Program 2.l – Facilitate Affordable Housing on City-Owned Property

The City will review all City-owned sites for potential to develop affordable housing, including City Hall, and select affordable housing developers to act as project partners to maximize the potential number of affordable units. Projects under this program will be expedited in compliance with the SB35 streamlined ministerial process. The City will also create a surplus property list.

Eight-year Objective: Encourage development of at least 60 units of affordable housing during the planning period on sites owned by the City.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Partner with a developer by 2022 on at least one project and issue building permits by 2025. Create surplus property list by 2023.

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Redesignating and rezoning the parcels listed in Table VI-46 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 20-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of development standards in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. Zoning Code revisions will then implement the adopted policies. The rezoning of the vacant parcels must be completed within three years of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2024. Sites that are planned to receive the Affordable Housing Overlays (see Programs 3.l and 3.m) in the General Plan and Zoning Code are also addressed by this program.

Eight-year Objective: Rezone sufficient sites to address 884 units (29.5 acres) in the lower-income RHNA categories.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Anticipated in 2022; latest date to complete rezoning: October 15, 2024

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan in 2022. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing.

Eight-year Objective: Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing and adopt updated General Plan and Downtown Specific Plan by 2022.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers.

As developers/owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2022, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by December 2024; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 (effective June 2021) to allow the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law. The City is also preparing objective design standards and supporting guidelines to apply to ADUs on historic properties that will be adopted prior to or shortly after adoption of the Housing Element.

The City provided a supporting brochure that explains the process and key provisions of the ADU ordinance, and application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been a decrease in processing time.

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Receive technical assistance through SCAG to evaluate permitting practices for ADUs and JADUs and implement improvements
- Online application process with staff intake for quality control
- Maintain and develop materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce steps and shorten timeframes, and
- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 368 ADUs during the 2021-2029 projection period.

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Update ADU ordinance Phase 2 (historic properties) by December 2021. Begin implementation of improvements based on Southern California Association of Governments (SCAG) technical assistance program grant by June 2022.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability based on the survey to determine whether the rate is 90 percent or more of the total needed to match the projected trendline of 49 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (44 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve 297 ADUs between 2021 and 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress in January 2024 and adjust after that if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources).

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address their RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be completed by the end of 2024.

Eight-year Objective: Address lower-income RHNA if ADU numbers aren't as high as projected.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete any needed rezoning by the end of 2024. Determine whether other additional programs are needed and implement them by the end of 2024.

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Senate Bill 13 requires under certain circumstances specified by state law, that enforcement of violations related to unpermitted ADUs be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them make the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Convert all known existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program and amend fees by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage concentrates all support materials and an application form that leads applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and connect ADU owners and renters with that information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.
- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.
- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the process of ADU development through promotion of City programs and connecting ADU owners to resources.

Funding Source: General Fund, grant funding

[1] Chapple, Garcia, et al. *Reaching California's ADU Potential: Progress to Date and the Need for ADU Finance*, 18.

Responsible Agency: Community Development Department

Timeframe: Create historic property guidelines and brochure by September 2021. Build up the Virtual Planning Desk with complete ADU information by December 31, 2021, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.1 – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: Advertise new Planning positions by December 2021 and be fully-staffed by June 2022. Include the housing division in the 2022-2023 budget and add new staff by December 2022.

Program 3.m – Implement SB 9 and SB 10

These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption. The City will develop application forms and informational materials to create a user-friendly and objective process in compliance with SB 9 and in the context of other City development requirements. The City will also review the provisions of SB 10 to explore how these might be utilized to enhance housing construction, pursuant to a full and extensive public process.

Eight-year Objective: Develop a process, materials and objective standards to accommodate all interested applicants on single-family properties; explore potential zoning code amendments pursuant to SB 10.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: SB 9 implementation by January 2022 and material preparation by December 2022; SB 10 review and consideration by December 2024

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300-foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population.

Eight-year Objective: The City will adopt an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 – 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer

State law (AB 2162 – 2018), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code by December 2022.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Ensure that new mixed-use and medium- to large-scale residential projects are ADA compliant, provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design.

Responsible Agency: Department of Planning and Building

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives; ongoing application and enforcement of accessibility requirements; ongoing education efforts.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete in 2022.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low and moderate income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the Housing Rights Center to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the Housing Rights Center at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide Fair Housing education, outreach, mediation, and referral services through the City Manager's office and the Housing Rights Center and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as relevant. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or

one-on-one counseling, among others. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff.

Funding Source: General fund, State, and federal funds

Responsible Agency: City Manager's Office; Community Development Department, Housing Rights Center, federal and State agencies

Timeframe: Ongoing

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. These types of facilities are still subject to State licensing requirements.

Eight-year Objective: New housing in South Pasadena includes diverse housing types, including residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: Amend zoning for Residential Care Facilities by June 2022. Incorporate the provisions of SB 9 in single-family zones by December 2022. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-51.

Table VI-51
COMPARISON OF SITE CAPACITY AND RHNA~~QUANTIFIED HOUSING IMPLEMENTATION SUMMARY~~

INCOME GROUP	TOTAL RHNA	UNITS APPROVED SINCE 6/30/21	ADUS WITH APPROVED BUILDING PERMITS SINCE 6/30/21	PROJECTED ACCESSORY DWELLING UNITS	UNITS ON VACANT AND NON-VACANT SITES WITH SUITABLE ZONING	UNITS ON VACANT SITES NEEDING ZONING CHANGES	UNITS ON NON-VACANT SITES NEEDING ZONING CHANGES	SURPLUS RHNA
Extremely Low	757	0	3~~2~~	45	0	70	902~~886~~	33~~13~~
Very Low		0	2~~1~~	27				
Low	398	0	9~~6~~	130~~1~~				
Moderate	334	0	1~~0~~	6	40	0	34~~484~~	57~~96~~
Above Moderate	578	9~~2~~	6~~4~~	89~~8~~	238	0	338~~426~~	102~~80~~
TOTAL	**2,067**	**~~92~~**	**21~~13~~**	**297**	**278**	**70**	**1,584~~696~~**	

~~1. 40 units are expected to be assisted under Program 1.c. 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.~~

Note: The income levels assigned to the ADUs approved since June 30, 2021 are based on the SCAG ADU affordability analysis.

6.6.3 Financial Resources

A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-52 describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to the City on a competitive basis for a variety of housing and community development activities. City competes for funds through the State's application process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Federal Emergency Shelter Grants	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	New Construction Rehabilitation Homeless Assistance Public Services
Home Investment Partnership Program (HOME)	Grants available to the City on a competitive basis for a variety of housing activities. City competes for funds through the State's application process.	Homebuyer Assistance Rehabilitation New Construction Rental Assistance
Housing Choice Voucher Program (Section 8)	Assistance program that provides direct funding for rental subsidies for very low-income families.	Rental Assistance
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	New Construction
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	Rehabilitation
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.	Homeless Assistance New Construction
Housing Opportunities for Persons with AIDS (HOPWA)	The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.	Rental assistance
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	Homebuyer assistance Rehabilitation New construction Rental assistance
2. State Programs		
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and non-entitlement jurisdictions, and competitive grants to non-entitlement jurisdictions.	Predevelopment Development Acquisition Rehabilitation Preservation Matching Funds Homelessness Assistance Accessibility Modifications Homeownership Assistance Fiscal Incentives
Local Early Action Planning (LEAP) Grants	The Local Action Planning Grants (LEAP), provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that: Accelerate housing production Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.	Housing element updates Updates to zoning, plans or procedures to increase/accelerate housing production Pre-approved architectural and site plans Establishing State-defined Pro-housing policies See complete list in program materials

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
SB 2 Technical Assistance Grants	Financial and technical assistance to local governments to update planning documents and zoning ordinances to streamline housing production, including but not limited to general plans, community plans, specific plans, implementation of sustainable communities strategies, and local coastal programs.	Technical assistance Planning document updates
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	Homebuyer Assistance
Building Equity and Growth in Neighborhoods (BEGIN)	A state-funded program administered by HCD which provides low- and moderate-income households up to $30,000 for a down payment.	Homebuyer Assistance
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	Homebuyer Assistance Rehabilitation
Single Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	Homebuyer Assistance
Housing and Disability Advocacy Program (HDAP)	Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.	Rental assistance
No Place Like Home	Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.	New construction
Mental Health Services Act (MHSA)	Funding through MHSA of 2004 available to counties to spend toward mental health services.	New construction Special needs programs
Homeless Emergency Aid Program (HEAP)	A block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California.	Identified homelessness needs Capital improvements related to homelessness Rental assistance
California Emergency Solutions and Housing (CESH)	Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.	Homelessness service system administration New construction Rental assistance
Low-Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	New Construction
3. Private Resources/Financing Programs/Regional Programs		
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multifamily rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition
Federal National Mortgage Association (Fannie Mae)	Fixed-rate mortgages issued by private mortgage insurers. Mortgages which fund the purchase and rehabilitation of a home. Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance Rehabilitation
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. City provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	Homebuyer Assistance

Table VI-52
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	New Construction Homebuyer Assistance Rehabilitation Housing Supportive Services
San Gabriel Valley Regional Housing Trust	A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects.	New Construction

6.6.4 Opportunities for Energy Conservation

Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.

Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use, which translates to a reduction in energy use. In 2020, the Council adopted a Climate Action Plan (CAP) as a long-range planning document that guides the City towards a target of carbon neutrality by 2045, which aligns with the State's overall climate goals. The Housing Plan also includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.

As part of the City's commitment to protecting the environment and building resiliency, South Pasadena chose to utilize Clean Power Alliance as the City's residential electricity provider in February 2019, and commercial electricity provider in May 2019. The City selected 100% Green Power as the default option for residential customers, which provides 100% renewable energy through South California Edison's (SCE) electrical infrastructure. In 2021, 95% of residents subscribed to the 100% Green Power option.

The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-53
COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED

INCOME LEVEL	RHNA ALLOCATION	UNITS PERMITTED 2013-2020	REMAINING ALLOCATION
Very Low	17	1	16
Low	10	3	7
Moderate	11	1	10
Above Moderate	25	113	-
Total	**63**	**118**	**33**

Source: City of South Pasadena Annual Progress Reports, HCD, 2021

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

    - Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.
- Seniors:
    - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.
- Unhoused Persons:
    - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.

- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
- The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.

Table VI-54 describes the City's progress in implementing the 2014-2021 Housing Element programs.

Table VI-54
2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Energy Efficiency Program This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program. **Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.	The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements. For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in more enforcement of housing maintenance and support for displaced tenants. The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.	Amend and continue with current energy-related program.
Planning Assistance and Permit Processing The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.	The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight Year Objective: Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period.		
Housing Development Program This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications. **Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate-income housing units during the 2014-2021 planning period.	No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full-service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.	Amend substantially to reflect current City efforts and continue.
CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners. **Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.	The City continues to provide information about CalHome and conducts outreach through its consultant, the Housing Rights Center. They serve as the main source of this type of information and support for South Pasadena residents.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Section 8 Rental Assistance The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons. **Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.	Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/ The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the Housing Rights Center and to Los Angeles County's Housing Voucher program. HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.	Continue.
Housing Acquisition and Rehabilitation A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing. **Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).	Amend to address accomplishments and continue.
Density Bonus for Affordable Housing The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households.	The Senior Housing project at 625 Fair Oaks was approved in 2020 and received a 35-percent density bonus. It will have 86 units with 13 units reserved for low-income households. The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction with adoption of an inclusionary housing ordinance, the City incorporated streamlined approval for waivers in conjunction	Amend to address updates to state law and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist with development of 21 lower income units and 5 moderate income units.	with the density bonus for projects that include on-site inclusionary housing. City staff regularly provides assistance to applicants considering proposing projects using the density bonus.	
Homeless Services The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena. **Eight-year Objective**: The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.	The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region. In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents. Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Senior Housing The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors. **Eight-year Objective**: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing apartment buildings as affordable senior housing whenever possible.	The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.	Continue.
Vacant Sites The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels. **Eight-year Objective:** Continue to maintain an inventory of vacant and underdeveloped sites for development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate-income housing units.	No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.	Amend and continue.
Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. **Eight-year Objective:** Continue to promote the development of housing units above ground floor commercial uses on vacant properties located	The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market-rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs is also located in a mixed-use district. A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been included in the draft programs section to further facilitate housing in the mixed-use areas.	Amend and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.		
Residential Second Units The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts. **Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.	The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2021 addressed issues that had added complexity to ADU approval in order to further facilitate ADU production. Although the 5th Cycle objective for residential second units was low, ADUs have become a much more significant component of the housing strategy over the past eight years. In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. Following the City's adoption of a new ADU ordinance in mid-2021, the number of building permits for ADUs increased substantially to 32 building permits in 2021. At the close of this housing element period, a second Code revision (Phase 2 for historic properties) was adopted in order to better facilitate ADUs on those properties, which is expected to further increase the applications and issuance of building permits for ADUs.	Amend and continue.
Land Use Controls 1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit. **Eight-year Objective:** The City will adopt an amendment to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use	Objective 1: Ordinance 2253 amended the Zoning Code to remove the conditional-use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. Objective 2: The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum	Objective 1. Delete. Objective 2. Amend and continue. Objective 3. Amend to reflect accomplishments and continue. Objective 4. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months. 2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300 foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population. **Eight Year Objective**: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds. 3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. **Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. 4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area, establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for	number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P-permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law. Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements. Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.	Objective 5. Amend to address completed portions of the program and continue. Objective 6. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
review by the Director of Planning and Building prior to occupancy and operations. **Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types. 5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements. **Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. 6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations. **Eight-year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code. 7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.		

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.		
Provision of Technical Assistance to Developers of Affordable Housing The City's Planning & Building Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. **Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process. The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications are submitted with all requirements to streamline the approval process. The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding. ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Fair Housing Program The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs. **Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing for persons with disabilities, on a case by case basis, in order to promote equal access to housing.	The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation. The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know-your-rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.	Amend and continue.
Promote Energy Conservation The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents. **Eight-year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building design guidelines and development standards, including the use of solar	Policies are being developed as part of the General Plan Update, currently underway.	Combine with Energy-Efficiency Program and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates, and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.		

6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES

This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.

6.8.1 Goals, Policies, and Programs

The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:

- Conserving the existing supply of affordable housing;
- Assisting in the provision of housing;
- Providing adequate sites to achieve a variety and diversity of housing;
- Removing governmental constraints as necessary; and
- Promoting equal housing opportunity.

The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: City Manager's Office

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b - Housing Acquisition

The City will partner with and support affordable housing developers to create new and rehabilitated, deed-restricted, affordable housing units on the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible partnerships with non-profit affordable housing developers pursuing acquisition and rehabilitation of the surplus properties as affordable housing to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. The City's workplan for fiscal year 2022/2023 includes establishment of an Occupancy Inspection Program and Policy. That will augment the already established code enforcement work.

Eight-year Objective: Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.

Funding Source: HOME, SB 2 PHLA, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Develop Occupancy Inspection Program and Policy in fiscal year 2022/2023.

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that there are no affordable housing units with deed-restrictions and subsidized funding currently in South Pasadena. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational

resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel and groundwater contamination to reduce exposure to these environmental threats.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the Housing Rights Center.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Expand housing mobility opportunities through affordable housing and encourage affordable development in high resource areas by facilitating timely review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

Program 2.b – Affordable Housing Production

The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.

Eight-year Objective: Fund and build 100 affordable units, at least 40 of which are in high resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and at least 30 in affluent neighborhoods to facilitate housing mobility in mixed-income neighborhoods.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the Housing Rights Center.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households whenever possible to facilitate housing mobility for a minimum

of five low-income and five very low-income households to receive assistance during the 2021-2029 planning period.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; Housing Rights Center

Timeframe: Ongoing as NOFAs are released for CalHome; Housing Rights Center will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract HRC to provide a biannual educational workshop, beginning in 2023, for landlords, property managers, and other housing providers on the benefits of marketing units to HCV holders with the objective of at least 5 housing providers pricing their units to be eligible for HCV.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing.

Program 2.f - Offer Services to People without Housing

The City will continue its emergency shelter referral program administered through the Police Department and will use multi-jurisdictional grant funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department

Timeframe: Coordinate a meeting with neighboring jurisdictions by February 2023 to identify strategies and translate materials on homeless services to Spanish by May 2023.

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.

Funding Source: General Fund (for staff resources) and grants

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special-Needs Housing

City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's

website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Eight-year Objective: Assist with creation of 30 units for those with special needs to reduce displacement risk and expand mobility opportunities.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December 2022; Train staff to process reasonable accommodations by December 2022; Seek funding opportunities beginning in 2022 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act by December 2022.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units and provide an evaluation of the program's effectiveness and any recommended revisions to increase the effectiveness of the program. The review will occur by April of each year starting in 2022 and if revisions are deemed necessary, they will be made when such needs are identified.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: Continue to implement the Inclusionary Housing requirements and facilitate the production of 600 lower-income and 300 moderate-income units during the planning period. Review effectiveness of the ordinance at producing affordable housing units annually starting in April 2023. If revisions to the ordinance are deemed necessary after that review, update zoning by the end of 2023, then annually thereafter as revisions are needed.

Program 2.j – General Plan Affordable Housing Overlay

The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.

Program 2.k – Affordable Housing Overlay Zone

The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.

Eight-year Objective: Develop at least 30 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning to include overlay by October 15, 2024.

Program 2.l – Facilitate Affordable Housing on City-Owned Property. The City will utilize City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the first RFP will be issued by 2024, in order to begin construction within two years and complete within the housing element cycle period. A second RFP on an additional inventory site will be issued by 2026. Projects under this program will be expedited in compliance with the SB 35 streamlined

ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives.

The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are:

- Site 9: Public works yard site
- Site 14: City-Owned Parking Lot site (City owns three of the four parcels)

The City is already coordinating with the owner of the other parcel on Site 14. Site 9 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 13 in Table VI-50 and will coordinate with the owner of the other parcel on Site 13 to encourage development of housing on that sites.

Eight-year Objective: Issuance of building permits for two projects, for a total of at least 70 ELI, VLI and LI units.

Funding Source: General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Create City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP in 2024 and second RFP in 2026. Building Permit issuance for first project by 2025; two building permits issued by 2029.

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended. The allowed base density on all the sites will be amended to permit at least 30 dwelling units per acre (du/ac.) with a minimum density of 20 du/ac. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 20-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Under the proposed allowed density, each site will permit at least 16 units. At least half (50 percent) of these sites shall be zoned for residential uses only, except that all of the very low and low-income housing need may be accommodated on sites designated for mixed uses if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. Some of the requirements of this program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.

Eight-year Objective: Rezone sufficient sites to address 938 units (31.3 acres) in the lower-income RHNA categories.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Latest date to complete General Plan amendments and rezoning: October 15, 2022

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

The City's Zoning Code permits the reuse of existing buildings and new development of housing above ground-floor uses in commercial districts and in the Mission Street Specific Plan Area, providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed-use projects within targeted areas of the city. As part of a mixed-use residential and commercial development project, the Zoning Code requires inclusion of affordable housing and provides density bonus incentives for projects that include units for very low-, low-, and moderate-income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations. The Mission Street Specific Plan is anticipated to be replaced by the Downtown Specific Plan in 2022. That plan will continue to facilitate high-density housing in the Downtown. The General Plan will also be updated on the same timeframe to allow more mixed-use districts that allow high-density housing.

Eight-year Objective: Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing and adopt updated General Plan, Downtown Specific Plan, and other needed zoning changes by 2022. See also Program 3.a.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers/owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2022, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties.

The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Online application process with staff intake for quality control
- Maintain and amend materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce the number of steps and shorten timeframes, and
- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.

Eight-year Objective: Address lower-income RHNA if ADU numbers aren't as high as projected.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Convert all known existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program and amend fees by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.
- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.
- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the process of ADU development through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.

Funding Source: General Fund, grant funding

Responsible Agency: Community Development Department

[1] Chapple, Garcia, et al. *Reaching California's ADU Potential: Progress to Date and the Need for ADU Finance*, 18.

Timeframe: Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.1 – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: City has already advertised new Planning positions and aims to be fully-staffed by June 2022. Include the housing division in the 2022-2023 budget and add new staff by December 2022.

Program 3.m – Implement SB 9 and SB 10

These two 2021 State housing bills, SB 9 and SB 10, were signed in September 2021. SB 9 requires the City to permit construction of two dwelling units on single-family lots (with some exceptions) and SB 10 allows local authorities to increase densities for multi-family properties and allow up to 10 units with a CEQA exemption. The City took action by urgency ordinance to establish objective standards in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. The City will also adopt a user-friendly and objective administrative process in compliance with SB 9 within the context of other City development requirements. The City will also review the provisions of SB 10 to explore whether and how these might be utilized to enhance housing construction, pursuant to a full and extensive public process. The City will monitor approvals of SB 9 units and report on the number of building permits issued every year as part of the annual report to HCD.

Eight-year Objective: Administration of SB 9 ordinance is ongoing; specific administrative process and guidelines for SB 9 to be developed by December 2022; explore potential zoning code amendments pursuant to SB 10.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: SB 9 implementation began in December 2021, material preparation by December 2022; SB 10 review and consideration by December 2024

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))

Eight-year Objective: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law and to establish the maximum number of beds permitted in any one emergency shelter at 30 beds.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully

address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code by December 2022.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design.

Responsible Agency: Community Development Department

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives; ongoing application and enforcement of accessibility requirements; ongoing education efforts.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete in 2022.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the Housing Rights Center to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the Housing Rights Center at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide Fair Housing education, outreach, mediation, and referral services through the City Manager's office and the Housing Rights Center (HRC) and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with HRC staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Funding Source: General fund, State, and federal funds

Responsible Agency: City Manager's Office; Community Development Department, Housing Rights Center, federal and State agencies

Timeframe: Ongoing

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements.

Eight-year Objective: Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: Amend zoning for Residential Care Facilities by June 2022. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide

In the 1940's, covenants that restricted the sale of property to Whites or Caucasians only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide

information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Eight-year Objective: Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.

Responsible Agency: Community Development Department; Los Angeles County Recorder

Funding Source: General Fund; grants if offered through a State or County program

Timeframe: Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2022; encouragement of removal from private properties: ongoing.

6.8.2 Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-55.

Table VI-55
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED[1]	REHABILITATED[1]
Extremely Low/Very Low Income	757	7	8
Low Income	398	9	8
Moderate Income	334	4	9
Above Moderate	578	0	10
Total	2,067	20	35

2. 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.

APPENDICES

Appendix A: Sites Exhibits

Appendix B: Public Participation Survey

Appendix C: Letter to Property Owners

Appendix D: Qualified Entities

Appendix E: Accessory Dwelling Unit Protection Methodology

Appendix F: Realistic Capacity Analysis

Appendix A:
Sites Exhibits

Maps and Exhibits - 2021-2029 Housing Element

- Citywide Maps of Sites in the Land Inventory
- Overview Maps of Sites to Address the Lower-Income RHNA
- Detailed Exhibits for Sites to Address the Lower-Income RHNA

Figure A-1.a. Citywide Sites Inventory Map (1)

Figure A-1.b. Citywide Sites Inventory Map (2)

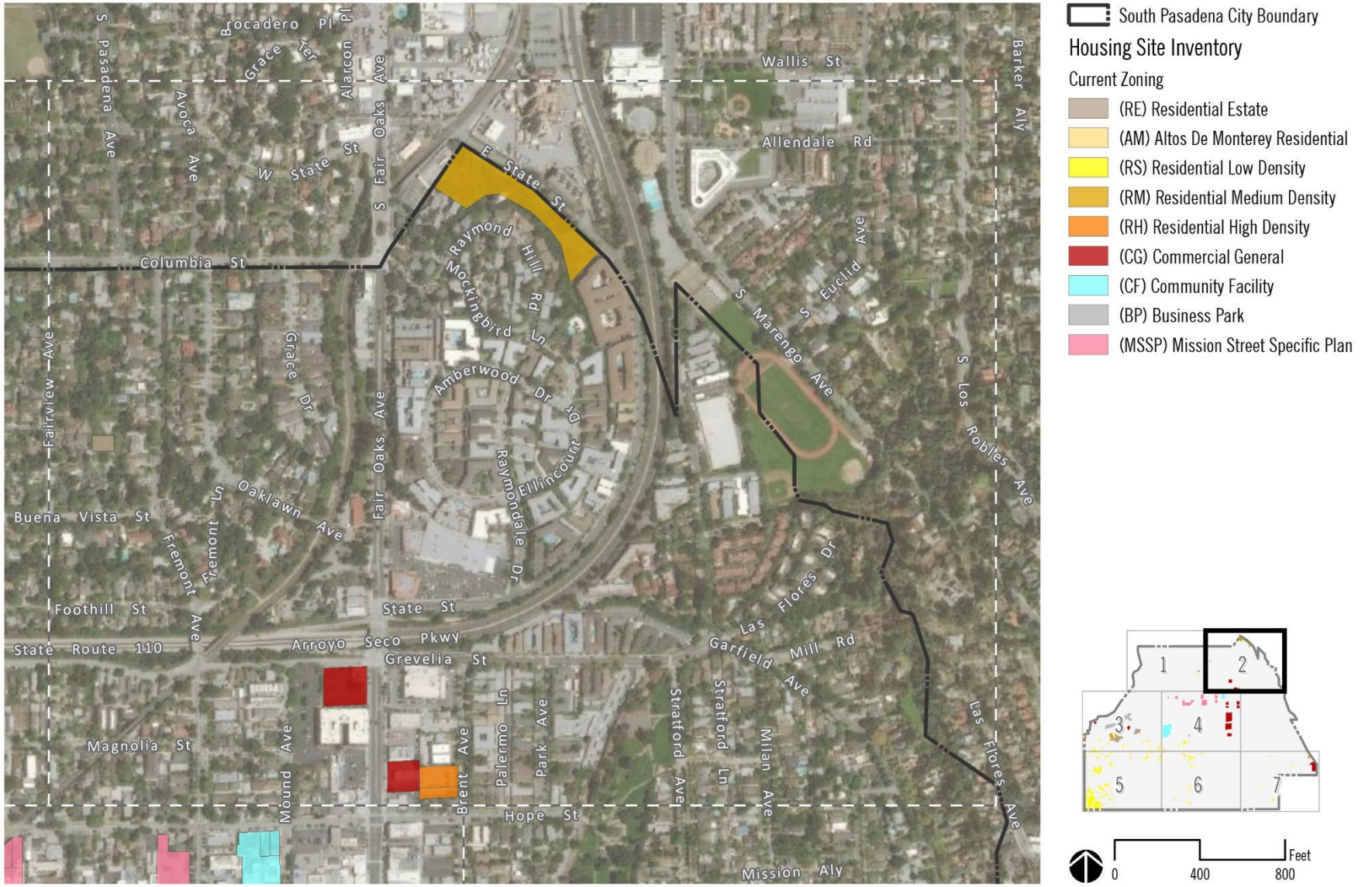

Figure A-1.c. Citywide Sites Inventory Map (3)

South Pasadena City Boundary
Housing Site Inventory
Current Zoning
(RE) Residential Estate
(AM) Altos De Monterey Residential
(RS) Residential Low Density
(RM) Residential Medium Density
(RH) Residential High Density
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
N Avenue 65
N Avenue 66
Pollard St
Hough St
State Route 110
Stoney Dr
Magnolia St
Grand Ave
Lohman Ln
Ferrara St
Elgin St
Chestnut Ave
San Pascual Ave
Crescent St
Princess Dr
Bridewell St
Arroyo Seco Pkwy
Mission St
El Centro St
Palm Ave
Palm Ct
Cawston St
Arroyo Dr
York Blvd
Hawthorne St
Pasadena Ave
Monterey Rd
Alta Vista Ave
Gates Pl
Short Wy
Lomitas Dr
Oak Hill Ave
Brunswick Ave
Kolle Ave
Saint Albans Ave
Blair Ave
Santa Teresa Ave
Oak Crest Ave
Indiana Ave
1
2
3
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7
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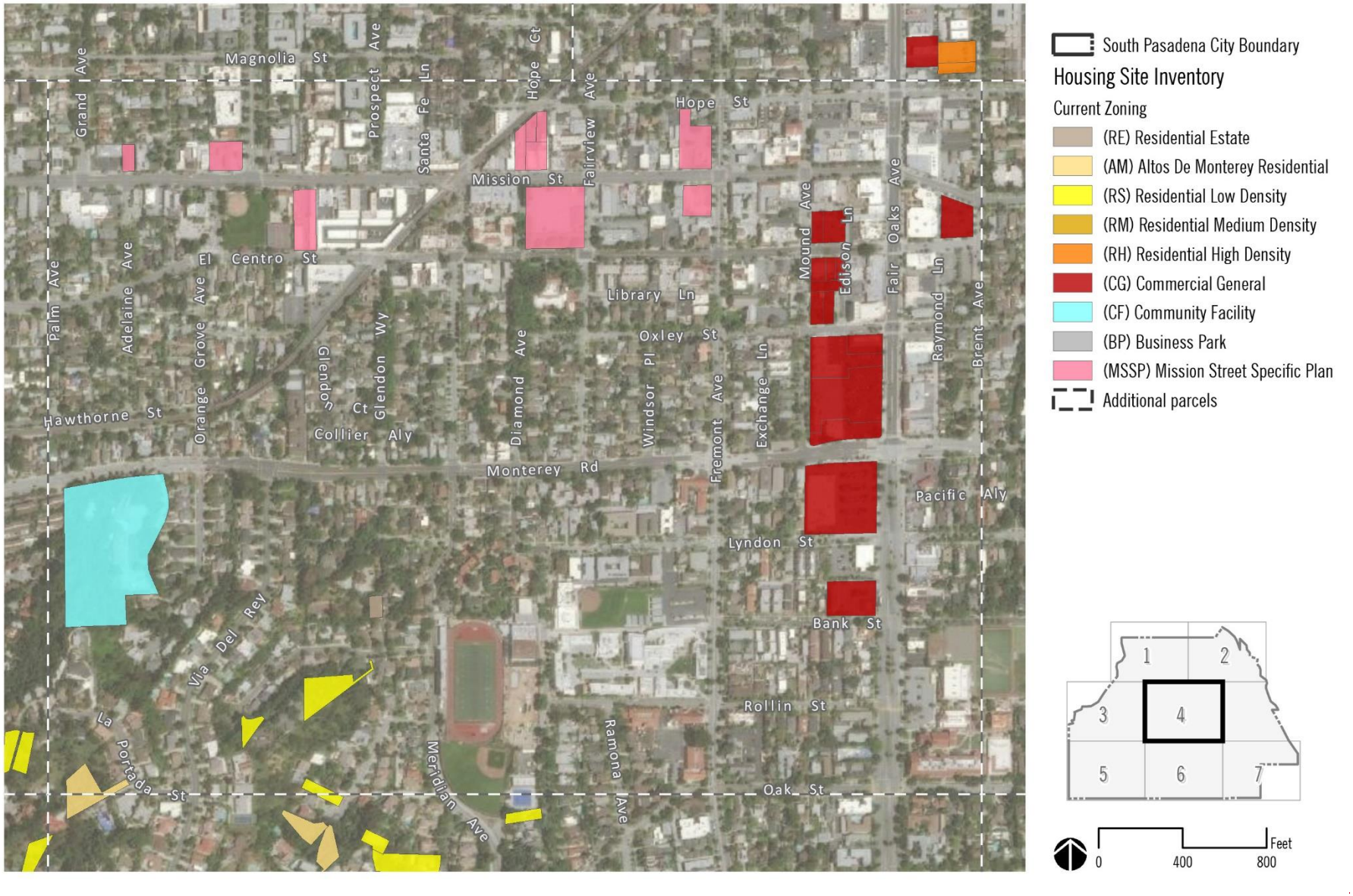
800
Feet

Figure A-1.d. Citywide Sites Inventory Map (4)



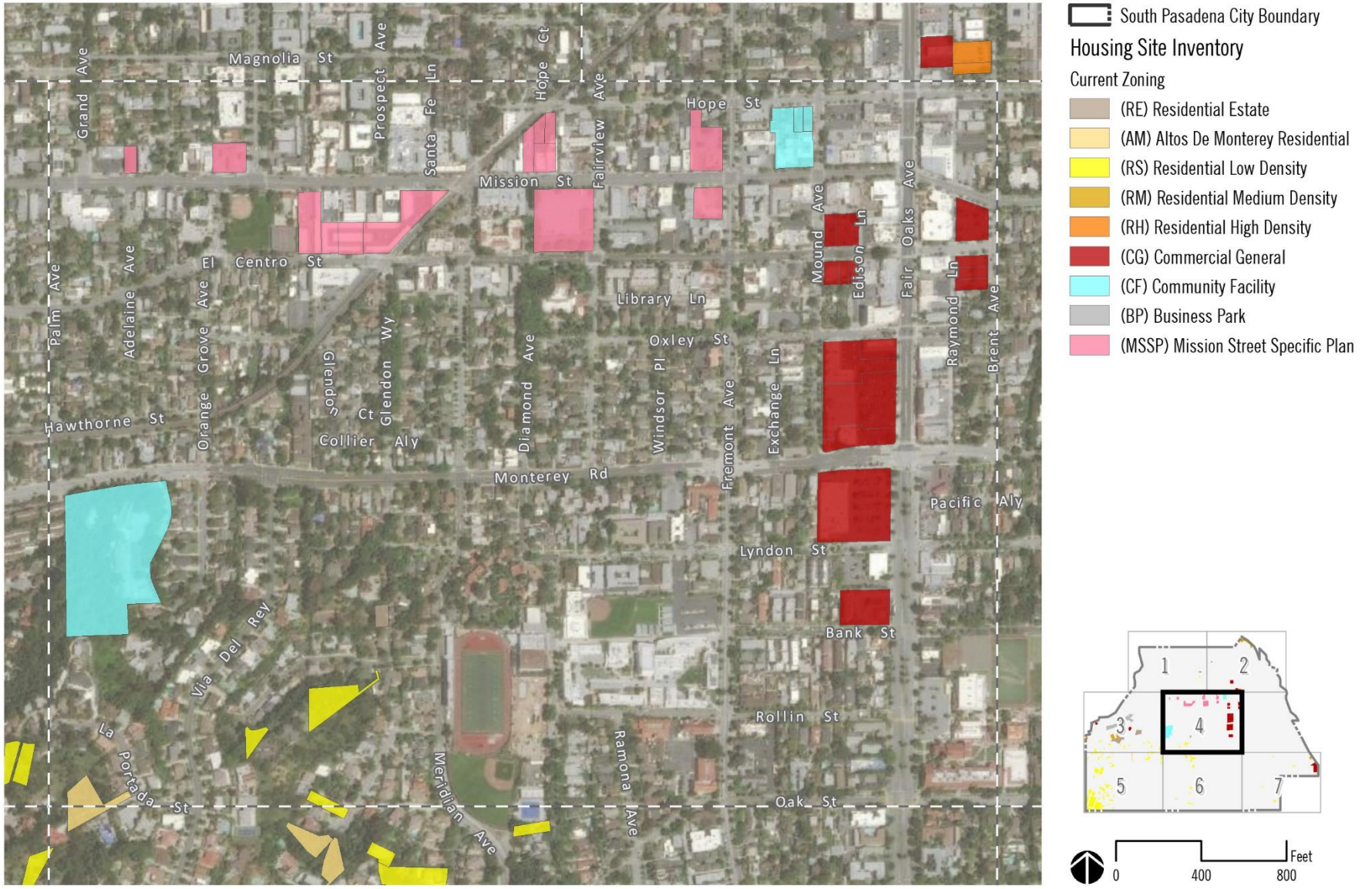

South Pasadena City Boundary
Housing Site Inventory
Current Zoning
(RE) Residential Estate
(AM) Altos De Monterey Residential
(RS) Residential Low Density
(RM) Residential Medium Density
(RH) Residential High Density
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
Magnolia St
Grand Ave
Prospect Ave
Santa Fe Ln
Hope Ct
Hope St
Fairview Ave
Mission St
Mound Ave
Edison Ln
Fair Oaks Ave
Raymond Ln
Brent Ave
El Centro St
Palm Ave
Adelaine Ave
Orange Grove Ave
Glendon Ct
Glendon Wy
Library Ln
Oxley St
Diamond Ave
Windsor Pl
Fremont Ave
Exchange Ln
Hawthorne St
Collier Aly
Monterey Rd
Pacific Aly
Lyndon St
Bank St
Via Del Rey
La Portada St
Meridian Ave
Ramona Ave
Rollin St
Oak St
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Figure A-1.e. Citywide Sites Inventory Map (5)

Figure A-1.f. Citywide Sites Inventory Map (6)

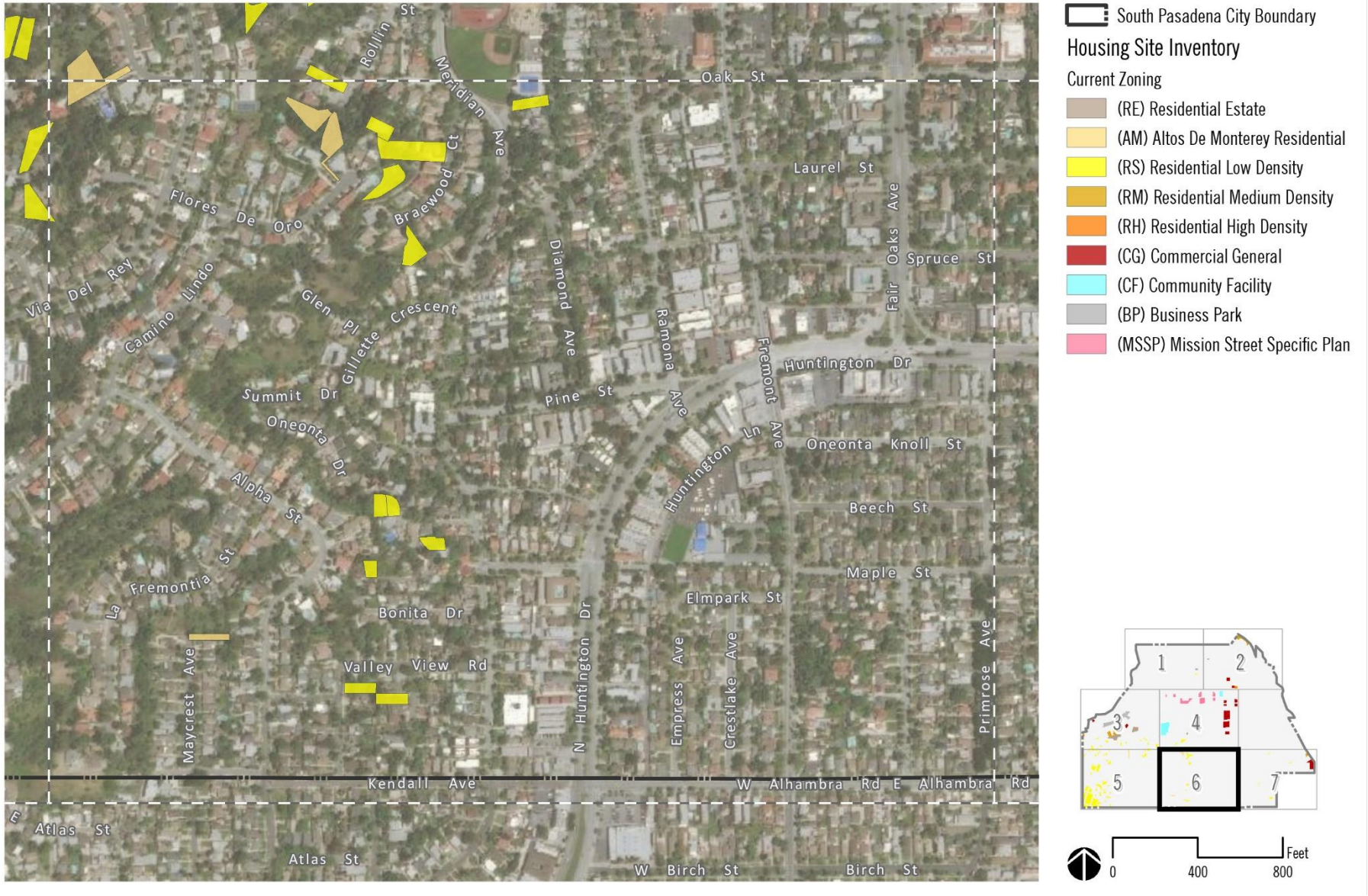


Figure A-1.g. Citywide Sites Inventory Map (7)

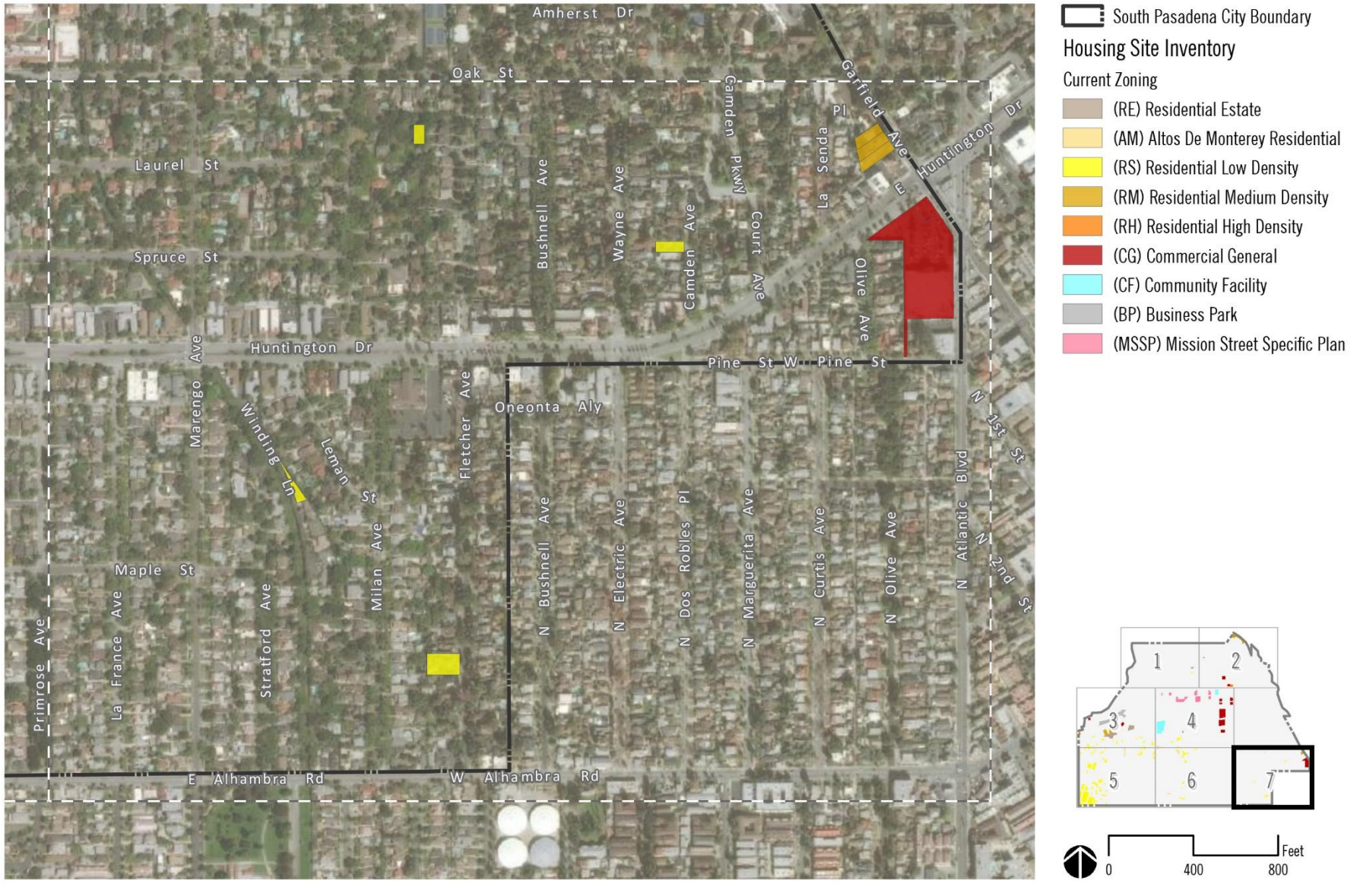
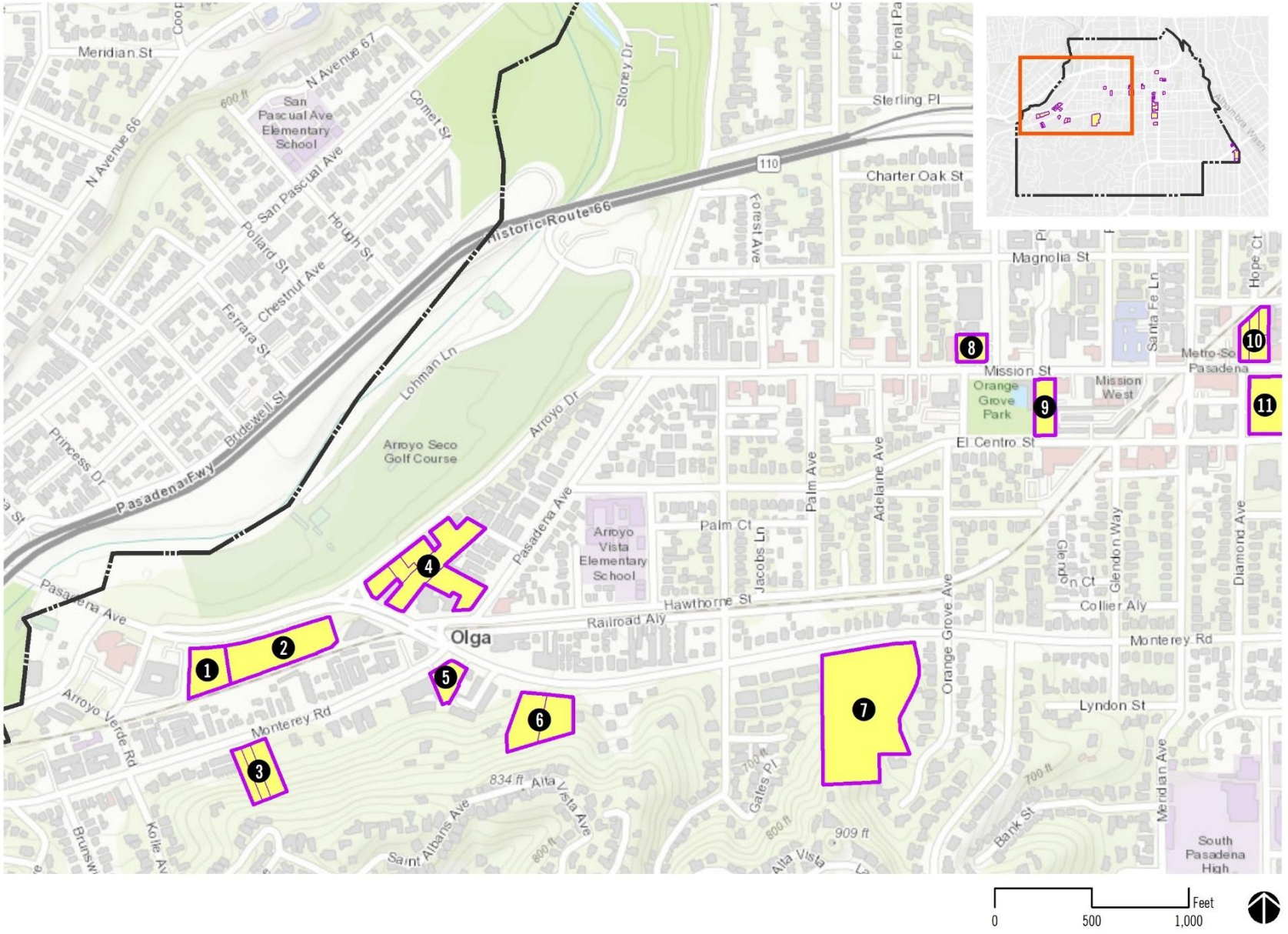


Figure A-2.a Maps of Sites to Address the Lower-Income RHNA Inventory (1)



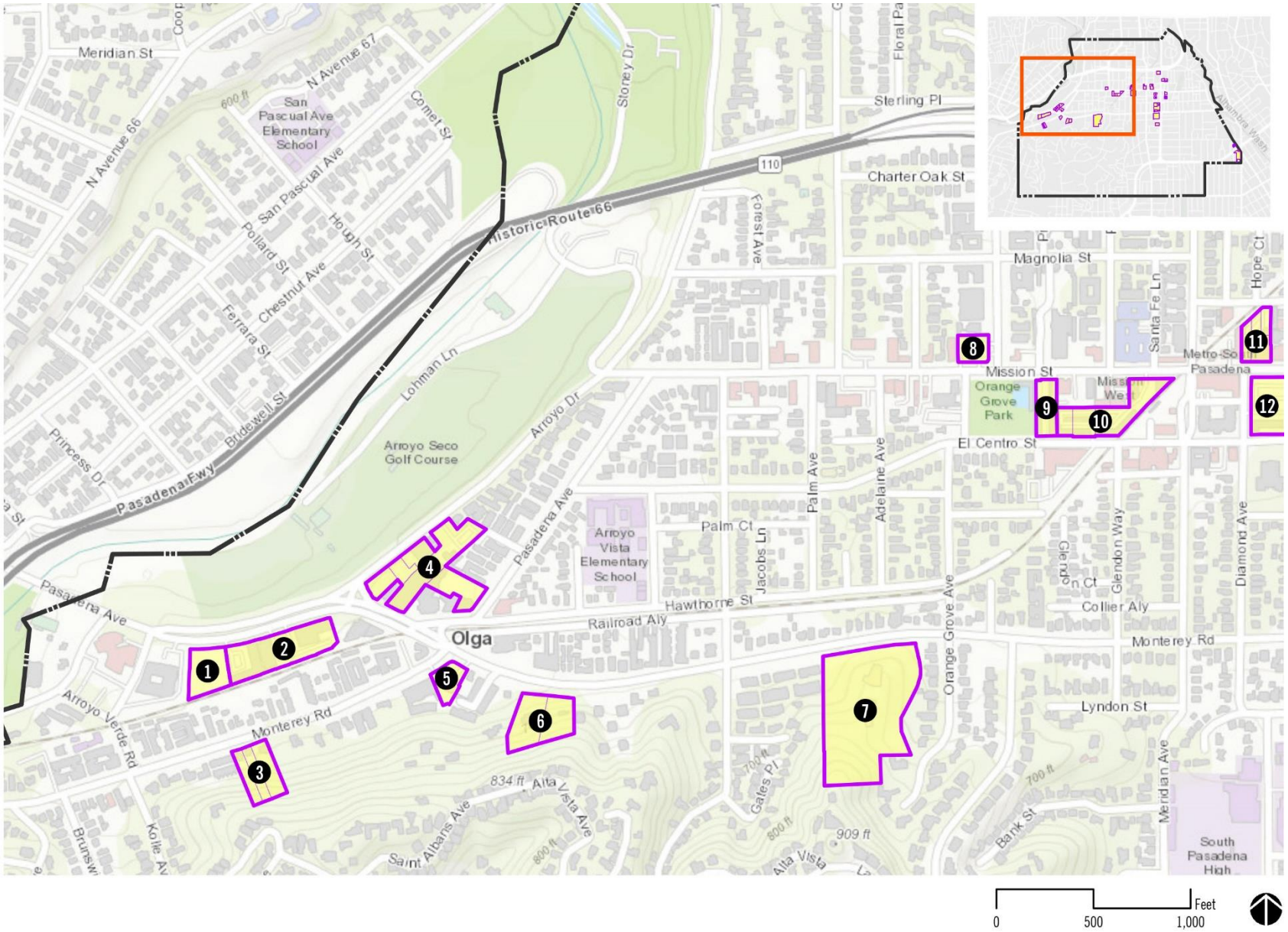

Meridian St
N Avenue 66
N Avenue 67
San Pascual Ave Elementary School
San Pascual Ave
Comet St
Stoney Dr
Floral Pa
Sterling Pl
Charter Oak St
110
Historic Route 66
Pollard St
Hough St
Chestnut Ave
Ferrara St
Bridewell St
Lohman Ln
Forest Ave
Magnolia St
Hope Ct
Santa Fe Ln
Mission St
Orange Grove Park
El Centro St
Metro-So
Pasadena
Princess Dr
Pasadena Fwy
Arroyo Seco Golf Course
Arroyo Dr
Pasadena Ave
Arroyo Vista Elementary School
Palm Ct
Palm Ave
Adelaine Ave
Jacobs Ln
Hawthorne St
Railroad Aly
Olga
Collier Aly
Glendon Way
Diamond Ave
Monterey Rd
Orange Grove Ave
Lyndon St
Arroyo Verde Rd
Gates Pl
834 ft
Alta Vista Ave
Saint Albans Ave
909 ft
Bank St
Meridian Ave
South Pasadena High
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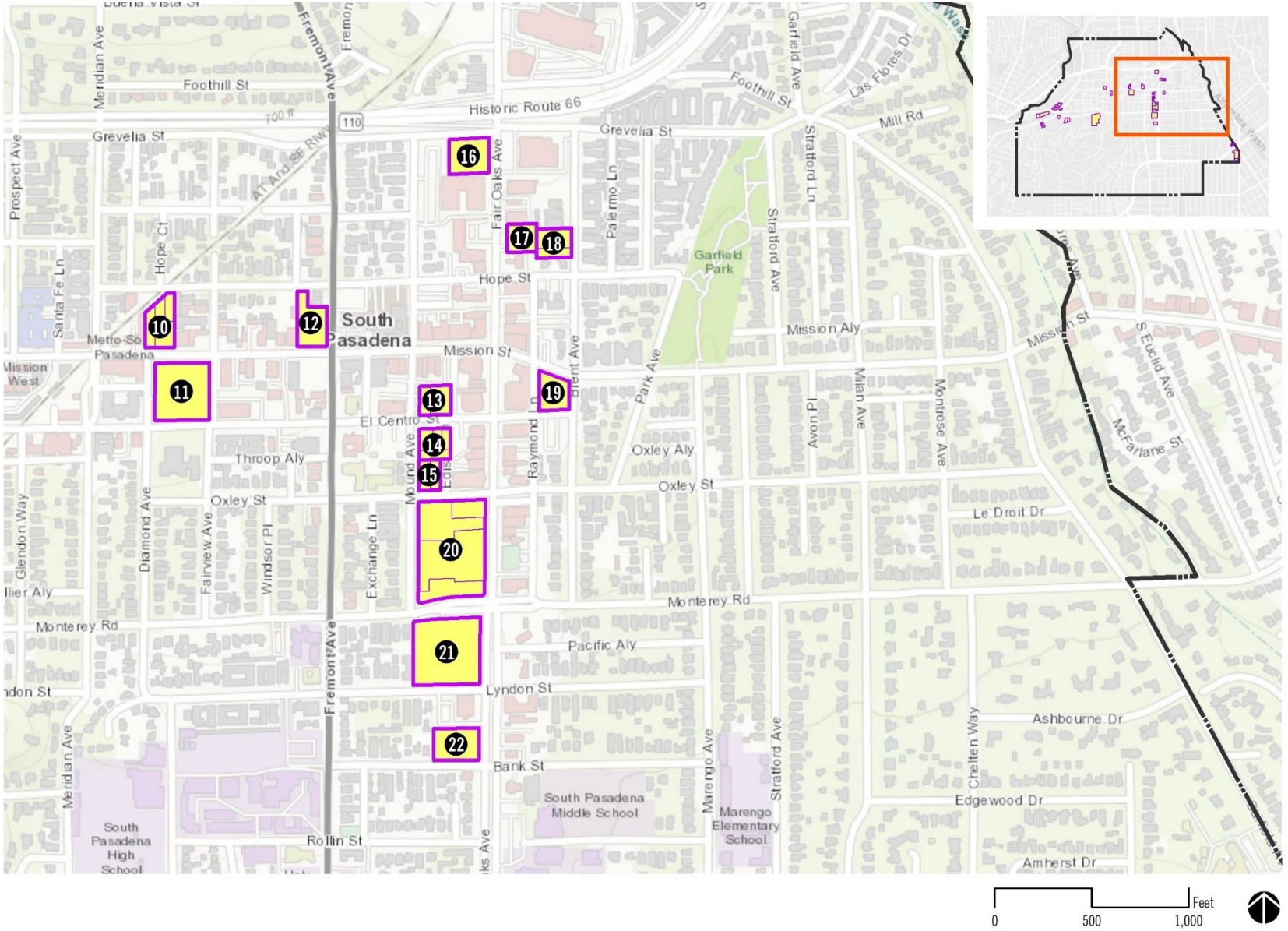
Figure A-2.b Maps of Sites to Address the Lower-Income RHNA Inventory (2)



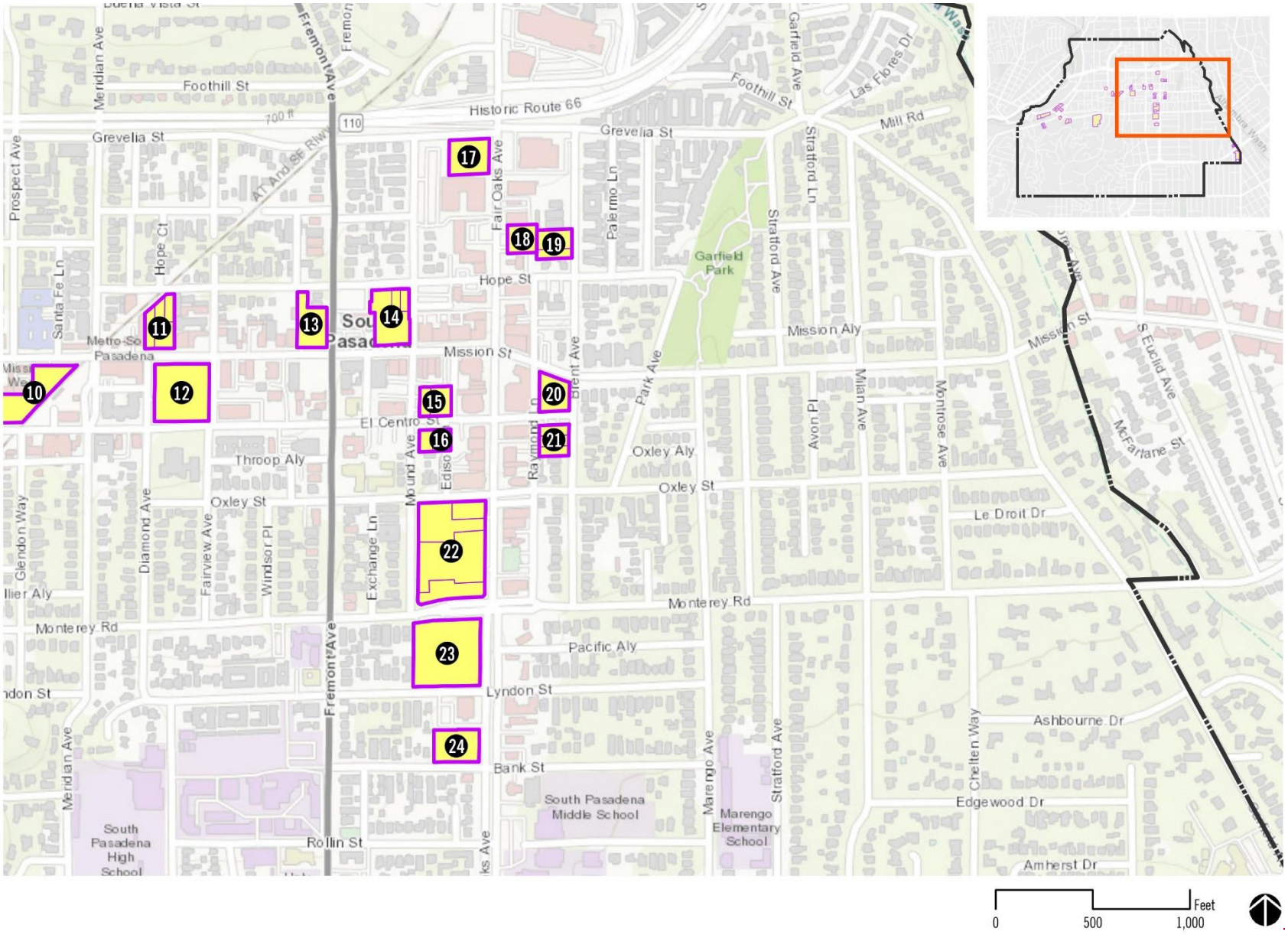

Foothill St
Historic Route 66
Grevelia St
Mill Rd
Las Flores Dr
Garfield Ave
Stratford Ln
Stratford Ave
Fair Oaks Ave
Palermo Ln
Garfield Park
Hope St
Mission St
Mission Aly
Park Ave
Brent Ave
Raymond Ln
Mound Ave
El Centro St
Throop Aly
Oxley St
Oxley Aly
Avon Pl
Milan Ave
Monrose Ave
Le Droit Dr
Monterey Rd
Pacific Aly
Lyndon St
Bank St
Rollin St
Ashbourne Dr
Edgewood Dr
Amherst Dr
Chelten Way
Marengo Ave
Marengo Elementary School
South Pasadena Middle School
South Pasadena High School
Fremont Ave
Meridian Ave
Diamond Ave
Fairview Ave
Windsor Pl
Exchange Ln
Glendon Way
Prospect Ave
Hope Ct
Santa Fe Ln
Metro-So Pasadena
Mission St
McFarlane St
S Euclid Ave
Feet
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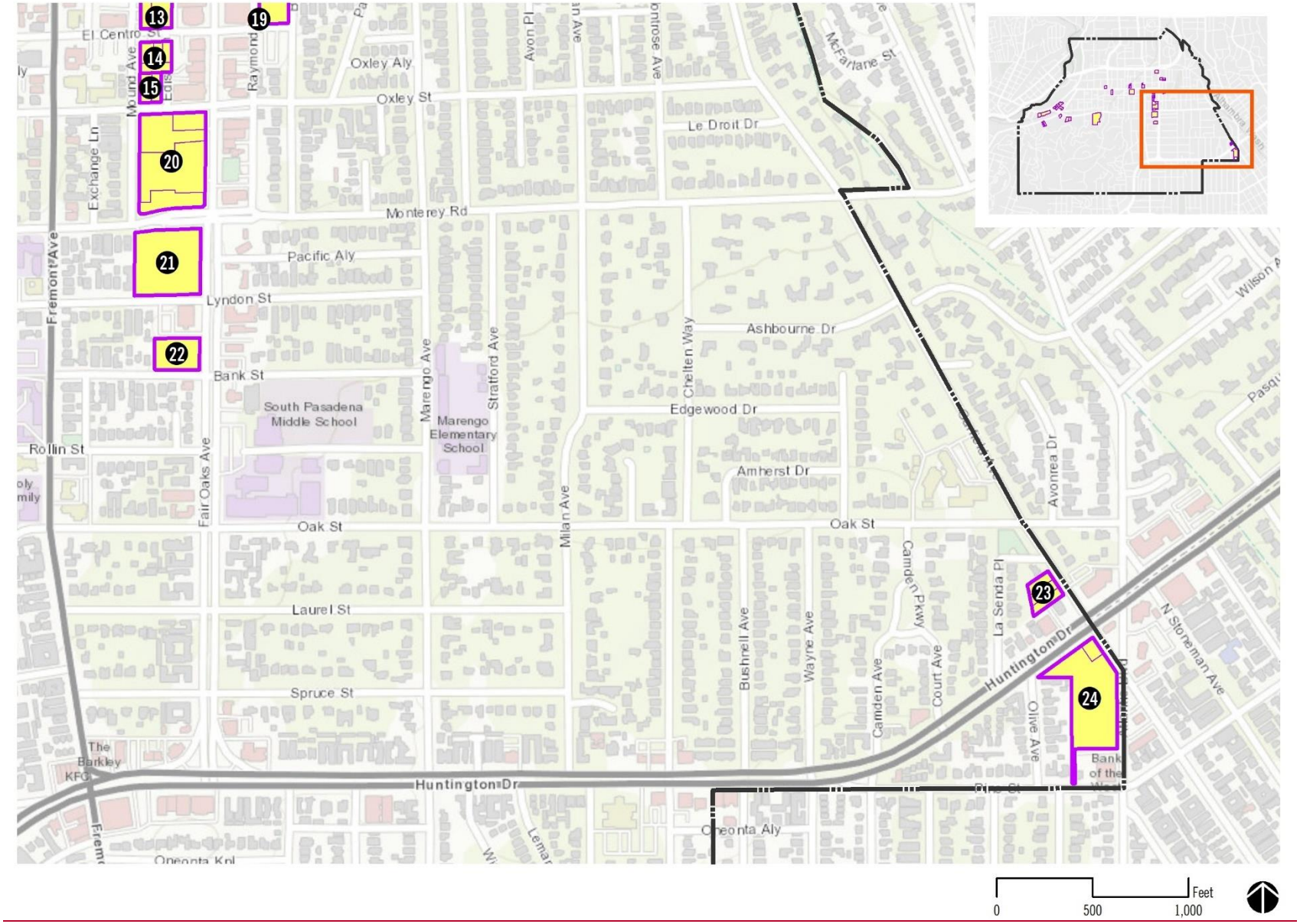
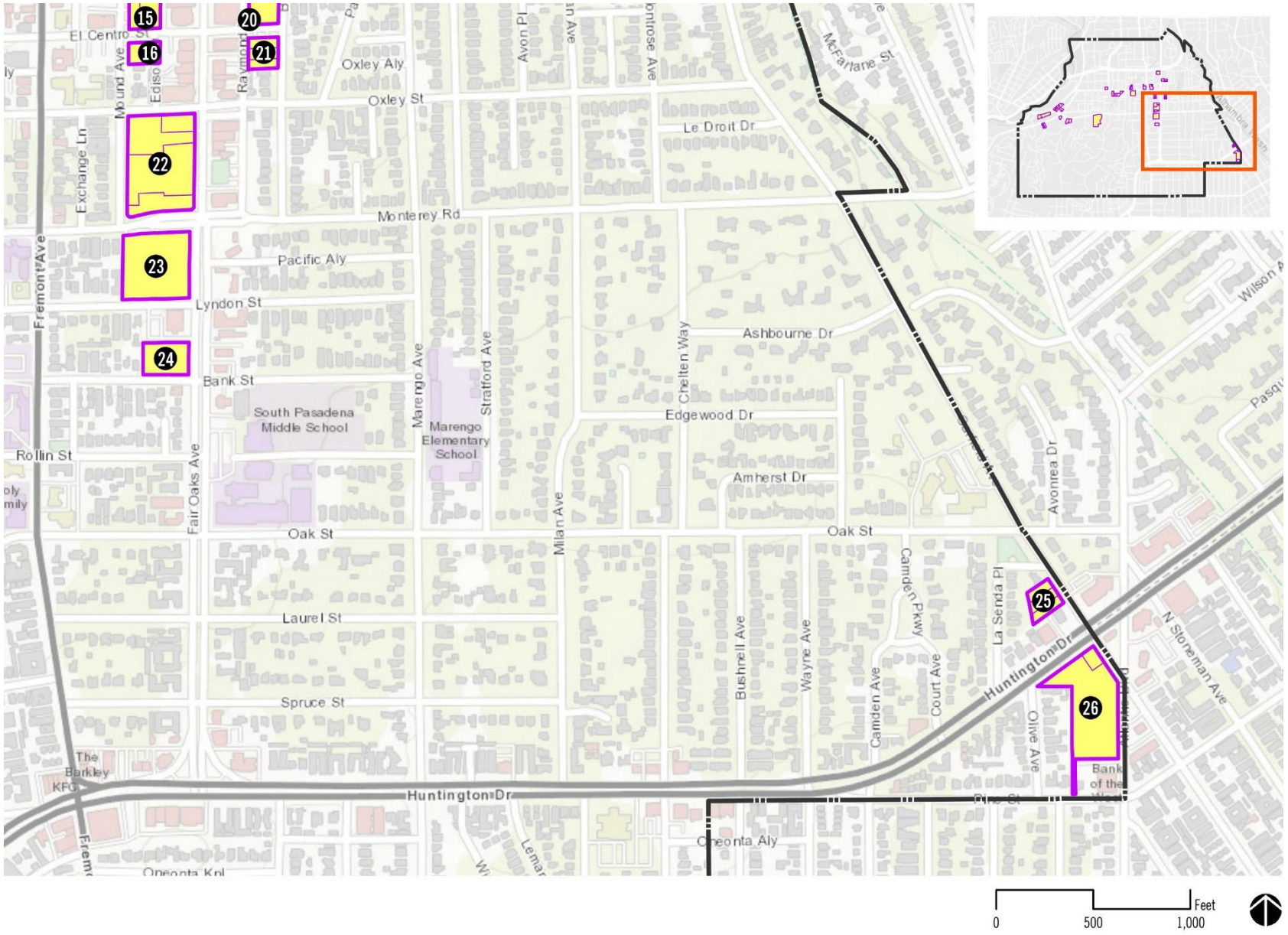
Figure A-2.c Maps of Sites to Address the Lower-Income RHNA Inventory (3)




15
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21
22
23
24
25
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El Centro St
Mound Ave
Edison
Raymond
Oxley Aly
Oxley St
Avon Pl
Monrose Ave
McFarlane St
Le Droit Dr
Exchange Ln
Monterey Rd
Fremont Ave
Pacific Aly
Lyndon St
Ashbourne Dr
Chelten Way
Wilson Ave
Bank St
South Pasadena Middle School
Marengo Ave
Marengo Elementary School
Stratford Ave
Edgewood Dr
Rollin St
Fair Oaks Ave
Amherst Dr
Avonrea Dr
Oak St
Milan Ave
Oak St
Camden Pkwy
La Senda Pl
Laurel St
Bushnell Ave
Wayne Ave
Huntington Dr
N Stoneman Ave
Spruce St
Court Ave
Camden Ave
Olive Ave
The Barkley
KFC
Huntington Dr
Pine St
Bank of the West
Oneonta Aly
Oneonta Knl
Lemar
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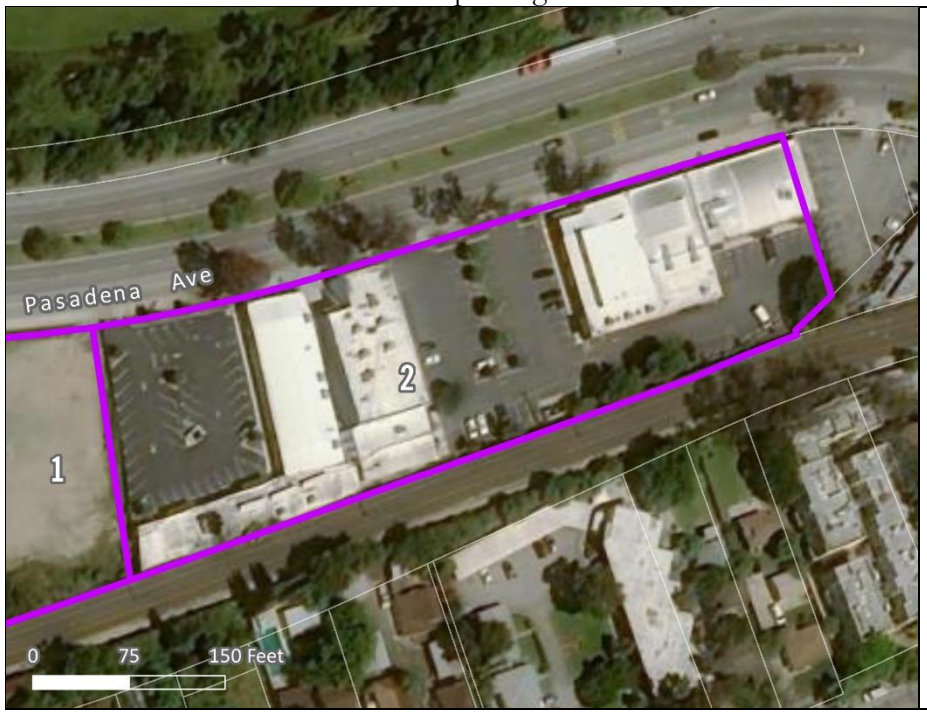
SITES TO ADDRESS THE LOWER-INCOME RHNA

1. Vacant Site

This site is vacant.

Parcel Number	5311003096
Site Size (acre)	1.05 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use with Housing Opportunity Site
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	70 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes - Verbal communication between City staff and property owner representative; Property owner representatives requested meeting with City (7/28/21 and 8/9/21 meetings to discuss potential housing proposal)

2. Business and Research Park parking lot site



Existing use is as a business park with offices and large surface parking areas. The site is underutilized given the large parking lot and proposed density. Bullseye Glass and Judson Studios (southwestern-most buildings) are relatively new tenants.

Parcel Number	5311004010
Site Size (acre)	2.23 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	5042 lower-, 2021 moderate-, 1320 abovemoderate-income units= 83 total units
Property Owner or Developer Interest in Residential Development?	Developer interest in site with some previous discussions with~~No response from the~~ property owner. Current status unknown.~~No expressed interest from any developers~~

3. Monterey Road site

Underutilized parcels each with one single-family home on it. All three parcels have the same owner. Owner is interested in the development of high-density residential housing. Potential projects that have been discussed with the City would propose consolidation of the three parcels.

Parcel Numbers	5311015035, 5311010001, 5311010002
Site Size (acre)	5311015035 – 0.34 acres, 5311010001 - 0.33 acres, 5311010002 – 0.59 acres = 1.26 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM with Affordable Housing Overlay
Proposed General Plan Land Use	Medium-Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	29 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes, both Property Owner and Developer Interest

4. Tyco site

Existing uses include parking lots and underutilized industrial buildings. All parcels have the same owner. Owner is interested in consolidating the parcels and developing a few hundred units of high-density housing on the site.

Parcel Numbers	5313011007, 5313011009, 5313011010, 5313011012, 5313011013
Site Size (acre)	5313011007 – 0.89 acres, 5313011009 – 0.34 acres, 5313011010 – 0.24 acres, 5313011012 – 1.00 acres, 5313011013 – 0.80 acres =3.26 acres total
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	130~~107~~ lower-, 57~~55~~ moderate-, 30~~55~~ above moderate-income units = 217 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner/Developer interested in building over 300 units

5. Liquor store site

Existing use is liquor store. Underutilized site with surface parking and proposed density.

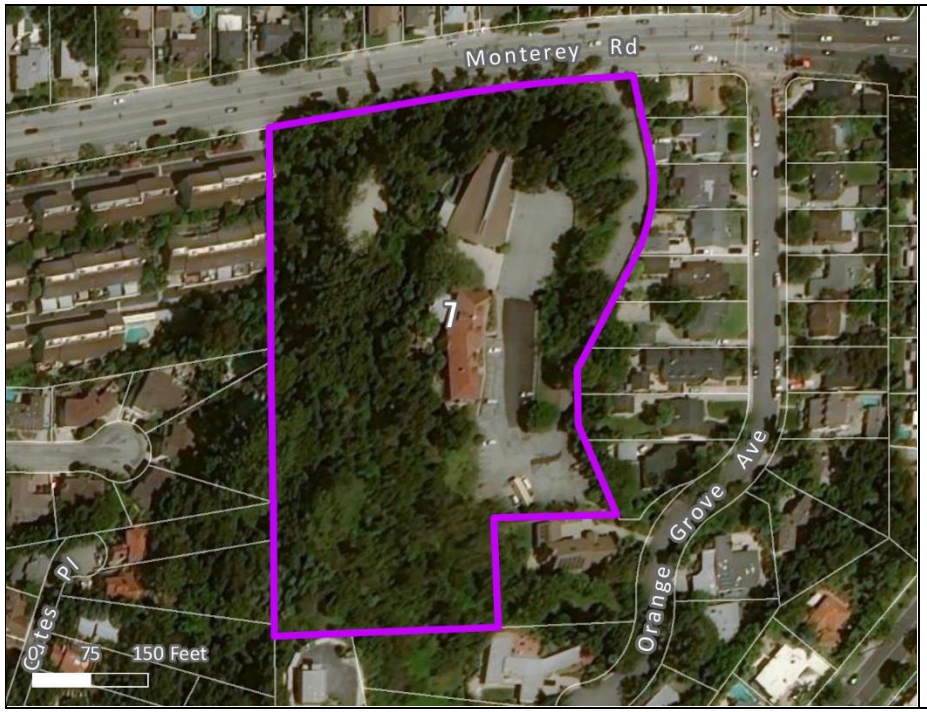
Parcel Number	5311012019
Site Size (acre)	0.55 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Ostrich Farm Zone
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	19~~15~~ lower-, 8 moderate-, ~~48~~ above moderate-income units = 31 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner. No expressed interest from any developers.

6. Arroyo Vista Inn site

Existing use is a bed & breakfast inn. Owners are interested in affordable housing development on the portions of the parcels close to Monterey Road, retaining the existing buildings. Close to transit and amenities.

Parcel Number	5311012010 and 5311012011
Site Size (acre)	5311012010 – 0.98 acres and 5311012011 – 0.78 acres = 1.76 acres total
Current General Plan Land Use	Estate & Very Low Density Residential
Current Zoning	RE
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RL with Affordable Housing Overlay
Proposed General Plan Land Use	Very Low Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	4 lower-income, 11 above moderate-income units = 15 total units
Property Owner or Developer Interest in Residential Development?	Yes. Letter and Meetings with Property Owners~~Onwers~~ for Affordable Housing

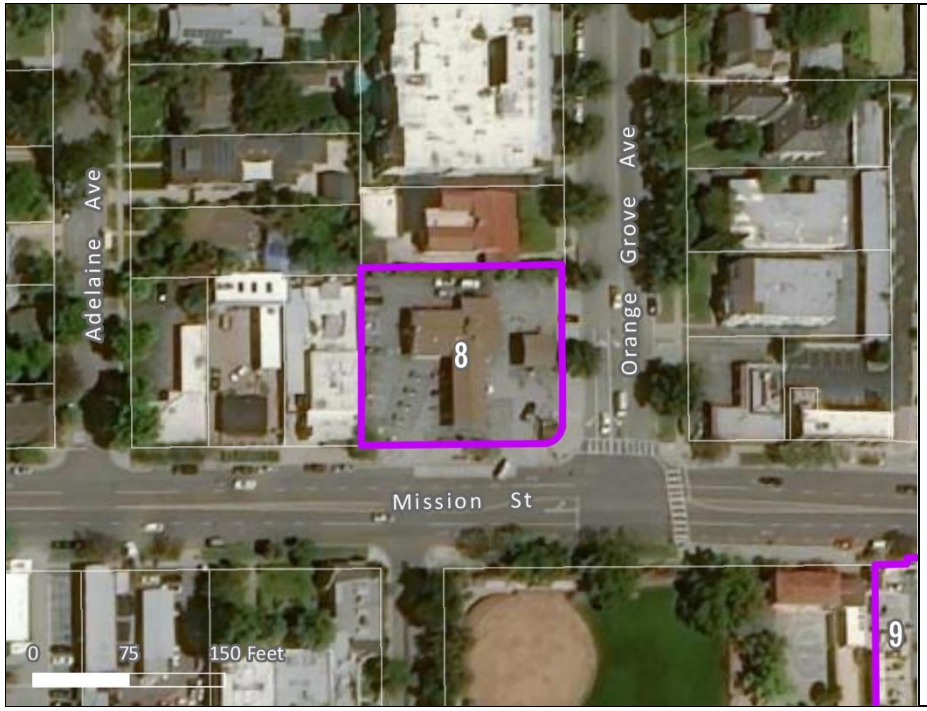
7. Methodist Church site



Existing use is church buildings, parking lot, and open space/undeveloped area. The church that owns the property has been studying different scenarios for ~~is interested in~~ developing the site further to incorporate housing, including ~~for~~ affordable housing units. The existing church building and parking lot would be retained along with some areas of slopes, but other areas of the site are underutilized and could easily accommodate housing development.~~.~~ Based on these assumptions and the discussions with the owners about their intentions, the site could be developed with 100 units.

Parcel Number	5314003083
Site Size (acre)	6.65 acres
Current General Plan Land Use	Community Facilities
Current Zoning	CF
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	CF with Affordable Housing Overlay
Proposed General Plan Land Use	Civic with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	100 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes. Meetings with property representatives and architects in response to their interest in developing 100 ~~units of affordable~~ housing units.

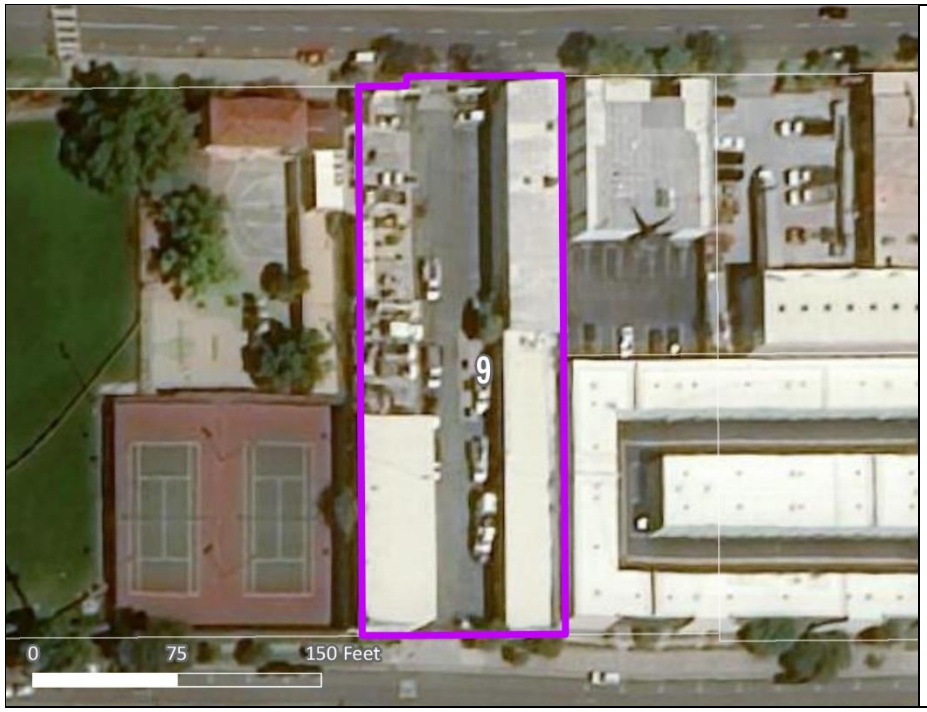
8. Gas station site

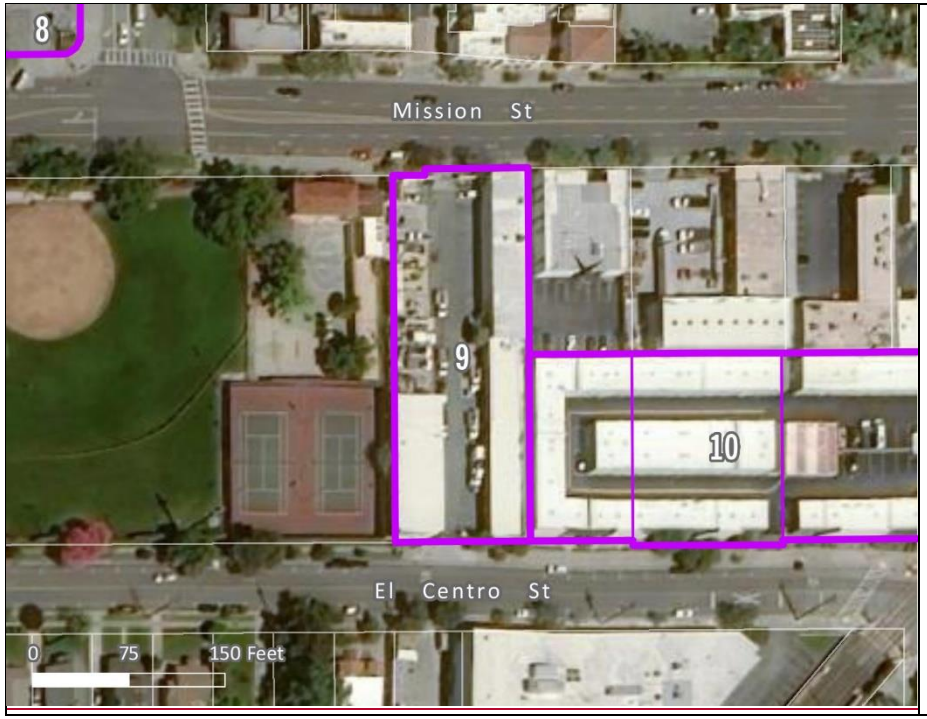


Existing use is a gas station. There is potential for redevelopment of ~~100 percent of~~ the site based on recent project trends and active economic reinvestment in area. This site is centrally located near transit and services.

Parcel Number	5313006025
Site Size (acre)	0.50 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	14~~12~~ lower-, 7~~6~~ moderate-, 3~~6~~ above moderate-income units = 24 total units
Property Owner or Developer Interest in Residential Development?	Yes. Property owner representative met with City staff regarding interest in a mixed-~~-~~use project with housing

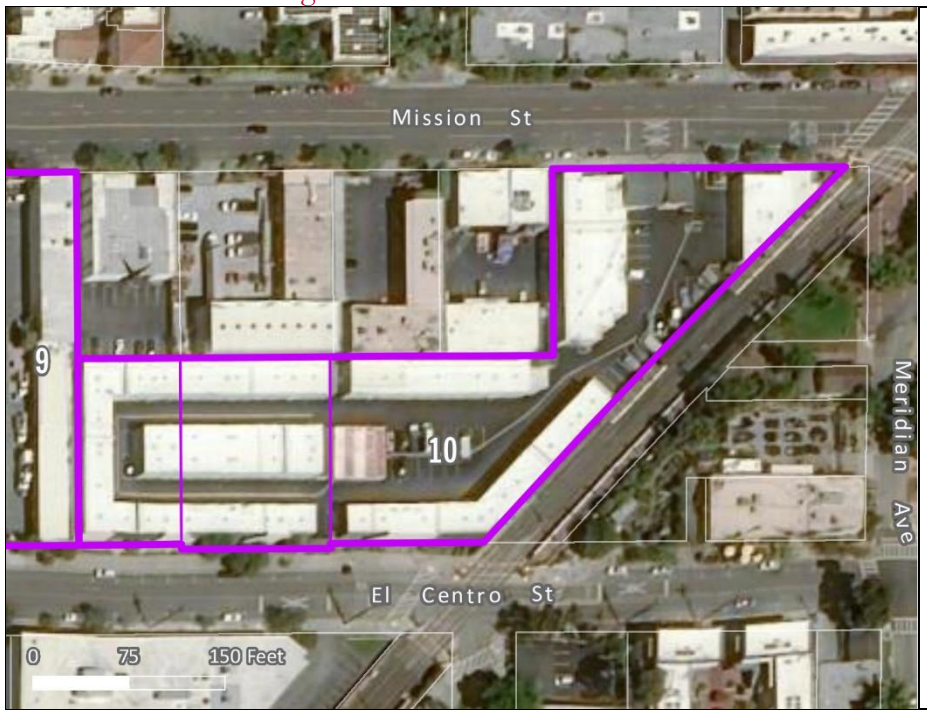
9. Public works yard site

	Existing use is the City public works yard. This property is owned by the City. This site is centrally located near transit and services. The City has identified another location (APN 5317028270) on East State Street near the northern city border where the public works yard could be relocated if this site was developed for housing. This property is included in Program 2.l~~See program~~ for developing City-owned sites with affordable housing.



Parcel Number	5315020901
Site Size (acre)	0.71 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	20~~17~~ lower-, 9 moderate-, 5~~8~~ above moderate-income units = 34 total units
Property Owner or Developer Interest in Residential Development?	Yes, City-owned and replacement Yard property identified.

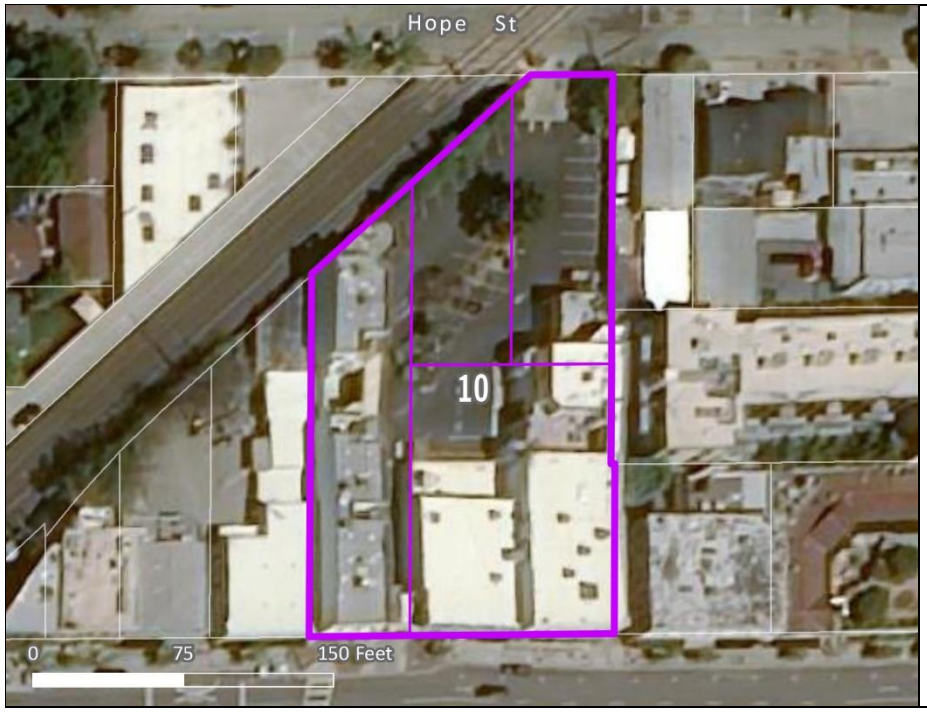
~~10. Gold Line Storage site~~

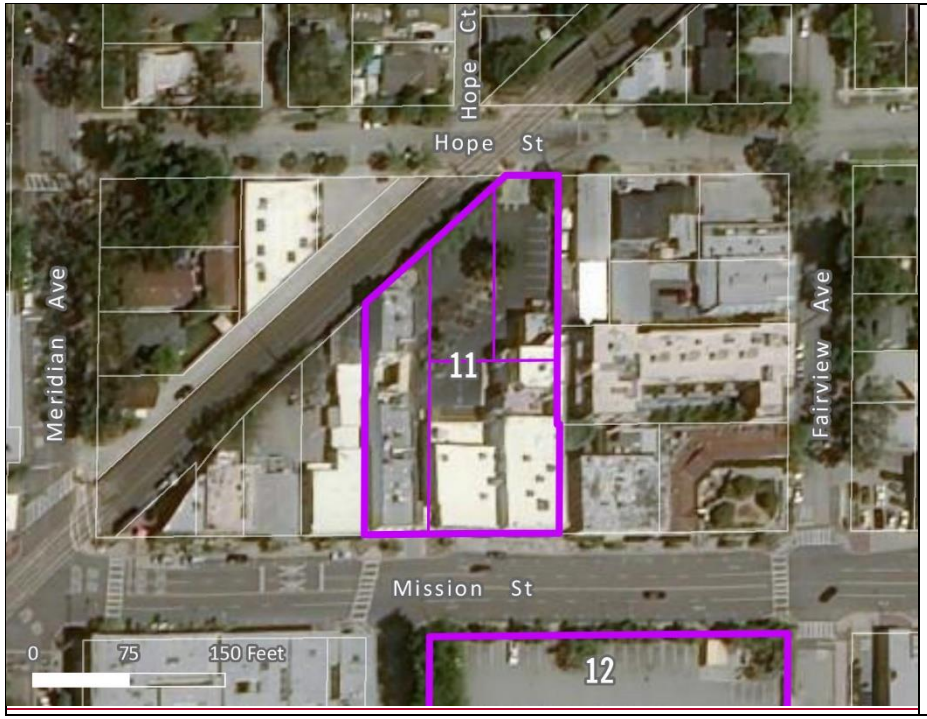


~~Existing use is a self-storage facility. All three parcels have the same owner. The site is an excellent site, adjacent to the transit station and close to many other services. There has been a recent increase in development interest on Mission, and a mixed-used development was recnetly approved (2021) for 60 units across the street on El Centro. There is high potential for redevelopment of 100 percent of the site based on recent project trends and active economic reinvestment in area.~~

~~Parcel Numbers~~	~~5315020014, 5315020008, 5315020009~~
~~Site Size (acre)~~	~~5315020014 – 1.14 acres, 5315020008 – 0.40 acres, 5315020009 – 0.27 acres = 1.81 acres total~~
~~Current General Plan Land Use~~	~~Mission Street Specific Plan~~
~~Current Zoning~~	~~MSSP~~
~~Rezoning or Change to Land Use Required?~~	~~Yes~~
~~Proposed Zoning~~	~~Mission Street (adjacent to the track)~~
~~Proposed General Plan Land Use~~	~~Housing Opportunity Site~~
~~Vacant or Non-Vacant~~	~~Non-Vacant~~
~~Density or Proposed Density (units per acre)~~	~~70 du/ac.~~
~~Realistic/Net Units~~	~~60 lower-, 30 moderate-, 31 above moderate-income units = 121 total units~~
~~Property Owner or Developer Interest in Residential Development?~~	~~No response from property owner. No expressed interest from any developers~~

~~11.~~10. Meridian site

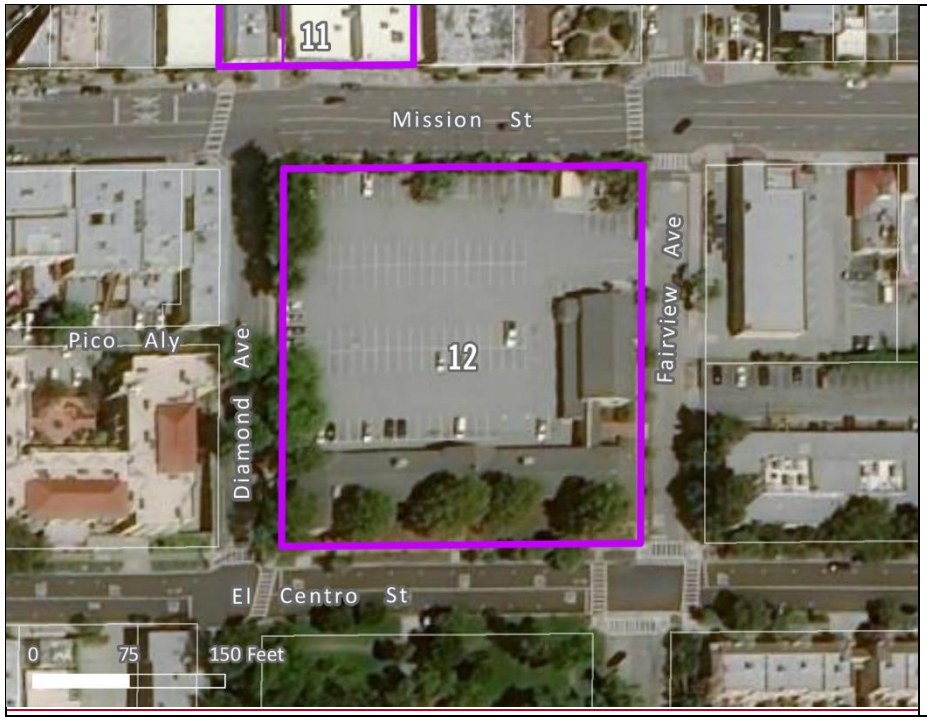
	Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services.



Parcel Numbers	5315014030, 5315014032, 5315014033, 5315014044
Site Size (acre)	5315014030 – 0.23 acres, 5315014032 – 0.16 acres, 5315014033 – 0.13 acres, 5315014044 – 0.31 acres= 0.83 acres total
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street (adjacent to the track)
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	34~~28~~ lower-, 15~~14~~ moderate-, 8~~14~~ above moderate-income units = 57~~56~~ total units
Property Owner or Developer Interest in Residential Development?	Yes. Meeting and site visit with owner representative and City staff

~~12.~~11. School District site

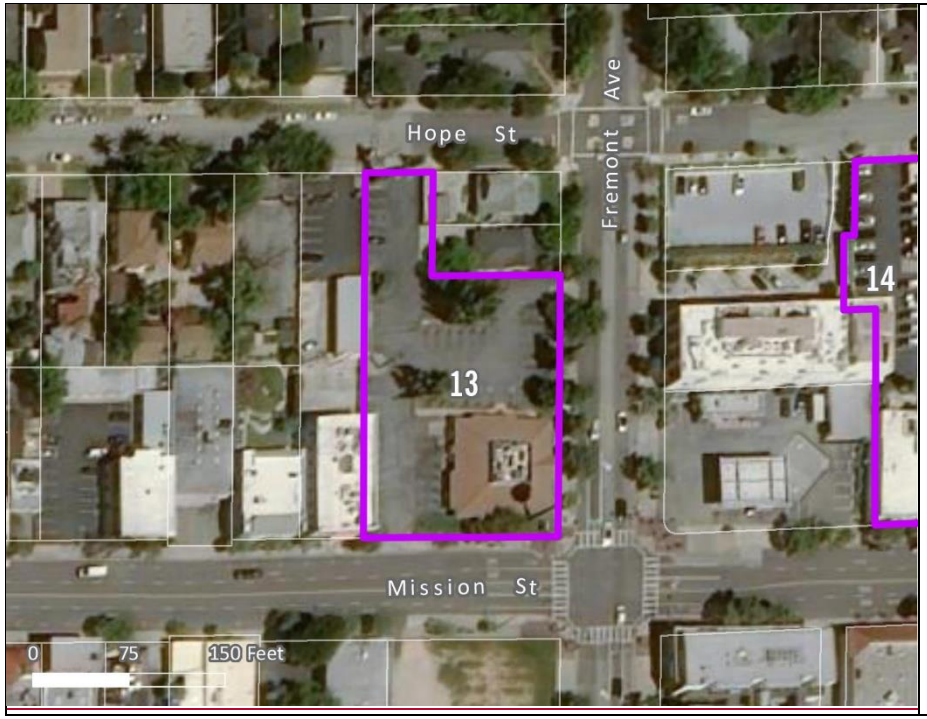
The property contains a historic school district building, but the majority of the propertyexisting use is mostly as a surface parking lot. with a small portion of the site used as an institutional structure. This site is identified in the current adopted South Pasadena Housing Element. In 2021,The site was recently sold by the South Pasadena Unified School District sold the property to a developer. The current property owner (The site is no longer contingent on a land swap as it was sold) This site is centrally located near transit and services. The City has held multiple meetingsreceived interest from at least five different developers on this site in the last year and a half. The buyer recently met with City staff to discuss a proposal for mixed-use, retail, housing, affordable housing, and adaptive reuse of historic resource. In September 2021, the developer submitted an application for Planning entitlements that is expected to go to Public Hearing in early summer 2022. The requested project is for 108 ownership units with approximately 19 units proposed as affordable moderate income units. The project is subject to the inclusionary housing requirements in the Zoning Code. The units assigned to this site are based on that application. This site is centrally located near transit, schools and services.



Parcel Number	5315008900
Site Size (acre)	1.90 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	19~~45 lower-, 23~~ moderate-income and 89~~-, 22~~ above moderate-income units = 108~~90~~ total units
Property Owner or Developer Interest in Residential Development?	Yes, application received.

~~13.~~12. Carrow's site

	Existing use is Carrow's restaurant with surface parking. This site has good potential for complete redevelopment with possible integration of restaurant into a mixed-use building. The owner has submitted an application for 50 units including 5 affordable units utilizing the State Density Bonus. The application was submitted prior to the inclusionary housing ordinance and is thus not subject to its provisions. This site is centrally located near transit and services.



Parcel Number	5315009051
Site Size (acre)	0.81 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	5 lower- and 45 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Yes. Application under review; unit count based on current application

~~14. City Hall Site~~

~~Existing use is City Hall, Fire Staton, Police Station and its parking lots. All three parcels are City-owned. There is a possibility that City Hall may move and the site could be redeveloped with housing included. The unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development or partial redevelopment. City Hall office space can easily relocate, but would need to find appropriate space for the Police Department. Fire Station is assumed to remain on this site. City would need to identify a new site (possibly the Arroyo area) for City Hall, or to have the developer incorporate City Hall into the new development. This site is centrally located near transit and services.~~

~~Parcel Numbers~~	~~5315002911, 5315002902, 5315002905~~
~~Site Size (acre)~~	~~5315002911 – 0.97 acres, 5315002902 – 0.12 acres, 5315002905 – 0.12 acres = 1.21 acres total~~
~~Current General Plan Land Use~~	~~Community Facilities~~
~~Current Zoning~~	~~CF~~
~~Rezoning or Change to Land Use Required?~~	~~Yes~~
~~Proposed Zoning~~	~~Mission Street~~
~~Proposed General Plan Land Use~~	~~Downtown Mission~~
~~Vacant or Non-Vacant~~	~~Non-Vacant~~
~~Density or Proposed Density (dwelling units per acre [du/ac.])~~	~~50 du/ac.~~
~~Realistic/Net Units~~	~~22 lower-, 11 moderate-, 10 above moderate-income units = 43 total units~~
~~Property Owner or Developer Interest in Residential Development?~~	~~Yes – owner interest; City-owned~~

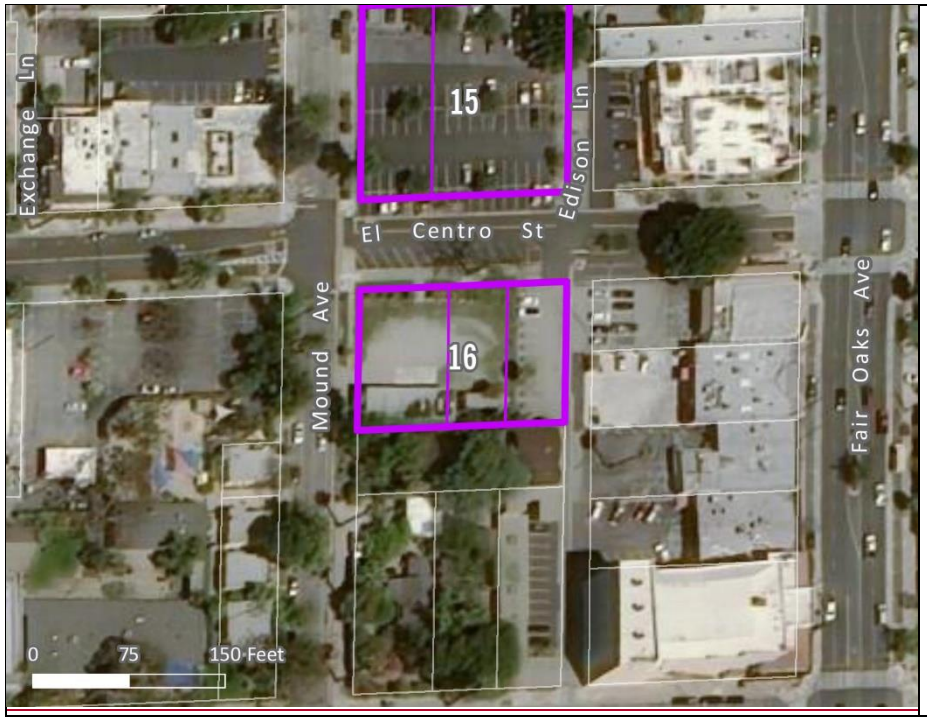
~~15.~~13. El Centro St. and Edison Ln. Site

	Existing use is a moderately used parking lot. The west parcel of the two parcels is owned by the City. The entire site is identified in the current adopted South Pasadena Housing Element. This site is centrally located near transit and services.

Parcel Numbers	5315003044, 5315003901
Site Size (acre)	5315003044 – 0.37 acres and 5315003901 – 0.19 acres= 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed-Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	2016 lower-, 8 moderate-, 48 above moderate-income units = 32 total units
Property Owner or Developer Interest in Residential Development?	The smaller, west parcel is City-owned. Although noNo response was received from the property owner of the eastnon-City owned parcel, the City will continue efforts to consolidate the parcels to develop a housing project. The City woule be interested in consolidating

~~16.~~14. City-Owned Parking Lot site

Existing use on the three northern parcels is a parking lot and a small theatre building. Those three~~The~~ parcels are owned by the City. There has been recurring interest from developers over the years for senior affordable housing development. The fourth parcel at the south end of the site could be consolidated with the other three parcels to develop as one site. There is one single-family residence on the existing site. It is not occupied by a lower-income household. The owners are interested in their property redeveloping together with the City-owned parcels as multifamily affordable units.



Parcel Numbers	5315003903, 5315003904, 5315003902, 5315003035
Site Size (acre)	5315003903 – 0.18 acres, 5315003904 – 0.12 acres , 5315003902 – 0.12 acres, 5315003035 – ~~=~~ 0.19 acres = 0.61~~42~~ acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	1 parcel Vacant, 2 parcels Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	20~~12~~ lower-, 9~~6~~ moderate-, 6 above moderate-income units = 35~~24~~ total units
Property Owner or Developer Interest in Residential Development?	Yes, Three parcels are city-owned and the owners of the fourth parcel are interested in their parcels being consolidated with the city parcels and all four parcels redeveloping together for multifamily residential development~~Yes, City-owned~~

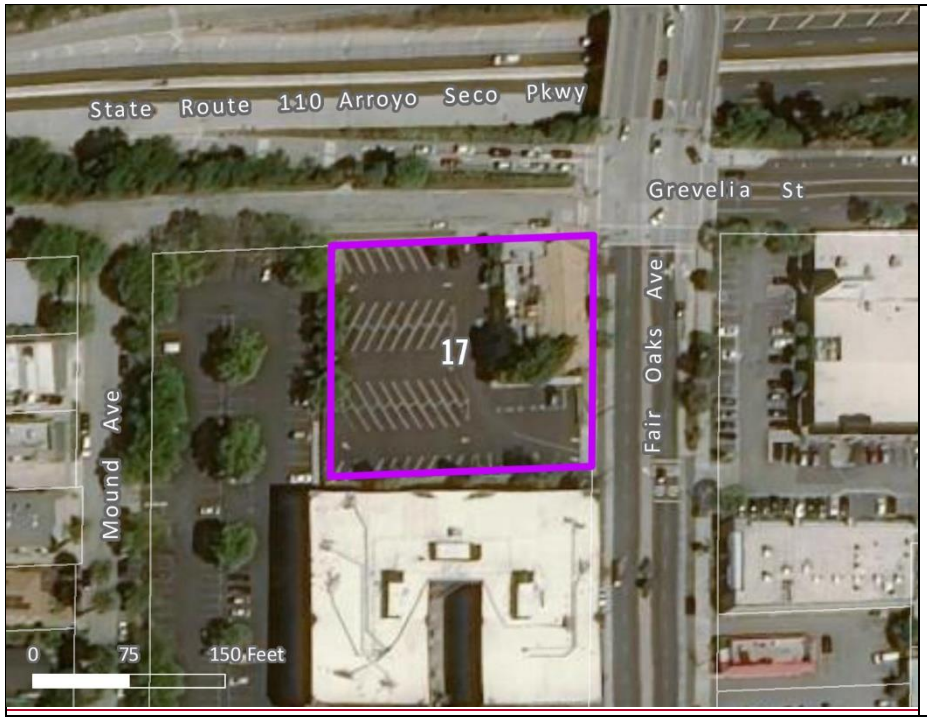
15. Oxley site

These are two adjacent parcels with the same owner. The owner has confirmed to the City that they are interested in redeveloping their parcels for multi-family housing. Currently, each parcel has one single-family home on it. They are not currently occupied by lower-income households.

Parcel Numbers	5315003033, 5315003032
Site Size (acre)	5315003033 – 0.18 acres, 5315003032 – 0.22 acres = 0.42 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	14 lower-, 5 moderate-, 4 above moderate-income units = 23 total units
Property Owner or Developer Interest in Residential Development?	Yes, property owner is interested in redevelopment with multifamily residential

~~17.~~16. Shaker's site

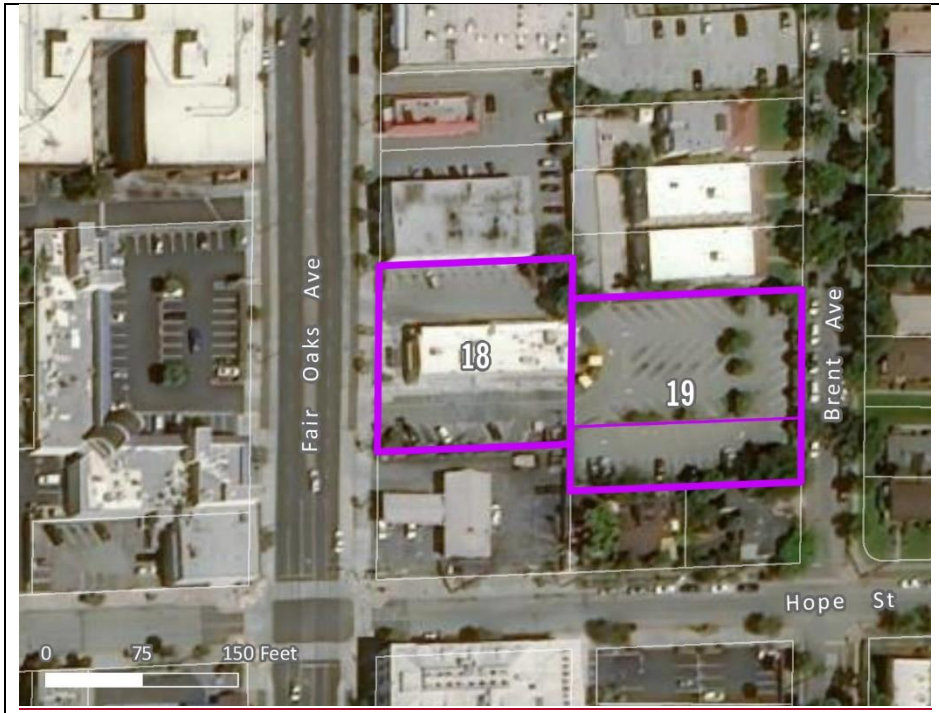
Existing use is a small restaurant, Shaker's, with substantial surface parking. This is a strong~~Good~~ site for redevelopment for housing, and ~~either through 100 percent of property reuse or~~ could incorporate the existing or a replacement restaurant and possibly other ~~in~~ ground floor commercial uses. ~~of a new mixed-use building.~~ Staff has held multiple meetings~~spoke~~ with the property owner and property owner's representative, who~~was told they~~ are very~~discussing options with developers and are~~ interested in developing~~housing on~~ the site with a high-density housing/mixed-use project.~~.~~ Redevelopment of the site will require a Historic Resources Evaluation (HRE) report for demolition. This site is centrally located near transit and services.



Parcel Number	5315001070
Site Size (acre)	0.85 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70~~60~~ du/ac.
Realistic/Net Units	33~~24~~ lower-, 15~~12~~ moderate-, 8~~12~~ above moderate-income units = 56~~48~~ total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner~~Onwer~~ representatives have met several times with City staff.

18. McDonald's site

	Existing use is a McDonald's restaurant with extensive surface parking. Identified as likely to redevelop based on recent project trends and active economic reinvestment in area. Most likely redevelopment would be as a restaurant incorporated into the ground floor~~groundfloor~~ of a mixed-use building. In the past, there~~There~~ has been interest in ~~-~~consolidating this site with adjacent sites on Fair Oaks. Also, the parcel adjacent to the east is underutilized~~undersutilized~~ surface parking with adjacent MF uses. This site is centrally located near transit and services.

	
Parcel Number	5318004019
Site Size (acre)	0.50 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	17~~15~~ lower,- 8~~7~~ moderate-, 4~~7~~ above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	No response from property owner. No recent expressed interest from developers.

19. McDonald's Parking Lot site

	Existing use is the parking lot for McDonald's. It is an underutilized~~undersutilized~~ surface parking lot with adjacent MF uses and a potential site for consolidation to the west. This site is centrally located near transit and services.

Parcel Number	5318004023, 5318004012
Site Size (acre)	5318004023 – 0.41 acres, 5318004012 – 0.21 acres = 0.62 acres total
Current General Plan Land Use	High Density Residential
Current Zoning	RH
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RH with Affordable Housing Overlay
Proposed General Plan Land Use	High Density Residential with Affordable Housing Overlay
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	11~~9~~ lower,- 4~~5~~ moderate-, 3~~4~~ above moderate-income units = 18 total units
Property Owner or Developer Interest in Residential Development?	City has contacted ~~No response from~~ property owners and provided explanation about the housing element, but has not received an official response.~~owner.~~ No expressed interest from developers.

20. Parking Lot at Mission St. and Brent Ave.

	Existing use is a parking lot used by the commercial uses to the west. Property does not provide required parking for adjacent uses. This site is centrally located near transit and services. The parking lot has previously been listed for sale.

Parcel Number	5318015017
Site Size (acre)	0.62 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	18~~15~~ lower-, 7 moderate-, 4~~7~~ above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	No response from property owner. No expressed interest from developers

21. Parking Lot at Raymond Ln. and El Centro St.

Existing use is a parking lot consisting of three parcels. All three parcels have the same owner. This site is centrally located near transit and services.

Parcel Numbers	5318015007, 5318015008, 5318015009
Site Size (acre)	5318015007 – 0.19 acres, 5318015008 – 0.19 acres, 5318015009 – 0.18 acres = 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	13 lower-, 7 moderate-, 6 above moderate-income units = 26 total units
Property Owner or Developer Interest in Residential Development?	No interest from property owners. No expressed interest from developers

~~22.~~21. Vons site

	Existing use is Vons grocery store and parking lot. All parcels have the same owner. Identified as having potential~~likely~~ to redevelop based on recent regional land use~~project~~ trends, owner interest in potential residential development, and active economic reinvestment in the area. Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that includes a grocery store would be anticipated. This site is centrally located near transit and services.

Parcel Numbers	5315004066, 5315004083, 5315004084, 5315004085
Site Size (acre)	5315004066 – 0.36 acres, 5315004083 – 1.06 acres, 5315004084 – 1.88 acres, 5315004085 – 0.66 acres = 3.96 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	157~~131~~ lower-, 66 moderate-, and 40~~66~~ above moderate-income units = 263 total units
Property Owner or Developer Interest in Residential Development?	~~Possible interest expressed to City staff.~~ Property owner has expressed ~~potential~~ interest to City in being able to develop higher density residential development in~~redevelopment with mixed use or housing within~~ the future~~next eight years yet is currently focusing on a potential new lease agreement~~.

Pavilions

~~23.~~22. ~~Pavillions~~ parking lot site

Existing use is a supermarket (Pavillions) with a large surface parking lot with the commercial use set back from the street. Although currently undergoing a remodel ~~(Pavillions). Redevelopment would require replacement of parking in a structure. Owner is proposing short term renovations (not expansion)~~ to update the store, the owner~~the existing building and parking lot, and property representative~~ has informed the ~~discussed with~~ City that they are also developing a proposal~~staff the potential~~ to redevelop the property with underground parking, a new market and high density ~~mixed use~~ housing on upper levels at the maximum that would be allowed by City zoning, and would include affordable housing units. The project would be similar to others that the owner has implemented in other locations throughout the state.

~~-~~Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that would include the grocery store use as well as housing.~~would be anticipated.~~ This site is centrally located near transit and services and schools.

Parcel Number	5319002034
Site Size (acre)	2.67 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70~~60~~ du/ac.
Realistic/Net Units	80~~58~~ lower-, 30~~29~~ moderate-, 23~~27~~ above moderate-income units = 133~~114~~ total units
Property Owner or Developer Interest in Residential Development?	Property owner~~Possible~~ interest expressed to City staff in higher density housing redevelopment.

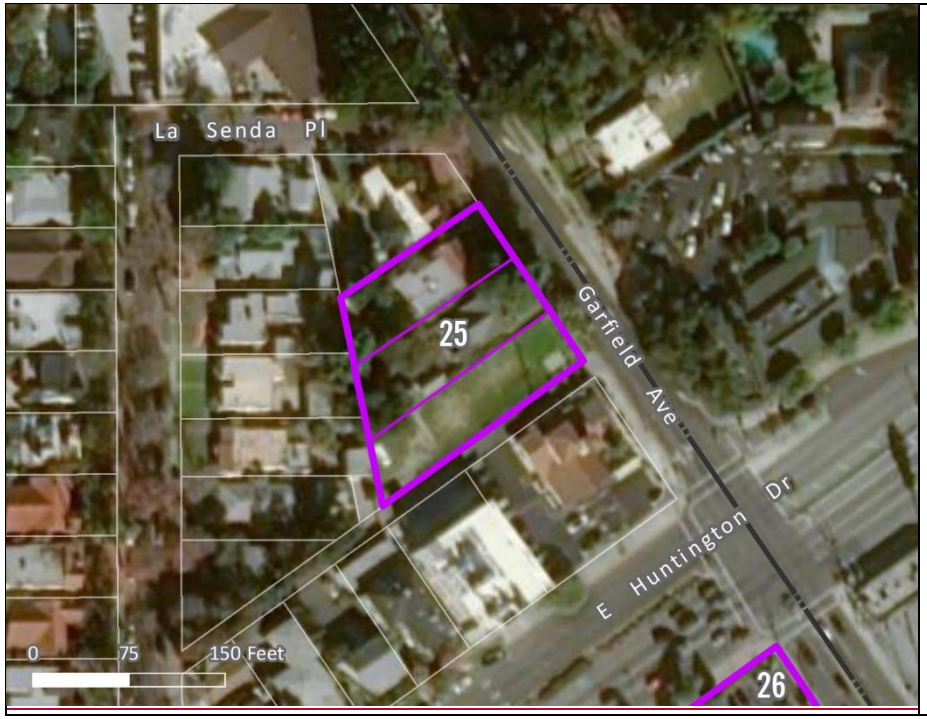
~~24.~~23. Office building and parking lot site

	Existing use is a two-story office building in rear, surface parking on frontage. There is potential for redevelopment of the site based on recent project trends and active economic reinvestment in area.This site is centrally located near transit and services. There is a 3-5 year lease, leaving the potential for full redevelopment toward the end of the 6th cycle.

Parcel Number	5319003029
Site Size (acre)	0.89 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	30~~25~~ lower-, 14~~13~~ moderate-, 6~~12~~ above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff.~~No response from the property owner.~~

~~25.~~24. YMCA-owned site

	One parcel is vacant and the other two are underutilized and each have one existing single-family house on them. The existing homes are not historic. All three parcels are owned by the South Pasadena San Marino YMCA. (The YMCA facility is not adjacent but nearby.) The YMCA Board has considered building more housing on the property but is only interested if it can build at a higher density than currently allowed.



Parcel Numbers	5321015018, 5321015017, 5321015016
Site Size (acre)	5321015018 – 0.20 acres, 5321015017 – 0.19 acres, 5321015016 – 0.16 acres= 0.55 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Mixed Use Centers
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	55 du/ac.
Realistic/Net Units	17~~15~~ lower-, 7 moderate-, 5~~7~~ above moderate-income units = 29 total units
Property Owner or Developer Interest in Residential Development?	Representative of~~No response from the~~ property owner (YMCA Board)~~. Prior interest from owner representative. No recent~~ expressed interest to City staff in developing a higher density residential project based on proposed rezoning.

~~26.~~25. Ralphs site

Existing use is a Ralphs grocery store and extensive parking lot. Both parcels have the same owner. The unit assumptions for this site only assume redevelopment of the parking lot, approximately 63 percent of the site.

Parcel Numbers	5321019009, 5321019022
Site Size (acre)	5321019009 – 0.17 acres, 5321019022 – 2.92 acres= 3.09 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mixed Use
Proposed General Plan Land Use	Mixed Use Centers with Housing Opportunity Site
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	80~~67~~ lower-, 30~~34~~ moderate-, 23~~33~~ above moderate-income units = 133~~134~~ total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner.

Appendix B:
Public Participation Summary

Appendix B: Summary of Public Participation

Release of Public Review Draft Housing Element

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. Below is a summary of all outreach since initiation of the Housing Element update, all written comments on the Housing Element received by the City, and how comments on the draft were addressed in this revised draft Housing Element. The summaries of outreach and community input are organized by type of outreach or meeting.

Public Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform.

Workshops 1 and 2

The City held two online public workshops with the general public to solicit feedback from City residents on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. The same workshop was held on the two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about Housing Elements. That survey was available before, during, and after the workshops. In addition, the City set up an email address to receive input ahead of the workshops and throughout the Housing Element Update and encouraged participants to submit comments and questions via email.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with an overview of the 6th-cycle Housing Element Update process, with a question-and-answer period in the middle. The second part of the workshop presentation focused on the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. Interaction was conducted via chat and email to minimize inappropriate content or behavior or instances of Zoom "bombing" by uninvited guests. Participants were directed to share their questions either through Zoom's chat feature or to email their questions to the City. The City staff selected questions among those received and answered some of them during the meeting as time allowed. They indicated that all questions would be answered in a frequently asked questions (FAQ) document that they drafted after the meeting's end and was then posted on the City's website.

Public Workshop, May 30, 2020 (Workshop 1)

There were approximately 30 participants at this workshop. Due to technical difficulties with the chat feature for some participants, after the end of the presentation more questions were answered by City staff and the consultant team.

The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: https://www.southpasadenaca.gov/home/showdocument?id=21084

- Participants asked about the RHNA process and how the number was determined for South Pasadena.
- Participants asked about the potential for golf courses, school district lands, and other sites with existing uses to be re-purposed for meeting the City's RHNA.
- Participants asked about Accessory Dwelling Units (ADUs) and their potential for rental units for low-income housing as well as the potential implications of the legalization of AirBnB in the City.
- Participants asked about the impacts of potentially increasing maximum density and height limits to increase housing supply.

Public Workshop, June 2, 2020 (Workshop 2)

There were approximately 30 participants at this workshop. The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: ***https://www.southpasadenaca.gov/home/showdocument?id=24141***

- Participants asked about CalTrans-owned properties and how those might be used for new housing.
- Participants asked about the potential lowering of the City's RHNA resulting from the current economic slowdown and future elimination of Metro bus stops in the City.
- Participants asked about the consequences and penalties for a non-compliant housing element.
- Participants asked about the methodology for determining RHNA and how SCAG had arrived at the City's RHNA numbers.
- Participants asked about the City's future ADU guidelines.

Workshops 3 and 4

The City held two online public workshops with the general public to solicit feedback from City residents on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m. The same workshop was held on two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about what should be discussed at the workshops. That survey was available before and during the workshops and was closed after the workshops. In addition, the City continued to accept emails to receive input ahead of the workshops.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with a brief overview of the 6th Cycle Housing Element Update process and the strategies under consideration to address the City's RHNA. Meeting participants were then separated into virtual breakout rooms to discuss questions about RHNA strategies. The groups were small, at around five people, and each had staff or consultant facilitators. Polling questions were asked of participants soon after the beginning of the workshop, after the presentation right before the breakout groups, and then the same questions were asked again just after the breakout group segment to gauge whether opinions changed based on the breakout group discussions. The polling questions were:

First poll after slide 4 – second team meeting rolls slide

- Did you participate in the Housing Element Workshops 1 or 2?
- If not, have you watched presentations the City has posted on their website about the Housing Element?

Second poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

Third poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

The discussion questions for the breakout groups were:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena, either because of the size, style, mix of uses, features, degree of affordability, etc.?

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

The workshops concluded after the breakout room discussion.

Public Workshop, September 23, 2020 (Workshop 3)

There were approximately 12 participants at this workshop. The participants represented members of City commissions, City Council members, housing advocates, community members, those who work in South Pasadena, and both renters and homeowners. The results of the two substantive poll questions for Workshop 3 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 20%
  - Upzoning single-family areas – 30%
  - Increasing density without increasing height – 0%
  - **Increasing height and density – 50%**

Poll after breakout groups and report-backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 11%
  - Upzoning single-family areas – 22%
  - Increasing density without increasing height – 11%
  - **Increasing height and density – 56%**

There were two breakout groups at Workshop 3. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

   - Sees a lot of obstacles for housing and would like the City to think outside of the box
   - Knows many of the legislators that wrote the laws, wants to make sure the City makes decisions that would provide the best housing
   - Wants to make sure the City avoids liability with HCD and advocacy groups
   - Wants to hear what fellow residents thought about the different proposals and what is important for the future
   - Would like to see broad community support coming together to get behind this element.
   - Wants to make sure housing is built for everyone in the San Gabriel Valley
   - Wants to make sure RHNA gets distributed to affirmatively affirm fair housing and avoids concentrations of poverty
   - Would like to see increased density and sustainable landscapes
   - Concerned about big RHNA increase that the City has to absorb. Important to preserve small town character and single-family neighborhoods as we add housing
   - A lot of people want to live here, want to make it possible for a variety of people to live here. Likes idea of increased height limits and greater densities

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- Higher-density/height can provide more affordable/lower-income housing without looking like Downtown Los Angeles
- Two-thirds of ADUs can be deemed affordable
- Believes the City needs to upzone and increase densities and will need more ideas for low-income housing
- Should go beyond the targeted zoning for the six areas mentioned
- City will run into issues with the no-net-loss rule
- Does not believe HCD will give the City the minimum number of ADUs that is calculated
- Least favorite is upzoning single-family housing
- Would like to see more analysis that increased density/height is needed. Believes the City will face some difficulty with providing sufficient proof for specific parcels
- Frustrated with the City's ability to provide low-income housing since there is no redevelopment or assistance from the State, believes the only tool available is inclusionary housing
- It's hard to imagine the proposal for upzoning single-family would be accepted by most residents, interested in what kind of implications will happen from the Housing Element in different portions of the City
- ADUs could be problematic as long-term housing, especially for families. Shouldn't be the primary solution
- Higher densities could allow a blending of housing affordable to lower- and higher-income brackets
- Not opposed to ADUs, concerned with affordability levels
- Concerned about reliance on ADUs
- More potential for ADUs as a solution than other options
- ADUs are a wonderful idea. City should allow ADUs to be legalized/acknowledged without penalty
- Asked about Caltrans properties. City let the questioner know that they have not heard back from Caltrans regarding a potential partnership. City is interested in working with Caltrans to rehabilitate the Caltrans properties. Can't easily count those towards to RHNA because they are not new units.
- Desires choices for all affordability levels
- Increase in height and density sounds nice. Interested in understanding more about how to distribute height and density so as not to limit affordability options to confined areas
- Concerned about waiving or lowering parking requirements and traffic from ADUs
- Be careful with parking issues
- Important to consider reasons behind voter-imposed height limit
- Preserve small-town character

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

    - To reduce GHG emissions, housing should be concentrated around High-Quality Transit Area (Gold Line Station)
    - Should be as close to the Gold Line Station as possible, should eliminate parking requirements in those locations
    - Along transit corridors (Huntington/Fair Oaks/Gold Line)
    - Near the Gold Line is preferred; however, it is a historic district
    - Vons center is a prime location
    - Definitely near transit, there will be some capacity issues with the historic character, commercial corridors
    - At least half of participants agreed housing should be dispersed through many areas of the City

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Monrovia/Azusa examples, options are diverse in terms of affordability
    - Smaller buildings on Raymond Street (south of Colorado) at Fair Oaks/Mission, need good design guidelines
    - Encinitas, higher-density project example (May 20th presentation to City Council)
    - Hiring great architects, variety of designs that are respectful of the context
    - The mix of densities by the middle school. There is a tradition of a mix of densities in South Pasadena.
    - Historic Ostrich Farm building in South Pasadena
    - President Apartments at 669 South Union in Los Angeles. It is a six-floor apartment building with 105 units.
    - We have a good mix all over town. Multifamily units are well integrated. Fit with diversity of architectural styles appropriate for each neighborhood
    - Mission Meridian in South Pasadena. It is a traditional mix with landscaping, setbacks, and quality materials. It did a good job of reflecting the historic character while also providing relatively dense housing and a range of bedrooms.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - As close to the Gold Line as possible, parking reformed
    - Proactive code enforcement, rental housing
    - Inclusionary Housing Policy
    - Sustainability
    - Affordability was mentioned by several people
    - Inclusive of income groups/families
    - Ability to be here in the long haul

- More permanent supportive housing
- Population-specific housing
- Encourage long-term tenants and homeowners, mix of kinds of housing and affordability
- Community, sustainability, and infrastructure adapting to climate change

The following question was brought up during the breakout groups:

- Has South Pasadena explored tax increment financing in lieu of disassembly of redevelopment?

Public Workshop, September 26, 2020 (Workshop 4)

There were approximately 15 participants at this workshop. The participants represented members of City commissions, housing advocates, community members, students, those who work in South Pasadena, and included renters and homeowners. The results of the two substantive poll questions for Workshop 4 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 15%
  - Upzoning single-family areas – 31%
  - Increasing density without increasing height – 15%
  - **Increasing height and density – 38%**

Poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 0%
  - **Upzoning single-family areas – 43%**
  - Increasing density without increasing height – 14%
  - **Increasing height and density – 43%**

There were three breakout groups at Workshop 4. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

   - Has followed the state laws and wants to make sure the City builds good looking beneficial housing
   - Not against raising the height in certain area (Ostrich Farms)
   - Housing should relate to the existing character and add value to the City
   - Believes affordable housing should be done first
   - Wants to hear what the community wants in terms of meeting our RHNA goals
   - Wants development of Caltrans properties according to the character of the community

- Interested in seeing more housing in the area, different types of housing suitable for families
- Would like a housing element that will sustain growth that the City can accommodate reasonably
- Concerned about impacts on schools
- Favors some minor height improvements in key areas
- Need more flexibility for low-income housing design
- Inclusionary housing regulations
- Affordable housing
- Address density and height within zoning (increase)
- Wants priority city process to follow HCD guidelines
- Prioritize geographic equitable distribution of units
- Prioritize housing dispersed equitably not just in concentrated areas.

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- No. The City would have to work with an outside partner (regional). There is no incentive for developers to provide affordable housing.
- None of the above, none of the options presented were good. Need to build more and increase density. Concerns about traffic around Ralphs and Vons sites.
- Most residents favor height and density modifications in certain areas but not all over town. City-owned property on Mound/El Centro could be a good candidate for low-income mixed-use housing, three to four stories.
- Look at adaptive re-use/micro-apartments. Need to work with the state to get credit for these types of developments.
- Upzone throughout the City (single-family areas). Would provide more opportunities. Focus on specific parcels for more density and height.
- A few people said all of the above.
- Reduce parking.
- Increase density without increasing the height, and work with developers to not create boxy projects. Can do a lot with density without height, allow up to five stories perhaps? City doesn't allow smaller product because of density.
- Adaptive re-use is counted by HCD for RHNA.
- 80 percent development assumption is not likely.
- Eliminating parking minimums in the Mission/Meridian zone.
- Downtown does not need more parking to claim more affordable units.
- The more we look at density, upzoning single-family lots, and increasing height will make a difference for planning for versus the actual building of housing. Should keep in mind.
- Inclusionary zoning. Could achieve a large amount through inclusionary housing.
- A few people liked the height and density increase strategy and had these additional comments:

  - One worried about ballot measure actually passing.
  - Likes the Andalucia precedent project.
  - Concern about sites at the periphery, need transit-oriented development.
- Upzoning single-family would be good for disbursement of housing in City. So, favor single-family upzoning but may be a stretch.
- Closer to transit (rail).
- A few people were skeptical about aggressive ADU numbers. Some had additional comments:
  - Doesn't understand how that works for renters.
  - Hard to monitor.

3. Are there certain areas of the City where increasing housing strategies should be concentrated?
   - Throughout the City but look for specific areas around transit, commercial areas, neighborhood amenities.
   - Concentrate around transit stop, walkable places, Downtown, Fair Oaks, Mission District. Opportunity by Ostrich Farm can be created.
   - Mound/Oxley is close to amenities and would encourage walkability/public transit.
   - Huntington Drive has pockets that could accommodate increased density, paratransit would be needed to support development in other areas.
   - All of the above - Downtown, Mission west of the subway stop, Mission should allow four stories.
   - Mission west does not want to mess with the historic downtown. There is not a lot of transit ridership. Has been a decrease in ridership.
   - If throughout City, not blanket, culture may not support it.
   - City/PlaceWorks has done a good job of identifying areas but there are some additional/other areas: Huntington Drive is underutilized (four cities connect). Currently, medical offices and low rise that is underutilized. Also look at Ostrich Farm, Mission, and Fair Oaks.
   - First priority is near Gold Line station. Incalculable asset that we are not realizing potential of.
   - Meridian mixed-use is good. Exciting possibility for mixed-use and density in that corridor.
   - Disbursement throughout City but with contextually different housing types. More near transit and services (Gold Line). Well served everywhere already, so can add housing anywhere.
   - Prefer to see more housing near transit hubs (Mission/Fair Oaks and metro station).
   - Near transit and where practical; consider vacant lots.
   - Downtown could accommodate a lot; Fair Oaks has a lot of opportunity for mixed-use; should be spread to some of the existing multifamily areas - triplex/four-plex.
   - Shouldn't only be in 3-5 targeted areas of the city. Look at single-family residential neighborhoods also. Allow higher densities on first two-three properties off main corridors.

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Different style in different places, Mission should look like it was built 150 years ago.
    - Different styles are appropriate, design review process is important, micro-apartments is something that should be considered in some areas, should not limit ourselves to a specific style/type.
    - Townhomes at Hope and Meridian is a good example, design standards that are not automobile oriented, cars are moved to the back, less curb-cuts, design and size should prioritize three bedrooms or more to accommodate families.
    - Mission/Meridian townhomes, variety of styles, bungalow to Spanish, does not want generic developments, need to have a sense of place, or reflects the historic character.
    - Needs to represent South Pasadena, Adobe style, historic examples, character needs to be similar to the unique neighborhoods.
    - Respect the historic fabric of the neighborhood block, be flexible given the context of the neighborhood, save the front historic design and modifications are located in the back, concerned about affordable housing
    - Generally, multifamily - Look at occupants, tenants (end users) as they transition over lifespan. Professionals, families, seniors; look at different users. Density/massing/open space/courtyards great but also can limit development so we need to look closer as implications of those constraints. It can be too restrictive. Need to dive into more and see specific examples.
    - Dense, walkable courtyard multifamily buildings already exist in South Pasadena. See Bank Street (10 units of housing in communal setting possible because without onerous parking requirements). Would love to see that happen again. Currently, the City parking requirements do not allow such projects to be built. Would like to see requirements change to bring back those types of projects and diversity of housing types.
    - Sierra Vista Apartments on Esperanza Avenue (low-income senior, 1-2 bed), example of dense affordable complex with beautiful exterior - Yosemite lodge style. Blends well with single-family and multifamily on block. It is only 45 units, so maybe higher density to get more units.
    - Likes Andalucia example, doesn't like Aliso example.
    - Mission Meridian.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - Design standards are set in stone, we can make sure it looks good.
    - That infrastructure/community services are able to support the new housing units.
    - Specifically, how we address affordable housing. One concern of ADU plan is that her work as an architect has shown that ADUs are just additional single-family for real estate but does not meet the goal of affordable units. Not just adding units, but how can we assure they are affordable units? Multifamily development also needed to meet minimum they need to make their projects pencil out. Make it more viable and provide more assurance. Don't skim the surface. Financing for developing affordable units is needed,

mentioned Pasadena as an example. Can City partner with bank or banks for affordable housing?

- Housing Element sets values to production. Wants to see recognition of race-based exclusionary practices. Contemporary recognition and repair of redlining and other racist practices. Altos de Monterey in the 1960s was the only place to allow non-white residents. Would like to see acknowledgement of past and commit to real policies that are equitable.
- In addition to being affordable, have permanent supportive housing.
- Reduce parking requirements near transit stops.
- Tenant protections.

The following questions were brought up during the breakout groups:

- Do all units count the same toward the RHNA requirement? For example, is a one-bedroom apartment treated the same as a three-bedroom dwelling?
- Could 710/Caltrans money be used for more transit?
- RHNA appeal, what are our chances to lower our numbers?

Public Workshop, October 21, 2021 (Workshop 5)

The City held a hybrid public workshops after release of the public draft Housing Element on Thursday, October 21, at 6:30 pm. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the workshop was to provide an overview of the 2021-2029 Public Review Draft Housing Element. After the presentation, the public was invited to ask questions and share comments. The meeting had approximately 12 participants, including two in-person and others on Zoom. Four participants spoke. The following summarizes these questions, comments and staff responses:

- The first question asked for clarification about AB 1398 regarding the possibility for getting the Housing Element approved by HCD by the February 11th deadline in order to avoid the mandatory timeframe for rezoning. The City clarified that before AB 1398 was approved, the February 11th deadline was for the adoption of the Housing Element by the City Council. However, with the change in law, adopting the Housing Element by the February 11th date is no longer a requirement to stay on the 8-year housing cycle. The law says in order to avoid a deadline to complete the rezoning within one year of October 15, 2021, the City would need to have adopted their Housing Element and submitted the adopted Housing Element to HCD for a 90-day review and receive certification at the end of that review before February 11, 2022. That new timeline is not feasible because the City is at the initial point of submitting the Draft Housing Element for the first 60-day review by HCD and will not have enough time to adopt and submit the final to HCD by February 11, 2022. Consequently, the City will adopt after February 11, 2022 and be required to complete the rezoning before October 15, 2022.
- The next question asked was in reference to whether Junior Accessory Dwelling Units (ADUs) were included as part of the site inventory in order to meet the City's RHNA. The City answered that both ADUs and JDUs will be counted.
- The third question asked how the City plans to incorporate the 6th, 7th and 8th (future) Regional Housing Need Allocations (RHNA) if the General Plan update is a 25-year plan with the follow-up question about the City's approach for meeting the RHNA from the 1st - 5th Housing Element updates. The City answered that through the 8-year timeframes for updating the Housing Element, the City will attempt to show that the City has the capacity to build the

units during the projection period while keeping in mind that the City's capacity to develop these units is in line with the longer-term General Plan. The Housing Element is on a different timeframe from the General Plan and will be updated again in 2030. Furthermore, staff clarified that the Program Environmental Impact Report (PEIR) will be covering the Housing Element, General Plan Update and Downtown Specific Plan (DTSP). Thus, the City will use the General Plan and the PEIR as guide when analyzing appropriate sites for the next housing element update. To answer the follow-up question, staff explained that the City was able to address capacity for the 63 RHNA units in the 5th Housing Element with existing zoning.

- The next question was in regard to the sites inventory. A property owner wanted to confirm that his property was included in the sites inventory as he is interested in developing housing. PlaceWorks confirmed and directed the speaker to find the site in the document. The property was identified as Site #4 and is shown in Table VI-46 and Appendix A. The speaker also wanted to know where the City was in terms of timeline for revising the General Plan. City staff answered that there is a draft of the General Plan Update from 2019, but that it had been put on hold during much of the Housing Element Update preparation in order to integrate consistent programs and policies that align with the Housing Element. Staff stated that the revised draft of the General Plan will be released for public review shortly.
- The last comment was about the importance of the City undertaking companion capacity planning for infrastructure including schools, water, wastewater, parking, etc. The commenter noted that the community has been requesting this type of analysis for two years. He would be more comfortable with the plan for housing presented in the draft if that infrastructure analysis was completed.

Surveys

The City conducted public outreach via two online community surveys. Each of the surveys was launched prior to public workshops for the Housing Element Update.

Survey 1 – May - September 2020

The first survey was made available on the City's website in May 2020 and was open until September 2020 to allow for a long time period for input to be provided due to the impacts of the COVID-19 pandemic. The link to the survey was also sent to everyone who registered for Workshops 1 and 2. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to find out a little bit about their perspective on housing issues. A total of 33 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about housing and the General Plan Housing Element. This survey should take about 2 minutes.

1. *Are you:*
    a. *Renter in South Pasadena*
    b. *Property owner in South Pasadena*
    c. *Other*

2. *Have you heard of the Housing Element of the General Plan?*
   YES or NO
3. *Have you heard of the regional housing needs assessment or RHNA numbers?*
   YES or NO
4. *Please rank the following issues in order of importance to you.*
   a. *Production of additional housing stock*
   b. *Preservation of existing housing stock*
   c. *Creation of economically sustainable neighborhoods*
   d. *Providing a diverse cost range of housing opportunities*
5. *Has housing affordability impacted you or your family personally?*
   YES or NO
6. *Have you participated in the City's General Plan Update process?*
   YES or NO

The following summarizes the responses to the survey:

1. Are you a renter, property owner, or other?

   Approximately 60 percent of respondents were property owners, 35 percent were renters, and 3 percent chose other.

2. Have you heard of the Housing Element of the General Plan?

   Three quarters of respondents had heard of the Housing Element, one quarter had not.

3. Have you heard of the regional housing needs assessment or RHNA numbers?

   Approximately 80 percent of respondents had heard of RHNA, 20 percent had not.

4. Please rank the following issues in order of importance to you?

   Respondents ranked the four options in the following order from highest to lowest priority:

   - Providing a diverse cost range of housing opportunities
   - Creation of economically sustainable neighborhoods
   - Preservation of existing housing stock
   - Production of additional housing stock

   It should be noted however that most respondents chose all four options as priorities.

5. Has housing affordability impacted you or your family personally?

   Approximately 55 percent of respondents had been impacted personally in terms of housing affordability, approximately 45 percent had not been impacted.

6. Have you participated in the City's General Plan Update process?

   Approximately 58 percent of respondents had previously participated in the General Plan Update process, approximately 25 percent had not.

Appendix B

Survey 2 – September - October 2020

The second survey was made available on the City's website in September 2020 and was open until October 2020. The link to the survey was also sent to everyone who registered for Workshops 3 and 4. The main purpose of the survey was to identify the housing strategies people would like to learn about and discuss at Workshops 3 and 4. A total of 17 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about how the City of South Pasadena can achieve its Regional Housing Needs Assessment (RHNA) allocation for the 2021 Housing Element Update. This survey should take about 2 minutes.

During the workshops on September 23rd and 26th, 2020 we plan to discuss the following topics that are options for the City to address its RHNA allocation:

- *Effort to Appeal the City's RHNA number*
- *Options to Address the RHNA and Receive a Certified Housing Element*
    a. *Programs and strategies for an aggressive program to produce more affordable Accessory Dwelling Units (ADUs) in South Pasadena*
    b. *Options for zoning changes to increase density (number of housing units allowed on a property)*
        i. *Allowing more ADUs to be built on a single-family property*
        ii. *Allowing multifamily housing buildings to be built in single-family neighborhoods*
        iii. *Allowing housing to be built in areas that do not currently allow residential development*
        iv. *Increasing building heights and densities to allow more housing units to be built in mixed-use areas in town and/or just on specific sites*

1. *Have you participated in the City's previous Housing Element workshops?*
2. *Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?*
3. *Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target? Choose as many as you agree with.*
    a. *Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units*
    b. *Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development*
    c. *Increased density in specific areas of the City*
    d. *Increased height in specific areas of the City*
    e. *Increased density and height in specific areas of the City*
    f. *Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood*
    g. *Other*
4. *What other topics/options would you like to see discussed at these or future workshops?*
5. *What questions do you have about the RHNA or 2021 Housing Element Update?*

The following summarizes the responses to the survey:

1. Have you participated in the City's previous Housing Element workshops?

   41 percent of respondents said yes, 59 percent said no.

2. Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?

   35 percent said yes, 41 percent said no. Three people chose other and wrote in a response. The write-ins included two people who said the appeal won't work, another said don't spend any money on the RHNA appeal, and another said they don't know enough to choose yes or no.

3. Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target?

   The number of votes each strategy received is shown below from the strategies that received the largest number of votes to those that received the least votes.

   - Increased density in specific areas of the City – 9 votes
   - Increased density and height in specific areas of the City – 9 votes
   - Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development – 8 votes
   - Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood – 7 votes
   - Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units – 6 votes
   - Increased height in specific areas of the City – 6 votes

   Several write-in strategies were also proposed:

   - Convert any retail and business buildings that become vacant to residential
   - Widescale upzoning of single-family neighborhoods
   - Reuse empty commercial buildings for affordable housing
   - Increased height and density throughout the City.

4. What other topics/options would you like to see discussed at these or future workshops?

   - I would like to know what ways you guys are planning to fit the 2,062 housing units if the height limit is not changed.
   - Use of non-profit developers versus regular developers.
   - The aggressive ADU idea is an attempt to shirk the city's responsibility to build more housing. It will likely not succeed - as the state will not accept it. ADUs have been legal in South Pasadena for 3 years and there has been almost nothing built. There is little the city can do to get more "aggressive" - let alone reach the type of numbers being talked about. The City needs to allow real densities of greater than 30 units to an acre in your multifamily areas. The multifamily I've seen built has such low densities that it encourages only luxury 1,900 square foot condos.

- There is a lot of fear of change in South Pasadena. Can we help people visualize South Pasadena in a future that satisfies RHNA requirements? That might help focus energy on the choice between the options.
- Streamlined permitting process. Progressive ways to address the missing middle housing types.
- I hope to see the elimination of parking requirements to facilitate unit production and a serious discussion about inclusionary zoning.
- Adaptive reuse of commercial buildings for affordable housing.
- At the first Zoom Housing Meeting, numerous sites were presented as potential areas for development. But much of this data was based on a single conversation with the owner of the property who "said they were open to considering development." I found that rather loosey goosey. There were too many "ifs" in that scenario.
- South Pasadena, along with other towns, is bleeding commercial space. What are the options for converting some of these into work/living lofts?
- Finally, all of the development that has been greenlit in the city only offers 13 "affordable units." All development must focus on affordability or we can never come close to meeting the numbers. We know that developers don't make money on building affordable housing, so who will the city partner with to make that happen?
- What about the additional infrastructure that will be needed to support 20 percent more units and a 20 percent increase in population?
- We just came out of a 7-year drought. Where will the extra water supplies come from?
- Multiple studies in the last decade, including at Mission Meridian, have proven that transit based housing is an urban myth. It does not reduce traffic. If this plan goes forward, how will South Pasadena achieve its green Climate Action Plan goals in the coming 10 to 20 years?
- Regarding specific locations within the City to be up zoned – PlaceWorks' previous presentation at the Planning Commission did not address Huntington Drive or any area south of it.
- Even in a city as small as South Pasadena, effects of any changes will be distributed unevenly, which will produce uneven follow-on effects. I live near the Metro station and near the proposed Seven Patios project, which will create a significant traffic impact, especially on Farmer's Market days. How do any of the proposed options take into account the related structural changes that they will create?

5. What questions do you have about the RHNA or 2021 Housing Element Update?

- In what ways are you planning for the moderate and above moderate housing if you don't get the 1,000 ADUs?? What is the current zoning capacity of South Pasadena assuming the 50 units/acre for the Draft DTSP??
- In what ways is the City of South Pasadena critically thinking about progressive development, instead of just appealing the RHNA numbers?
- More information on inclusionary requirements, ADU considerations for RHNA counts, and Caltrans housing considerations for RHNA counts.

- I have some questions as to the accuracy of the predictions since they were determined pre-Covid. There are now more people moving out of the California than moving into the state.
- The increased density adjacent to the Gold Line Station under the pretense that all of these people will take the train to work in Pasadena/Downtown L.A. is a false flag. No one at the Mission Meridian Transit Village takes the Gold Line to commute. The ridership on the trains has steadily declined for three years. The few people I know who used the train to commute to Downtown Los Angeles are now driving as a precaution during Covid-19. The condos at the Mission Meridian Transit Village sold for upwards of $1.1 million in 2005. To be honest, it's highly unlikely that anyone who has paid that amount of money for a home is commuting by train. This was reported in the Los Angeles Times in 2007 and still holds true today. My council member used to ride his bike to take the train, but even he has quit doing that. He affirms that residents living at Mission Meridian are not commuting by train.
- Explain why South Pasadena never responded to the AFFH or LPFS surveys sent out by SCAG in 2018 and due back no later than April 2019. Our city's allocation now includes excess allocation from other cities who responded to the survey and saw their initial allocations reduced.
- When are you going to admit you want our city to look like Glendale, Pasadena, and Alhambra?
- Do we need to vote on these changes to the General Plan or will it be decided by the City? For instance, height increase was considered for the November Ballot, but up zoning wasn't. Who makes the decisions?
- Can we zone for/build more housing to exceed the target?
- What are resources I can consult to learn more about the RHNA process, specifically to understand how South Pasadena's RHNA number compares to that of other communities?

Hearings

City staff and their consultant, PlaceWorks, presented at multiple public hearings at different points in the update process prior to release of the public draft Housing Element.

July 21, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on July 21, 2020. The presentation covered the City's RHNA allocation, sites analysis and options for addressing the identified RHNA shortfall, options for inclusionary housing policy and ADU regulations, and potential options for increased density and height to accommodate additional housing. Information on potential changes to allowed density and height on specific sites was studied and presented. The following questions and input were received from the Planning Commission:

- Provide additional explanation of what moderate and above moderate RHNA means
- Has staff considered studying the Pavilions site?
- One consideration is changing what is allowed in single-family areas versus increasing the height limit in other areas
- Has staff looked at the stables site?

- Should think about a road diet on Monterey Road
- Consider street parking in the ADU regulations
- Could pre-approved ADUs include pre-fabricated units? It seems like they would be more affordable
- Are there precedents and incentives for converting market rate units to affordable units?
- What about the Caltrans properties?
- What about condo version to market rate then to affordable housing?
- Showing partial site redevelopment of Vons and Ralphs sites as the baseline condition with full redevelopment with density and height increases is misleading. If this is the approach needs to be supported more.
- Amount of parking provided for the precedent projects versus what would be required under South Pasadena's regulations?
- Wondering about the illustrative examples show versus the sites/areas a ballot measure to increase height would actually apply to
- Has City had conversations with the owners of all of these sites?
- Can regulations regarding height and zoning be adjusted after the Housing Element is adopted?
- Do Density Bonus units count towards the RHNA?
- Seems weird to have a ballot measure to increase height before the Housing Element.
- Will the RHNA change?
- Seems like the City would be forced to build more small units
- Makes sense to have less parking at the Gold Line Storage sites. Connect with the Downtown Specific Plan and General Plan and do that with all the 5 sites.
- Transit access to each of the 5 sites needs to be looked at
    - Ralphs site should be good, there are multiple bus lines
    - Ostrich farm site – not sure if there is sufficient transit access
- Increased density can add economic benefit/energize the area, just one edge might not make sense
- Premature for a height ballot initiative, the tail is wagging the dog
- Should fight the RHNA
- State Density Bonus – allows increased height
- South Pasadena isn't alone in facing a large RHNA increase
- The Council and the Mayor Pro Tem have personally written to and spoken with SCAG and state legislators and they aren't getting any traction on changing the RHNA
    - Alhambra – 6,000 + unit RHNA
    - San Marina – 398 unit RHNA
    - Beverly Hills – 3,096 unit RHNA
- The area a height increase applied to could be less site specific – a wider area
- More study is needed ahead of a ballot measure on height, leaning towards not recommending

- Supportive of strategic increased heights but thinks we aren't there yet, not enough time to make a decision to have a ballot measure ahead of the deadline for the general election. Not supportive of sending to City Council for November ballot
- Supportive of need to reconsider height limits
- Housing need is critical
- The consideration of height increase needs to be more thoroughly vetted, can't support at this time

Three recorded voicemail comments were received:

- First voicemail comment - SPRIG
    - Need an alternative that accommodates the RHNA within the 45-foot height limit
    - They gathered 67 signatures – don't want height increase
- Second voicemail comment
    - No height increase
    - Concerns about water, sewer, and electricity
- Third voicemail comment
    - Opposed to height-limit increase
    - Confirmed they had also submitted written comment

August 5, 2020

City staff and PlaceWorks presented to the City Council at their meeting on August 5, 2020. The presentation focused on the consideration by the Planning Commission at their July 21st meeting of recommending to the City Council to place a ballot measure to propose allowing increased height on the November ballot. Staff reported that the Planning Commission did not recommend moving forward with the ballot measure at this time. Staff also presented regarding a potential RHNA appeal by the City.

August 11, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on August 11, 2020. New analysis and information was presented about specific sites studied for potential height and density increases, following up on the presentation at the July 21st meeting. Updates included information on transit accessibility of candidate sites, parking ratios for precedent examples, and the addition of one site for consideration for potential height and density increases.

The following questions and input were received from the Planning Commission.

- Regarding Ostrich Farm Area:
    - Why not include parcels to the east of the vacant site?
    - Ostrich Farm area is appropriate, without needing to be as surgical as elsewhere
    - Need to look at how to make Ostrich Farm more of a complete neighborhood
    - Can it connect to Highland Park?

- Regarding Meridian Property:
    - Be careful to recognize historic district
    - Be careful not to overwhelm surrounding historic structures with additional height
    - Agree with sensitivity towards Meridian site
- Comments regarding sites in general:
    - Vons, Ralphs, and Ostrich Farm are good opportunities
    - Generally, site locations seem pretty smart
    - Concern about putting a lot of units in far corner of the city
    - Traffic and parking should be a top consideration
    - Traffic and parking analysis need to go hand in hand with these sites
    - Look at what State density bonus law means when considering additional heights
    - We need to build more housing
    - Presentation materials are going to be key pieces when communicating to residents
    - How much time do we have to make zoning changes outlined in Housing Element?
    - Does a height increase need to be in place at adoption of Housing Element?
    - What is required to prove redevelopment potential of a non-vacant site?
    - Question regarding ADU production target; answered that City will have to include aggressive programs
    - What does it mean if we don't raise heights? (need to explain to the public)
    - Is there a way to raise heights without going to the voters?
    - Can City get credit for units built in excess over prior Housing Element cycle?

September 8, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on September 8, 2020. The focus of the presentation was ADUs and options for supporting that housing type in the City as part of the Housing Element and ongoing City programming. Staff was specifically seeking input on update to the City's ADU zoning regulations and consideration of policies and programs to include in the draft Housing Element.

One recorded voicemail comment was received:

- City talked about ADU projection methodology at the July 21st Planning Commission meeting. Doesn't see that in the presentation this time.

The following questions and input were received from the Planning Commission:

- Will objective design standards be part of the near-term ADU ordinance update?
- Are the projected ADU numbers changing?
- Some ADU updates should be made now and maybe some later – before or after Housing Element adoption. The items to do later would be the more aggressive measures.
- Address parking problem related to ADUs
- Okay with duplex, deed-restriction ADU idea
- All were supportive of amnesty program.
    - One commissioner asked: Why does it need to be limited to non-historic properties?

- Yes, City should streamline planning and building review process
- Yes, supportive of homeowner assistance – guide to ADU development process
- Supports fee reductions for affordable ADUs
- Okay with ADU monitoring, but some concerns about staff time resources
- Okay with education and promotion around ADUs. Supportive of proactive/targeted outreach to certain neighborhoods and areas with larger lots
- Supportive of allowing two detached ADUs as long as there is enough room on the parcel for open space
- Concerned about streamlining impacts on staff workload. Should have as many standard ADU building types as possible. One-stop shop is a good idea.
- If City allowed two detached ADUs on a parcel could they require parking?
- Should include pre-fab ADU units – important for education program
- Should include costs and sources for loans in education and promotion program
    - City of Pasadena is offering two types of loans to encourage ADUs
- Careful who gets included on the list of resources (builders, etc.). Don't want to unfairly support or not support someone.
- Could tie education and promotion to streamlined approval
    - Homeowners could provide case study materials about the process, costs, how it went for them
- Could have objective criteria for which builders/others get included on the resources list

December 15, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on December 15, 2020. The presentation focused on additional design and economic analysis PlaceWorks prepared for certain sites to understand what types of housing projects would be feasible and acceptable on those sites and how changes to the City's General Plan and zoning related to density would relate to what is allowed under State Density Bonus law. The additional focused most on the Vons site.

January 26, 2021

City staff and PlaceWorks presented to the Planning Commission at their meeting on January 26, 2021. The meeting focused on the proposed Inclusionary Housing Regulations. Supporting information was presented regarding analysis of height and density on certain sites, following up on earlier meetings, in particular, the December 15, 2020, meeting.

May 26, 2021

City staff and PlaceWorks presented an update on the Housing Element process to the Planning Commission at their meeting on May 26, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the Planning Commission:

- Was the City concerned by HCD's preliminary review of some of the Housing Element sections?
- Asked about thresholds for sites analysis.
- Asked about the overlay described in Table VI-4 and details of the proposed zoning column.

- Mentioned public comment from Josh Albrektson from the previous Planning Commission meeting, not to forget it.
- What happened at the EIR scoping meeting?
- Thinks the City is being too optimistic about the analysis of the sites. Should remove small and steep single-family sites. In general, overly optimistic in all categories including ADUs, vacant and non-vacant sites.
- Multiple commissioners agreed yes, density increases are needed.
- Should ask other cities for ideas of how to meet the RHNA, need some magical solutions.
- Do City-owned sites included in the Housing Element have to be surplus?
- Does not want to include the ballfield or stables as Housing Element sites.
- Can the affordable housing production program be strengthened?
- Generally concur with strategies that were in the preliminary draft programs submitted to HCD.
- Would like another chance to review sites at the time of the public draft.
- Could there be some sort of "pre-permit program" for ADUs as a way to gauge interest in ADUs?
- Would it be possible for the planning commissioners to do a driving tour some of the sites?
- Interested in the church sites strategy.
- Likes the idea of redoing the City Hall site.
- Could the parcels by war memorial building on Fair Oaks possibly be added to the inventory?
- Can existing units be rehabilitated and counted towards the RHNA?
- Multiple commissioners said yes to the affordable housing overlay.
- Don't rule out all historic sites.
- Should increase densities in Ostrich Farm and Downtown.
- Should put increasing the citywide height limit back on the table and continue the community conversation.
- Will minimum densities be put into place?
- Raising height limits on certain properties should be considered.
- Multiple commissioners felt the sites to receive the affordable housing overlay will be competing with state density bonus in terms of incentivizing actual development. The overlay should be calibrated to produce results.
- In favor of affordable housing overlay but not as spot zoning.
- Feels the City doesn't have enough staff capacity to implement all of the proposed Housing Element programs. There is a long wait time for processing applications for ADUs. Need dedicated housing staff.
- Maybe strategy for projecting ADUs can be to project numbers annually – make more specific – year 2, year 3, etc.
- Can the parcel assemblage program work in conjunction with overlay zoning?
- They have done lot consolidation on hillside sites. There was an example of this from the previous Planning Commission meeting.

- Should spend time justifying the ADU projection number.
- Have demolitions of affordable units been an issue in South Pasadena?
- What the EIR is evaluating is a moving target, can't really finish the analysis yet.
- Please post the PowerPoint for this meeting.
- Need to get the word out to the public that the comment period is coming.
- History and context information in the Housing Element will be very helpful.
- There should be more aggressive publicity about the ADU amnesty program.
- Supportive housing for those with disabilities is needed.

October 12, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on October 12, 2021. The meeting focused on the release of the 2021-2029 public review Draft General Plan Housing Element. Public comments included:

- 95% realistic capacity because of density bonus?
- No analysis of inclusionary housing regulations?
- ADU projection numbers are too high

The following summarizes the input and questions from the Planning Commission:

- Which programs are state mandates, which are continuing from previous Housing Element? Please present this at the Oct 21st community workshop.
- Asked for clarification on state requirements regarding Senate Bill 9
- Asked for more context for regarding the level of input sought from the community at this point in the process.
- Need to explain RHNA and why the number is high.
- The Planning Commission requested an informational update at their Nov 9th meeting, including HCD comments if possible.

November 9, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on November 9, 2021. Four members of the public commented. These comments included:

- The City should have a requirement to hire local skilled workforce – both for reducing environmental/AQ/VMT impacts and for local jobs. The City of Hayward recently put this type of policy/requirement in place.
- Is the City applying for any state funding programs mentioned in the Housing Element programs?
- The ADU projection numbers are wildly optimistic.

The following summarizes the input and questions from the Planning Commission:

- Projected ADUs are only 20% of City's RHNA

- Is more than 50% of lower income RHNA being accommodated on non-vacant sites?
- Are there regional or nearby examples of projects - could any of that analysis or examples be strengthened/added to?
- The majority of the Planning Commission expressed concerns over the public's potential reaction to the rezoning and density changes included in the Draft, as well as the potential confusion about what the City is doing.
- Suggested strengthening the information in the water quality section of the Assessment of Fair Housing
- Asked for clarification about ADU track record information in the draft
- Could a program be added to close the gap between planning approvals and building permits?
- Could a program be added to work with prospective ADU applicants – ombudsman/mentor/technical assistance?
- Staffing and staff retention are critical to implementing the Housing Element programs
- Understand based on analysis presented earlier in the Housing Element project that the densities/units assumed in the HE will lead to bulkier buildings with smaller units if there is no density bonus/height increase for the project
- For rezoning, would be helpful to know what percent of the City will require rezoning?
- Agrees with public comment re: local skilled workforce and VMT reduction. Would be good for South Pasadena to have a local workforce requirement.
- Suggested more public outreach, with an emphasis on going to the people, and enhancing the site maps.
- What about the Caltrans housing?
- Some cities are fighting the RHNA
- Many of the regulations from the state in the Housing Element are impossible to meet
- Are many SCAG jurisdictions going to be in compliance?
- Sites maps could be better, add a legend/key. Note whether a site is vacant or non-vacant.
- Thinks the City has been doing a good job of getting the word out to the public about the project

November 17, 2021

City staff presented to the City Council on the public draft Housing Element at their meeting on November 17, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the City Council:

- Does the Monterey Road site (Site #3 in Appendix A) have an approved project?
- Ostrich Farm sites – what input has been received from property owners.
- Asked about the Carrow's site.
- Can the densities proposed in the draft fit within the 45 foot height limit?
- When will the aggressive ADU amnesty program happen?
- Is the City considering objective design standards to implement SB 9?
- Could SB 10 apply to only one parcel?

- Impressed with staff and the outreach that has been done to property owners. Thinks they've gone a long way toward addressing any controversy in the community.
- Amazing that there was no public comment at this meeting.
- The RHNA formula was unfair to South Pasadena.
- The Executive Director of Move LA was concerned about the RHNA approach related to High Quality Transit Corridors (HQTCs). Communities don't want HQTCs identified in the future because they will receive higher RHNA numbers because of them.
- Staff and consultants – good job addressing this complex topic.

Written Public Comments

Received Prior to Public Draft

The City received the following written public comments prior to the release of the Public Draft Housing Element.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 9, 2020) expressed concern over staff report indication that City does not currently allow ADUs within the Mission Street Specific Plan area. Mr. Gelfand noted that such a policy is unlawful, citing State code, GC 65852.2.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 13, 2020) expressed satisfaction with the recent Planning Commission meeting where the City Attorney confirmed that the City is required to allow ADUs in the Mission Street Specific Plan's Districts that allow residential uses. Mr. Gelfand stated that during a Planning Commission meeting, staff suggested the definition of 'public transit', under the state ADU law, is limited to major transit stops. Mr. Gelfand states that this is not true and provided a citation for ADU state law, Gov Code 65852.2(j)(10). Mr. Gelfand states that the City does not have a parking problem, it has a "driving problem". Mr. Gelfand believes that reducing parking will actually alleviate traffic. Mr. Gelfand states that parking is meaningless in consideration of citywide. high access to transit. Mr. Gelfand states that the City's proposal to count 1,000 ADU units toward its RHNA allocation is preposterous; however, the City's plan to incentivize ADU development is taken seriously. They feel it will result in a modest increase in ADU production.

Leonora Camner, Executive Director of Abundant Housing LA, and Anthony Dedousis, Director of Policy and Research of Abundant Housing LA, regarding Preliminary Sites Analysis from the July 21, 2020 Planning Commission Agenda Report (September 4, 2020). Ms. Camner and Mr. Dedousis identified major issues in the Preliminary Sites Analysis, including:

6. The report appears to treat new housing capacity (i.e. the potential for new housing) as equivalent to realistic housing production (i.e. actual new housing). This is incorrect; they are not the same thing.

7. The report contains extremely optimistic forecasts of future ADU production which are extremely unlikely to be achieved even with aggressive policies, based on recent development trends.

8. The Preliminary Sites Analysis for lower-income housing is unlikely to meet California's standards for affirmatively further fair housing.

9. By accommodating insufficient housing growth to meet the RHNA targets at each income level, the Preliminary Sites Analysis is likely to fall afoul of the No Net Loss requirement.

They conclude their letter noting that Abundant Housing LA (AHLA) published a detailed memo, "Requirements and Best Practices for Housing Element Updates: The Site Inventory", explaining the key legal requirements and AHLA's recommended best practices for housing element updates. They offer availability to discuss our concerns further, and offer recommendations for additional policies to incorporate into South Pasadena's Housing Element Update.

Dr. Josh Albrektson (via email to HCD, February 25, 2021) informed HCD that they would receive a letter from Abundant Housing LA, YIMBY Law, and others regarding South Pasadena's current Housing Elements plans. Dr. Albrektson claims the City is not following any of the rules in the HCD's June 10th memo. Dr. Albrektson states the City is going to HCD for a review soon, so Dr. Albrektson wanted to give HCD some local knowledge. Dr. Albrektson states that the City is passing an ADU ordinance that will make it harder to build ADUs. Dr. Albrektson states that in the fire zone, they will require all ADUs to be within 150 ft of the front property line, have sprinklers, and for all garage and structure conversions the parking lot must be replaced.

Dr Josh Albrektson (March 8, 2021) provides a list of six issues he identified as "illegal" in the preliminary draft Housing Element sections, referencing a Housing Element Memo he states the City does not comply with. Theses issues are:

1. Claiming a projection of 1,000 ADUs in the Housing Element.

2. Objective design standards versus subjective design guidelines for ADUs and what really qualifies as an objective standard.

3. It is illegal to backdate an ordinance or apply it to projects that have completed a pre-application checklist. This comment related to the City's inclusionary housing ordinance and the definition of "deemed complete."

4. Inclusionary units and density bonus cannot be used to count for RHNA units in the Housing Element. The analysis MUST use the base zoning.

5. The inclusionary housing ordinance will cause a significant drop in realistic development capacity.

6. AB 1505, regarding rental inclusionary housing, commenter provided a link to an HCD 2019 memo about this law.

Dr. Albrektson concludes with stating that South Pasadena will not produce a compliant Housing Element due to not following HCD's guidelines. Dr. Albrektson states that there are more reasons other than what he listed for which he predicts HCD will reject the City's draft element.

Abundant Housing LA (March 10, 2021) references a past 2020 letter the organization sent to the Mayor and identifies five concerns, some of which are carried forward from the 2020 letter, about the City's preliminary draft Housing Element sections. The five major concerns are:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its map of best candidate sites appears to include many sites where redevelopment is extremely unlikely.

2. Planning continues to make overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies.

3. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

4. Planning indicates that the proposed Inclusionary Housing Ordinance will help the City achieve its lower-income RHNA targets without a clear assurance that this ordinance will be accompanied by adequate zoning densities.

5. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

The organization provides recommendations for each identified concern for the City to consider.

Dr. Josh Albrektson (via email to HCD, April 12, 2021) introduced himself and summarized past public comments he has provided to the City about the Housing Element. Dr Albrektson indicates when he believed the City's actions were in conflict with State housing law and/or other guidance from HCD. The time frame of his comments range from July 2020 to April 2021.

Dr. Josh Albrektson (via email to HCD, April 13, 2021) presenting items he would like HCD to tell South Pasadena regarding its preliminary draft Housing Element sections. The list of points is below:

1. ADU estimates must be realistic.

2. A 10% Low and 10% VLI inclusionary housing requirement is a significant governmental constraint to housing and that must be accounted for in the realistic development capacity calculations.

3. Realistic development calculations must include factors like topography [and existing uses meaning that]...realistic development potential for these sites ...should be much less than 50%.

4. All sites included must be realistic. Sites that are currently leasing or have no owner affirmation or city sites that require replacements cannot be included in the sites inventory.

5. All sites included in vacant land list must actually be realistically able to be developed.

6. All sites must include a realistic number of possible affordable units.

7. Provided link to own sites inventory sheet

Dr. Albrektson provides additional information in the email that generally appeared to support his initial points above and offered some new ideas, listed below:

- Development limitations, including the City's height limits and inclusionary housing ordinance are impeding development.
- Market trends indicate multifamily development interest is low
- The City offers "representative project" examples that are dated (from 2005/2017) and would not comply with current laws and are therefore not representative.

- Using inclusionary units and state density bonus is not a substitute for appropriate zoning and is specifically outlawed. What this will actually do is make it so that almost all buildings can no longer be financially viable and nothing will get built in South Pasadena.

Andrew Jarnagin (April 28, 2021) describes what he identifies are three key issues with the City's 5th Cycle Housing Element that should be addressed in the 6th Cycle. These three issues are:

1. Encourage transit-oriented development in the downtown area

2. Remove barriers to affordable housing

3. Provide data to support policy and projections

Mr. Jarnagin offered additional comments for the City's Planning and Building Department. Mr. Jarnagin concludes with questions for the City related to its capacity to support meeting RHNA targets.

Dylan Casey, Executive Director of California Renters Legal Advocacy and Education Fund, (May 5, 2021) commented on the City's ADU ordinance. Mr. Casey states that the ordinance as currently proposed presents numerous conflicts with state ADU standards. Mr. Casey claims that if the Council fails to amend the ordinance to resolve these conflicts, South Pasadena would lose the ability to apply any development standards to ADU permits, and be forced to apply only the state minimum standards. Mr. Casey states that the proposed ordinance is in violation of Gov. Code Section 65852.2, as it would be more restrictive than is permitted under state law. Mr. Casey believes that the City should embrace ADU development and consider its benefits.

Anthony Dedousis, Director of Policy and Research at Abundant Housing LA, (via email to HCD, May 5, 2021), referenced two past letters (September 2020 and March 2021) submitted to City Planning. Mr. Dedousis notes that they have not received a response from City staff and City councilmembers.

Dr. Josh Albrektson (via email to HCD, May 20, 2021) sent information about inclusionary housing ordinance affordability levels recently passed by four different cities to provide a comparison demonstrating that South Pasadena's should be lower. The comparison cities were Pomona, Alhambra, Pasadena, and San Francisco.

Andrew Jarnagin (July 26, 2021) notes that he attended the May 26th, 2021 South Pasadena Planning Commission meeting and reported that HCD's review of the preliminary draft Housing Element sections was discussed in a positive light, which oversimplified the significant changes expected of the Housing Element in order to be in compliance. Mr. Jarnagin provided comments about HCD's informal review of the City's ADU projection and sites inventory. Mr. Jarnagin states that the South Pasadena community should be prepared for a non-compliant Housing Element from HCD. He believes that elected officials and residents must be presented realistic options for RHNA numbers to assess different approaches and determine policies that best align with local desires.

The Steering Committee Members of Our Future LA (September 14, 2021) provided feedback broken down into six focus areas. The focus areas are listed below along with the major topics within each focus area:

1. Protections – tenant protections including just cause eviction protections and enforcement, rent stabilization, tenants' right to counsel, strengthen permanent tenant education, and tenant anti-harassment protections.

2. Preservation – prioritize rezoning in high resource neighborhoods, don't include rent stabilized units in the sites inventory, implement no net loss laws, institute local programs and funding sources to preserve existing affordable housing.

3. Prioritization of Affordable Housing – value capture, create affordable housing on public land, 100% affordable housing overlays including for areas zoned R1.

4. Site Capacity Assessment – likelihood uses will discontinue, realistic capacity, report on progress towards 5th cycle RHNA, include a 15-30% buffer of sites.

5. Affirmatively Furthering Fair Housing – increase concentration of lower income households in areas where concentrations are currently low, reduce concentrations of lower income households in areas of noise or pollution, reduce noise and pollution, invest in historically disinvested areas including place-based strategies, analyze patterns of segregation and discrimination, prioritize site identification in high opportunity census tracts, identify funding and programs to ensure affordable units are built, solicit input on the housing element from all socioeconomic groups.

6. Forecasts of ADU Development – should use safe harbor methodology, provide for mid-cycle adjustments, use city-specific data to forecast affordability.

Our Future LA requested the opportunity to meet with the City to address their concerns in greater detail.

Comments Received on Public Draft

Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a

researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up

60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.

- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.

c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.

3. Accessory Dwelling Units
   a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
   b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
4. Zoning
   a. Allow residential to be built in areas that are zoned for commercial use.
   b. Allow flexibility in inclusionary zoning.
5. Better entitlement process and reducing barriers to development
   a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
   b. Reduce parking standards and eliminate parking minimums.
   c. Cap fees on all new housing.
   d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.

Revisions in Response to Comments on the Public Draft Housing Element

Comment: Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

- How addressed: The City's Inclusionary Housing Ordinance is mandatory for projects of a certain size, unlike the option to take advantage of state density bonus law. In addition, certain incentives are provided under the Inclusionary Housing Ordinance if applicants comply with objective design standards.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

- How addressed: The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

- How addressed: Additional information about the Inclusionary in-lieu fee study that the City has been conducting has been included in this draft in Section 6.4. Program 2.i in Section 6.8 commits the City monitoring the effectiveness of the Inclusionary Housing Ordinance annually and revising the ordinance if needed to improve its effectiveness at producing affordable housing units.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

- How addressed: ADU building permit approvals in the City continue to increase and permit processing times have decreased. No revisions have been made in response to this comment.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
    - How addressed: This type of program is required by the state for inclusion in the Housing Element. If any deed-restricted affordable housing is created during the planning period, the City will implement this program related to those units.
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
    - How addressed: Revisions have been made to Program 2.a to provide more certain timing for program actions.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
    - How addressed: No revisions have been made in response to this comment.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
    - How addressed: Comment noted.

- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
    - How addressed: According to LACDA, there were 10 vouchers in use in South Pasadena in 2021. Revisions were made to Program 2.d to increase outreach to encourage use of vouchers in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
    - How addressed: No revisions have been made in response to this comment.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
    - How addressed: Most of the sites included in the Housing Element that are proposed to received the Affordable Housing Overlay only allow lower densities currently. No revisions have been made in response to this comment.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
    - How addressed: Program 2.l has been substantially revised since the last draft of the Housing Element.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
    - How addressed: An additional incentive has been added to Program 3.d along with more detail about program timing and implementation.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
    - How addressed: The City processing time for ADUs has decreased in recent months. The applications received and building permits approved for ADUs has continued to increase substantially during 2021 and early 2022.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
    - How addressed: Comment noted.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
    - How addressed: Comment noted. The City has already made progress implementing Program 3.l which is noted via revisions to the program in this draft.

- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
    - How addressed: The City took action by urgency ordinance to establish objective standards for SB 9 in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. Revisions have been made to Program 3.m with this updated information.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.
    - How addressed: No revisions have been made in response to this comment.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

- How addressed: Refer to earlier response related to the Inclusionary Housing Ordinance.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

- How addressed: See earlier responses.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

- How addressed: The City Hall site has been removed from the sites inventory in this draft.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

    - How addressed: The City has continued to reach out to property owners about interest in development of sites in the inventory. Additional information has been added to Appendix A as applicable.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

    - How addressed: The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

    - How addressed: See earlier responses regarding ADU production.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

    - How addressed: Revisions have been made to Section 6.6 and Appendix E, however the City continues to rely on the SCAG affordability analysis as it is the best data available.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

    - How addressed: See earlier response regarding monitoring of the effectiveness of the Inclusionary Housing Ordinance.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

    - How addressed: Section 6.4 Fair Housing Assessment has been substantially revised since the last draft to address comments received and to address a new state law AB 1304 that went into effect since the previous draft was released.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

- How addressed: No revisions have been made in response to this comment.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
        - How addressed: Historic exclusionary practices occurred throughout South Pasadena. Rezoning to address housing needs will address all income categories and will take place in areas of the City that are high resource.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
        - How addressed: No revisions have been made in response to this comment. However, revisions have been made to Programs 1.c to address the need for tenant protection in addition to Program 1.d which was already included in the draft Housing Element.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
        - How addressed: The City's Inclusionary Housing Ordinance was adopted in 2021. Part of its intent is to create more homeownership opportunities for lower income residents or those who would like to become residents of South Pasadena who have historically been excluded. In addition, Program 5.c has been added to this draft to support inclusion and to remove racially restrictive covenants from property deeds citywide.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
        - How addressed: Zoning work called for in Program 3.a addresses this comment. Revisions have been made to that program and to Section 6.4 to address constraints associated with existing development standards.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
        - How addressed: The City is committed to complying with state no net loss statute and has included as many suitable sites as possible that can be analyzed to be adequate. The number of sites included in this draft exceeds the City's RHNA. Residential development will be allowed on a substantially larger number of sites once the General Plan, DTSP and associated zoning changes are complete.
    c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
        - How addressed: Housing regulations statewide and locally in South Pasadena have changed significantly in the last two years including related to ADUs and with the adoption of the Inclusionary Housing Ordinance. Basing likelihood of development for the 6th cycle on the 5th cycle housing unit development doesn't make sense in light of these changes.

3. Accessory Dwelling Units
    a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
        - How addressed: Programs 3.g and 3.h address this comment.
    b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
        - How addressed: Programs 3.g, 3.i, and 3.k address this comment.
4. Zoning
    a. Allow residential to be built in areas that are zoned for commercial use.
        - How addressed: Sites currently zoned for commercial use are proposed to receive the Affordable Housing Overlay or to have their base General Plan land use and zoning changed in order to address the City's RHNA.
    b. Allow flexibility in inclusionary zoning.
        - How addressed: The City's Inclusionary Housing Ordinance allows a variety of options depending on the project type and whether an applicant chooses to comply with the objective design standards in the ordinance.
5. Better entitlement process and reducing barriers to development
    a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
        - How addressed: The sites rezoned to address the lower-income RHNA as called for in Program 3.a of this Housing Element will allow projects with 20 percent affordable units ministerially. Other projects are eligible for ministerial review under state law.
    b. Reduce parking standards and eliminate parking minimums.
        - How addressed: Program 3.a calls for the city to evaluate parking requirements as part of the DTSP and zoning amendments to implement the Housing Element.
    c. Cap fees on all new housing.
        - How addressed: No revisions have been made in response to this comment.
    d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.
        - How addressed: No revisions have been made in response to this comment.

Appendix B

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Appendix C:
Letter to Property Owners

CITY OF SOUTH PASADENA

OFFICE OF THE PLANNING AND COMMUNITY DEVELOPMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: (626) 403-7210 ▪ FAX: (626) 403-7211
WWW.SOUTHPASADENACA.GOV

October 20, 2020

[PROPERTY OWNER NAME]
[PROPERTY OWNER ADDRESS LINE 1]
[PROPERTY OWNER ADDRESS LINE 2]

Re: 2021-2029 Housing Element Update

Dear Property Owner,

The City of South Pasadena (City) is in the process of updating its Housing Element of the General Plan as required by state law. The new Housing Element is intended to address the housing needs of current and future City residents. One of the requirements of the Housing Element is for the City to demonstrate that there is sufficient land to allow the development of a range housing types to include higher density multi-family units.

The City has identified the property at [PROPERTY ADDRESS], which our records indicate you own, as having the potential to be developed with higher density multi-family units. A development with up to 30 units per acre is already allowed in this location either under current zoning or would allowed by the draft General Plan and Downtown Specific Plan, currently undergoing community input and anticipated for adoption in mid-2021. One of the options the community will consider through ongoing outreach is whether to allow increasing the height or density on specific sites or in certain areas of the City to accommodate more affordable housing.

The City would like your input regarding the future of your property.

- ☐ **Are you interested in new residential development at [PROPERTY ADDRESS] within the next 3-8 years?**
  - **If yes:**
    - **Have you already begun to explore this possibility?**
    - **Have you considered a particular type of project?**
    - **Have you considered developing the property with affordable units?**
    - **Would an increase in height or density change your perspective?**
- ☐ **Do you have any concerns about your property being identified for potential housing development in the Housing Element?**

We look forward to your input to ensure we develop the most accurate and feasible plan for our housing future. Please send us an email at HousingElement@SouthPasadenaCA.gov to provide us with your feedback by November 3, 2020, so that we can complete our Housing Element update effort. If you have any questions or comments please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development at MLin@SouthPasadenaCA.gov or (626) 403-7236.

Sincerely,

Joanna Hankamer
Director of Planning and Community Development

Appendix D:
Qualified Entities

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
FRESNO	Fresno Housing Authority	P.O. Box 11985	Fresno	CA	93776	(559) 443-8475	Edward Stacy	ned@pacbell.net	(559) 445-898	Local, regional, national nonprofit org.		6/14/17	12/16/98
ALL COUNTIES	American Baptist Homes of the	6120 Stoneridge Mall Road, 3rd F	Pleasanton	CA	94588	(925) 924-7162	Ancel Romero		(925) 924-723	Local, regional, national public agenc	X	8/14/14	12/22/98
ALAMEDA	Housing Authority of City of Alar	701 Atlantic Ave	Alameda	CA	94501	(510) 747-4300	Denise Connors	dconnors@alamedahsg.org	(510) 522-784	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of the City of	3203 Leahy Way	Livermore	CA	94550	(925) 447-3600	Jon D. Hovey	livhsg@prodigy.net	(925) 447-094	Local, regional, national nonprofit org	X	8/14/14	12/23/98
ALAMEDA	Housing Authority of County of A	22941 Atherton St	Hayward	CA	94541	(510) 538-8876	√	obasgal@aol.com	(510) 727-855	Local, regional, national nonprofit org.			12/23/98
ALL COUNTIES	USA Properties Fund	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Jesse Slansky		(323) 650-474	Local, regional, national public agenc	X	12/13/13	12/23/98
CONTRA COSTA	Rubicon Programs, Inc.	2500 Bissell Ave	Richmond	CA	90804	(510) 235-1516	Tom Matthews	TomM@Rubiconpgms.org	(510) 235-202	Local, regional, national nonprofit org.		6/5/17	12/23/98
KERN	Golden Empire Affordable Hous	3600 CheSte.r Ave. Ste. B	Bakersfield	CA	93301	(805) 633-1533	Gary Kammer		(805) 633-161	Local, regional, national nonprofit org.		6/14/17	12/23/98
LAKE	Lake County Housing Services I	255 N. Forbes St.	Lakeport	CA	95453	(707) 263-2510	Linda Hedstrom	linda_h@co.lake.ca.us	(707) 263-275	Local, regional, national nonprofit org.		6/14/17	12/23/98
LOS ANGELES	West Hollywood Community Ho	7530 Santa Monica Blvd, Suite 1	West Hollywood	CA	90046	(323) 650-8771	Robin Conerly	robin@whchc.org	(323) 650-474	Local, regional, public agency	X	8/14/14	12/23/98
LOS ANGELES	City of Pomona Housing Authori	505 South Garey Ave	Pomona	CA	91766	(909) 620-2368	Benita DeFrank, Neighborhood Services Director		(909) 620-370	Local, regional, national nonprofit org	X	6/14/17	12/23/98
LOS ANGELES	Hollywood Community Housing	1726 N. Whitley Ave	Hollywood	CA	90028	(323) 469-0710	Christina V. Duncan		(323) 469-189	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Hope - Net	760 S. Westmoreland Ave	Los Angeles	CA	90005	(213) 389-9949	Canoace Whalen	hope-net@pacbell.net	(213) 389-009	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	Skid Row Housing Trust	1317 E. 7th St	Los Angeles	CA	90021	(213) 683-0522	Jim Bonar		(213) 683-078	Local, regional, national nonprofit org	X		12/23/98
LOS ANGELES	The Long Beach Housing Devel	333 W. Ocean Blvd., 2nd Flr	Long Beach	CA	90802	(562) 570-6926	Diana V. McNeel		(562)570-674	Local, regional, national nonprofit org	X		12/23/98
MARIN	Housing Authority of the County	4020 Civic Center Drive	San Rafael	CA	94903	(415) 491-2530	Anna Semenova	ASemenova@marinhousing.org	(415) 491-253	Local, regional, national nonprofit org	X	2/26/14	12/23/98
MARIN	Canal Community Alliance	91 Larkspur St	San Rafael	CA	94901	(415) 454-2640	Tom Wilson	canalca@aol.com	(415) 454-396	Local, regional, national nonprofit org	X		12/23/98
ORANGE	Neighborhood Housing Services	350 Hillcrest	La Habra	CA	90631	(562) 694-2051	Diane Ste.wart	nhs@aol.com	(562) 694-205	Local, regional, national nonprofit org	X		12/23/98
SAN DIEGO	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN DIEGO	San Diego Housing Commissior	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7555	Dottie Pierce	dottiep@sdhc.org	(619) 578-736	Local, regional, national nonprofit org	X	8/14/14	12/23/98
SAN DIEGO COU	Housing Development Partners	1122 Broadway, Suite 300	San Diego	CA	92101	(619) 578-7590	Dottie Pierce	dottiep@sdhc.org	(619) 578-735	Local, regional, national nonprofit org	X	2/26/14	12/23/98
SAN FRANCISCO	Tenderloin Neighborhood Devel	201 Eddy St	San Francisco	CA	94102	(415) 776-2151	Don Falk	tndc@ix-netcom.com	(415) 776-395	Local, regional, national nonprofit org	X		12/23/98
SAN JOAQUIN	Stockton Shelter for the Homele	P.O. Box 4803	Stockton	CA	95204	(209) 465-3612	Bill Mendelson		(209) 943-480	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Cambrian Center, Inc.	2360 Samaritan Place	San Jose	CA	95124	(408) 559-0330	Dale J. Harrington	dale2360@ix.netcom.com	(408) 377-047	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Charities Housing Development	195 East San Fernando St	San Jose	CA	95112	(408) 282-1125	Chris Block	chblock@aol.com	(408) 282-113	Local, regional, national nonprofit org	X		12/23/98
SANTA CLARA	Palo Alto Senior Housing Projec	455 E. Charleston Rd	Palo Alto	CA	94306	(650) 494-1944	Genie Dee	gxdee@california.com	(650) 493-743	Local, regional, national nonprofit org	X		12/23/98
SONOMA	Burbank Housing Development	3432 Mendocino Ave	Santa Rosa	CA	95403	(707) 526-9782	John Lowry	burbank@sonic.net	(707) 526-981	Local, regional, national nonprofit org	X		12/23/98
ALAMEDA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702		Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/9/17	12/24/98
ALL COUNTIES	Resources for Community Deve	2220 Oxford St	Berkeley	CA	94704	(510) 841-4410	Dan Sawislak	dsawislak@rcdhousing.org	(510) 548-350	Local, regional, national nonprofit org	X	6/5/17	12/24/98
ALPINE	Amador-Tuolumne Community A	935 South State Highway 49	Jackson	CA	95642	(209) 223-1485 E	Raj Rambob	rrambob@atcaa.org	(209) 223-417	Local, regional, national public agenc	X	5/24/17	12/24/98
CALAVERAS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
COLUSA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
CONTRA COSTA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	East Bay NHS	2320 Cutting Blvd	Richmond	CA	94804	(510) 237-6459			(510) 237-648	Local, regional, national nonprofit org	X	9/27/10	12/24/98
CONTRA COSTA	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
CONTRA COSTA	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
EL DORADO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
FRESNO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
FRESNO	Better Opportunities Builder, Inc	P.O. Box 11863	Fresno	CA	93775	(559) 443-8400	Tracewell Hanrahan	nandersen@bobinc.org	(559) 443-849	Local, regional, national nonprofit org	X	8/14/14	12/24/98
GLENN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
KERN	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
KINGS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
LASSEN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98
LOS ANGELES	Housing Authority of the City of	2500 Wilshire Blvd, PHA	Los Angeles	CA	90057	(213) 252-4269	Larry Goins			Local, regional, national public agenc	X	3/3/11	12/24/98
LOS ANGELES	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
MADERA	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MADERA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIN	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit org	X		12/24/98
MARIPOSA	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org	X	4/10/18	12/24/98
MERCED	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit org	X	9/27/10	12/24/98
MERCED	Eskaton Properties Inc.	5105 Manzanita Ave.	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit org	X	5/24/17	12/24/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
MERCED	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
MONTEREY	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
MONTEREY	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
MONTEREY	South County Housing, Inc.	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
NAPA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
ORANGE	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
ORANGE	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
PLACER	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
PLACER	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
PLACER	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
RIVERSIDE	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Bill Bolstad		(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
RIVERSIDE	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SACRAMENTO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SACRAMENTO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SACRAMENTO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN BENITO	South County Housing, Inc.	7455 Carmel St.	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SAN BERNARDIN	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN BERNARDIN	Neighborhood Housing Services	1390 North D St	San Bernardino	CA	92405	(909) 884-6891	Edward Moncrief	edward@nhsie.org	(909) 884-6893		X		12/24/98
SAN DIEGO	St. Vincent de Paul Village	3350 E St	San Diego	CA	92102	(619) 687-1029	Harvey Mandel	hmandel@neighbor.org	(619) 687-101	Local, regional, national nonprofit orc	X	8/14/14	12/24/98
SAN DIEGO	Civic Center Barrio Housing Cor	1665 E. 4th St, Ste. 210	Santa Ana	CA	92701	(714) 835-0406	Helen Brown	ccbhc@msn.com	(714) 835-735	Local, regional, national public agenc	X		12/24/98
SAN FRANCISCC	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN JOAQUIN	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SAN JOAQUIN	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SAN MATEO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SAN MATEO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SAN MATEO	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CLARA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	Palo Alto Housing Corp	725 Alma St	Palo Alto	CA	94301	(650) 321-9709	Marlene H. Prendergast		(650) 321-434	Local, regional, national nonprofit orc	X		12/24/98
SANTA CLARA	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SANTA CRUZ	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SANTA CRUZ	South County Housing, Inc	7455 Carmel St	Gilroy	CA	95020	(408) 842-9181	Jan Lindenthal	jan@scounty.com	(408) 842-027	Local, regional, national nonprofit orc	X		12/24/98
SISKIYOU	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
SOLANO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
SOLANO	Mid-Peninsula Housing Coalitior	303 Vintage Park Drive, #250	Foster City	CA	94404	(650) 356-2900			(650) 357-976	Local, regional, national public agenc	X	8/14/14	12/24/98
SOLANO	Affordable Housing Associates	1250 Addison St., Ste. G	Berkeley	CA	94702	(510) 649-8500	Susan Friedlow		(510) 649-031	Local, regional, national nonprofit org.		5/24/17	12/24/98
SOLANO	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
SONOMA	Affordable Housing Foundation	P.O. Box 26516	San Francisco	CA	94126	(415) 387-7834	Eric Tang	etloanmach@aol.com	(415) 752-990	Local, regional, national nonprofit orc	X		12/24/98
STANISLAUS	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
STANISLAUS	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TULARE	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit orc	X	4/10/18	12/24/98
TUOLUMNE	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
VENTURA	Century Housing Corporation	1000 Corporate Pointe	Culver City	CA	90230	(310) 642-2007	Ronald A. Griffith		(310) 258-071	Local, regional, national public agenc	X	8/14/14	12/24/98
YOLO	ACLC, Inc	315 N San Joaquin St	Stockton	CA	95202	(209) 466-6811			(209) 466-346	Local, regional, national nonprofit orc	X	9/27/10	12/24/98
YOLO	Eskaton Properties Inc.	5105 Manzanita Ave	Carmichael	CA	95608	(916) 334-0810	Courtney Tatum, Kat	courtney.tatum@eskaton.org	(916) 338-124	Local, regional, national nonprofit orc	X	5/24/17	12/24/98
ALL COUNTIES	BRIDGE Housing Corporation	345 Spear Strett, Suite 700	San Francisco	CA	94105	(415) 989-1111	Brad Wiblin		(415) 495-489	Local, regional, national public agenc	X	12/24/10	12/28/98
AMADOR	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CALAVERAS	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
COLUSA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
CONTRA COSTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
EL DORADO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
GLENN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
LOS ANGELES	FAME Corporation	1968 W. Adams Blvd.	Los Angeles	CA	90018	(323) 730-7727	Sandra Hernandez	sandrah@famecorporations.org	(323) 737-571	Local, regional, national nonprofit org	X	8/14/14	12/28/98
NAPA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
NEVADA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
PLACER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SACRAMENTO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SAN JOAQUIN	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SHASTA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
SUTTER	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
TEHAMA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YOLO	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
YUBA	Rural California Housing Corp	3120 Freeboard Drive, Suite 201	West Sacramento	CA	95691	(916) 414-4436				Local, regional, national public agenc	X	8/14/14	12/28/98
RIVERSIDE	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SACRAMENTO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
SAN BERNARDIN	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SAN FRANCISCC	BUILD Leadership Development	1280 Bison, Ste. B9-200	Newport Beach	CA	92660	(949) 720-7044	Tracy Green	tlg-build@msn.com	(949) 720-743	Local, regional, national nonprofit org	X		12/29/98
SOLANO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
YOLO	Sacramento Valley Organizing C	3263 1st Ave	Sacramento	CA	95817	(916) 457-0245	Larry Ferlazzo	scocl@pacbell.net	(916) 457-020	Local, regional, national nonprofit org	X		12/29/98
ALL COUNTIES	Foundation for Affordable Housi	384 Forest Ave., Suite 14	Laguna Beach	CA	92651	(949) 443-9101	Darrin Willard		(949) 443-913	Local, regional, national nonprofit org	X	8/14/14	12/30/98
BUTTE	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
GLENN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
LASSEN	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
PLUMAS	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SHASTA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
SUTTER	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
TEHAMA	Community Housing Improveme	1001 Willow St	Chico	CA	95928	(530) 891-6931	Kris Zappettini	chip@sunset.net	(530) 891-854	Local, regional, national nonprofit org	X	8/14/14	12/30/98
ALAMEDA	East Bay Asian Local Developm	310 Eighth Street, Ste. 200	Oakland	CA	94607		Lynette Jung Lee	ljunglee@ebaldc.com	(510) 763-414	Local, regional, national nonprofit org.		5/9/17	1/5/99
CONTRA COSTA	East Bay Asian Local Developm	310 Eighth Street, Suite 200	Oakland	CA	94607	(510) 287-5353			(510) 763-414	Local, regional, national nonprofit org.		6/5/17	1/5/99
FRESNO	Fresno Co. Economic Opportun	3120 W. Nielsen Ave., Ste. 102	Fresno	CA	93706	(559) 485-3733	George Egawa	eocnlsn@psnw.com	(559) 485-373	Local, regional, national nonprofit org.		6/14/17	1/5/99
SOLANO	Fairfield Redevelopment Agency	1000 WebSte.r St., 2nd Floor	Fairfield	CA	94533	(707) 428-7688	Lark Solis	lsolis@ci.fairfield.ca	(707) 428-762	Local, regional, national nonprofit org	X		1/5/99
EL DORADO	El Dorado County Housing Auth	937 Spring St	Placerville	CA	95667	(530) 621-6167	Joyce Aldrich	jaldrich@innercite.com		Local, regional, national nonprofit org.		6/14/17	1/6/99
LOS ANGELES	American Family Housing	15161 Jackson St.	Midway City	CA	92655	(714) 897-3221	Donna Gallup	info@compuall.net	(714) 893-685	Local, regional, national nonprofit org	X	1/5/17	1/6/99
SAN FRANCISCC	Bernal Heights Neighborhood C	515 Cortland Ave	San Francisco	CA	94110	(415) 206-2140	Housing Director		(415) 648-079	Local, regional, national nonprofit org	X		1/6/99
SAN FRANCISCC	Mission Housing Development C	474 Valencia St, Ste. 280	San Francisco	CA	94103	(415) 864-6432	Philip Dockow		(415) 864-037	Local, regional, national nonprofit org	X		1/8/99
STANISLAUS	Modesto Redevelopment Agenc	940 11th St	Modesto	CA	95355	(209) 577-5247	Bill Cooper	bcooper@ci.modesto.ca.us	(209) 544-398	Local, regional, national nonprofit org	X		1/8/99
SAN FRANCISCC	Chinatown Community Develop	1525 Grant Ave	San Francisco	CA	94133	(415) 984-1450	Joanne Lee	cchd@hooked.net	(415) 984-149	Local, regional, national nonprofit org	X		1/11/99
ALL COUNTIES	The Trinity Housing Foundation	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	2/26/14	1/12/99
LOS ANGELES	The Long Beach Housing Devel	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	PICO Union Housing Corporatio	1038 Venice Blvd.	Los Angeles	CA	90015	(213) 747-2790	Jesus Torres	jtorres@puhc.org	(213) 743-381	Local, regional, national nonprofit org	X	8/14/14	1/12/99
VENTURA	A Community of Friends	836 Avalon Ave	Lafayette	CA	94549	(925) 385-0754	Bill Leone	bleone@apr.com	(925) 215-240	Local, regional, national public agenc	X	6/14/12	1/12/99
LOS ANGELES	Korean Youth & Community Cer	680 S. Wilton Place	Los Angeles	CA	90005	(213) 365-7400	Jimmy Lee		(213) 353-128	Local, regional, national nonprofit org	X		1/19/99
CONTRA COSTA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	tomlf@earthlink.net	(925) 439-083	Local, regional, national nonprofit org	X	6/5/17	1/21/99
IMPERIAL	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
RIVERSIDE	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN BERNARDIN	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SAN DIEGO	Coachella Valley Housing Coalit	45-701 Monroe St, Ste. G., Plaza	Indio	CA	92201	(760) 347-3157	Emilia Mojica	Emojica@cvhc.org	(760) 342-646	Local, regional, national nonprofit org	X	6/14/17	1/21/99
SOLANO	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	Pacomseru@aol.cn	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
SONOMA	Pacific Community Services, Inc	329 Railroad Ave, P.O. Box 1397	Pittsburg	CA	94565	(925) 439-1056	Tom LaFleur	pacomseru@aol.com	(925) 439-083	Local, regional, national nonprofit org	X		1/21/99
ALAMEDA	Community and Economic Deve	250 Frank H. Ogawa Plaza Ste. 5	Oakland	CA	94612	(510) 238-3502	Jefferey P. Levin	jplevin@oaklandnet.com	(510) 238-369	Local, regional, national nonprofit org.		5/9/17	1/27/99
ALAMEDA	Bay Area Community Services	629 Oakland Ave	Oakland	CA	94611	(510) 499-0365	Daniel Cooperman	dcooperman@bayareacs.org	(510) 569-458	Local, regional, national nonprofit org	X	5/9/17	1/28/99
ALL COUNTIES	National Community Renaissan	9421 Haven Avenue	Rancho Cucamor	CA	91730	(909) 204-3508	Tracey Williams	twilliams@nationalcore.org	(909) 483-652	Local, regional, national public agenc	X	5/24/17	5/17/99
ALL COUNTIES	Community Housing Assistance	3803 E. Casselle Ave	Orange	CA	92869		Ken Robertson	chapahq1@aol.com	(714) 744-685	Local, regional, national public agenc	X	8/14/14	5/18/99
CONTRA COSTA	Community Housing Developme	1535 Fred Jackson Way ste A	Richmond	CA	94801	(510) 412-9290	Donald Gilmore	Dgilmore@chdcnr.com	(510) 215-927	Local, regional, national nonprofit org	X	5/24/17	5/19/99
DEL NORTE	Redwood Community Action Ag	904 G St.	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
HUMBOLDT	Redwood Community Action Ag	904 G St	Eureka	CA	95501	(707) 269-2021	Bill Rodstrom	planning@rcaa.org		Local, regional, national nonprofit org	X	8/14/14	5/19/99
LOS ANGELES	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
MONTEREY	Peoples' Self-Help Housing Cor	3533 Empleo St	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ORANGE	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN BENITO	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	http://www.pshh.org/	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SAN DIEGO	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SAN DIEGO	Bayview CDC	5100 Federal Blvd, 2nd Floor	San Diego	CA	92105	(619) 262-8403	Stasi Williams		(619) 262-783	Local, regional, national nonprofit org	X		5/19/99
SAN LUIS OBISP	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
SANTA BARBAR	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	x	9/26/08	5/19/99
SANTA BARBAR	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
VENTURA	Long Beach Affordable Housing	5855 Naples Plaza, Suite 209	Long Beach	CA	90803	(562) 434-3333	H. Kim Huntley		(562) 434-333	Local, regional, national public agenc	X	9/26/08	5/19/99
VENTURA	Peoples' Self-Help Housing Cor	3533 Empleo St.	San Luis Obispo	CA	93401	(805) 540-2452	John Fowler	admin@pshhc.org	(805) 544-190	Local, regional, national nonprofit org	X	8/14/14	5/19/99
ALL COUNTIES	DML & Associates Foundation	6043 Tampa Ave, Ste. 101A	Tarzana	CA	91356	(818) 708-2710	Myron Lieberman		(818) 708-194	Local, regional, national nonprofit org.		5/23/17	5/21/99
ALL COUNTIES	EAH, Inc.	22 Pelican Way	San Rafael	CA	94901	(415) 599-2712	Scott Johnson	scott.johnson@eahhousing.org	(415) 453-368	Local, regional, national public agenc	X	5/23/18	5/21/99
ALAMEDA	Satellite Affordable Housing Ass	1835 Alcatraz Ave.	Berkeley	CA	94703	(510) 647-0700	Susan Friedland	Susanfriedland@sahahomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700			(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
CONTRA COSTA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
KERN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
NAPA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
ORANGE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
RIVERSIDE	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
RIVERSIDE	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SACRAMENTO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SACRAMENTO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN BERNARDIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN DIEGO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN FRANCISCO	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SAN FRANCISCO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN JOAQUIN	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SAN MATEO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA BARBAR	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
SANTA CLARA	Satellite Housing Inc.	2526 Martin Luther King., Jr Way	Berkeley	CA	94704	(510) 647-0700	Susan Friedland,	staff@sathomes.org	(510) 647-082	Local, regional, national nonprofit org	X	2/26/14	6/10/99
SOLANO	Anka Behavioral Health	1850 Gateway Blvd., Suite 900	Concord	CA	94520	(925) 825-4700		zzcheap@aol.com	(925) 825-261	Local, regional, national nonprofit org	X	9/27/10	6/10/99
SOLANO	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
STANISLAUS	Housing Authority of the County	P.O. Box 581918	Modesto	CA	95358	(209) 523-0705	Rich Chubon	Rchubon@stancoha.net	(209) 522-863	Local, regional, national nonprofit org	X		6/10/99
VENTURA	Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	CA	92677	(323) 726-9672	Carol Cromar	hcaccromar@dessretonline.com		Local, regional, national public agency		6/14/17	6/10/99
LOS ANGELES	Abode Communities	701 E. Third St., Ste. 400	Los Angeles	CA	90015	(213) 629-2702	Holly Benson		(213) 627-640	Local, regional, national public agenc	X	8/14/14	3/9/00
ALL COUNTIES	University River Village	7901 La Riviera Drive	Sacramento	CA	95826	(916) 381-2001	Kaci Walsh		(916) 381-732	Local, regional, national public agency		5/10/17	6/1/00
ALL COUNTIES	National Affordable Housing Tru	2335 North Bank Drive	Columbus	OH	43220	(614) 451-9929	Robert Snow	bsnow@naht.org	(614) 451-337	Local, regional, national public agency		5/24/17	6/1/00
SAN DIEGO	San Diego Co. Dept. of Housing	3989 Ruffin Road	San Diego	CA	92123	(858) 694-4805	Alfredo Ybarra	aybarrcd@co.san-diego.ca.us	(858) 694-487	Local, regional, national nonprofit org	X		9/19/00
ALL COUNTIES	California Housing Partnership C	369 Pine Street, Suite 300	San Francisco	CA	94104	(415) 433-6804	Matt Schwartz	mschwartz@chp.net	(415) 433-680	Local, regional, public agency	X	8/14/14	10/23/00
ALL COUNTIES	Solari Enterprises, Inc.	1544 W. Yale Ave	Orange	CA	92687	(714) 282-2520	Bruce Solari	solari@solari-ent.com	(714) 282-252	Profit-motivated individual or organization		5/24/17	12/29/00
LOS ANGELES	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
RIVERSIDE	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
SAN BERNARDIN	Southern California Presbyterian	516 Burchett St	Glendale	CA	91203	(818) 247-0420	Jacqueline A Seegobm		(818) 247-042	Local, regional, national public agenc	X	8/14/14	12/29/00
ALL COUNTIES	Mercy Housing, Inc.	1999 Broadway, Suite 1000	Denver	CO	80202	303-830-3300	Janet Gaf	info@mercyhousing.org	(303) 830-330	Local, regional, national public agency		5/24/17	1/17/01
ALL COUNTIES	California Community Reinvestn	100 West Broadway Ste. 1000	Glendale	CA	91210	818-844-4951	David Saltzman	david.saltzman@e-ccrc.org	(818) 550-980	Local, regional, national nonprofit org	X	5/23/17	1/18/01
FRESNO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
KERN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
LOS ANGELES	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
RIVERSIDE	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN BERNARDIN	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
SAN DIEGO	The East Los Angeles Commun	1248 Goodrich Blvd.	Los Angeles	CA	90022	(323) 838-8556	Jasmine Borrego	trmreception@telacu.com	(323) 838-054	Local, regional, national public agenc	X	8/14/14	1/29/01
ALAMEDA	Christian Church Homes of Nort	303 Hegenberger Road, Ste. 201	Oakland	CA	94621	(510) 632-6712	William F. Pickel	bpickel@cchnc.org	(510) 632-675	Local, regional, national public agency		5/9/17	2/6/01
ALL COUNTIES	Goldrich & Kest Industries, LLC	5150 Overland Avenue	Culver City	CA	90230	(310) 204-2050	Carole Glodney	Carole@Gkind.com	(310) 280-576	Profit-motivated individual or organiz	X	8/14/14	4/25/01
LOS ANGELES	LTSC Community Development	231 East Third Street, Ste. G 106	Los Angeles	CA	90013	(213) 473-1606	Takao Suzuki	tsuzuki@ltsc.org	(213) 473-168	Local, regional, national nonprofit org	X	8/14/14	4/25/01
ALL COUNTIES	East Los Angeles Community C	530 South Boyle Avenue	Los Angeles	CA	90033	(323) 269-4214	Ernesto Espinoza		(323) 261-106	Local, regional, national nonprofit org	X	12/24/10	7/13/01
LOS ANGELES	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
ORANGE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
RIVERSIDE	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN BERNARDIN	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SAN DIEGO	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SANTA BARBAR	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
VENTURA	Nexus for Affordable Housing	1572 N. Main Street	Orange	CA	92867	(714) 282-2520	Bruce Solari	bruce@solari-ent.com	(714) 282-252	Local, regional, national nonprofit org	X	8/14/14	7/13/01
SACRAMENTO	Norwood Family Housing	630 I Street, Second Floor	Sacramento	CA	95814	(916) 440-1328	Darren Bobrowsky	dbobrowsky@shra.org	(916) 442-673	Local, regional, national nonprofit org	X		1/9/02
ALL COUNTIES	Bayside Communities	1990 North California Blvd., Ste. 1	Walnut Creek	CA	94596	(925) 482-9406	Basil Rallis	brallis@baysidecommunities.com	(510) 891-900	Profit-motivated individual or organiz	X	5/10/17	9/10/02
ALL COUNTIES	Newport Development, LLC	9 Cushing, Ste. 200	Irvine	CA	92618	(949) 923-7812	Warren Allen	wallen@newportpartners.com	(949) 585-044	Profit-motivated individual or organiz	X	5/24/17	9/10/02
ALL COUNTIES	Mercy Housing California	1360 Mission St., Suite 300	San Francisco	CA	94103	213-743-5830	Ed Holder	eholder@mercyhousing.org	(415) 553-637	Local, regional, national nonprofit org	X	5/24/17	12/9/02
ALL COUNTIES	KDF Communities, LLC	1301 Dove St., Suite 720	Newport Beach	CA	92660	(949) 622-1888	John Bernard		(949) 851-181	Profit-motivated individual or organization		5/23/17	12/13/02
SONOMA	Divine Senior Apartments	P.O. Box 148	Occidental	CA	95465	(707) 874-3538	Richard W. Blanz		(707) 874-353	Local, regional, national nonprofit org	X		5/29/03
ALL COUNTIES	California Human Development	3315 Airway Drive	Santa Rosa	CA	95403	(707) 521-4788	John M. Way	CaliforniaHumanDevelopment.org	(707) 523-377	Local, regional, national nonprofit org	X	8/14/14	6/30/03
ALL COUNTIES	Reiner Communities LLC	100 Spectrum Center Dr. Suite 83	Irvine	CA	92618	(949) 753-0555	Dylan Feliciano	df@reinerllc.com		Profit-motivated individual or organiz	X	5/16/17	6/30/03
ALL COUNTIES	Petaluma Ecumenical Properties	1400 Caulfield Lane	Petaluma	CA	94954	(707) 762-2336	Vera R. Ciammetti	pep@pephousing.org	(707) 762-465	Local, regional, national nonprofit org.		5/10/17	8/19/03
ALL COUNTIES	The John Stewert Company	1388 Sutter St., 11th Floor	San Francisco	CA	94109	(415) 345-4400	Margaret Miller	mmiller@jsw.net	(415) 614-917	State-wide, for-profit	X	5/24/17	8/19/03
ALL COUNTIES	William G. Ayyad, Inc.	9252 Chesepeake Dr., Suite 100	San Diego	CA	92123	(858) 244-0900 *	Rebecca Ayyad	rayyad@udgi.net	(858) 244-090	Profit-motivated individual or organization		5/24/17	8/19/03
MENDOCINO	CDC of Mendocino County	1076 North State Street	Ukiah	CA	95482	(707) 463-5462	Todd Crabtree	crabtret@cdchousing.org	(707) 463-418	Public housing authority		2/26/14	8/25/03
SONOMA	Sonoma County Community De	1440 Guerneville Road	Santa Rosa	CA	95403	(707) 565-7901	Nick Stewart	Nick.Stewart@sonoma-county.org				8/14/14	9/8/03
ALL COUNTIES	Linc Housing Corporation	100 Pine Avenue, # 500	Long Beach	CA	90802	(562) 684-1100	Sid Paul		(562) 684-1137			8/14/14	9/15/03
LOS ANGELES	Francis R. Hardy, Jr.	2735 W. 94th Street	Inglewood	CA	90305	(323) 756-6533	Francis R. Hardy, Jr.		(323) 756-6533				9/18/03
ALL COUNTIES	Domus Development, LLC	594 Howard St., Ste 204	San Francisco	CA	94105	(415) 856-0010	Meea Kang		(415) 856-0264		X	8/14/14	2/4/04
ALL COUNTIES	BUILD Leadership Developmen	P.O. Box 9414	Newport Beach	CA	92658	(877) 644-9422	Tracy Green		(949) 719-971	Local, regional, national nonprofit org.		5/16/17	2/4/04
ALL COUNTIES	Skyline Real Estate Developme	P.O. Box 7613	Newport Beach	CA	92658	(949) 293-4705	Lynn Miller	skylinerealestate@cox.net	(949) 719-971	Profit-motivated individual or organization		5/24/17	2/4/04
LOS ANGELES	A Community of Friends	9 Cushing, Ste. 200	Irvine	CA	92618	(415) 856-0010	Meea Kang	meea@domusd.com	(415) 856-0264		X	8/27/13	2/4/04
ALL COUNTIES	MBK Management Corporation	23586 Calabasas Road, Ste. 100	Calabasas	CA	91302	(818) 444-2100 e	Jessica Robbins	jrobbins@mbkmgmt.com	(818) 337-7578		X	5/23/17	3/4/04
ALL COUNTIES	Cabouchon Properties, LLC	Pier 9, Suite 114	San Francisco	CA	94111	(415) 433-2000	Susan Terrado		(415) 433-2000			5/23/17	4/28/04
ALL COUNTIES	Maximus Properties, LLC	23586 Calabasas Road, Ste. 103	Calabasas	CA	91302	(818)449-4004	Jeffrey S. McGuire	jmcguire@remax.net	(818) 449-4004			5/23/17	4/28/04
ALL COUNTIES	Squier Properties, LLC	1157 Lake Street	Venice	CA	90291	(310) 418-6389	Scott Richards√	gsquier@earthlink.net	(310) 418-638	Profit-motivated individual or organization		5/24/17	4/28/04
LOS ANGELES	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
LOS ANGELES	Winnetka King, LLC	23586 Calabasas Road, Ste. 100	Los Angeles	CA	91302	(818) 222-2800	Rick Macaya		(818) 222-2800				4/28/04
SANTA BARBAR	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin		(805) 496-4948				4/28/04
VENTURA	Many Mansions, Inc.	1459 E. Thousand Oaks Blvd.,Ste	Thousand Oaks	CA	91362	(805) 496-4948	Neil McGuffin	danhardy@west.net	(805) 496-494	Local, regional, national nonprofit org	X		4/28/04
ALL COUNTIES	Creative Housing Coalition	4612 Alta Canyada Road	La Canada	CA	91011	(805) 736-9342	Jane Anderson		(805) 736-9342			5/23/17	5/19/04
ALL COUNTIES	Fallbrook Capital Corporation	6700 Fallbrook Avenue, #111	West Hills	CA	91307	(818) 712-6931	Brandt Blaken		(818) 712-6931			5/23/17	6/1/04
LOS ANGELES	Los Angeles Housing & Commu	1200 W.7th Street, 9th Floor	Los Angeles	CA	90017	(213) 808-8654	Franklin Campos	fcampos@lahd.lacity.org	(213) 808-8999		X	8/14/14	3/15/05
ALL COUNTIES	West Bay Housing Corporation	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
SAN DIEGO	A Community of Friends	1390 Market Street, Ste. 405	San Francisco	CA	94102	(415) 618-0012	Bill Pickel		(415) 618-0228		X	9/25/12	4/6/05
ALAMEDA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878	Erin Coyle	erin.coyle@nclt.org	(510) 548-7562		X	8/14/14	6/10/05
CONTRA COSTA	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
LOS ANGELES	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
MARIN	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
RIVERSIDE	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600x	Todd Cottle		(714) 242-2092		X		6/10/05
SAN BERNARDIN	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
SAN DIEGO	Orange Housing Development C	414 E. Chapman Avenue	Orange	CA	92866	(714) 288-7600	Todd Cottle		(714) 242-2092		X		6/10/05
SAN FRANCISCO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
SAN MATEO	Northern California Land Trust, I	3122 Shattuck Avenue	Berkeley	CA	94705	(510) 548-7878			(510) 548-7562		X	8/14/14	6/10/05
ORANGE	Riverside Chartable Corporation	3803 E. Casselle Ave	Orange	CA	92869	(714) 628-1650	Kenneth S. Robertson		(714) 628-1657			8/14/14	9/2/05
LOS ANGELES	Home and Community	2425 Riverside Place	Los Angeles	CA	90039	(213) 910-9738	Sabrina Williams		(213) 913-5819				11/28/05
ALL COUNTIES	Wakeland Housing & Developm	1230 Columbia St. Ste. 950	San Diego	CA	92101	(619) 326-6215	Tim Wray		(619) 235-5386		X	5/24/17	12/27/05
LOS ANGELES	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
ORANGE	Hart Community Homes	2807 E. Lincoln Ave	Anaheim	CA	92086	(714) 630-1007	William Hart		(714) 630-3714		X		12/27/05
KERN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151			6/14/17	2/8/06
KERN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936			6/14/17	2/8/06
LOS ANGELES	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
LOS ANGELES	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ORANGE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
ORANGE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
RIVERSIDE	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
RIVERSIDE	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN BERNARDIN	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN BERNARDIN	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
SAN DIEGO	Keller & Company	4309 Argos Drive	San Diego	CA	92116		Chad Keller		(619) 795-7151				2/8/06
SAN DIEGO	Poker Flats LLC	1726 Webster	Los Angeles	CA	90026		Jennifer B. Luria		(323) 661-2936				2/8/06
ALL COUNTIES	Hampstead Development Group	3413 30th Street	San Diego	CA	92104	(619) 543-4200	Chris Foster		(619) 543-4220		X	8/24/11	5/5/06
KERN	Housing Authority of the County	601 24th Street	Bakersfield	CA	93301	(661) 631-8500	Stephen M. Pelz		(661) 631-9500			8/14/14	5/5/06
SANTA CRUZ	Housing Authority of the County	2931 Mission Street	Santa Cruz	CA	95060	(831) 454-5901	Ken Cole					8/14/14	5/5/06
LOS ANGELES	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ORANGE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
RIVERSIDE	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
SAN BERNARDIN	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
VENTURA	Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	CA	90020	(213) 252-4411	Alison Dickson		(213) 252-4422		X		6/8/06
ALL COUNTIES	A. F. Evans Development, Inc.	4305 Univeristy Ave. Suite 550	San Diego	CA	92105	(619) 282-6647	Anne Wilson		(619) 282-4145		X	1/26/12	10/11/06
ALL COUNTIES	California Coalition for Rural Ho	717 K Street, Suite 400	Sacramento	CA	95814	(916) 443-4448	Alicia Sebastian	alicia@calruralhousing.org	(916) 447-0458		X	5/23/17	10/11/06
ALL COUNTIES	Chelsea Investment Corporation	725 South Coast Highway 101	Encinitas	CA	92024	(760) 456-6000	Jim Schmid		(760) 456-6001			5/23/17	10/11/06
ALL COUNTIES	Corporation for Better Housing	15303 Ventura Blvd., Suite 1100	Sherman Oaks	CA	91403	(818) 905-2430	Mary Silverstein		(818) 905-2440			5/23/17	10/11/06
ALL COUNTIES	Community HousingWorks	2815 Camino Del Rio South, Ste.	San Diego	CA	92108	(619) 858-9031	Daniel Marcus	dmarcus@chworks.org	(619) 282-414	Local, regional, national nonprofit org	X	6/7/18	10/11/06
IMPERIAL	Calexico Community Action Cou	2306 M.L. King	Calexico	CA	92231	(760) 357-2995	Steve F. Rivera		(760) 357-2923			6/14/17	10/11/06
LOS ANGELES	Clifford Beers Housing, Inc.	1200 Wilshire Blvd. Ste. 205	Los Angeles	CA	90017		James Bonar		(213) 316-0111		X		5/3/07
ALL COUNTIES	USA Properties Fund	2440 Professional Drive	Roseville	CA	95661	(916) 773-5866	Geoffrey C. Brown		(916) 773-5866			5/24/17	7/12/07
CONTRA COSTA	City of Walnut Creek	1666 N. Main Street	Walnut Creek	CA	94596	(925) 943-5899	Laura Simpson	Simpson@walnut-creek.org	(925) 256-3500		X	2/26/14	9/11/07
ALL COUNTIES	Bank of America, N.A.	555 California St., 6th Floor	San Francisco	CA	94104	(415) 953-2631	Gabriel Speyer		(415) 622-1671			5/16/17	12/4/07
ALL COUNTIES	Fairfied Residential LLC	5510 Morehouse Drive, Suite 200	San Diego	CA	92121	(858) 824-6406	Paul Kudirka	pkudirka@ffres.com	(858) 635-8606			5/23/17	12/4/07
MONTEREY	CHISPA Inc.	295 Main Street, Suite 100	Salinas	CA	93901	(831) 757-6251	Normond V. Kolpin		(831) 757-7537				5/29/08
ALL COUNTIES	Allied Pacific Development, LLC	169 Saxony Road, Suite 103	Encinitas	CA	92024	(760) 557-1480			(760) 557-1480		X		5/27/10
ALL COUNTIES	Belveron Real Estate Partners,	268 Bush St., #3534	San Francisco	CA	94104	(415) 273-6801			(415) 520-5688		X		5/27/10
DEL NORTE	Humboldt Bay Housing Develop	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Bonnie Hughes	bhughes@housinghumboldt.org	(707) 826-7319		X	8/14/14	5/27/10
HUMBOLDT	Humboldt Bay Housing Development Corporation (DBA Housing Humboldt)	PO Box 4655	Arcata	CA	95518	(707) 826-7312	Elizabeth Matsumoto	bmatsumoto@housinghumboldt.or	(707) 826-731	Local, regional non-profit	X	8/14/14	5/27/10
ALL COUNTIES	Richman Group of California, LL	21520 Yorba Linda Blvd, Suite G-	Yorba Linda	CA	92887	(714) 837-6138	Pamela Mikus	MikusP@therichmangroup.com			X		5/28/10
ALL COUNTIES	Renaissance Housing Communi	110 Pacific Avenue, Suite 292	San Francisco	CA	94111	(415)0419-4027	David Silver		(415) 789-448		X		8/9/10
ALAMEDA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404	Linda Gardiner	linda.gardiner@ac.gov.org	(510) 670-637	Local, regional, national nonprofit org.		5/9/17	9/27/10
ALL COUNTIES	Mesa Realty Advisors	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
CONTRA COSTA	Alameda County Allied Housing	224 W. Winton Avenue, Room 10	Hayward	CA	94541	(510) 670-5404			(510) 670-637	Local, regional, national nonprofit org	X	9/27/10	9/27/10
LOS ANGELES	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ORANGE	A Community of Friends	56 Cbana Blanca	Henderson	NV	89012	(310) 213-5310	Rick W. Toney				X	9/25/12	9/27/10
ORANGE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
RIVERSIDE	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
SAN BERNARDIN	CSI Support & Development Se	201 E. Huntington Drive	Monrovia	CA	91016	(626) 599-8464	Isa Woods		(626) 599-8463		X		9/27/10
ALL COUNTIES	California Commercial Investme	4530 E. Thousand Oaks Blvd., St	Westlake Village	CA	91362	(805) 495-8400			(805) 495-5471		X	8/14/14	12/24/10
ALL COUNTIES	Dawson Holdings, Inc.	300 Turney Street, 2nd Floor	Sausalito	CA	94965	(801) 244-6658	Tim Fluetsch		(801) 733-6116		X	8/14/14	12/24/10
ALL COUNTIES	WNC Community Preservation I	17782 Sky Park Circle	Irvine	CA	92620	(714) 662-5565			(714) 662-4412		X		3/3/11
AMADOR	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Rachel Iskkow	rachel@mutualhousing.com	(916) 453-840	Local, regional, national public agenc	x	4/21/16	3/3/11
SOLANO	Mutual Housing California	8001 Fruitridge Road, Suite A	Sacramento	CA	95820	(916) 453-8400	Holly Wunder Stiles	holly@mutualhousing.com			x	8/14/14	3/3/11
ALAMEDA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
BUTTE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
CONTRA COSTA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
EL DORADO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
FRESNO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
IMPERIAL	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KINGS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
LOS ANGELES	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MADERA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MENDOCINO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MERCED	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
MONTEREY	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
ORANGE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
PLACER	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
RIVERSIDE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SACRAMENTO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BENITO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN BERNARDIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN DIEGO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN FRANCISCO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN JOAQUIN	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN LUIS OBISP	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SAN MATEO	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA BARBAR	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CLARA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
SANTA CRUZ	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
STANISLAUS	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
TULARE	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
VENTURA	ROEM Development Corporatio	1650 Lafayette Circle	Santa Clara	CA	65050	(408) 984-5600 E	Erin Caputo	ecaputo@roemcorp.com	(408) 984-3111		X	5/24/17	3/30/11
KERN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101			6/14/17	3/28/12
LOS ANGELES	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
NAPA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
ORANGE	City of Newport Beach	100 Civic Center Drive	Newport Beach	CA	92660	(949) 644-3221	Melinda Whelan				X	8/14/14	3/28/12
ORANGE	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SAN BERNARDIN	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
SOLANO	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
SONOMA	SWJ Housing	PO Box 815	Sebastopol	CA	95473	(707) 823-9884	Scott Johnson		(707) 634-1422		X	8/14/14	3/28/12
VENTURA	Abbey Road Inc.	15305 Rayen Street	North Hills	CA	91343	(818) 332-8008	Jonathon Dilworth		(818) 332-8101		X	6/14/17	3/28/12
ALL COUNTIES	Preservation Partners Developn	21515 Hawthorne Blvd. Suite 125	Torrance	CA	90503	(310) 802-6681	Chuck Treatch	Chuck@preservationpartners.org	(310) 802-668	A California limited partnership, for-p	X	8/14/14	1/16/13
ALL COUNTIES	Berkadia	823 Colby Drive	Davis	CA	95616	(916) 769-7768	Al R Inouye	Al.inouye@inouyeapartments.com			X	8/1/16	2/26/14
ORANGE	Jamboree Housing Corporation	17701 Cowan Ave, #200	Irvine	CA	92614	(949) 214-2395	Roger Kinoshita	rkinoshita@jamboreehousing.com	(949)214-2395	Local, region, national, nonprofit org		4/22/16	4/22/16
ALL COUNTIES	American Community Develope	20250 Harper Avenue	Detroit	MI	48225	(313) 884-0722	Derek M. Skrzynski	derek@acdmail.com	(313) 884-072	Profit-motivated individual or organiz	X	9/2/16	9/2/16
ALL COUNTIES	Highland Property Development	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno	p.patierno@highlandcompanies.cc	(626) 698-636	Profit-motivated individual or organization			9/27/16

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM
PURSUANT TO GOVERNMENT CODE SECTION 65863.11

County	Organization	Address	City	ST	Zip	Phone Number	Contact Person	E-Mail Address	FAX Number	Type of Organization	Confirm	Date Revised	List Added
ALL COUNTIES	GAL Affordable LP	250 W. Colorado Bv. Suite 210	Arcadia	CA	91007	(626) 698-6357	Paul Patierno		(626) 698-636	Profit-motivated individual or organization			10/24/16
ALL COUNTIES	Eden Housing, Inc.	22645 Grand Street	Hayward	CA	94541	(510) 582-1460	Andrea Osgood	aosgood@edenhousing.org	(510) 582-652	Local, regional, national nonprofit org	X		11/8/16
LOS ANGELES	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
ORANGE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
RIVERSIDE	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN BERNARDIN	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
VENTURA	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/6/17
SAN DIEGO	Innovative Housing Opportunitie	19772 Macarthur Bv., Ste. 110	Irvine	CA	92612	(949) 863-9740	Patricia Whitaker		(949) 863-974	Local, regional, national nonprofit org	X		4/7/17
ALL COUNTIES	Lincoln Avenue Capitol, LLC	680 5th Avenue, 17th Floor	New York	NY	10019	(646) 585-5524	Andrew Mika	andrew@lincolnavecap.com		Profit-motivated individual or organiz	X	8/30/19	5/3/17
LOS ANGELES	Community Development Comm	700 W. Main Street	Los Angeles	CA	91801	(626) 586-1812	Larry Newnam	larry.newnam@lacdc.org	(626) 943-381	Loca., regional, national public agency		11/6/17	8/17/17
FRESNO	Self-Help Enterprises	8445 W. Elowin Court/P.O. Box 6	Visalia	CA	93290	(559) 802-1620	Thomas J. Collishaw	tomc@selfhelpenterprises.org	(559) 651-363	Local, regional, national nonprofit org.		4/10/18	4/10/18
ALL COUNTIES	Colrich Multifamily Investments,	444 West Beach St.	San Diego	CA	92101	(858) 490-2300	Danny Gabriel	dannyg@colrich.com	(858) 490-026	Profit-motivated individual or organization			4/16/18
ALL COUNTIES	Standard Property Company, IN	1901 Avenue of the Stars, Suite 3	Los Angeles	CA	90067	(310) 553-5711	Brad Martinson	bmartinson@standard-companies.	(310) 551-166	Profit-motivated individual or organization			6/4/18
ALL COUNTIES	Jonathon Rose Companies	551 Fifth Ave, 23rd Floor	New York	NY	10176	(917) 542-3600	Nathan Taft	nathan@rosecompanies.com	(917) 542-360	Profit-motivated individual or organization			6/27/18
ALL COUNTIES	JEMCOR Development Partners	1700 El Camino Real Suite #400	Sna Mateo	CA	94402	(415) 941-5847	Michael McDermott	mmcdeormott@jemcorpartners.com		Profit-motivated individual or organization			8/8/18
ALL COUNTIES	Catalyst Housing Group, LLC	21 Ward Street, Suite 2	Larkspur	CA	94939	(415) 205-4702	Jordan Moss	Jordan@CatalystHousing.com		Profit-motivated individual or organization			12/11/18
LOS ANGELES	Los Angeles County Developme	700 W. Main Street	Alhambra	CA	91801	(626) 586-1816	KeAndra Cylear-Dod	keandra.cyleardodds@lacda.org		Local, regional, national public agency			4/18/19
ALL COUNTIES	Veritas Urban Properties LLC	2050 Hancock Street, Suite B	San Diego	CA	92110	(619) 746-5191	Gilman Bishop	gbishop@bishopventures.com		Profit-motivated individual or organization			4/24/19
LOS ANGELES	Santa Fe Art Colony Tenants As	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	CA	90058	(310) 663-6665	Sylvia Tidwell	sylvia@sylviatidwell.net		Tenants' Association			5/2/19
SANTA CLARA	Silicon Valley at Home	350 West Julian Street, Building 5	San Jose	CA	95110	(669) 254-1009	Mathew Reed	mathew@siliconvalleyathome.org		Local, regional, national nonprofit org.			7/10/19
LOS ANGELES	San Gabriel Valley Habitat for H	400 S Irwindale Ave	Azusa	CA	91702	(626) 709-3277	Mark Van Lue	mvanlue@sgvhabitat.org		Local, regional, national nonprofit org.			8/12/2019

Appendix E:
Accessory Dwelling Unit Projection Methodology

Analysis for projecting accessory dwelling units as part of meeting South Pasadena's Regional Housing Needs Allocation ***(Revised: March 2022)***

As part of the Housing Element Update for the City of South Pasadena (City) and to ensure that the City is able to meet the Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments (SCAG), the City may project the number of Accessory Dwelling Units (ADUs) that is expected to be built over the course of the 6th Round Housing Element Cycle. ~~–~~The California Department of Housing and Community Development (HCD) recognizes that ADUs have become more popular in recent years and expects the trend to continue. ADUs are seen as an attractive option for developing housing given their affordability to lower-income renters, relatively low cost to construct, and their ability to provide income and alternative housing options to homeowners.

Assuming a certain number of ADUs will be developed over the course of housing element implementation has been acceptable to the State of California since ADU law was instituted in 2003. These projections are based on recent past ADU development trends in the jurisdiction and the current market rents for ADUs in the jurisdiction. State law regulating ADUs has changed significantly since 2016, requiring local jurisdictions to allow ADUs more broadly across a jurisdiction and with development standards and other regulations that reduce cost and other barriers to ADU development. This includes changes to require less on-site~~onsite~~ parking, allow fewer fees to be charged related to ADUs, and allow conversion of existing structures to ADUs.

HCD "Safe Harbor" Calculation

HCD's~~The~~ Housing Element Site Inventory Guidebook~~ from HCD that was~~ finalized in June 2020, has clarified parameters for analyzing ADU past performance and using it to project the number of ADUs expected to be developed as part of meeting the City's RHNA. HCD has explained that the quantity of ADU building permits issued in previous years, particularly since 2018 as effects of the changes to the law began having more impact, may be used as a baseline for making the calculations. According to HCD, to project the number of ADUs expected, there are two methods that are acceptable to arrive at a 'safe harbor' number for projected ADUs. Both are based on past approvals of ADUs in a jurisdiction. Based on preliminary discussions with HCD for South Pasadena, the safe harbor number can be relied on in the 6th Round Housing Element in combination with programs to comply with state ADU regulations and monitor ADU production. The two options for 'safe harbor' analysis are described here:

- Use the number of ADU building permits in the jurisdiction since January 2018 to estimate new production. Take the average number of ADUs that have received building permits per year since the beginning of 2018. That average number can be assumed to be the average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029). The 6th Cycle RHNA projection period begins June 30, 2021.
- Assume an average increase of five times the previous planning period ADU construction trends prior to 2018. Take the average number of ADUs with building permits issued per year between January 1, 2014, and December 31, 2017, which is the part of the 5th Housing Element RHNA projection period occurring before January 1, 2018, when many of the new ADU laws began to take effect. Multiply that average by five. That average number can be assumed to be the

-average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029).

A jurisdiction may choose to use one or the other of these approaches if better data is available for one of the timeframes. Before 2018, South Pasadena only approved one ADU during the 5th Cycle. During that time, the ADU regulations in the City were much more limiting and ADUs were only allowed on parcels larger than 12,000 square feet. Once the new state laws took effect, the ADU numbers began to increase. Between January 1, 2018, and the present (mid-2021), an average of 12 ADUs received planning permits per year with an increase every year.

Four ADUs received building permits in 2018, seven in 2019, ~~and~~ eight in 2020, and 32 in 2021, for an average of 13 (12.75)~~six~~ ADUs per year receiving building permits during that timeframe.

When 13~~6~~ ADUs per year on average are projected through the end of the projection period, the City estimates a safe harbor number of 106~~49~~ ADUs between June 30, 2021, and October 15, 2029.

Projection Based on Data Reflecting South Pasadena's Specific Circumstances

If a jurisdiction expects a higher number of ADU approvals in the 6th Cycle than what is projected using one of the safe harbor options, additional data, analysis of trends, and supporting programs, including a monitoring program, must be included in the Housing Element. The City of South Pasadena does expect a higher number of ADUs will be permitted than the safe harbor number of 101~~49~~ ADUs, because of the recent upward trajectory following~~trends, due to~~ updates to the City's ADU zoning regulations that went into effect in early June and December 2021, and based on the results of other ADU programs and initiatives that have been implemented or are planned at the City. ~~Below are the ADU trends between 2017 and 2020.~~

Over five years, ADU building permit activity has increased as follows:

- 2017 to 2018 – increase from 1 to 4 ADUs that received building permits
- 2018 to 2019 – increase from 4 to 7 ADUs that received building permits
- 2019 to 2020 – increase from 7 to 8 ADUs that received building permits
- 2020 to 2021 – increase from 8 to 32 ADUs that received building permits

The 32 permits issued in 2021 far exceeded the City's earlier (Public Review Draft) projection of 12 ADU permits. The increase can be attributed to two important policy actions taken by the City Council:

- Adoption in June 2021 of a new, less restrictive, ADU ordinance with more clearly defined parameters that support a faster approval process.
- Online application process that ensures complete applications for faster processing.

Furthermore, in December 2021, the Council adopted an urgency ordinance with standards for constructing ADUs on historic properties, along with comprehensive design guidelines that pave an administrative (by-right) path for owners of historic properties to build an ADU. Council adopted the same ordinance permanently into the Municipal Code on February 2, 2022. This resolves issues that have delayed approval of ADUs and reduced applications. Staff immediately noticed an increase in interest and new applications with approval of the new standards.

At the end of 2021, the City added four new Planning~~Based on these increasing ADU trends and applications received so far, the City estimated that 12 ADUs will be permitted by the end of 2021. In addition to the strong upward trend in permits, less-restrictive City ADU regulations went into effect in early June 2021 and are having an impact. The trend in ADU application submittals also support this assumption. The City received 30 ADU applications in 2020 and has already received 49 applications between January 1 and October 1, 2021. As of October 1, the number of ADU building permits has already exceeded the 12 building permits estimated for 2021 in Table 1. This supports the conservative assumptions in Table 1 and the more vigorous assumptions in Table 3.~~

~~The City is expecting to add~~ staff ~~in 2021~~ to increase permit processing capacity, including ADU applications. With increased staffing and clear, objective Code standards~~for ADU permit processing. Even with a plateauing of ADUs permitted each year through October 15, 2029, the City anticipates permits will remain steady or increase slightly each year. In addition to these reasons~~, the City is already seeing ADU applications trending higher at a faster pace than projected earlier. The City has already initiated several of ~~bases~~ the programs in this 2021-2029 Housing Element~~estimates on other programs and initiatives the City is undertaking~~, including homeowner education and assistance and the ADU amnesty program for~~that would help~~ property owners with an existing unpermitted ADU on their property to legalize based on ~~bring that ADU into~~ compliance with the Building Code.~~City codes.~~ A list of the programs and initiatives the City is undertaking related to ADUs is included at the end of this memo.

The trend in ADU application submittals since ~~Based on~~ the Code was amended supports an assumption that~~above reasoning,~~ the "safe harbor" is far below reasonably projected numbers, and given the City's RHNA, it is important to us a projection that is reflective of the permit activity experienced over the past year since conditions changed. The City received 67 Planning applications for ADUs in 2021, more than double the 30 received in 2020. A record 45 Planning approvals were issued, and the year ended with 22 Planning applications pending. The revised projection below now incorporates the sharp increase that followed adoption of the new ordinance and assumes that application numbers will increase only slightly in the next two years, leveling off at 55 Planning approvals annually. (This contrasts with a later, but higher, peak of 68 in the previous draft). Based on the 2021 data and increased staffing level, the revised analysis assumes that 70 percent of projects with Planning approval will receive building permits throughout the 8.3-year Housing Element cycle, for~~City expects~~ a total projection of 318 ADUs (including the actual building permit numbers from the second half of 2021).

It is quite possible that this projection is too low, as market trends show growing popularity and there is pent-up demand to build ADUs in South Pasadena due to the prior limitations in the Code. Applications on historic properties in particular have been on hold pending the recently adopted ordinance and are just beginning to be submitted. For informational purposes, a second, more robust, scenario is included in Table 3 that projects a growth trend based on continuing the upward trajectory in 2020 and 2021. Nevertheless, the more conservative number (Table 1) has been used for the sites inventory based on HCD comments that indicated concern about projecting growth using only two years as a baseline. Accordingly, the City is projecting ~~of~~ 297 ADUs between January 1, 2022~~June 30, 2021~~, and October 15, 2029, as detailed in Table 1, in addition to the 21 units permitted during the second half of 2021, which are separately counted toward the RHNA. ~~Table 1 provides detail on known (for 2020) and anticipated ADUs for 2021 through October 15, 2029~~.

Table 1. Accessory Dwelling Unit Projection

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	45~~20~~	32~~12~~
Issued after June 30, 2021 (Actual)	28	21
2022	50~~27~~	35~~17~~
2023	55~~40~~	39~~26~~
2024	55	39~~36~~
2025	55~~65~~	39~~42~~
2026	55~~68~~	39~~44~~
2027	55~~68~~	39~~44~~
2028	55~~68~~	39~~44~~
2029 (through October 15)	40~~60~~	28~~38~~
~~-~~**Total January 1, 2022~~June 30, 2021~~-October 15, 2029**	**420~~461~~**	**297**

ADU Affordability Analysis

SCAG prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena.~~-~~ The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that do not reach the rental market. ADU research conducted by the University of California, Berkeley's Center for Community Innovation[1]~~ADU research conducted by the University of California, Berkeley's Center for Community Innovation[1]~~ indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or below-market rental rates. SCAG conservatively estimated that 15 percent of the ADUs in their region would be in this category and thus rented to the extremely low-income category of households. Table 2 lists the projected 297 ADUs by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena.

Table 2. Projected ADUs - Affordability

Percentage	Number of ADUs	Income Category Affordable To:
15%	45	Extremely Low Income
9%	27	Very Low Income
44%	131	Low Income
2%	6	Moderate Income
30%	89~~88~~	Above Moderate Income
100%	**297**	**Total**

~~[1] Chapple et al. 2017. Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver. University of California, Berkeley's Center for Community Innovation.~~

An Alternative Projection Based on 2020-2021 ADU Permit Trend

Table 3 presents a scenario that reflects the actual number of approved ADU Planning applications and building permits issued in 2021, assumes a 10-percent annual increase in applications beginning in 2022 that continues for the next five years before leveling off, and assumes that 75 percent of approved Planning applications will receive building permits. Based on these assumptions, this more robust scenario projects a total of 383 ADUs between January 1, 2022, and October 15, 2029.

~~The City has also begun working on other efforts to facilitate ADU production. Those are detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle. Due to all of these efforts – some already initiated and some to be initiated during the first two years of the planning period – the City expects the ADU production numbers may be higher than the 297 unit number. While the analysis of how the City will address the RHNA relies on the lower 297 unit number, the analysis of a higher 368 ADU unit number has been provided in Table 3. This number would include seven ADUs assumed for the second half of 2021, beginning at the beginning of the projection period on June 30. Based on 2020 building permits issued, this approach assumes that building permits are issued for 57 percent of planning applications in 2021. After that, the assumption is that more efficient processes will increase this ratio. So, while planning applications increase at 10 percent annually, building permits increase by 25 percent. This plateaus in 2027, as shown in Table 3. This projection scenario forecasts that 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU over the next 10 years. The 8 percent includes units not counted in the RHNA estimate that received permits in 2020 and the first half of 2021. Additionally, the estimate does not include multifamily ADUs, which are estimated to become more popular as apartment building owners get more savvy regarding ADU law. Furthermore, the City's program to grant amnesty for illegal units, and recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on all of the information in this paragraph, the City considers this ADU projection scenario more likely than the 297-unit projection.~~

Table 3. Possible Higher Accessory Dwelling Unit Projection

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2020 ~~– Actual~~	30	8	Actual
2021	45	32~~14~~	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received~~; similar trajectory to previous years.~~ ~~30% move forward to~~ building permits
Issued after June 30, 2021	28	21	Actual
2022	50	38~~25~~	Assumption of 10% increase in applications and 50% moving forward to building permits
2023	55~~54~~	41~~33~~	Assumption of 10% increase in applications and 60% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2025	66	5049	~~Assumption of 10% increase in applications and 75% moving forward to building permits~~
2026	72	54	~~Assumption of 10% increase in applications and 75% moving forward to building permits~~
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	~~Assumption of steady application rate, no increase~~
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022- ~~June 30, 2021-~~ October 15, 2029	**510~~531~~**	**383~~368~~**	**~~Total ADU applications and permits over 8.3 year projection period~~**

Projections Relative to Existing Single-family Housing Stock

In 2019, South Pasadena's single-family housing stock consisted of 5,642 units. 31 ADU permits were issued in the previous housing element cycle, including the first half of 2021.

Tables 1 and 3 each contain projections for many more ADUs, and for context, it is informative to consider the number of single-family properties within the city and whether those projections make sense within that context. Table 4 shows that as a percentage of the existing housing stock, the more conservative projection would result in 6.1 percent of single-family properties that have ADUs. The more aggressive scenario results in less than 8 percent. In either case, more than 92 percent of single-family properties remain unaffected.

Table 4: Percentage of ADUs Projected Relative to Housing Stock

Housing Stock (5,642 units)	5,642	Additional ADUs as a % of housing stock	Total ADUs as a % of housing stock
Table 1 ADUS	318	5.6%	6.1%
Table 3 ADUs	404	7.2%	7.7%

Additionally, the estimate does not take into account multifamily ADUs, which are estimated to become more popular as apartment building owners get savvier regarding ADU law. Furthermore, the City's program creating an amnesty process for illegal units, to recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on this information, it can be concluded that both of the ADU projection scenarios are realistic within the context of the overall existing housing stock.

City of South Pasadena ADU Initiatives and Programs for 2021-2029

Program 3.f – Allow and Facilitate ADUs

Program 3.g – Monitor ADU Production

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

Program 3.i – ADU Amnesty Program

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Program 3.k – ADU Education and Promotion and Homeowner Outreach

[i] Chapple et al. 2017. *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver*. University of California, Berkeley's Center for Community Innovation.

Appendix F:
Realistic Capacity Analysis

Justification of the 95 percent Realistic Capacity Assumption Applied to Downtown and Mixed-Use Sites

Much of the City of South Pasadena's lower-income Regional Housing Needs Assessment (RHNA) is proposed to be accommodated in the Draft Downtown Specific Plan (DTSP) area and the mixed-use Neighborhood Centers proposed in the General Plan Update. These sites are included in the set of sites with detailed exhibits and descriptions in Appendix A. Where full redevelopment of a site or adding to existing structures is assumed for the Housing Element analysis, a realistic development capacity of 95 percent is assumed. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity and by new policies requiring inclusionary housing and providing design incentives, FAR bonuses, height concessions and other options to increase density (state density bonus) for projects on these sites. This appendix is included to provide the background and analysis to support that 95-percent assumption.

Multi-unit Housing: Trending Upward in South Pasadena and Regionally

The City of South Pasadena is nearly built out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of sites that include a portion or all of the site with new residential units.

After a hiatus following construction of South Pasadena's first new mixed-use, transit-adjacent development in 2005, several multiple-unit residential or mixed-use projects containing higher density housing have recently been constructed or approved in South Pasadena (see Table 1), demonstrating an increasing interest to construct multi-family housing in the city. These are all on sites that were previously developed. The Mission Bell Project, approved in 2020, includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was approved in 2020 under the City's first state density bonus application. The Seven Patios Project, with 60 housing units, was approved in 2021. All three projects were able to achieve higher densities with a range from 22 to 50 dwelling units per acre (du/ac) without accounting for removal of the nonresidential portions of the project from the total parcel or site in the case of the mixed-use projects. All three projects achieved higher than 95 percent of allowed development capacity and two achieved higher than 100 percent. While the trend toward higher density, mixed-use development in South Pasadena is more recent, it is consistent with what is happening in the region, where projects containing multi-family housing of various densities, unit sizes, and architectural styles are being developed at 100 percent or higher percent of allowed capacity on previously developed sites (See Housing Element Tables VI-44 and 42). Most are receiving the entitlements with the inclusion of dedicated affordable units as a prerequisite to receiving significant density bonuses that are attractive to developers and make the project feasible.

Table 1. Representative Projects on Non-Vacant Sites in South Pasadena

Address/ Project Name	Assessor's Parcel Numbers	Acres	Entitled, Under Construction, or Completed?	Zone	Previously Developed With/ Existing Uses	Project Description	Total Number of Dwelling Units	Density	Percentage of Allowed Capacity	Similar Sites in Table VI-46 (and Site ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; Construction anticipated in 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-use, transit-oriented development (TOD), multifamily housing (studios, lofts, flats, and townhomes), and street-fronting commercial uses (restaurant and retail).	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.45 FAR	Odd-shaped sites near transit: Gold Line Storage (10); North side of Mission (8, 11, 13, 14); Other sites near rail transit: City Yard (9); Fremont/Mission (13, 14), Arco (9)
Mission Bell 1101, 1107, 1115 Mission Street	5315-008-045 5315-008-043	0.72	Entitled in 2020; Construction anticipated in 2022	MSSP	A portion of the existing historic building to be demolished and the other portion adaptively reused Two parcels were consolidated	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.48 FAR	School Site -12 (historic resource); Site Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined);
Eight Twenty 820 Mission Street	5315-017-094 5315-017-082 5315-017-067 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses.	38	20	109% of allowed FAR (allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined)
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in spring 2020	CO	Commercial retail with underutilized parking lot No parcel consolidation for redevelopment	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (17, 18, 22, 23, 24)
Mission Meridian Village Meridian Avenue and Mission Street	5315-021-001 5315-021-079 5315-021-047	1.6	Built in 2005	MSSP	Lower-density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre.	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 11)

Source: PlaceWorks and City of South Pasadena, 2021

Why this trend will continue and likely increase: Inclusionary Housing and Density Bonus

Chapter 6.5 (Housing Development Resources) provides a full narrative of the inclusionary housing ordinance (see *Zoning Provisions to Encourage Affordable Housing*), which Council adopted in May 2021. The projects in Table 1 were developed prior to the City's adoption of this ordinance. Only one of them voluntarily included affordable units and received bonus density and height, achieving 138% of the underlying density (allowed capacity), the highest of the five projects. Now that the inclusionary units are required, coupled with by-right density bonus, this has become a central component of the strategy to build affordable units and forms an important component of the basis for anticipating the 95-percent realistic capacity.

Because the properties identified in the Sites Inventory (Appendix A) with a 95-percent realistic capacity assumption are eligible for the design incentives in the adopted Inclusionary Housing Ordinance and because the Inclusionary Housing regulations apply to all residential projects of more than three units, the realistic capacity on these sites takes the Inclusionary Housing regulations into consideration.

The inclusionary housing regulations streamline use of the State Density Bonus to increase the amount of affordable housing approved in the City. This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan, both currently being updated, to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. These changes will be adopted at or near the same time as Housing Element adoption. Zoning updates to codify those changes will occur shortly after the General Plan and Downtown Specific Plan are adopted. The City has been conducting outreach and gathering input from the community and decision makers since early 2019 and support has been expressed for the proposed increased density.

State and Local Regulations encourage full development of allowed capacity for project feasibility

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects with 20% affordable units as required by the ordinance. The City has not been made aware of any pending applications that were cancelled due to adoption of the inclusionary housing regulations. In fact, the effect thus far has been as anticipated; the City has received more inquiries from developers since adopting the inclusionary housing regulations.

In September 2021, the City received the first Design Review application subject to the inclusionary housing code, for 108 one- and two-bedroom condominium units in a mixed-use, 84,198 square-foot, 50-foot height project. The proposed project would include 20% of its base units as affordable. The applicant is requesting to comply with the streamlined density bonus provisions and receive Code-allowed concessions. However, staff understands that many developers need to wait for density increases in the forthcoming General Plan and Downtown Specific Plan before submitting applications.

Ongoing Analysis and Monitoring

In July 2021, the City contracted with EPS, an economics consultant firm, to prepare an Inclusionary Housing In-Lieu Fee Study and develop Affordable Housing Program Recommendations. This work will analyze the inclusionary housing regulations and make recommendations for the City's affordable housing program or participation in a regional affordable housing production program. The analysis will also support the City's understanding of housing production trends and confirm the assumptions that it is realistic to anticipate that developments will be proposed at 95 percent of the zoning capacity. The City has committed in the programs section of this Housing Element to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if needed at that point.

Conclusion

Based on the trends and regulations analyzed, the assumption of 95 percent of realistic development capacity on the DTSP and mixed-use sites is reasonable and potentially conservative based on the fact that the most recently approved and developed multifamily and mixed-use with multifamily projects are developing at a higher percentage of allowed capacity. Table 2 shows the number of units on these sites at 95, 100, and 110 percent of allowed capacity under the proposed DTSP and General Plan. Note that the figures include the small number of sites that have a lower-capacity assumption in the DTSP and mixed-use areas. The realistic capacity percentages are lower on those sites because of existing uses that are anticipated to remain on part of the sites.

While 95 percent is the assumption used for this housing element, the number of units potentially possible at 100 and 110 percent of capacity are included in Table 2 to demonstrate what could easily happen if the recent trends to take advantage of state density bonus law for multifamily projects in South Pasadena continue.

Table 2. Capacity Assumption Alternatives

	95% Capacity	100% Capacity	110% Capacity
Units	1,545	1,623	1,781