



CITY OF LA CAÑADA FLINTRIDGE

2021-2029 Housing Element

Adopted
October 4, 2022

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HOUSING ELEMENT

9.1 Introduction

9.1.1 Statutory Framework

The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in the city.

Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969. It is one of the seven required elements. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the Government Code sets forth the legal requirements of the Housing Element and encourages the provision of affordable and decent housing in communities to meet statewide goals. Specifically, Section 65580 states the element shall consist of "...an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources and scheduled programs for the preservation, improvement, and development of housing." The contents of the element must be consistent with the other elements of the General Plan [Government Code § 65300.5].

Meeting the housing needs established by the state is an important goal for the City of La Cañada Flintridge (the City or City, as the local government). As the population of the state continues to grow and scarce resources decline, it becomes more difficult for local agencies to create adequate housing opportunities while maintaining a high standard of living for all citizens in the community. State law recognizes that housing needs may exceed available resources and, therefore, does not require that the City's quantified objectives be identical to the identified housing needs. This recognition of limitations is

critical, especially during this period of financial uncertainties as a result of the COVID-19 pandemic in both the public and private sectors.

Section 65583(b)(2) states, “It is recognized that the total housing needs...may exceed available resources and the community’s ability to satisfy this need within the content of the general plan requirements... Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved...”

This 2021-2029 La Cañada Flintridge Housing Element is prepared in compliance with state law and covers the period of October 15, 2021 through October 15, 2029.

9.1.2 Purpose

The state has declared that “the availability of housing is of vital statewide importance and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.” In addition, the government and the private sector should make an effort to provide a diversity of housing opportunities and accommodate regional housing needs through a cooperative effort, while maintaining a responsibility toward economic, environmental, fiscal factors and community goals within the General Plan. Further, State Housing Element law requires “an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs.” The law requires:

- An analysis of population and employment trends;
- An analysis of household characteristics;
- An inventory of suitable land for residential development;
- An identification of a zone or zones where emergency shelters are permitted by right;
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing;
- An analysis of special housing needs;
- An analysis of opportunities for energy conservation;
- An analysis of publicly assisted housing developments that may convert to non-assisted housing developments; and
- An assessment of fair housing practices in order to develop policies and programs designed to affirmatively further fair housing.

The purpose of these requirements is to develop an understanding of the existing and projected housing needs within the community and to set forth policies and schedules, which promote preservation, improvement and development of diverse types and costs of housing throughout the City of La Cañada Flintridge.

9.1.3 Organization

This Housing Element is organized into five primary chapters:

- **9.1 – Introduction:** Provides an overview of the purpose, scope, and organization of the Housing Element.
- **9.2 – Community Profile:** Provides a summary of the City’s demographic and housing characteristics, and associated housing needs.
- **9.3 – Housing Constraints:** Provides an assessment of the various constraints to housing development and preservation.
- **9.4 – Housing Opportunities and Resources:** Provides an inventory of resources available for meeting the City’s existing and projected housing needs.
- **9.5 – Housing Plan:** Outlines the City’s commitments to providing and preserving housing opportunities in the community.

Additional data and background information are provided in appendices.

9.1.4 Relationship to Other General Plan Elements

The La Cañada Flintridge General Plan was adopted in 2013 and consists of eight elements: 1) Land Use; 2) Open Space and Recreation; 3) Conservation; 4) Safety; 5) Circulation; 6) Noise; 7) Air Quality; and 8) Housing. All elements carry equal weight and are designed to be consistent with each other.

State law requires that “...the General Plan and elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies...” The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement, and development of housing within the City. The Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the SCAG region and has been reviewed with the rest of the General Plan to ensure internal consistency. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

California Senate Bill 1241 (SB 1241) was passed by the California legislature in 2012, which required jurisdictions to update their Safety Elements upon the next revision of the Housing Element, on or after January 1, 2014. Subsequently,

Government Code § 65302, subd(g)(3.2) was changed to address fire hazard planning. The Safety Element has been updated concurrently with the Housing Element update and has incorporated housing-related discussions and policies on flood hazards, wildfire, emergency preparedness, and climate change.

The Safety Element outlines hazards related to development in the City. The entire City of La Cañada Flintridge is located in the Very High Fire Hazard Severity Zone, as defined by CAL FIRE. Fifteen neighborhoods in the City, representing 986 residences, approximately 15% of the City's housing stock, have a single point of access and egress which can result in difficulty evacuating neighborhoods in the event of a wildfire. For these neighborhoods, a new Safety Element policy was adopted to prohibit the development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) and prohibit the conversion of existing spaces to ADUs and JADUs, unless access compliance with California Fire Code can be demonstrated.

9.1.5 Public Outreach

Opportunities for residents to provide input on housing issues and recommend strategies are critical to the development of appropriate and effective programs to address the housing needs of La Cañada Flintridge. The City encourages and solicits the participation of its residents and other local agencies in the process of identifying housing and community development needs. The residents of La Cañada Flintridge were provided with ample opportunities to provide early input into the development of the draft Housing Element and to review and comment on the City's draft Housing Element and recommend programs before it was sent to HCD for review, and again prior to adoption. This section provides an overview of the public outreach process and input received. Details are provided in Appendix A. Due to the COVID-19 pandemic, many of the initial public engagement activities were held virtually.

9.1.5.1 Community Workshops

Two virtual joint Housing Element and Safety Element community workshops were conducted, on March 11, 2021, and June 10, 2021, hosted by the City's Planning Commission, specifically for the purpose of informing the community and stakeholders about what the Housing and Safety Elements include, why they must be updated, and receiving Planning Commission and public input regarding the update of the City's Housing and Safety Elements. These workshops were advertised via display ad in the local paper and posted on the City's website and at City Hall. Special notices were also sent to community stakeholders and developers. Additional advertisement of the workshops was via an email distribution list of interested parties. This included developers and an active group of community members interested in housing as it impacts the City's ability to meet goals outlined within the Climate Action Plan. The workshops were also publicized during both City Council and Planning Commission meetings, both of which are broadcast on cable television and

livestreamed via the City’s website and during meetings of the Business Support and Development Committee, which includes business owners, residents, the Chamber of Commerce, representatives from religious organizations that are located within and/or serve the community, and City representatives.

The first workshop (March 11, 2021) provided an overview of the requirements of a Housing Element, a review of the Regional Housing Needs Allocation (RHNA) that was assigned to the City by the Southern California Association of Governments (SCAG), a discussion of strategies to meet the RHNA, and opportunities for the Planning Commission and community to ask questions and provide preliminary suggestions.

A second public workshop was held on June 10, 2021. The City provided options for ways to accommodate the RHNA and presented constraints to development that had been identified through preparation of the Constraints section of the Housing Element and input from stakeholders (see the following section regarding focus group sessions). Comments and questions from the public at the second public workshop were varied and included inquiry about whether the projected number of ADUs was accurate, and concerns that reducing parking requirements for future multi-family development would not provide adequate parking. A participant commented that the cost of housing in the city is so high, and the affordable options so low, younger people are being priced out of housing in the city, and that even young people born in La Cañada Flintridge are not able to remain once they reach adulthood. A question was raised asking what the City could do to incentivize affordable housing, and another suggested asking religious institutions whether they are interested in being part of a proposed overlay to allow housing on their parking lots. The Planning Commission suggested including all religious institutions in the city in the proposed overlay, and some additional sites for potential consideration were suggested by the Commissioners. City staff followed up with a review of the suggested religious institution sites and additional locations in the city. As a result, one religious institution was added to the sites inventory, although others were not included because of site constraints.

A segment of the Safety Element portion of the workshop discussed the city’s fire hazards, which are also a constraint to development of new housing in the city. A participant suggested prohibiting ADUs in neighborhoods of La Cañada Flintridge where a significant number of homes are served by a single access point, creating a challenge for emergency access and evacuations. The Safety Element incorporates this suggestion as a new policy, and the Housing Element includes a policy to prohibit the development of ADUs and JADUs in specific areas of the city identified by the Safety Element.

9.1.5.2 Focus Group Sessions

Two focus group sessions were held on May 5, 2021. Participants were invited by an email invitation sent by the City’s Community Development Director. One of

the meetings was with parties potentially interested in building affordable housing, including representatives of local religious facilities who have contacted the City about the possibility of building affordable housing on their campuses, and Habitat for Humanity, who has recent experience with building both low income and housing for the homeless in the Los Angeles area. One of the comments received was similar to comments received at the public workshop in that younger people who grew up in the City cannot return as young adults because they cannot afford the cost of housing. The second session was held with developers of market rate housing. Both groups discussed constraints to building housing in the City, such as a severe shortage of available sites and very high land values. The market rate developers discussed some of the development standards that are difficult to implement, such as the way the City measures building height, and parking standards that increase the cost of development. Section 9.4 includes various programs to reduce constraints to development of housing, including revising the methods the City uses to measure height, increasing the maximum height of structures and revising the way height is measured, increasing allowable floor area ratio (FAR), and reduced parking standards.

9.1.5.3 Housing Element Webpage

The City created a webpage on its website dedicated to the Housing Element update. It included background information; announcements for the public workshops; the announcement for and link to the Notice of Preparation (NOP) for the Initial Study/Negative Declaration prepared for the Housing Element update; and links to the PowerPoint presentations that were presented at the public workshops and meetings. It also included both an online form to fill out to submit questions and comments as well as an email address to which interested persons could submit questions and comments. The City posted each of the Draft Housing Element versions for the public to review, and the Final Housing Element (adopted), with each version remaining available for review and comparison.

In response to a comment received from a member of the public, the website was reworked in August 2022 to provide a more user-friendly format. On September 30, 2022 the website was again updated to post the Second Draft (Revised) on the website. Content was rearranged so that all draft versions were located in the same area for easier access under “Draft Housing Element Documents” on top of the main page. The “Timeline” section was updated to reflect recent and upcoming meetings, and the “Background” page was updated to include all 8 presentations from Planning Commission workshops and meetings, the joint City Council/Planning Commission meeting and all City Council meetings.

9.1.5.4 First Draft Housing Element Review

The City advertised the availability of the Housing Element for public review in accordance with the advertising conducted for the Community Workshops (see

Section 9.1.5.1), and the document remains available on the City’s website for public information. The first draft Housing Element was made available to the public on September 21, 2021, and submitted to HCD for review on October 6, 2021. After an approximately 60-day review period, HCD coordinated a call with staff and consultants to review their comments on the first draft of the Housing Element, which took place on November 29, 2021. A formal letter detailing HCD’s comments followed on December 3, 2021.

9.1.5.5 Second Draft Housing Element Public Outreach

Special City Council Meeting. Based on the comments received from HCD and members of the public, on February 8, 2022, the La Cañada Flintridge City Council held a Special City Council meeting, noticed to the public in the usual manner, to discuss revisions to the Sites Inventory, and other aspects of the Housing Element.

Meeting with Industry Professionals. City officials met with a Real Estate and Development professional on February 18, 2022, to discuss sites within the City they thought would be suitable for higher density residential.

Planning Commission Workshop. On March 10, 2022, at a regular meeting of the Planning Commission, an agenda item was included to discuss the draft Housing Element and Sites Inventory. Staff reported on the results of inquiries to add additional sites to the Sites Inventory that had been suggested at the Special City Council meeting described above. Explanations were provided for why certain parcels were added and others removed from the Sites Inventory. The public was given additional opportunity to provide input into the process.

Joint City Council/Planning Commission Workshop. On April 5, 2022, a Joint City Council/Planning Commission Workshop was held to provide the public an additional opportunity to provide input regarding the Housing Element update, and to discuss how to approach the next steps in updating the Sites Inventory and Housing Element. The Joint Workshop was noticed to the public in the usual manner. At that meeting, direction was given to City staff to retain the services of an outside consultant to conduct a pro forma analysis to evaluate realistic densities and development standards necessary to allow for housing development projects (including those for lower and moderate income residents) given the City’s high property values. In addition, a Joint Subcommittee was formed consisting of two Planning Commissioners and two City Councilmembers, to oversee the completion and adoption of the Housing Element update.

Regional Housing Needs Assessment (RHNA) video. The Joint Subcommittee first met on April 13, 2022 and continued to meet either weekly or biweekly basis overseeing the City’s update to the second draft Housing Element. At the Subcommittee’s direction, a public relations firm was retained to prepare a video explaining the RHNA process in Southern California and how it affects the City.

The video was first made available on the City's website on June 21, 2022, and then it was posted to the City's Facebook page. The video remains on the City's website. As of early August, the video had more than 6000 views accessed from the City's Facebook page.

Direct Contact with Property Owners. Also at the Subcommittee's direction, two letters were sent out to all the commercial property owners and all Faith-based organizations in the City (those with land that could accommodate housing) along the City's primary commercial corridor, which is Foothill Boulevard, and one along Oak Grove Drive, just south of Foothill Boulevard. The first was sent on June 30, 2022, providing proposed density adjustment information and requesting a response from the letter recipient if interested in being on the Sites Inventory.

The second letter was sent on July 14, 2022 to the same group of commercial property owners and Faith-based organizations informing them that the City is considering changes to the Zoning Code and Downtown Village Specific Plan (DVSP) that would allow commercial properties to have the option to develop with multi-family residential or mixed use and allow religious organizations to partner with developers to provide housing on their parcels. The letter explained that since the first letter was sent, the City Council held a discussion and gathered public feedback on the proposed density of multifamily housing. Based on an economic analysis conducted by Michael Baker International (MBI), the City Council and Housing Element Subcommittee directed that a minimum density of 25 dwelling units per acre (du/ac.), with a top density yet to be determined (*and subsequently determined the top density to be 30 du/ac.*), be utilized when looking to rezone properties to accommodate the City's fair share of housing, as allocated by the State and the Southern California Association of Governments. The letter further explained that this would expand the flexibility for properties that meet certain criteria to build residential or mixed use projects once rezoned and potentially increase the value of the property. A copy of each letter can be found in Appendix A, and a copy of the final report from MBI is included in Appendix E.

As a result of the letters discussed above, approximately 40 property owners replied to the City expressing interest in having their future options for their property expanded or requesting additional information. Responses from property owners is included as one of the criteria for why certain sites are included on the Sites Inventory.

Sites Inventory Published. In an effort to gather additional public input regarding the Sites Inventory, the City posted the revised Sites Inventory on the City's website from July 20 – July 29, 2022. Although the comment period was to be concluded July 29, 2022, the Sites Inventory remained posted on the City's website for an additional three weeks, and public comment was still accepted. Comments received as part of the Sites Inventory review are found in Appendix A.

9.1.5.6 Adoption Hearings

Second Draft of Housing Element Posted. In advance of the Planning Commission meeting to discuss the revised Housing Element, the draft was posted on the City’s website on August 19, 2022. The draft remained on the City’s website throughout the public hearing process, and remains on the City’s website. The Planning Commission hearing was noticed to the public in the usual manner.

Planning Commission Recommendation. The Planning Commission reviewed the updated Housing Element at its August 25, 2022 meeting, heard public comment, and recommended that City Council adopt the proposed resolution, recommending that the City Council adopt General Plan Amendment (PLAN-2022-0003) for the 2021-2029 Housing Element.

City Council Special Meeting, September 12, 2022. The City Council considered the updated Housing Element at its September 12, 2022 meeting. Approximately 47 members of the public commented on the Housing Element during the public hearing. A combination of City Council and Subcommittee input at a follow-up session after the September 12, 2022 meeting provided direction to staff and the consultant for changes to the Sites Inventory and Housing Element document. The September 12, 2022 City Council public hearing was continued to the October 4, 2022, regular City Council meeting to allow identified amendments to tables, maps and the Affirmatively Furthering Fair Housing (AFFH) analysis be incorporated into a revised second draft of the Housing Element. The revisions to the Housing Element made as a result of the City Council direction on September 12, 2022 were posted to the City’s website on September 30, 2022 and notification of availability of the revised second draft was emailed, including a link, to all individuals and organizations that have previously requested notices relating to the City’s housing element at least seven days before submitting the draft revision to HCD.

City Council Meeting, October 4, 2022. The City Council considered the updated Housing Element at its October 4, 2022 hearing, and adopted the 6th Cycle Final Housing Element. Seven members of the public commented on the Housing Element during the public hearing.

Submit Adopted Housing Element to HCD. Following adoption of the Final Housing Element by the City Council, the City submitted the adopted Housing Element for HCD review and certification on October 7, 2022.

9.1.5.7 Summary of Public Comments and City Responses

Throughout the update process, public participation has been solicited and feedback submitted regarding the first and second draft Housing Element and second draft sites inventory.

Topics raised in public comments include but are not limited to support for draft housing element; interest or support for zone changes to higher density housing and mixed use; concern about state housing plan requirements; opposition to proposed densities; support for sites on inventory; opposition to sites on inventory; support for accessory dwelling units (ADUs); and concerns about negative impacts to community character and traffic. A considerable number of comments were received regarding an application for a previous project that is not active. Copies of public comments received may be found in Appendix A.

To respond to public comments, the city provided details from the draft plan or other explanations, or revised the draft housing element. For example, when concerns were raised about certain sites on the inventory, responses explain which sites were removed because they lacked significant justification for reuse or are under state or federal ownership. Other sites identified in comments were added or retained based on the following criteria: a) developer or property owner interest to redevelop site; b) underutilized site (ILR<1.0); c) buildings that are older than 30 years; d) antiquated commercial uses with significant surface parking; e) vacant lot or parking lot with minimal existing site improvements; f) underutilized parking lot supporting low intensity development; and g) existing use retained and institution would add residential units.

With regards to density concerns, the responses explain that according to state law, the city must allow at least 20 units per acre for low income housing. Additionally, the responses share that the City retained a consultant, Michael Baker International (MBI), who prepared a Market Feasibility Analysis that is presented in Appendix E and recommended establishing a base density of 25 dwelling units per acre for high density housing. The proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.

Responses provide details about ADUs and references to Program 8 that will facilitate the development of ADUs, in accordance with state law. Concerns about negative impacts to community character and traffic were also noted.

Please refer to Appendix F for a summary of Public Comments by comment ID number and City responses to each comment.

9.2 Community Profile

City of La Cañada Flintridge

Encompassing approximately 8.6 square miles, La Cañada Flintridge is an attractive, suburban community situated at the base of the San Gabriel Mountains, 18 miles northeast of downtown Los Angeles. Located along the 210 Freeway (I-210) and Angeles Crest Highway, the community is bordered by the Angeles National Forest to the north and the nearby cities of Pasadena to the east, Glendale to the south, and the unincorporated County communities of La Crescenta and Montrose on the west. Characterized by semi-rural neighborhoods and carefully maintained homes, La Cañada Flintridge is home to approximately 20,261 residents. Although not incorporated until 1976, the community was largely established by this time as two distinct residential communities of La Cañada and Flintridge. These areas experienced the majority of development before the 1960s, with the subdivision of ranchland to create large lot estate and single-family homes in the early part of the century. Rapid development that characterized much of the surrounding region was largely precluded in La Cañada Flintridge due to the area's steeply sloping hillsides and limited water and sewer infrastructure.

Today the community is largely built-out. The city saw a slight increase of approximately 21 dwelling units between 2013 and 2020. While housing stock is relatively stable, the city has experienced changes in its population characteristics, which impacts housing needs. For example, while the city's population grew by only 1.1 percent between 2010 and 2020, it has seen a considerable increase in its Asian population, growing from 26 percent to 31 percent between 2010 and 2019.

The age distribution in the community has also shifted over the period. Between 2010 and 2019, the median age in the community decreased slightly from 45.9 to 45.1 years. In 2010 seniors 55 years and over accounted for 31 percent of the population, with this proportion increasing to 35 percent between 2010 and 2019 as persons in their 50s and early 60s aged in place. The city currently lacks housing options tailored for seniors.

La Cañada Flintridge's excellent public and private schools, attractive neighborhoods, and high quality homes are attributes that attract many potential homebuyers and renters, resulting in a housing market in high demand. Home prices in La Cañada Flintridge are significantly higher than those in most surrounding communities, with the typical sales price as of July 30, 2021 for a single-family home in the middle price tier at nearly \$2 million, according to Zillow. According to Zumper, as of August 16, 2021, only three properties were available for rent in the city. One two-bedroom apartment was available for \$2,495/month, and two four-bedroom single-family homes were offered for rent at \$7,000/month and \$9,500/month. In addition, land, environmental, and

infrastructure constraints combine to keep land prices high, and housing growth has not occurred aside from the construction of accessory dwelling units on single-family parcels.

The City's 2021-2029 Housing Element will address the community's regional share of housing growth through a variety of means, including mixed use and senior housing in the downtown area and other sites along Foothill Boulevard, single-family infill, and provisions for accessory dwelling units (outside of the 15 city neighborhoods with a single-point of access and egress).

Data Sources

This section utilizes a variety of sources to compile the most updated data, to the extent feasible. Data sources include: Decennial Census; American Community Surveys (ACS); SCAG projections and forecasts; State Employment Development Department employment and wage data; State Department of Finance estimates; Home Mortgage Disclosure Act (HMDA) data on mortgage financing; and Corelogic home sales data; among others. (Note: Because multiple sources were used to prepare the Community Profile, at times the data is not completely consistent.)

The ACS, the Census Bureau's annual sample survey, is designed to provide more detailed information about a community. Depending on the size of the community, ACS may collect annual estimates, three-year estimates, or five-year estimates. Given La Cañada Flintridge's population over 20,000, ACS surveys the city at least once every five years. The majority of variables used in this Housing Element are obtained from the 2014 – 2019 five-year estimates. Sources are denoted below each table.

9.2.1 Population Characteristics

Understanding the characteristics of a population is vital in the process of planning for the future needs of a community. Issues such as population growth or decline, race/ethnicity, age, and employment trends are factors that combine to influence the type of housing needed and the ability to afford housing. The following section describes and analyzes the various population characteristics and trends that affect housing needs.

9.2.1.1 Population Growth

Prior to its incorporation in 1976, the La Cañada Flintridge area was already fully developed and well established as two County areas: La Cañada to the north and Flintridge to the south. In the 1920s, developers began to subdivide the land and attract buyers. The largest subdivisions included Alta Canyon, developed by Edwin T. Earl (inventor of the refrigerated fruit railroad car); Descanso/Central

La Cañada, carved out of the Lanterman family holdings; and Flintridge, laid out by U.S. Senator Frank P. Flint.

During the regional building boom years of the late 1940s and early 1950s, limited new growth in La Cañada Flintridge was the result of insufficient water supply and water rights, which translated into Los Angeles County's 1948 Zoning Code provisions. Although the Foothill Municipal Water District was annexed to the Los Angeles Metropolitan Water District in 1953, major land development patterns were already established in the city by this time. Further growth in the region through the 1950s and 1960s was frequently driven by the accessibility of freeways; however, in La Cañada Flintridge, the Glendale Freeway (SR-2) and the I-210 were not completed through the city until the early 1970s.

Today, La Cañada Flintridge is largely built-out and the City's adopted policy is to retain the community's natural hillsides and semi-rural character. In addition, the presence of environmental and infrastructure constraints (e.g., hillside topography, wildfire hazards, lack of public sanitary sewers or acceptable percolation rates for septic) on the few remaining vacant parcels in the city precludes extensive development. The population of the city has been relatively stable since 1980 with only minor fluctuations.

Table HE-1 shows population growth in La Cañada Flintridge and other cities in the region between 2010 and 2020. As shown in the table, the city's population increased by only 15 persons between 2010 and 2020, whereas other nearby cities experienced modest growth.

Table HE-1. Regional Population Growth

City	2010	2020	Change (2010–2020)	
Los Angeles	3,792,621	4,010,684	218,063	5.7%
Glendale	191,719	205,331	13,612	7.1%
Pasadena	137,122	144,842	7,720	5.6%
La Cañada Flintridge	20,246	20,261	15	0%

Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.

9.2.1.2 Age Characteristics

Demand for housing is often affected by the age composition of a community. Different age groups demand certain types of housing that correspond to different circumstances and ability to afford housing. Traditionally, young adults prefer affordable apartments, condominiums, and small single-family units. Middle aged adults typically prefer larger homes as they raise families. As circumstances change and children leave home, older adults often trade in their larger homes for smaller, moderately priced condominiums and smaller

single-family units. As seniors continue to age, many require housing with supportive services to assist in activities of daily living.

Table HE-2 illustrates the city population by age group. The data shows modest reduction in the numbers of children between 0 – 19, and a slight increase in the population of people between 20 and 34 and over. Most striking are the changes in the 55+ age groups from 2010 to 2019, which increased substantially over this time period, while the number of people in the 35-54 age groups decreased. The data suggests that as the middle-aged population ages, it is not being replaced by younger residents. One explanation could be that younger people are being priced out of housing in the city, and that even young people born in La Cañada Flintridge are not able to remain once they reach adulthood, consistent with the comments made by stakeholders during the community outreach meetings.

Table HE-2. Age Characteristics

Age Group	2010		2019	
	Number	Percent	Number	Percent
0–14	3,965	19.6	3,831	18.9
15–19	1,852	9.1	1,809	8.9
20–24	861	4.3	952	4.7
25–34	1,021	5.0	1,523	7.5
35–44	2,136	10.6	1,978	9.8
45–54	4,039	19.9	3,086	15.2
55–64	3,185	15.7	3,314	16.4
65–74	1,695	8.4	2,280	11.3
75–84	1,068	5.3	928	4.6
85+	424	2.1	560	2.8
Total	20,246	100.0	20,261	100.0
Under 65	17,059	84.3	16,493	81.4
Over 65	3,187	15.7	3,768	18.6

Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.

9.2.1.3 Race and Ethnicity

Race and ethnicity of the population are important factors for an analysis of housing needs and conditions for several reasons. A community’s racial and ethnic composition may have implications for housing needs to the extent that different groups have different household characteristics, income levels, and cultural backgrounds that may affect their housing needs and preferences. Different racial and ethnic groups differ in their attitudes toward and/or tolerance for “housing problems” as defined by the federal Department of

Housing and Urban Development (HUD), including overcrowding and housing cost burden. A household/person is considered to be experiencing a cost burden if it spends more than 30 percent of its gross income on housing. Perceptions regarding housing density and overcrowding, as well as the cultural practices of living with extended families, tend to vary among racial and ethnic groups.

Table HE-3 shows that the city’s primary ethnicities are persons of White and Asian origins. Combined, the White and Asian populations account for over 90 percent of the population in La Cañada Flintridge. According to the 2019 American Community Survey 5-year estimates, persons who categorized themselves as Hispanic represent 10 percent of La Cañada Flintridge’s population, compared to over 48 percent of the population in Los Angeles County as a whole. In general, Hispanic and Asian/Pacific Islander households exhibit a greater propensity for living in extended families or other household arrangements than the White population. Communities with larger proportions of Hispanic and Asian households tend to have larger average household sizes. The Pew Research Center reported that multigenerational households – defined as “including two or more adult generations or including grandparents and grandchildren younger than 25” – were more likely in Asian and Hispanic households than white households.¹

Table HE-3. Race and Ethnicity

Category	La Cañada Flintridge		Los Angeles County
	Number	Percent	Percent
White	12,224	60.3	52.1
Black	154	0.8	8.1
American Indian	0	0.0	0.8
Asian	6,302	31.1	14.7
Native Hawaiian/Other	374	1.8	20.2
Two or More Races	1,207	6.0	4.1
Total	20,261	100.0	100.0
Hispanic Origin ¹	2,029	10.0	48.6

¹ Of any race.
Source: American Community Survey 2014-2019 estimates.

¹ Pew Research Center. (April 15, 2018). A record 64 million Americans live in multigenerational households. <https://www.pewresearch.org/fact-tank/2018/04/05/a-record-64-million-americans-live-in-multigenerational-households/>

9.2.1.4 Economic Characteristics

Employment has an important impact on housing needs. Incomes associated with different jobs and the number of workers in a household determine the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as communities with military installations, college campuses, and large amounts of seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

Between 2010 and 2018, the two largest occupational categories for city residents were Management, Business, Science and Arts; and Sales and Office occupations, making up 90% of the civilian employed population over age 16. Table HE-4 shows the largest employment sectors were:

- Education & Social Services
- Professional Services
- Information/Finance

Jobs in these fields often require specialized knowledge and, in many cases, advanced degrees. Some examples may include lawyers, engineers, accountants, and research and development professionals.

Table HE-4. Employment by Industry

Industry	Number	Percent
Agriculture	23	0.3
Construction/Manufacturing	569	6.3
Wholesale/Retail Trade	1,071	11.8
Transportation	216	2.4
Information/Finance	1,596	17.6
Professional Services	1,820	20.1
Education & Social Services	2,700	29.8
Arts/Entertainment/Recreation	507	5.6
Other	274	3.0
Public Administration	292	3.2
Total Employed	9,068	100.0
Source: American Community Survey 2014-2019 5-year estimates		

Wages reported by the California Department of Employment Development show that the average salary in the Los Angeles Metropolitan area was \$62,006 in 2020 (see Table HE-5). Of the employed residents in La Cañada Flintridge, more

than 30 percent worked in the education and social services industries. The average salaries for these occupations ranged from \$71,575 for education to \$61,628 for social service occupations. Health care practitioners earned an average of \$100,721, while healthcare support services employees earned an average salary of \$34,776.

Approximately 20 percent of the population worked in professional services. These are higher paying industries with salaries averaging \$136,326 for management and \$93,101 for all science occupations. Professional occupations also include legal, computer and mathematical, and architecture and engineering professions, which earned average salaries ranging from \$102,452 to \$132,857.

Table HE-5. Occupational Wages, Los Angeles–Long Beach Metropolitan Statistical Area

Occupations	Average Salary
Management	\$136,326
Legal	\$132,857
Architecture and engineering	\$103,804
Computer and mathematical	\$102,452
Healthcare practitioners and technical	\$100,721
Life, physical, and social science	\$93,101
Art, design, entertainment, sports, and media	\$88,286
Business and financial operations	\$85,015
Educational instruction and library	\$71,575
Protective service	\$63,864
<i>Mean</i>	<i>\$62,006</i>
Construction and extraction	\$61,850
Community and social service	\$61,628
Installation, maintenance, and repair	\$57,329
Sales	\$48,351
Office and administrative support	\$46,703
Transportation and material moving	\$42,940
Production	\$40,879
Buildings and grounds cleaning and maintenance	\$38,450
Personal care and service	\$37,086
Farming, fishing, and forestry	\$36,516
Healthcare support	\$34,776
Food preparation and serving	\$32,238
Source: California Employment Development Department (EDD) Occupational Employment and Wage Data, 2020 - 1st Quarter.	

9.2.2 Household Characteristics

The 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 and unrelated individuals living together.” Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households. Household type and size, income levels, the presence of special needs populations, and other household characteristics determine the type of housing needed by residents, their preferences, and their ability to obtain housing that meets their needs. This section details the various household characteristics affecting housing needs.

9.2.2.1 Household Type and Size

Households are constantly changing form. Even in periods of static population growth, household characteristics are subject to change as adult children leave home, divorces occur, and the population ages. As shown in Table HE-6, there were a total of 6,423 households in the city in 2019, a decrease of 6.2 percent from 2010.

The number of households in Los Angeles County has been increasing at a stable and higher rate than the city’s number of households since 2010. Households increased in Los Angeles County by nearly 2.3 percent, or an average of 0.25 percent annually.

Table HE-6. Household Trends

Year	Number	Change	% Change	Average Annual % Change
City of La Cañada Flintridge				
2010	6,849			
2019	6,423	-426	-6.2	-0.7
Los Angeles County				
2010	3,241,204			
2019	3,316,795	75,591	2.3	0.25
Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.				

Household size is a significant factor in housing demand. Often, household size can be used to predict the unit size that a household will select. As shown in Table HE-7, households containing two persons represented the largest single share of owner-occupied households in the city (32%) in 2019, followed by four-person households (27%). In renter-occupied households, four-person households were the largest share (27%), followed by single-person households (24%).

When compared to the SCAG region overall, La Cañada Flintridge has a lower share of single-person households (14% vs. 23.4%) and a lower share of 7+ person households (0.6% vs. 3.1%). Household size trends combined with the city's age trends suggest that there may be a larger proportion of households with older adults living as couples, and families with young children in the city. The average household size in La Cañada Flintridge is larger than the average in Los Angeles County and most surrounding communities (Table HE-8).

Table HE-7. Household Size

Household Size (Persons)	Owner-Households		Renter-Households	
	Number	Percent	Number	Percent
1	721	12.4	141	24.0
2	1,837	31.5	122	20.7
3	964	16.5	100	17.0
4	1,563	26.8	159	27.0
5	555	9.5	62	10.5
6	160	2.7	4	0.7
7+	35	0.6	0	0.0
Total	5,835	100.0	588	100.0
Avg. Household Size	3.17*		2.93	
Source: American Community Survey 2014-2019 estimates.				

Table HE-8. Average Persons per Household

Jurisdiction	2020 Average Household Size
La Cañada Flintridge	3.15*
Burbank	2.47
Pasadena	2.45
South Pasadena	2.60
Glendale	2.66
Los Angeles County	2.99

Source: American Community Survey 2014-2019 estimates.

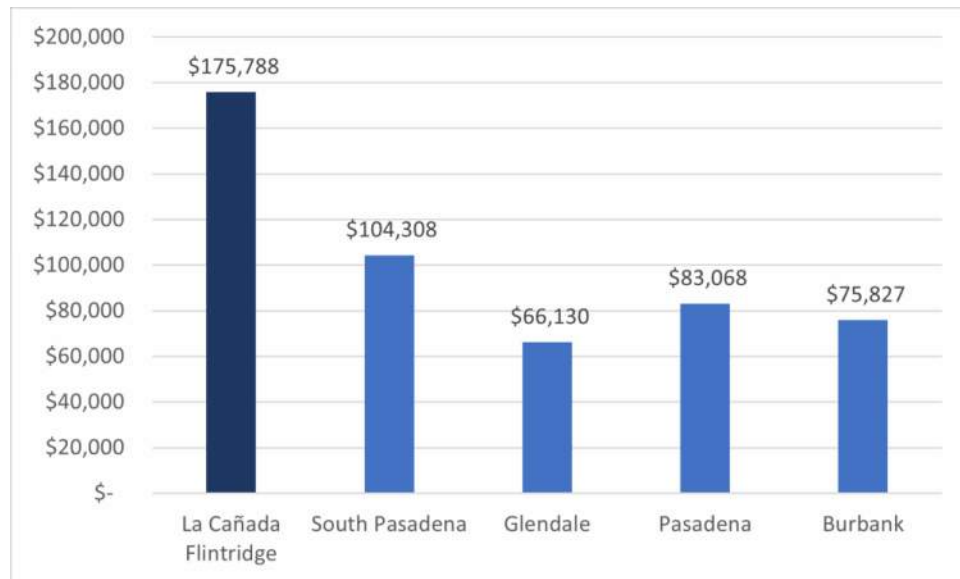
*Note: A slight discrepancy in the data reported accounts for the difference in persons/household.

9.2.2.2 Household Income

Household income is an indication of wealth in a community and therefore is directly connected to the ability to afford housing. As household income increases, the more likely that household is to own a home. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of households occupying unsound and overcrowded housing increases.

Household income data for La Cañada Flintridge is available from the American Community Survey (2019 5-year estimates). Figure HE-1 shows that La Cañada Flintridge's median household income, which is \$175,788, is significantly higher than the median incomes of all neighboring communities. It is \$70,000 more than the next-highest community of South Pasadena, and more than twice the Los Angeles County median income of \$68,044 per household for the same period. In 2019, over 40 percent of city households were estimated to have incomes of \$200,000 or more, constituting the largest income group in the community (Table HE-9).

Figure HE-1. Median Household Income Comparison



Source: American Community Survey 2014-2019 estimates.

Table HE-9. Household Income

Income Range	2019	
	Number	Percent
Less than \$10,000	128	2.0
\$10,000 to \$14,999	77	1.2
\$15,000 to \$24,999	231	3.6
\$25,000 to \$34,999	186	2.9
\$35,000 to \$49,999	218	3.4
\$50,000 to \$74,999	482	7.5
\$75,000 to \$99,999	475	7.4
\$100,000 to \$149,999	976	15.2
\$150,000 to \$199,999	829	12.9
\$200,000 or more	2,820	43.9
Total	6,423	100.0
Median Income	\$175,788	

Source: American Community Survey 2014-2019 estimates.

9.2.2.3 Households by Income Group

For purposes of the Housing Element, the State of California has established five income groups based on income limits provided by the Department of Housing and Community Development (HCD). The established standard income groups are generally defined as follows:

- **Extremely low income:** households earning 0 to 30 percent of the Area Median Income (AMI) of the County of Los Angeles;
- **Very low income:** households earning between 30 and 50 percent of the AMI;
- **Low income:** households earning between 50 percent and 80 percent of the AMI;
- **Moderate income:** households earning between 80 percent and 120 percent of the AMI; and
- **Above moderate income:** households earning over 120 percent of the AMI.

For a household of four in Los Angeles County, the AMI for 2020 was \$77,300. Table HE-10 is based on the estimated household income for La Cañada Flintridge for 2013-2017. The proportions of extremely low, very low, and low income groups comprised approximately 15 percent of city households.

Approximately 77 percent of households in the city are classified as above moderate income.

Table HE-10. Households by Income Groups

Income Group	% of County Median	Income Range (\$)¹	% of Households²	# of Households²
Extremely low	0–30	\$23,700-\$36,550	4.5%	289
Very low	30–50	\$39,450-\$60,850	4.5%	289
Low	50–80	\$63,100-\$97,350	6.4%	411
Moderate	80–120	\$64,900-\$100,150	7.4%	475
Above moderate	>120		77.2%	4,959

Notes:

1. Income range based on 1 to 5 person households for 2020.
2. Income distribution is based on SCAG RHNA Methodology (2013-2017 ACS) data.

Sources: SCAG RHNA Methodology, 2020; HCD Income Limits - Los Angeles County, 2020.

9.2.3 Housing Problems

9.2.3.1 Cost Burden

Measuring the portion of a household’s gross income that is spent for housing is an indicator of the dynamics of demand and supply. This measurement is often expressed in terms of “overpayers”: households paying an excessive amount of their income for housing, therefore decreasing the amount of disposable income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community. Federal and state agencies use cost burden/overpayment indicators to determine the extent and level of funding and support that should be allocated to a community.

State and federal programs typically define overpayers as those paying over 30 percent of household income for housing costs. For this evaluation, household income is based on HUD Area Median Family Income (HAMFI), which is estimated annually for each metropolitan area using data from the American Community Survey (Median Family Income in the Past 12 Months). A household is considered to be experiencing a cost burden if it spends more than 30 percent of its gross income on housing and experiencing a severe cost burden if it spends more than 50 percent of its gross income on housing.

Table HE-11 shows that 34.88 percent of La Cañada Flintridge households were overpaying for housing during the period 2013-2017. The percentage of households overpaying was significantly higher for lower-income households compared to those with higher incomes. Nearly 90 percent of households in the lowest income category (0-30 percent of HAMFI) were overpaying for housing,

compared to less than 25 percent of households in the highest income category (over 100 percent of HAMFI).

Table HE-11. Households With Cost Burden

Household Income	Percent of Overpaying Households		
	Total Renters	Total Owners	Total Households
0-30% HAMFI	100.00%	87.72%	88.71%
31-50% HAMFI	61.90%	71.01%	68.89%
51-80% HAMFI	64.58%	58.62%	61.32%
81-100% HAMFI	28.57%	63.04%	58.49%
>100% HAMFI	28.99%	24.09%	24.43%
Total households	47.65%	33.22%	34.88%

Source: HUD CHAS Data (2013-2017 ACS), 2020.

HAMFI = HUD Area Median Family Income.

Cost Burden = Paying over 30% of HH income in housing costs

Table HE-12 shows household spending on housing costs as a percent of income. As shown in the table, even though households with the lowest incomes make up only small portion of overall households in the City, a disproportionate number of them (214 households out of 264 total in the lowest income category) spend more than half their income on housing.

Table HE-12. Share of Income Spent on Housing

Income	Households by Share of Income Spent on Housing Cost:		
	< 30%	30-50%	> 50%
< 30% HAMFI	20	30	214
30-50% HAMFI	168	85	355
50-80% HAMFI	154	90	184
80-100% HAMFI	119	44	95
> 100% HAMFI	3,865	814	330
Total Households	4,326	1,063	1,178

Source: SCAG pre-certified housing data

Table HE-13 shows household spending on rent as a percent of income. As shown in the table, all households with the lowest incomes (less than \$20,000/year) spend more than 50 percent of their income on rent. While in general the percent of household income spent on rent decreases, all households that make between \$75,000 and \$99,999 annually also spend more than 50 percent of their income on rent. Households in the highest income category (\$100,000 or more) make up the largest percentage of households in the City, and also spend the lower proportion of their income on rent.

Table HE-13. Share of Income Spent on Rent

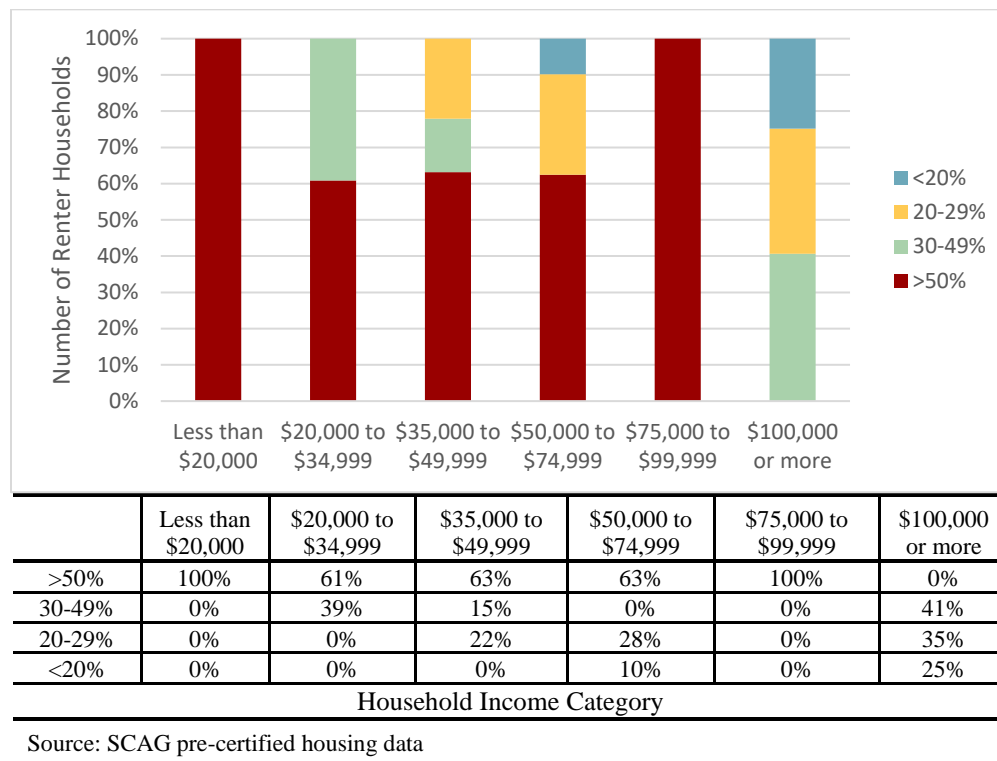
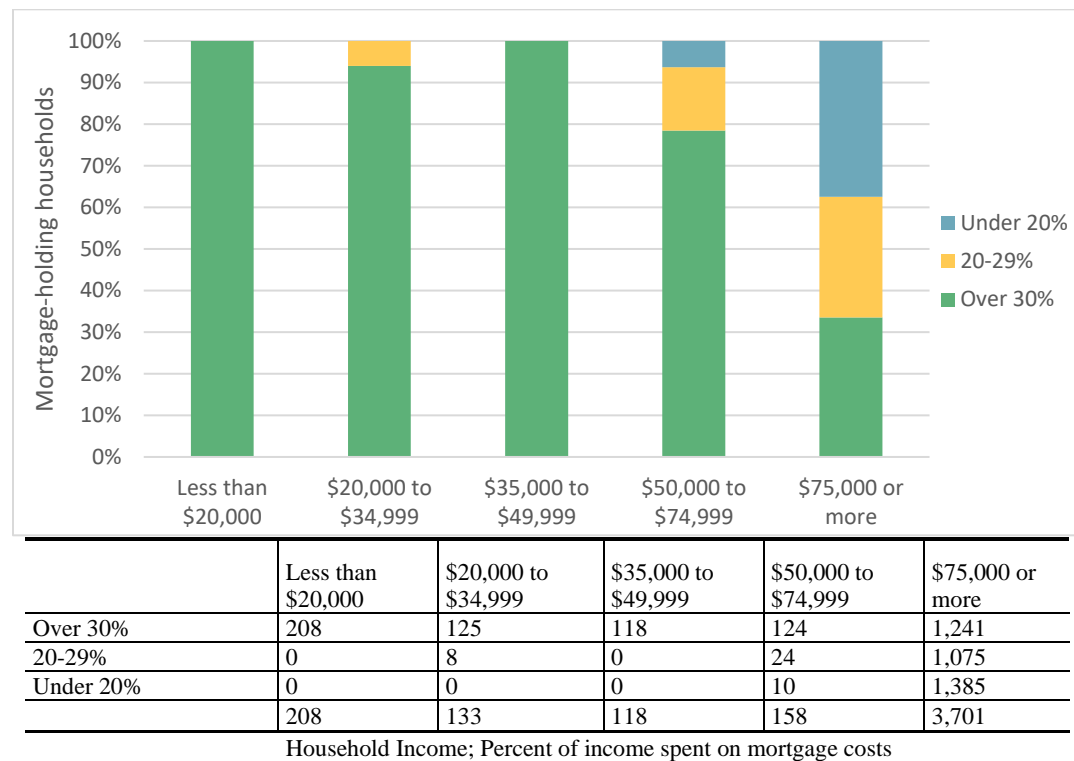


Table HE-14 shows spending on mortgage costs by income level. All households with the lowest income levels (less than \$20,000/year) spend over 30 percent of their income on mortgage costs, as do all households with annual incomes between \$35,000 and \$49,000. While a large number of households at higher income levels spend over 30 percent of their income on mortgage costs, spending on mortgage costs as a percent of household income decreases as household income increases.

Table HE-14. Share of Income Spent on Mortgage Costs



Source: SCAG pre-certified housing data

9.2.3.2 Overcrowding

Overcrowding is defined by state law as having more than one person per room in a single housing unit. Generally, a room is defined as a living room, dining room, bedroom, or finished recreation room; bathrooms and kitchens are not considered. There were a total of 59 overcrowded households in La Cañada Flintridge in 2019, all of which were owner-occupied (Table HE-15).

Table HE-15. Overcrowded Households

Persons per Room	Renter-Households	Owner-Households	Total Households
1.01-1.50	0	50	50
1.51+	0	9	9
Total Households	0	59	59

Source: American Community Survey 2014-2019 estimates.

9.2.4 Special Needs Groups

Certain segments of the population require special needs for housing. These special needs groups include seniors, disabled, female-headed households with

children, large households, farmworkers, and the homeless. Often, these are low income households who have limited access to housing choices.

Table HE-16 shows the presence of special needs populations in La Cañada Flintridge. Senior-headed households (34.3%) were the largest special needs group in the City, followed by persons aged 65 and older (18.7%) and large households (12.7%). The specifics of special needs groups will be explored in the following discussions.

Table HE-16. Special Needs Populations

Special Needs Group	# of Persons or Households	# of Owners	# of Renters	% of Total Households or Persons
Persons 65+	3,768	–	–	18.7
Senior-headed households	2207	2073 (94%)	134 (6%)	34.3
Seniors living alone	662	552 (83%)	110 (17%)	10.3
Persons with Disabilities	1,118	–	–	5.5
Large households	816	750 (92%)	66 (8%)	12.7
Female-headed households with children	221	--	--	3.4
Farmworkers	33	--	--	0.2
Extremely low income households	289		0	4.5
Homeless	2	--	--	0

Source: American Community Survey 2014-2019 estimates.

9.2.4.1 Seniors

Seniors often age in place, which can result in many seniors living in housing that is too expensive for their fixed incomes or that structurally does not accommodate their specific needs for assistance. Even though seniors may have difficulty living in their own homes, oftentimes they do not have the option or mobility afforded to other segments of the population to relocate to a more suitable housing arrangement. They commonly have to leave their home community and relocate away from family and friends to find a suitable unit. The purpose of this section is to determine the housing needs of the senior community, which is defined as persons aged 65 or over.

As shown in Table HE-17, 3,187 seniors resided in La Cañada Flintridge in 2010, representing 12 percent of the total population. As of 2019 the senior population had risen to 3,768 persons or 18.2 percent of the total population.

Table HE-17. Senior Population

Year	Number of Seniors	Change	% Change	Average Annual % Change
2010	3,187			
2019	3,768	581	15	1.7

Sources: Bureau of the Census, 2010 and 2019.

Table HE-18 shows the number of homes within the City that were occupied by seniors. The 2010 Census estimates that 1,916 households (28 percent) in the city were occupied by seniors and that number grew to 2,207 in 2019, more than a 15% change. In 2010, there were 559 seniors living alone; by 2019, that number rose to 662 seniors. These trends indicate a need for more of a variety of housing options for seniors in the community. This is a need that was identified in the City's Land Use Element (2013), which included specific policies to address the need.

Table HE-18. Senior Household Trends

Year	Number of Senior Occupied Homes	Change	% Change
2009-11	1,916		
2019	2,207	291	15.2

Sources: Bureau of the Census 2009-2011, 2019 American Community Survey

As shown in Table HE-19, only 4.4 percent of seniors in the city were renters in 2010. In Los Angeles County, 36 percent of the senior households rented their housing. The number of senior renters in La Cañada Flintridge increased slightly between 2010 and 2019, where approximately six percent of the senior households in the city were renters.

Senior homeowners are considerably more prevalent in La Cañada Flintridge than renters. Senior homeowners represented 94 percent of all senior households in 2019. Seniors are more inclined to be homeowners because they tend to have lived in the community for an extended period of time and were able to secure homeownership before the price of housing increased over the past several decades.

Table HE-19. Senior Households by Tenure

Senior Occupied Households	2010		2019	
	Number	Percent	Number	Percent
Owner	1,832	95.6	2,073	93.9
Renter	85	4.4	134	6.1

Sources: U.S. Census Bureau. (2010), American Community Survey 2014-2019 estimates.

9.2.4.2 Persons with Disabilities

Persons with disabilities include those who are physically, mentally, and/or developmentally disabled. Each type is unique and requires specific attention in terms of access to housing, employment, social services, and medical services. Both physical and mental disabilities can hinder access to traditional housing facilities and the ability to earn adequate income. Disabled individuals have particular housing needs in terms of location and design requirements. For example, physically disabled individuals may require special housing design features, such as wheelchair ramps, holding bars, special bathroom designs, wider rooms, and other features. Similar to older adults, persons with disabilities also have special housing needs in terms of location, and often need to be located near public facilities and alternative transportation services.

The ACS estimates that 2,879 residents (14.1 percent of the population) in La Cañada Flintridge had one or more disabilities in 2019. The majority of the city's disabled population is comprised of seniors with self-care and independent living difficulties (Table HE-20). Two residential care facilities in the city provide 12 beds for elderly care.

Table HE-20. Disability Status

Type of Disability	Population with Disabilities			
	Age 5–17	Age 18–64	Age 65+	Total %
Hearing	0	152	300	15.7
Vision	0	59	159	7.6
Cognitive	59	159	242	16.0
Ambulatory	8	192	557	26.3
Self-Care	32	76	262	12.9
Independent Living	0	172	450	21.6
Total Disabled Persons	99	810	1,970	2,879

Note: A person can have multiple disabilities.

Source: American Community Survey 2014-2019 estimates.

A recent change in state law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. As defined by state law, “developmental disability” means a severe, chronic disability of an individual that:

- is attributable to a mental or physical impairment or combination of mental and physical impairments;
- is manifested before the individual attains age 18;
- is likely to continue indefinitely;

- results in substantial functional limitations in three or more of the following areas of major life activity: self-care; receptive and expressive language; learning; mobility; self-direction; capacity for independent living; or economic self-sufficiency; and
- reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. 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 many 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.

Four factors – affordability, design, location, and discrimination – significantly limit the supply of housing available to households of persons with disabilities. The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features commonly necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. “Barrier free” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group. Incorporating barrier-free design in new multi-family housing is especially important to provide the widest range of choices for the disabled. Housing that applies universal design principles² is considered barrier free and accessible to persons of a wide range of abilities/disabilities.

State and federal legislation mandate that a specified portion of units in new or rehabilitated multi-family apartment complexes be accessible to individuals with limited mobility.³ The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. The City works with applicants who need special accommodations

² The seven principles of universal design are: Equitable Use; Flexibility in Use; Simple and Intuitive Use; Perceptible Information; Tolerance for Error; Low Physical Effort; and Size and Space for Approach and Use.

³ The State of California regulates accessibility through Title 24 of the California Building Standards Code and federal Americans with Disabilities Act mandate residential accessibility requirements.

in their homes to ensure that application of zoning and building code requirements does not create a constraint. In 2014, the City adopted a formal procedure for review and approval of reasonable accommodation requests (Ordinance 419 § 39).

9.2.4.3 Large Households

Large households are defined as households consisting of five or more persons. Generally speaking, the needs of large households are not targeted in the housing market, especially in the multi-family housing market. As shown in Table HE-21, approximately 13 percent or 816 households in La Cañada Flintridge met the definition of large households. Homeowners comprised 92% of the large households in the city, while eight percent are renters. The city has a substantial number of large homes which could accommodate the needs of large households, but it is not known if large households occupy these homes. The County had a slightly larger percentage of large households at 14 percent.

Table HE-21. Household Size by Tenure

Household Size (Persons)	Owner	Renter	Total	Percentage
1	721	141	862	13.4
2	1,837	122	1959	30.5
3	964	100	1064	16.6
4	1,563	159	1722	26.8
5	555	62	617	9.6
6	160	4	164	2.6
7 +	35	0	35	0.5
Total	5,835	588	6,423	100.0

Source: American Community Survey 2014-2019 estimates.

9.2.4.4 Single-Parent Households

Single-parent households, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Female-headed families with children are a particularly vulnerable group because they must balance the needs of their children with work responsibilities, often while earning limited incomes.

As shown in Table HE-22, a significant portion of single-parent households had a female as the head of the household. The 2010 Census counted 2,738 family households with children under 18 years of age in La Cañada Flintridge. Of these households, 345 or about 7 percent were headed by a single adult, with the majority being headed by females. In 2019 the number of households with

children under 18 years of age decreased slightly to 2,643. Of the households headed by a single adult, the majority continued to be headed by females.

In La Cañada Flintridge, 49 (.7 %) of the female-headed households were living in poverty. In addition, 15 (.2 %) of the female-headed families with children were living in poverty.

Table HE-22. Households with Children

Household Type	2010		2019	
	Number	Percent	Number	Percent
Married couple households	5,029	73.4	4,938	76.9
With children under 18 years old	2,393	47.6	2,363	47.9
With no children	2,636	52.4	2,575	52.1
Female householder*	525	7.7	1,016	15.8
With children under 18 years old	243	46.3	221	21.8
With no children	282	53.7	795	78.2
Male householder*	214	3.1	469	7.3
With children under 18 years old	102	47.7	59	12.6
With no children	112	52.3	410	87.4
Non-family households	1,081	15.8	973	15.1
Total Households	6,849	100.0	6,423	100.0

*No spouse present

Sources: U.S. Census Bureau. (2010), American Community Survey 2014-2019 estimates.

9.2.4.5 Farmworkers

Farmworkers are defined by the Census as “agricultural workers and their supervisors” and represent a very small percentage of the City’s total population. According to the 2014-2018 ACS, 50 persons in the City of La Cañada Flintridge were employed in the agriculture, forestry, fishing, hunting, and mining industry. The La Cañada Flintridge farmworker population accounts for 0.54% of the total employment in the City. The total number of farmworkers for LA County is 3,266, according to the 2017 Census of Agriculture, 2017. Farmworkers generally receive much lower wages than other local occupations. According to the State Employment Development Department, farm workers earned an average annual salary of \$36,516 (Table HE-5). These wages severely limit housing options for farmworkers in Southern California’s expensive housing market. Overcrowding and substandard housing conditions are often the only option.

The USDA Census of Agriculture, 2017, documents the labor arrangements between farmworkers and producers, providing insight into their uncertain

working conditions. As shown on Table HE-23, only 54% of farmworkers reported working over 150 days, or roughly 5 months. Approximately 12% were migrant workers, and 25% were unpaid workers.

Table HE-23. LA County Farmworkers

	Total	Percentage
Farm workers	3266	-
Farm workers by days worked:		
• over 150 days	1749	54%
• less than 150 days	1517	46%
Migrant workers	395	12%
Unpaid workers	822	25%

Source: 2017 Census of Agriculture, USDA.

9.2.4.6 Homeless Population

Factors contributing to the rise in homelessness include high rates of unemployment and underemployment, a lack of housing affordable to low and moderate income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the de-institutionalization of the mentally ill. Homelessness has long been an issue in Los Angeles County, reflecting high costs of housing in the region. Along with cuts in public funding, lasting impacts of the Great Recession, and recent economic and social impacts related to the COVID-19 pandemic, local communities are increasingly strained in their limited resources to provide assistance to the homeless.

Section 65583(1)(7) mandates that municipalities address the special needs of homeless persons within their jurisdictional boundaries. “Homelessness” as defined by HUD, describes:

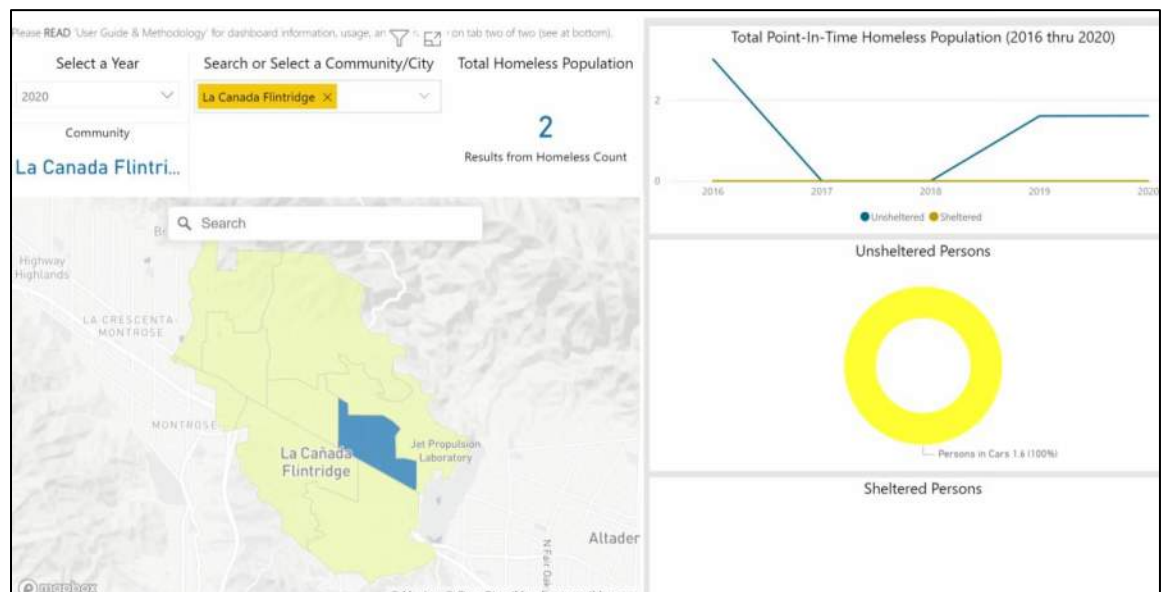
- Individuals/families who lack a fixed, regular, and adequate nighttime residence, including:
 - Place not meant for human habitation;
 - Living in a shelter; or
 - Exiting an institution.

- Individuals/families who will imminently (within 14 days) lose their primary nighttime residence.
- Unaccompanied youth (under 25 years of age) or families with children/youth.
- Individuals/families fleeing or attempting to flee domestic violence.

This definition does not include persons living in substandard housing (unless it has been officially condemned); persons living in overcrowded housing (for example, doubled up with others); persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge); or persons who may be at risk of homelessness (for example, living temporarily with family or friends).

The Los Angeles Homeless Services Authority (LAHSA) is a Joint Powers Authority established in 1993 as an independent agency by the County and the City of Los Angeles. As the lead agency in the Los Angeles Continuum of Care, LAHSA coordinates and manages over \$67 million dollars annually in federal, state, County, and city funds for homeless services across Los Angeles County. LAHSA also performs policy and planning research and analysis, with the goal of supporting, creating, and sustaining solutions to homelessness. In January 2020, LAHSA conducted the annual Greater Los Angeles Homeless Count. The count showed that there were two people experiencing homelessness in La Cañada Flintridge.

Figure HE-2. 2020 Homeless Count by Community/County



Source: Greater Los Angeles Homeless Count (2020), Los Angeles Homeless Services Authority (LAHSA)

In February 2014, the City amended the Zoning Code to create an emergency shelter overlay zone to provide locations in the city where an emergency shelter

is identified as a permitted use. Given the small number of homeless persons in the city, no homeless shelters or service centers are located in La Cañada Flintridge. Program 15 demonstrates the City’s commitment to maintain an emergency shelter ordinance consistent with state law. Table HE-24 provides an inventory of services and facilities located in the area.

Table HE-24. Inventory of Homeless Services and Facilities

Name	Services	Location
Elizabeth House	Residential shelter for pregnant women 18 and older and their children. Also offers classes in parenting, health education, job skills training, and weekly counseling.	760 Santa Barbara St. Pasadena, CA
Union Station Foundation	Operates an intake center, a family center (50 beds), adult center (56 beds), a transitional apartment complex, and a career development program.	825 E. Orange Grove Blvd. Pasadena, CA
Beacon House	Operates the Lowe House Program with 9 beds for single women and women with children and low income families	Pasadena, CA
Hathaway Sycamores Child and Family Services	Youth CES assessments and access center storage is available by appointment.	Pasadena, CA
Hillsides Youth Moving On	Youth CES assessments, shower and laundry facilities are available by appointment only.	Pasadena, CA
Friends in Deed	Drop-in shelter for women that provides shower and laundry facilities, clothing and other services.	Pasadena, CA

Source: Veronica Tam & Associates.

9.2.4.7 Extremely Low-Income Households

The category “extremely low-income households” is a subset of “very low-income households,” and is defined as 30 percent (or less) of the area median income. The housing element must quantify existing and projected extremely low-income households, analyse their housing needs, and assess the kind of housing available and suitable for extremely low-income households, including tenure, rates and trends of overcrowding and overpayment.

Table HE-25 below identifies 438 households in the City that are considered extremely low-income households, or approximately 6.7% of all the households in the City. Of the 438 ELI households, 8 are renter-occupied, and 430 are owner-occupied. Table HE-25 provides information on housing problems by income level for various categories of households in La Cañada Flintridge. These problems include:

- Units with physical defects (lacking complete kitchen or bathroom);

- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

The types of problems experienced by different households vary by income level and tenure. Renters generally experience housing problems at a higher rate than owners, with 50% of all renter households experiencing a housing problem compared to 36% of owner households. Renters also experience a cost burden more than owners. As incomes increase for renters, the percentage of households experiencing any housing problem, including a cost burden, decreases. The same is true for owner households, with 89% of extremely low-income owner households having a housing cost burden (including 76% with a severe cost burden), compared to only 25% of moderate/upper income owner households. Almost all extremely low-income households in La Cañada Flintridge are owner households. Of these, large families generally have high rates of cost burden than other extremely low-income owner households in the City.

Table HE-25. Housing Needs by Income

Household by Type, Income, and Housing Problem	Renters					Owners					Total Households
	Elderly	Small Families	Large Families	All Other Households	Total Renters	Elderly	Small Families	Large Families	All Other Households	Total Owners	
Extremely Low Income (0-30%AMI)	4	0	0	4	8	215	95	35	85	430	438
% with any housing problem	100%	NA	NA	100%	100%	100%	100%	100%	71%	94%	94%
% with cost burden >30%	100%	NA	NA	100%	100%	88%	100%	100%	71%	88%	89%
% with cost burden > 50%	100%	NA	NA	100%	100%	77%	68%	100%	71%	76%	76%
Very Low Income (31-50% AMI)	0	50	0	0	50	165	85	35	10	270	320
% with any housing problem	NA	100%	NA	NA	100%	73%	100%	0%	100%	80%	83%
% with cost burden >30%	NA	100%	NA	NA	100%	73%	112%	0%	100%	83%	86%
% with cost burden > 50%	NA	100%	NA	NA	100%	55%	76%	0%	0%	57%	64%
Low Income (51-80% AMI)	65	105	10	25	205	135	130	25	0	290	495
% with any housing problem	23%	62%	100%	100%	56%	52%	65%	80%	NA	60%	59%
% with cost burden >30%	23%	62%	100%	100%	56%	56%	65%	80%	NA	62%	60%
% with cost burden > 50%	0%	62%	100%	60%	44%	37%	65%	80%	NA	53%	49%
Moderate/Upper Income (>80% AMI)	25	230	65	65	385	1,525	2,655	595	120	4,895	5,280
% with any housing problem	120%	35%	54%	46%	45%	16%	27%	44%	79%	27%	28%
% with cost burden >30%	120%	37%	46%	46%	45%	16%	27%	37%	63%	25%	27%
% with cost burden > 50%	0%	11%	0%	0%	6%	4%	9%	12%	33%	8%	8%
Total Households	94	385	75	94	690	2,040	2965	690	215	,5890	6,580
% with any housing problem	52%	51%	60%	63%	50%	32%	33%	46%	77%	36%	37%
% with cost burden >30%	52%	52%	53%	63%	50%	31%	33%	40%	67%	34%	36%
% with cost burden > 50%	4%	36%	13%	20%	25%	18%	15%	18%	47%	18%	18%

Source: CHAS data book (2014-2018)

Extremely low-income households can also be any of the aforementioned special needs populations and can thus take advantage of the services and facilities (resources) listed for special needs populations. In addition, the City will rely on the non-funding-related actions to encourage affordable and special needs housing production, including housing for extremely low income households, as detailed in Programs 8, 13, 15 and 19.

9.2.5 Housing Stock Characteristics

The characteristics of the housing stock, including growth, type, age and condition, tenure, vacancy rates, housing costs, and affordability are important in determining the housing needs for the community. This section details the housing stock characteristics of La Cañada Flintridge to identify how well the current housing stock meets the needs of current and future residents of the city.

9.2.5.1 Housing Growth

La Cañada Flintridge experienced very modest housing growth between 2013 and 2020 (Table HE-26). The housing stock increased by 21 units, from 7,095 to 7,116, representing an increase of .3 percent. This slight increase in the housing stock was in contrast to the 3.7 percent increase experienced by the County, but was comparable to the other nearby cities of South Pasadena and Burbank, where the increase in number of units was also less than 1 percent. Glendale and Pasadena both experienced small increases in the number of housing units in the same time period. La Cañada Flintridge has very little remaining vacant land for development, and majority of vacant parcels are within areas that are constrained by topography.

Table HE-26. Housing Growth

Jurisdiction	2013	2020	2013–2020
			Percent Change
La Cañada Flintridge	7,095	7,116	0.3
South Pasadena	11,125	11,183	0.5
Pasadena	60,314	62,753	4.0
Glendale	76,375	81,019	6.1
Burbank	44,626	44,978	0.8
Los Angeles County	3,463,492	3,590,574	3.7
Sources: State Department of Finance, 2013 and 2020.			

9.2.5.2 Housing Type

Providing for a diverse range of housing types is an important consideration in a community. A diverse range of housing types helps ensure that all households in a community, regardless of income level, size, age, and family type, have the ability to find adequate housing that meets their needs.

Table HE-27 shows the composition of La Cañada Flintridge's housing stock by unit type in 2013 and 2020. The composition of the city's housing stock has remained virtually unchanged over the timeframe, with single-family detached homes comprising the majority of the housing stock in La Cañada Flintridge (92 percent). The remaining share of homes in La Cañada Flintridge consists of mobile homes, multi-family units, and single-family attached units, which together accounted for approximately 8 percent of units.

Table HE-27. Housing Unit Types

Housing Type	2013		2020	
	Number of Units	% of Total Units	Number of Units	% of Total Units
Single-Family				
Detached	6,519	91.9	6,537	91.9
Attached	186	2.6	189	2.7
Subtotal	6,705	94.5	6,726	94.6
Multi-Family				
2–4 units	96	1.4	96	1.3
5+ Units	250	3.5	250	3.5
Subtotal	346	4.9	346	4.9
Mobile homes	44	.6	44	0.6
Total units	7,095	100	7,116	100
Vacancy rate		2.4		3.1
Sources: State Department of Finance 2013 and 2020.				

9.2.5.3 Housing Availability and Tenure

Household tenure, or the ratio between owner- and renter-occupied households, can be influenced by many factors, such as: housing cost (including interest rates, economics, land supply, and development constraints), housing availability, income, employment structure, and consumer preference. As shown below in Table HE-28, homeowners in La Cañada Flintridge outnumber renters nine-to-one. In comparison to Los Angeles County, the city has a substantially higher proportion of homeownership. In 2019, city homeownership rate (at 90.8%) is double the County rate (45.3%).

Table HE-28. Tenure Comparison

Occupied Units	2010		2019	
	Number	Percent	Number	Percent
Los Angeles County				
Owner	1,544,749	47.7	1,511,628	45.3
Renter	1,696,455	52.3	1,816,770	54.7
Total	3,241,204	100.0	3,328,398	100.0
La Cañada Flintridge				
Owner	6,120	89.4	5,835	90.8
Renter	729	10.6	588	9.2
Total	6,849	100.0	6,423	100.0
Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.				

Table HE-29 shows the average household size by tenure. In both 2010 and 2019, the average household size for renter-occupied households was slightly higher than that for owner-occupied households, with both average household size for owner-occupied households and renter-occupied households trending upward.

Table HE-29. Household Size by Tenure (2010-2019)

Tenure	Average Household Size	
	2010	2019
Owner	2.94	3.17
Renter	2.93	2.93
Total	2.94	3.05
Sources: U.S. Census Bureau. (2010). American Community Survey 2014-2019 estimates.		

9.2.5.4 Vacancy Rate by Tenure

Vacancy rates are an important housing indicator because they demonstrate the degree of choice available. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low of a vacancy rate can force prices up, making it more difficult for low and moderate income households to find housing. Vacancy rates between two to three percent are usually considered healthy for single-family housing, while a vacancy rate of five to six percent for multi-family housing is considered healthy.

According to the American Community Survey (2014-2019 estimates), the city's homeowner vacancy rate was 0.4 percent, and the rental vacancy rate was 4.7 percent, although the data does not explain what portion of the rental vacancy rate

is for single family or multi-family housing. Both rates indicate housing choice is very limited in La Cañada Flintridge.

9.2.5.5 Housing Age and Condition

Generally, housing older than 30 years of age will require minor repairs and modernization improvements. Housing units over 50 years of age are more likely to require major rehabilitation, such as roofing, plumbing, and electrical system repairs. After 70 years of age a unit is generally deemed to have exceeded its useful life without major repairs or renovations.

Homes in La Cañada Flintridge are generally older than those of many communities in Los Angeles County. The city developed as a residential community, beginning with the Flintridge and Alta Canyon subdivisions in the 1920s. As shown in Figure HE-3, the largest proportion of La Cañada Flintridge's housing (37%) was built between 1950 and 1959, making it approximately 62 to 71 years old. Housing units of this age are more likely to require major rehabilitation and repairs. The city has few newer units, as nearly 80 percent of the housing stock was built before 1970.

Overall, the housing stock in the city is generally in excellent condition. Presumably homeowners with higher incomes, such as those in La Cañada Flintridge, can afford to repair and renovate when needed.

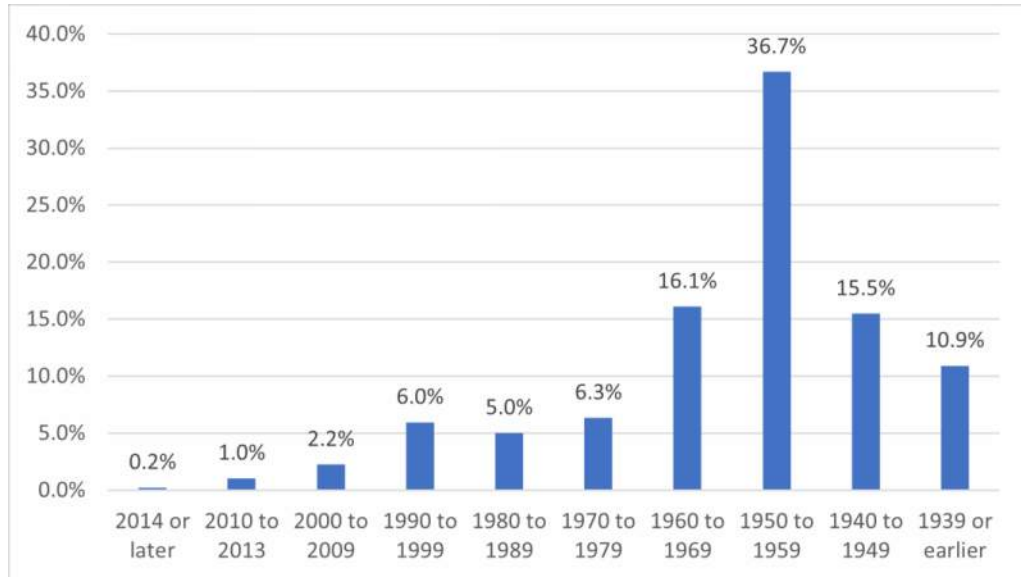
The City tracks complaints submitted to the Code Enforcement officer regarding both building and property maintenance. From 2017 through 2021, building maintenance complaints range from 1-3 % of complaints received. Property maintenance complaints, which are wider ranging than building maintenance, are generally related to overgrown vegetation and would likely not impact the quality of housing stock directly, averaged between 35-40 % in 2017-2018, but reduced to 9-12% in 2019-2021. The difference is attributable to implementation of a new online permitting software program. The Building and Safety Division receives 1-2 complaints per year regarding issues such as inadequate plumbing, mold and other issues which impact the availability of housing. Complaints regarding septic tanks, which service almost all areas south of Foothill Boulevard, average 3-5 per year.

During preparation of a historic preservation ordinance in 2017-2020, the City did assess the age of all structures based on data obtained from the Los Angeles County Assessor. While more than 5,000 of the 7,000+ residential structures within the city were more than 50 years of age, through issued building permits it was determined that the vast majority of units had been renovated, remodeled or added to since the original date of construction. This indicates that regular maintenance and upkeep occurs on most residential units.

Information obtained from the California Department of Finance, Table 2: E-5 City/County Population and Housing Estimates, 4/1/2020, provides 7,118 total

units within the city. Approximately 70% of units are owner occupied and there are 250 multifamily units within the city. Multifamily units were generally built in the 1970s-1980s, so are approximately 40-50 years old. Based on the information above and the number of complaints received regarding building and property maintenance, it is estimated that the number of units requiring rehabilitation or replacement would be approximately 150, or 2% of the housing stock.

Figure HE-3. Year Housing Units Built



Source: American Community Survey 2014-2019 estimates.

9.2.6 Housing Cost and Affordability

Housing costs vary widely from one community to the next, being affected by a range of factors. The type and style of homes, neighborhood characteristics, quality of schools and public services, crime rates, and access to employment opportunities are qualities that many home buyers consider when looking for a new home in a particular community.

La Cañada Flintridge's attractive hillside homes, tree-lined streets, low crime rate, and highly ranked school district are all factors that contribute to the high quality of life in the community. According to local realtors, the primary reasons cited by home buyers that relocate to La Cañada Flintridge are the high caliber of the local school district and the quality of homes in the community. These qualities make La Cañada Flintridge a highly desirable location for families with school-aged children.

9.2.6.1 Ownership Housing Costs

The city has some of the region's highest single-family housing prices. According to SCAG data, median home prices in La Cañada Flintridge increased 200% between 2000 and 2018, while prices in the SCAG region increased 151percent. As shown in Table HE-30, the city's median home price was approximately \$1,435,500 in December 2020, and due to steeply rising home prices in the first one-half of 2021, Zillow reported the price of a typical home in the middle price range as nearly \$2 million as of July 30, 2021.

Table HE-30. Home Prices

City/Community	Median Home Price	Distance from La Cañada Flintridge
La Crescenta	\$1,010,000	2.8 miles
Glendale	\$1,038,500	6.0 miles
Altadena	\$960,000	6.3 miles
Pasadena	\$916,000	7.8 miles
Burbank	\$894,750	11.2 miles
La Cañada Flintridge	\$1,435,000	–

Source: Redfin, December 2020

9.2.6.2 Rental Housing Costs

According to the 2013-2019 ACS, the median contract rent was \$2,858 in La Cañada Flintridge, compared to \$1,614 for Los Angeles County. Few homes are available for rent as of August 2021. Rental listings on Zillow.com indicate the following rental rates as of August 2021:

- One-bedroom apartment/house: none available
- Two-bedroom apartment: \$1,950
- Three-bedroom house: \$2,895, \$5,220
- Four-bedroom house: \$6,950, \$10,520
- Five-bedroom house: none available

9.2.6.3 Housing Affordability by Income Level

The ability to afford a home is an important factor affecting the quality of life in a community. Housing affordability in La Cañada Flintridge can be determined by comparing the costs of owning or renting a home with the maximum amount which households with different income levels can afford to pay for housing.

This information can reveal what type and size of housing is affordable in the community and what types of households will likely experience overcrowding and overpayment.

HUD conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, the California Department of Housing and Community Development (HCD) developed income limits that can be used to determine the maximum price that could be affordable to households in the upper range of their respective income category. Households in the lower end of each category can afford less by comparison than those at the upper end. According to HUD's Comprehensive Housing Affordability Strategy (CHAS) data, as of 2017, the income distribution of La Cañada Flintridge households was as follows (See Table HE-9):

- Extremely Low income: 4.5%
- Very Low income: 4.5%
- Low income: 6.4%
- Moderate or Above Moderate income: 84.6%

The maximum affordable home and rental prices for residents in Los Angeles County are shown in Table HE-31. This amount can be compared to current housing asking prices (Table HE-30) and market rental rates (Section 9.2.7.2) to determine what types of housing opportunities a household can afford.

Extremely Low Income Households

Extremely low income households earn 30 percent or less of the County AMI, up to \$23,700 for a one-person household and up to \$36,550 for a five-person household in 2020. An extremely low income household can generally afford homes offered at prices between \$61,790 and \$86,953, adjusting for household size. After deductions for utilities, a one-person extremely low income household could afford to pay up to \$442 in rent per month and a five-person low income household could afford to pay as much as \$650. Extremely low income households cannot afford market-rate rental or ownership housing in La Cañada Flintridge without assuming a cost burden.

Very Low Income Households

Very low income households earn between 31 and 50 percent of the County AMI – up to \$39,450 for a one-person household and up to \$60,850 for a five-person household in 2020. A very low income household can generally afford homes offered at prices between \$129,241 and \$191,020, adjusting for household size. Given the costs of ownership housing in La Cañada Flintridge, very low income households would not be able to afford a home in the city. Very low income renters would not be able to find affordable appropriately-sized market-rate rental units in La Cañada Flintridge without assuming a cost burden.

Low Income Households

Low-income households earn between 51 percent and 80 percent of the County AMI – up to \$63,100 for a one-person household and up to \$97,350 for a five-person household in 2020. The affordable home price for a low income household at the maximum income limit ranges from \$230,534 and \$347,334. Based on the average home sale price of \$1,435,000 in 2020 (Table HE-30), ownership housing would not be affordable to low income households. After deductions of utilities, a one-person low income household could afford to pay up to \$1,427 in rent per month and a five-person low income household could afford to pay as much as \$2,170. A low income household in La Cañada Flintridge would not be able to find adequately sized affordable apartment units without assuming a cost burden.

Moderate Income Households

Moderate-income households earn between 81 percent and 120 percent of the County AMI – up to \$100,150 depending on household size in 2020. The maximum affordable home price for a moderate income household is \$238,233 for a one-person household and \$359,325 for a five-person family. Moderate income households in La Cañada Flintridge are not able to afford adequately-sized homes. The maximum affordable rent payment for moderate income households is between \$1,472 and \$2,240 per month. Appropriately-sized market-rate rental housing would not be affordable to moderate income households in this income group.

Table HE-31. Housing Affordability by Income Group

Household (Persons)	Annual Income	Affordable Costs	Utilities	Taxes, Ins., HOA (Ownership)	Affordable Rent	Affordable Home Price
Extremely Low Income (0–30% AMI)						
1	\$23,700	\$593	\$151	\$207	\$442	\$61,790
2	\$27,050	\$676	\$166	\$237	\$510	\$72,096
3	\$30,450	\$761	\$190	\$266	\$571	\$80,244
4	\$33,800	\$845	\$223	\$296	\$622	\$86,069
5	\$36,550	\$914	\$264	\$320	\$650	\$86,953
Very Low Income (31–50% AMI)						
1	\$39,450	\$986	\$151	\$345	\$836	\$129,241
2	\$45,050	\$1,126	\$166	\$394	\$960	\$149,182
3	\$50,700	\$1,268	\$190	\$444	\$1,077	\$166,966
4	\$56,300	\$1,408	\$223	\$493	\$1,185	\$182,427
5	\$60,850	\$1,521	\$264	\$532	\$1,257	\$191,020
Low Income (51–80% AMI)						
1	\$63,100	\$1,578	\$151	\$552	\$1,427	\$230,524
2	\$72,100	\$1,803	\$166	\$631	\$1,637	\$265,026
3	\$81,100	\$2,028	\$190	\$710	\$1,837	\$297,157
4	\$90,100	\$2,253	\$223	\$788	\$2,030	\$327,179
5	\$97,350	\$2,434	\$264	\$852	\$2,170	\$347,334
Moderate Income (81–120% AMI)						
1	\$64,900	\$1,623	\$151	\$568	\$1,472	\$238,233
2	\$74,200	\$1,855	\$166	\$649	\$1,689	\$274,020
3	\$83,500	\$2,088	\$190	\$731	\$1,897	\$307,435
4	\$92,750	\$2,319	\$223	\$812	\$2,096	\$338,527
5	\$100,150	\$2,504	\$264	\$876	\$2,240	\$359,325

Assumptions: 2020 HCD income limits; 30 percent of gross income as affordable housing cost; 35 percent of monthly affordable cost for taxes and insurance in determining ownership housing affordable price; 10 percent down payment and 3.0 percent interest rate for 30-year fixed-rate mortgage loan; utilities based on Los Angeles County Utility Allowance.

Sources:

1. State Department of Housing and Community Development 2020 Income Limits.
2. Veronica Tam and Associates, 2021.

9.2.6.4 Affordable Housing

No publicly assisted affordable housing project is located in La Cañada Flintridge.

9.3 Housing Constraints

A variety of factors can constrain the development, maintenance, and improvement of housing. The following section explores various housing constraints in La Cañada Flintridge, including market conditions, governmental regulations, and environmental and infrastructure constraints.

9.3.1 Market Constraints

The price of land, construction costs, and market financing contribute to the cost of housing and can potentially hinder the production of both market rate and affordable housing units. These potential market constraints are driven by market conditions over which the City has little control. Direct public subsidies that lower the cost of housing development, such as land write-down or fee waivers, can be an effective way to lessen the impacts of market conditions. The City can also participate in programs to enhance access to credit for mortgage and home improvement financing for low- and moderate-income households.

9.3.1.1 Construction Costs

Depending on the type of development, construction costs can vary widely, with multi-family housing generally less expensive to construct than single-family homes. However, there is wide variation within each construction type, depending on the size of the unit, amenities, finishing details provided, and whether structured parking is necessary for multifamily and mixed use development, which increases the overall cost of construction. An important factor in the cost of a housing development is the type and number of improvements that must be made to raw land in order to construct housing. Construction costs for residential units in La Cañada Flintridge can rise above regional averages due to the steeply sloping hillsides that characterize much of the remaining vacant land in the community. These topographical features can increase construction costs by as much as 15 to 25 percent over non-hillside development areas, due to the following factors:

- additional soils and geological engineering reports;
- complex foundations, which include exotic caisson and grade beam foundation designs or foundations that incorporate massive retaining walls;
- intensified percolation difficulties leading to more costly onsite septic systems; and
- increased grading required to create adequate building pads.

Areas designated for multi-family developments (including properties designated for mixed use developments) are located on or near Foothill Boulevard in non-hillside locations and are therefore much less likely to be

associated with the topographic constraints that result in these additional costs and factors.

9.3.1.2 Land Costs

Critical determinants in the price of raw land include location, size of parcel, zoning, and supply. La Cañada Flintridge's regional location, attractive neighborhoods, and high caliber school district are qualities that make the community highly desirable for potential homebuyers. This demand, coupled with the built-out status of the community and steep topography of many residential areas, keep land costs high regardless of local controls. According to current listings of vacant land on Realtor.com, the average price per square foot of vacant single-family residential land is approximately \$70 for large sites. In January 2021, there were a total of five vacant single-family parcels for sale, ranging from \$550,000 for approximately 0.4 acre to \$3,995,000 for a 1.05-acre lot. No vacant multi-family parcels were listed for sale.

9.3.1.3 Financing Costs

The availability and cost of mortgage financing directly impact the affordability of housing. Increases in mortgage interest rates can significantly impede housing opportunities, especially for first-time homebuyers, while reductions in interest rates can introduce more potential buyers into the housing market. Over the past 30+ years, interest rates have fluctuated significantly, reaching peak levels of over 12 percent in the late 1980s. Since that period, interest rates have fallen dramatically, with mortgage rates for 30-year fixed rate loans ranging from around 2.7 to 3.3 percent for people with good credit in January 2021.

For the most part, economic conditions and national policies influence mortgage rates and there is little that local governments can do to affect these rates. However, public and private entities can offer interest rate write-downs to expand home purchase opportunities to lower income households, and government-insured loan programs may be available to reduce mortgage down payment requirements.

Under the Home Mortgage Disclosure Act (HMDA), lending institutions must disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all home loan applications, including those financed at market rate or through government assistance. The following discussion presents the lending patterns in the city in 2019.

Home Purchase Loans

There was a total of 682 conventional loan applications in the city in 2019. Of those applications, 63 percent received approval (Table HE-32), though only 59 percent were originated, that is, four percent were not accepted by the applicant. There were 17 applications for government-backed loans during 2019. Nine of

the loans were approved and originated. A similar proportion of conventional and government-backed loans were denied, withdrawn, or incomplete.

There were also significant applications for home improvement (253) and refinancing (1,585) loans. Low interest rates have made refinancing especially popular in recent years. Approval rates for refinancing loans were comparable to conventional purchase loans, at nearly 60 percent with 57 of loans originated. Home improvement loans had slightly lower approval rates at about 53 percent with all but one approved application originating.

Table HE-32. Disposition of Conventional Home Purchase Loans—2019

Loan Purpose/Type	Total Applications	Loans Originated		Approved Not Accepted		Denied		Withdrawn or Incomplete		Loans Purchased	
		#	%	#	%	#	%	#	%	#	%
Purchase - Conventional	656	388	59.15%	26	3.96%	47	7.16%	113	17.23%	82	12.50%
Purchase - Government	17	9	52.94%	0	0.00%	2	11.76%	3	17.65%	3	17.65%
Home Improvement	253	133	52.57%	1	0.40%	87	34.39%	29	11.46%	3	1.19%
Refinancing	1,585	909	57.35%	40	2.52%	178	11.23%	271	17.10%	187	11.80%
Total	2,511	1,439	57.31%	67	2.67%	314	12.50%	416	16.57%	275	10.95%

Note: An originated loan is one that is approved by the lender and accepted by the applicant.

Source: LendingPatterns.com™, HMDA 2019, La Cañada Flintridge.

Foreclosures

Los Angeles County, and the Southern California region in particular, experienced soaring home prices coupled with low interest rates from 2000 to 2005. The new financing (adjustable rate mortgages) as well as predatory lending practices (aggressive marketing, hidden fees, and negative amortization) allowed people to purchase homes beyond their means. However, changes in the state and national economy led to rising interest rates in 2006 and nationwide home prices declined. As the interest rates increased and home prices decreased, many households that were trapped in adjustable rate mortgages were unable to refinance their loans with fixed rates. Foreclosure rates reached national highs, and many California cities were affected. As of August 2007, the Los Angeles/Long Beach metro area ranked 29th on a list of highest foreclosure rates nationally.⁴⁵

⁵ http://money.cnn.com/2007/08/14/real_estate/California_cities_lead_foreclosure/index.htm?postversion=2007081411

Foreclosures peaked at 29 in La Cañada Flintridge 2010, after which the number of foreclosures has steadily to only a few foreclosures annually. There were 145 total foreclosures in La Cañada Flintridge between 2007 and 2018, but only one in 2018. However, it is possible that the economic impacts of the COVID-19 pandemic may lead to an increase in foreclosure rates in the future.

9.3.2 Government Constraints

Actions or policies of governmental agencies, whether involved directly or indirectly in the housing market, can impact the ability of the development community to provide adequate housing to meet consumer demands. For example, the impact of federal monetary policies and the budgeting and funding policies of a variety of departments can either stimulate or depress various aspects of the housing industry.

State agencies and local government compliance with state statutes can complicate the development of housing. Statutes such as the California Environmental Quality Act (CEQA), and rezoning and General Plan amendment procedures required by the California Government Code can also act to prolong the review and approval of development proposals by local governments. In many instances, compliance with these mandates establishes time constraints that cannot be altered by local governments.

City policies can also impact the availability and affordability of housing. Land use controls, building codes, site improvement requirements, fees, and other local programs to improve the overall quality of housing may serve as constraints to housing development. The following public policies can affect overall housing availability, adequacy, and affordability.

9.3.2.1 Land Use Controls

The La Cañada Flintridge General Plan and Zoning Code provide for a range of land use designations/zones in the city that can accommodate residential units. The City's Downtown Village Specific Plan applies to the downtown core of the city and provides development guidance and standards for that portion of La Cañada Flintridge.

All applications for development must comply with the density range within the adopted General Plan. If an application were to be received for a density lower than that identified within the General Plan, it would be processed in accordance with state law but with a staff recommendation for denial based on non-compliance with the General Plan. There is no Variance or other application that can be utilized to approve a project at a lower density than required. The City allows for the concurrent submittal of housing development applications through Planning and plan check through Building and Safety to minimize delays in the approval and development process. However, a building permit

cannot be issued until the end of the 15-day appeal period for an entitlement through Planning.

Residential land use designations and corresponding zones are presented in Table HE-33. The distribution of land use by zoning is presented in Figure HE-4.

Table HE-33. Residential Land Use Designations (Existing)

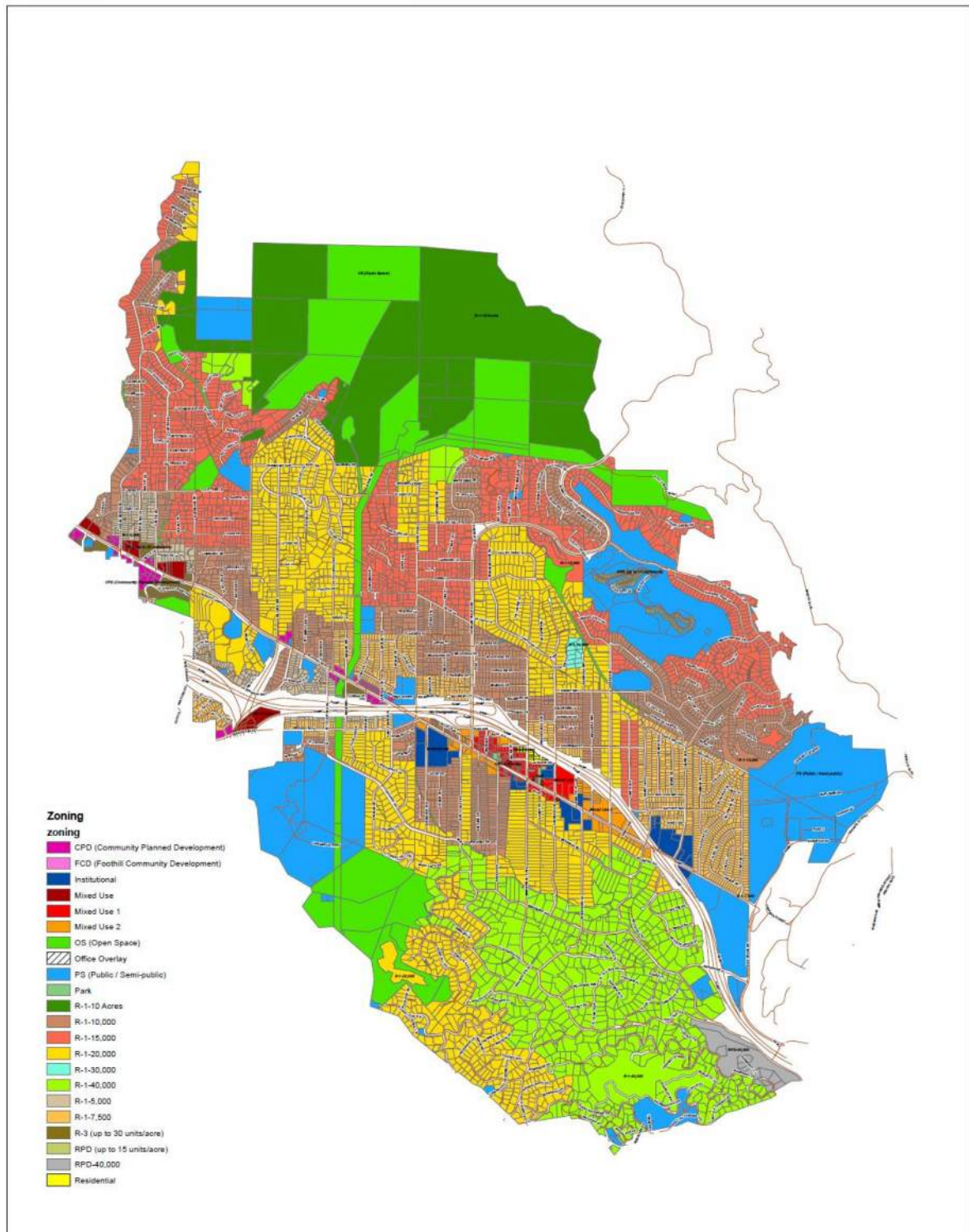
Residential Land Use Category	Corresponding Zone/District	Maximum Density	Description
Single-Family Residential			
Hillside Residential	R-1-10 acre	1 du/10 acre	Extremely low density development in steeply sloping hillside areas in the northern portion of the city. The minimum lot size is 10 acres.
Estate Residential	R-1-40,000	1 du/acre	Extremely low density development for single-family homes with a minimum lot size of 40,000 SF.
Very Low Density	R-1-20,000 and R-1-30,000	2 du/acre	Very low density development for single-family homes with a minimum lot size of 20,000 SF or 30,000 SF.
Low Density Residential	R-1-10,000 and R-1-15,000	4 du/acre	Low density residential development for single-family homes with a minimum lot size of 10,000 SF or 15,000 SF.
Medium Density Residential	R-1-5,000 and R-1-7,500	8.7 du/acre	Medium density single-family residential development with a minimum lot size of 5,000 or 7,500 SF.
Medium Density Residential	Residential Planned Development (RPD)	4 du/ac	Single-family residential development is allowed in the RPD zone consistent with the zoning and development standards required of the R-1-5,000 zone.
Multi-Family			
High Density Residential	R-3	20-30 du/acre	High and transitional and supportive housing.
High Density Residential	RPD	20-30 du/acre	Differs from R-3 by providing opportunities to: <ul style="list-style-type: none"> ▪ To encourage compatibility of multifamily projects with adjacent uses; ▪ To promote high standards of site planning, architecture and landscape design; ▪ To provide opportunities for design flexibility while maintaining high quality in multifamily residential developments; ▪ To avoid overloading of utilities; ▪ To provide for orderly transition between the types of residential land uses, and between residential and commercial land uses, as outlined in the land use element of the general plan; ▪ To promote internal compatibility of each project's architecture, landscaping, and use of open space to achieve a high quality residential environment; and ▪ To assure that sufficient open space is provided for both private and common areas.

Residential Land Use Category	Corresponding Zone/District	Maximum Density	Description
Mixed Use			
Mixed Use	MU	30 du/acre	Provides for a mix of residential and non-residential uses within a single development. The uses can be vertically and horizontally mixed.
Downtown Village Specific Plan	Mixed Use 1 (MU-1)	15 du/ac	MU-1 allows various combinations of retail, office, and multi-family residential and senior housing. Residential is only allowed on the upper level of a building w/a CUP and must have retail or other non-residential uses on the ground floor.
Downtown Village Specific Plan	Mixed Use 2 (MU-2)	15 du/ac	MU-2 allows various combinations of retail, office, and multi-family residential and senior housing, as well as stand-alone residential. Unlike MU-1, MU-2 does not limit MF residential to the upper level, although it also requires a CUP.
Downtown Village Specific Plan	Residential	SF: up to 8.7 du/ac MF: up to 15 du/ac	Detached single-family (min. lot size 5,000 SF) and multi-family residential developments are permitted.
Public	Public and Semi-Public	See description	One detached, single-family dwelling unit per lot

Sources: Land Use Element (2013), Downtown Village Specific Plan and Zoning Ordinance (2021).

Higher densities are not considered feasible in many areas of the La Cañada Flintridge due to environmental and infrastructure constraints. However, multi-family development in the R3 and RPD zones requires a minimum density of 20 dwelling units per acre with a maximum density of 30 dwelling units per acre, and the Mixed Use zone allows up to 30 dwelling units per acre, both of which encourage development at higher densities within these zones.

Figure HE-4. Zoning Map



Prepared by the Community Development Department

City of La Cañada Flintridge Zoning Map



Updated April 2016

9.3.2.2 Residential Development Standards

The City's Zoning Code contains development standards for each zoning district consistent with the land use designations of the Land Use Element of the General Plan. The La Cañada Flintridge Zoning Code establishes development standards for each zone to ensure quality development in the community. Development criteria, as specified in the Zoning Code, are presented in Table HE-34.

The City is currently preparing a comprehensive update to the Zoning Code, which will result in changes to certain land uses, development standards, and permit processes. Because the updated Zoning Code will not be adopted prior to the adoption of the 6th Cycle Housing Element, the existing Zoning Code is being used to identify constraints to development. However, as noted in this chapter and in Chapter 9.5, many of the constraints are already being addressed as part of the Zoning Code update. Additional revisions to mitigate constraints will be considered as the comprehensive update to the Zoning Code progresses.

Table HE-34. Basic Residential Development Standards

Standards	R-1	R-3/RPD	DVSP: MU1, MU2, Residential	MU	PS
Min. Lot Size	Varies from 5,000 sf to 10 acres	R-3: Sites less than 7,500 sf can only be developed with a SF residence RPD: 0.5 acre	SF: 5,000 sf MF: 1.0 acre	5,000 sf	0.5 acre
Max. Floor Area/Lot Coverage	Less than 80 ft. of frontage: floor area review required when exceeding 4,500 sf 10,000 sq. ft. or less: 36% of lot area 10,001 to 15,000 sf: 3,600 sf + 23% of lot area over 10,000 sf 15,001 sf or more – 4,750 sq. ft. + 20% of lot area over 15,000 sf. ¹	SF: Same as R-1-5,000 MF: 50%	MF: Average open space of 600 sq. ft. per dwelling unit	80%	35%
Setback: Front	Flag lots, minimum of 25 ft. For all other lots: front yard setback is based on the average depth of the front setback of the properties along the same side of the block, subject to available data.	SF: Same as R-1-5,000 MF: 25 ft. arterial streets; 20 ft. local streets	SF: same as R-1 MF: No required front yard setback, although setbacks required for a multi-family are subject to CUP review. MU: Contiguous with front property line, or up to 10 ft in the Village Center.	0-5 ft. average	25 ft
Setback: Side Yard	First Floor Interior Side Yard: Min. 5 ft or 10% of the average lot width (whichever is greater) Max. 20 ft Lots with 80 ft or less average lot width, and total floor/roofed area exceeding 4,500 sf: Interior side yard min. 8 ft Exterior side yard min. 16 ft	SF: Same as R-1-5,000 MF: Interior side: 10 ft.,	SF: Same as R-1 MF: No required side yard setbacks, although setbacks required for a multi-family are subject to CUP review. MU: No required side yard setbacks	0 ft., 15 ft. if adjacent to residential zone	

Standards	R-1	R-3/RPD	DVSP: MU1, MU2, Residential	MU	PS
Setback: Corner (Street) Side Yard	Min. 10 ft or 20% of the average lot width Max. 20 ft	SF Same as R-1-5,000 MF: 15 ft. arterial street; 10 ft. local street Reverse corner side: 20 ft	SF: Same as R-1 MF: No required side yard setbacks, although setbacks required for a multi-family are subject to CUP review MU: No required side yard setbacks.	0 ft., or 15 ft if adjacent to residential zone	25 ft.
Setback Required: Rear Yard	15 ft.	SF: Same as R-1-5,000 MF: 25 ft.	SF: Same as R-1 MF: 15 ft. MU: No required rear setbacks, except a min. 15 feet is required for any use adjacent to residential zones on the south side of Foothill Boulevard in Village Center.	5 ft., or 15 ft. if adjacent to residential zone	25 ft.
Height	28 ft. - lots < 10,000 sq. ft., all hillside lots, or lots of less than 65 ft. of frontage 32 ft. - lots > 10,000 sq. ft.	SF: Same as R-1-5,000 MF: 35 ft.	SF: Same as R-1 5,000 MF: two stories, or 32 ft. MU: Fronting Foothill Blvd in Village Center: - buildings less than 35,000 sq. ft. floor area: 24 ft. -buildings more than 35,000 sq. ft. floor area: 32 ft. Not fronting Foothill Blvd: 32 ft.	35 ft.	35 ft.
Sources: La Cañada Flintridge Zoning Code (2as of 021) and DVSP (as of 2021)					

La Cañada Flintridge's development standards are typical for the region, and establish opportunities for a diverse housing mix, while retaining the existing residential characteristics of the community and protecting environmentally sensitive hillside areas. Maximum height requirements range from 28 feet to 35 feet. In some cases, this has been found to constrain housing development as projects have been unable to achieve allowable densities and heights without exceptions to the zoning standards. The technique for measuring allowable heights has also presented a constraint to development. The City is currently in the process of updating the development standards in its zoning code to facilitate housing development. Program 3 includes modifications to allowable heights, measurement standards, and other changes to remove constraints and ensure that properties can be developed at the full allowable densities. Program 3 also includes preparation of objective design standards for the R-3 and MU zones.

In order to accommodate residential growth, the City allows for higher density in the multifamily, mixed use and Specific Plan areas. The multifamily and Mixed Use land use designation facilitates higher density residential development in the city outside of the Downtown Village Specific Plan area. Development standards adopted for the R-3 and Mixed Use designation permit densities of 20 to 30 dwelling units per acre for multi-family projects.

The City's Downtown Village Specific Plan (DVSP) provides for integration of residential uses along Foothill Boulevard at densities of up to 15 units per acre. The DVSP replaced the Foothill Community District, Community Planned Development, and Public/Semi-Public zones that previously existed for this area with Mixed Use 1, Mixed Use 2, Residential, Institutional, and Park zones. Land use zones within the DVSP include a combination of single-family detached, single-family attached, and multi-family residential uses. The DVSP designates three Land Use Districts that can accommodate residential development:

- **Mixed Use 1:** Retail on the ground floor with office uses and residential uses permitted on upper levels only (CUP required).
- **Mixed Use 2:** Multi-family residential, office, and retail mix. Office use is permitted on upper levels only, and multi-family use is permitted on ground or upper levels (CUP required).
- **Residential:** This area is exclusively designated for residential development. Single-family homes, condominiums, townhomes, and apartments are permitted.

Program 4 includes proposed changes to the DVSP to encourage additional residential development within the DVSP. Proposed changes include: removing the MU-1 and MU-2 districts; creating the MU-12 and MU-25 districts; assigning parcels on the Sites Inventory with either MU-12 (a density of 12 – 15 dwelling units per acre), or MU-25 (increasing the density to 25 - 30 dwelling units per acre); modifying development standards; eliminating the restriction for residential only to be allowed on the upper level within a mixed use

development; and eliminating the CUP requirement for mixed use and multifamily development. In addition to promoting additional residential development, the proposed changes provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's primary commercial corridor.

Hillside Development

The City recognizes that the community's hillside areas provide an important aesthetic, environmental, and recreational resource to the community. To preserve habitat areas and natural characteristics of the city's hillside areas, additional development standards are imposed on hillside properties based on topographic and viewshed concerns.

However, some of the hillside areas of La Cañada Flintridge, which were developed into the steep terrain, resulted in long, winding roads that terminate on the sides and tops of ridges leading to single-family residences. This creates a challenge for emergency vehicles which may, at times, have difficulty accessing homes due to inadequate roadway widths, while vehicles parked on-street within the right-of-way further narrow the drive lanes. In many areas there is no adequate space for emergency vehicle turnarounds in single-family neighborhoods. Because La Cañada Flintridge is a Tree-City, there are approximately 15,000 trees that are located in the public right-of-way, which can narrow available drive lanes for emergency vehicles to navigate, and also creates a potentially hazardous situation in the event of evacuation, especially if thick smoke is present. Dense foliage intended to provide privacy for homeowners can prevent firefighting equipment from having adequate visibility and access to a structure. Some locations in the City lack visible street signs, while others have a street numbering system that does not follow the County addressing standard and needs to be corrected to improve public safety. Data from the wildfirerisk.org website published by the USDA Forest Service indicates that populated areas in La Cañada Flintridge have, on average, greater wildfire likelihood than 86% of all the communities in Los Angeles County.

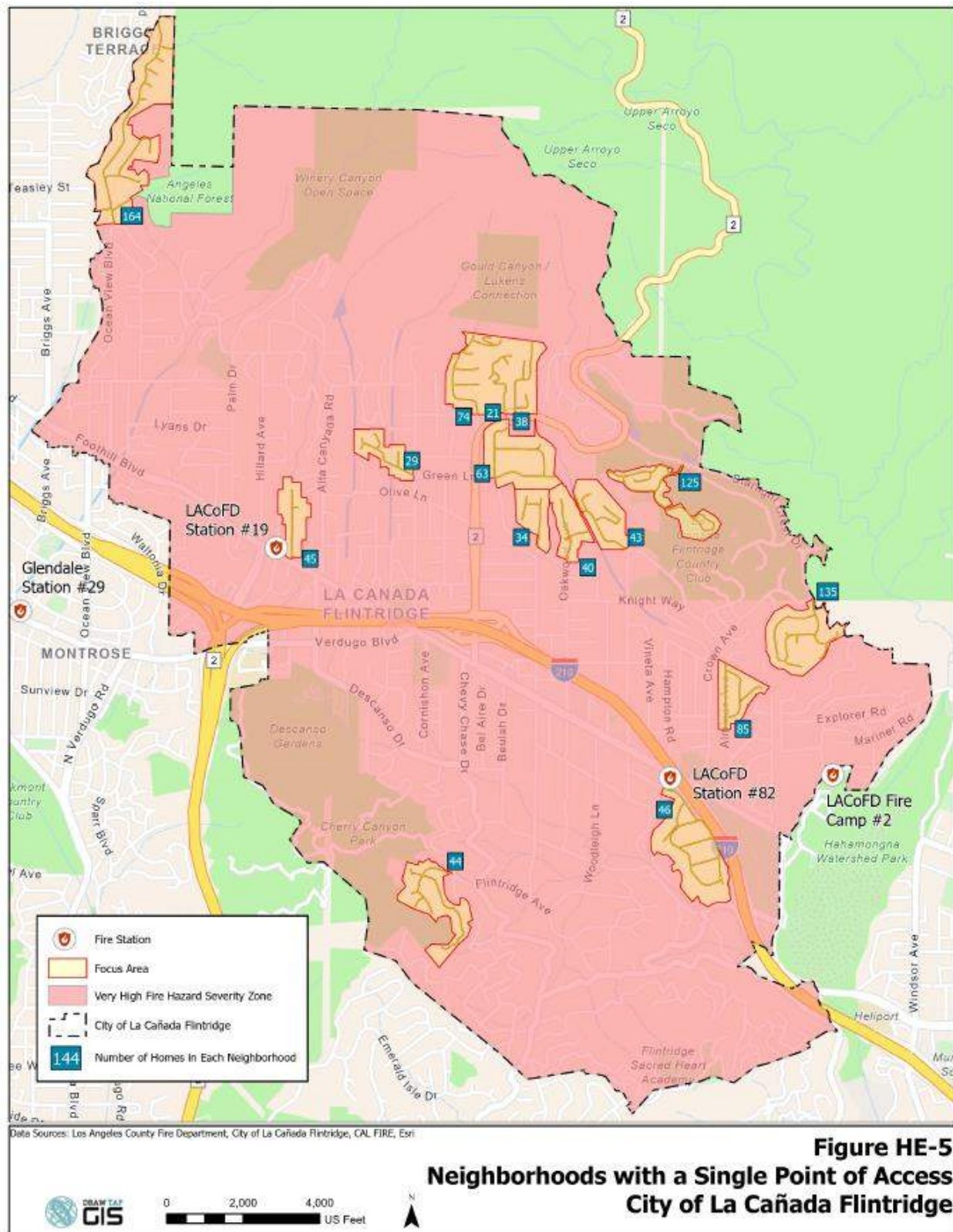
There are 15 neighborhoods in La Cañada Flintridge, totaling 986 houses, with a single point of access and egress, and several of these areas are in the hillsides of the city. See Figure HE-5 for the locations of these areas. Depending on the location and slope of the lot, the General Plan and the Zoning Code establish standards to provide limitations on residential densities and the maximum size of dwelling units. Due to geological and construction constraints and safety issues, the City permits only low-intensity developments and ADUs/JADUs as required by state law in the hillside areas.

State law allows local jurisdictions to identify areas where ADUs are not appropriate due to safety concerns. Because of the potential challenges of evacuating neighborhoods with a single point of access in an emergency, the City's recently updated Safety Element (2021) prohibits future new development

in these 15 areas, including ADUs and JADUs, and prohibit the conversion of existing spaces to ADUs. Properties with substandard driveway widths are also prohibited from adding ADUs, JADUs, and converting existing spaces to ADUs due to insufficient access for emergency vehicles, unless access is widened to current standards.

The preparation of the City's Safety Element entailed considerable coordination with the California Department of Forestry and Fire Protection (CAL FIRE), the Los Angeles County Fire Department (LACoFD), and was reviewed by the State Board of Forestry and Fire Protection for completeness and compliance with State mandates. Prohibiting the development of ADUs and JADUs in the areas in the City with serious wildfire safety, and therefore life safety concerns is not considered a constraint to development in the City. As discussed in Section 9.3.2.3, ADU construction in the City has increased substantially in the first portion of 2022, and this increase has happened following adoption of the updated Safety Element.

Figure HE-5. Neighborhoods with a Single Point of Access



Parking Requirements

As shown in Table HE-35, the City’s Zoning Code contains provisions for parking based on unit type, and on a per-bedroom basis for multi-family units. Although off-street parking requirements are typical for the region, the City is currently considering a further reduction of off-street parking requirements for residential uses via the comprehensive update to the Zoning Code. As parking construction can contribute significantly to the cost of a project, any reduction in required parking would lower development costs and further lessen any constraint on housing development created by parking requirements. Program 3 includes modifications to off-street parking requirements for residential uses, so that they are appropriate for the size, scale, and type of residential development.

Table HE-35. Parking Requirements

Unit Type	Parking Requirement
Single-Family:	2 spaces in a fully enclosed garage space
Multi-Family and Mixed Use:	Zero to one bedrooms: 1 parking space/unit Two bedrooms: 2 parking spaces/unit 3 bedrooms: 2.25 parking spaces/unit Four or more bedrooms: 2.5 parking spaces/unit One guest parking space per four units. Minimum one covered space per unit.
Emergency Shelters:	One space for every four beds, one-half space for every bedroom designated for families, and one space per each staff member.
Single Room Occupancy (SRO):	One space per employee or resident manager, and one space per unit.
Transitional Housing Units:	Subject to the same parking standards that apply to comparable residential uses in the same zone
Supportive Housing:	Subject to the same parking standards that apply to comparable residential uses in the same zone
Downtown Village Specific Plan:	The parking standards of the Zoning Code apply in the DVSP unless a Parking District is established.
Sources: La Cañada Flintridge Zoning Code (as of 2021), Downtown Village Specific Plan (as of 2021).	

Reduced parking is allowed for affordable housing consistent with the City’s Affordable Housing Density Bonus, which is also in the process of being updated to maintain compliance with state law, or by provision of a parking study that justifies a reduced rate. The comprehensive update of the Zoning Code proposes further reductions to multifamily residential and mixed use parking standards and also proposes new parking standards for senior housing at rates that are lower than for non-senior multifamily housing (see Program 3). Additionally, the City’s existing parking standard for emergency shelters will be revised to maintain consistency with state law (Program 15).

9.3.2.3 Provision for a Variety of Housing Types

State housing law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all segments of the population, including multi-family rental housing, factory built housing, mobile homes, emergency shelters, transitional housing, supportive housing, single room occupancy facilities, and low barrier navigation centers (a new state requirement since the last update of the Housing Element).

Table HE-36 summarizes the housing types permitted in each of the residential zoning districts, as described in the City’s current Zoning Code, while Table HE-37 summarizes the housing types permitted in the DVSP. The comprehensive update of the Zoning Code will include updates to modernize language and ensure residential development standards comply with state law. Where residential uses are outdated or vague, the update will provide clarity to ensure the code complies with state law regarding what uses must be permitted in each zone. For example, Program 3 adds a new provision for senior housing that has reduced parking standards; Program 6 will require by-right approval for projects with 20 percent affordable housing; Program 8 ensures the City’s ADU ordinance remains consistent with state law; Program 12 updates the condominium conversion ordinance; Program 14 updates the density bonus ordinance; and Program 15 updates the special needs housing ordinance.

Although not a part of the current comprehensive update of the Zoning Code, Program 4 proposes updates to the Downtown Village Specific Plan to incentivize residential development, including increased density, modification of development permits to allow residential development by right, modifications to development standards to reduce constraints, and preparation of objective design standards that apply in the DVSP. Program 15 provides for updating the Zoning Code to add a provision for low barrier navigation centers and to make any other changes to ensure that ordinances regarding special needs housing uses (e.g., emergency shelters, low barrier navigation centers, transitional and supportive housing, and single-room occupancy facilities (SROs) provided and maintained consistent with state law.

Table HE-36. Housing Types by Zoning District

R-1	R-3	RPD	CPD	PS	MU	OS
Single-family residences	One detached single-family residence/lot	One detached single-family residence/lot	Emergency shelters (necessary for city's homeless population) in the Emergency Shelter Overlay Zone	One detached single-family residence/lot	Apartments and condominiums	Residence, caretaker, for use by a caretaker or supervisor and his or her immediate family where continuous supervision is required. (subject to director's review)
Accessory Dwelling Unit or Junior Accessory Dwelling Unit	Duplex, triplex, or MF dwellings, apartments, and dwelling groups with 2 or more units	Duplex, triplex, or MF dwellings, apartments, and dwelling groups with 2 or more units	Institutions for aged persons or children, private	Accessory Dwelling Unit or Junior Accessory Dwelling Unit	Rooming and boarding houses	
Child day care, adult day care, foster care, or home for the aged as mandated by state law	Residential condominium projects	Residential condominium projects	Rooming and boarding houses		Accessory Dwelling Unit or Junior Accessory Dwelling Unit	
Transitional housing	Family day care home, small or large, as permitted by state law;	Foster family homes for senior citizens or developmentally disabled, 6 or fewer, as permitted by state law	Emergency shelters (beyond necessary for city's homeless population) in the Emergency Shelter Overlay Zone with a CUP		Transitional housing	
Supportive housing	Foster family homes for senior citizens or developmentally disabled, 6 or fewer,	Foster home facilities for children, 6 or fewer, as permitted by state law	Single room occupancy (SRO) facilities		Supportive housing	

R-1	R-3	RPD	CPD	PS	MU	OS
	as permitted by state law					
	Foster home facilities for children, serving six or fewer children, as permitted by state law	Accessory Dwelling Unit or Junior Accessory Dwelling Unit				
	Accessory Dwelling Unit or Junior Accessory Dwelling Unit					
Transitional housing	Transitional housing	Transitional housing				
Supportive housing	Supportive housing	Supportive housing				
Source: La Cañada Flintridge Zoning Code (as of 2021)						

Table HE-37. Housing Types by Zoning District in the Downtown Village Specific Plan

MU-1	MU-2	R	I
Permitted			
		Single-family dwelling	
Conditionally Permitted			
Multiple family dwelling (upper level only)	Multiple family dwelling	Senior multiple family dwelling	Residential care home and facilities
Senior multiple family dwelling (upper level only)	Senior multiple family dwelling		
Source: Downtown Village Specific Plan (as of 2021)			

Single-Family Housing

Single-family detached housing is permitted in the R-1, R-3, RPD, and PS zones, as well as the Residential zone in the DVSP. Attached single-family housing is also permitted in R-3 and RPD zones.

Multi-Family Housing

The City's Zoning Code and General Plan identify several areas in the community for multi-family residential uses, including the R-3, RPD, and MU zones, as well as the MU-1, MU-2, and R land use districts in the DVSP. Allowable densities in these zones are 20-30 units per acre in the RPD, R-3, and MU zones, while in the DVSP area density is limited to 15 units per acre in the MU-1 and MU-2 districts. As noted above, Program 4 proposes to remove the MU-1 and MU-2 zoning districts, create MU-12 and MU-25 zoning districts, and increase the maximum density in the MU-25 district of the DVSP to 30 dwelling units per acre.

As part of the Zoning Code update, the City is proposing to add a new senior citizen multifamily residential ordinance to the Zoning Code to facilitate development of senior housing to address the Housing Element Needs Assessment (Chapter 9.2) and to implement Goal 6 of the Land Use Element (Program 3). The purpose is to encourage a mix of residential types to satisfy a variety of senior housing needs and to ensure that multifamily housing that is designed for senior citizens facilitates their ability to live independently and provides enhanced safety and convenience features. It will apply to senior citizen multifamily housing development in the R-3, RPD, and MU zones of the Zoning Code, and in the Residential, Mixed Use 12, and Mixed Use 25 districts of the Downtown Village Specific Plan.

The City is also proposing to add a religious institution overlay zone to facilitate and incentivize affordable multifamily residential housing on property owned by religious institutions (Program 5).

Condominiums

In order to preserve the existing multifamily rental housing in the community, the City has adopted a condominium conversion ordinance that includes tenant provisions and a number of standards and criteria. Before a multifamily rental property is converted to condominium ownership, the applicants must provide an information report on the rental and vacancy rate of the property and provide an analysis of the effect of the proposed conversion of the property on the City's low- and moderate-income housing supply. The applicant must also follow stringent development standards and an extensive review process by the City. These changes are intended to preserve the limited apartment stock in the city for rental use. Program 12 updates this ordinance.

Accessory Dwelling Units

An accessory dwelling unit (ADU) is an attached or detached residential unit that provides complete independent living facilities for one or more people. A Junior Accessory Dwelling Unit (JADU) is an ADU contained entirely within a single-family residence. Twenty ADUs were approved in the City between 2018 and 2020 – five in 2018, two in 2019, and 13 in 2020. In 2021 the City issued 10 building permits for ADUs/JADUs. In the first six-months of 2022, the City has issued 24 building permits for ADUs/JADUs. Therefore, averaging the number of building permits in 2020 (13), 2021 (10) and not yet completed 2022 (24), an average of 15.7 ADU/JADU permits have been issued. This is consistent with the 15 annual permits and 120 total permits anticipated to meet the RHNA for this 2021-2029 6th Cycle Housing Element.

In May 2020, the City adopted new regulations for ADUs to comply with state legislation, including AB 68, AB 881, AB 587, AB 671, and SB 13. This legislation promotes the construction of new ADUs and JADUs and limits the ways cities can regulate their design. Under the new regulations, ADUs and JADUs are permitted with a Zoning Clearance on any lot zoned R-1, R-3, RPD, PS, or MU zone. Under current state law the City may adopt regulations governing the design of ADUs, but no lot coverage, floor area ratio, open space, or minimum lot size can preclude the construction of a “statewide exemption ADU,” which is an ADU with an area up to 800 square feet, height up to 16 feet, and 4-foot side and rear yard setbacks.

The maximum size of ADUs may not exceed 50 percent of the floor area of the primary dwelling, or 1,200 square feet, except that units up to 800 square feet are permitted under the statewide exemption. One parking space is required for each unit, except in cases where state law eliminates parking requirements, such as when the ADU is within ½ mile walking distance of public transit.

The increase in approvals of ADUs in 2020, 2021 and 2022 (noted above) indicates that the updated regulations have incentivized ADUs. Program 8 includes updates to the Zoning Code and Downtown Village Specific Plan to ensure ongoing compliance with state law related to ADUs/JADUs. Program 21 will restrict construction of new ADUs/JADUs in the neighborhoods that have been identified as having one means of ingress and egress, as noted in other sections of this Housing Element, for safety reasons.

Manufactured Homes

The City’s Zoning Code defines a “manufactured home” as a structure, transportable in one or more sections, that is built on a permanent chassis and is designed for use with or without a permanent foundation when attached to the required utilities. This definition does not include a recreational vehicle. Manufactured homes that are installed on a foundation are permitted on a single-family lot. Manufactured housing that is not constructed with a

foundation is generally found in mobile home parks. This type of housing is subject to the same development standards and design review criteria as “stick-built” housing.

Group Care Facilities

Group care facilities, including group homes for seniors, developmentally disabled adults, and foster family care homes serving six or fewer persons are permitted in the R-3 and RPD zones. Private institutions of 16 people or more are conditionally permitted in the CPD zone and the DVSP Institutional zone. Group care facilities of seven or more individuals are conditionally permitted in the CPD, MU and DVSP Institutional zones. As part of the comprehensive update to the Zoning Code that is currently in process, the code will be clarified to ensure that group care facilities are permitted in accordance with the requirements of state law, and to show clearly which zones permit group care facilities (Program 3).

Emergency Shelters

According to the most recent survey conducted by LAHSA, two unhoused people were identified in La Cañada Flintridge. The neighboring cities of Glendale and Pasadena provide a wide variety of homeless services and facilities.

Pursuant to SB 2, local jurisdictions must address the shelter needs of the homeless. Specifically, emergency shelters must be permitted by right in at least one zone with adequate capacity to accommodate at least one shelter.

The identified zone must have adequate capacity to accommodate at least one shelter. The Zoning Code was amended in 2014 to permit one emergency shelter by right in areas within the Emergency Shelter Overlay Zone in the CPD zone, as one shelter would be adequate to accommodate the City’s identified need of people experiencing homelessness; any additional emergency shelter would require a CUP. The emergency shelter regulations permit up to 30 beds, which is adequate to accommodate the very limited number of unsheltered people in the La Cañada Flintridge. However, subsequent changes to state law have modified standards for emergency shelters, including parking standards. The City will revise the Zoning Code to update and maintain standards that are consistent with state law (Program 15).

Low Barrier Navigation Centers

Recent state legislation (AB101) requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” (LBNC) is defined 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.” LBNCs may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions. AB 101 also set a timeline for jurisdictions to act on applications for LBNC developments. The requirements of this bill are effective through the end of 2026, at which point they may be repealed unless extended by the legislature. Program 15 includes an update to the development code to allow low barrier navigation centers as required by state law.

Transitional Housing

Consistent with SB 2, local jurisdictions must address the need for transitional housing. California Government Code [Section 65582(h)] defines “transitional housing” as buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

In 2014 the City amended the Zoning Code to address the provision of transitional housing. Transitional housing is recognized as a residential use and to be permitted in the same manner as comparable residential uses in the same zone. The City will update its Zoning Code when necessary to remain consistent with state law regarding transitional housing (Program 15).

Supportive Housing

Supportive housing links the provision of housing and social services for the homeless, people with disabilities, and a variety of other special needs populations. California Government Code [Section 65582(f)] defines “supportive housing” as housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists 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. Government Code [Section 65582(g)] identifies “target population” as persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

The City amended the Zoning Code in 2014 to address the provision of supportive housing. Supportive housing is recognized as a residential use to be

permitted in the same manner as comparable residential uses in the same zone. When located within ½ mile of a transit stop, state law specifies that no off-street parking may be required for supportive housing. Program 15 includes updates to the Zoning Code to ensure that regulations for supportive housing comply with state law.

Single-Room Occupancy (SRO)

Single-Room Occupancy (SRO) units are one-room units intended for occupancy by a single individual. They are distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not necessarily required to have a kitchen or bathroom, many modern SROs have one or the other.

The City amended the Zoning Code in 2014 to permit SROs with a Conditional Use Permit in the CPD zone and is proposing to allow SROs in the MU zone with a Conditional Use Permit as part of the comprehensive update of the Zoning Code, subject to the following standards: Single-occupancy rooms shall have a floor area of between 200 and 300 square feet; double-occupancy rooms shall be between 350 and 400 square feet, and rooms shall have a maximum occupancy of two people. Each SRO unit shall have bathroom and kitchen facilities. Interior common area will be provided, along with laundry facilities and a cleaning supply room. A manager shall be available at all times. Units shall be rented month-to-month for a period not to exceed six months.

Farm Worker and Employee Housing

Pursuant to the California Employee Housing Act (Section 17000 of the California Health and Safety Code), any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation. Employee housing for six or fewer people must be permitted wherever a single-family residence is permitted. To comply with state law, no conditional use permit or variance can be required for employee housing. The zoning ordinance does not reference employee housing or define it as a distinct use. When employee housing for six or fewer people is provided in a single-family residence it is regulated in the same way as comparable single-family residences.

State law further requires housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household be considered an agricultural land use, and permitted in the same way as other agricultural uses. There are currently approximately 50 people working in the agriculture industry in the city. However, as an urbanized community, there is no land within La Cañada Flintridge designated for commercial farming or a comparable agricultural use that would warrant provision for agricultural worker housing under this requirement.

Short-Term Vacation Rentals

As home-sharing websites have risen in popularity in recent years, there has been a significant increase in the number of homes being offered on a short-term basis to generate rental income. Homes may be offered as “home-shares,” where the primary resident offers one or more rooms to visitors while remaining on site, or whole homes may be rented on a daily or weekly basis. While the impact of short-term rentals on housing availability and affordability is still being evaluated, there is evidence that short-term rentals have a negative effect on housing affordability by changing the way residential properties are used and reducing housing availability for local residents.

Jurisdictions vary in their approach to short-term rentals. On one end of the spectrum, some cities remain silent on the issue and do not create specific permits or regulations for short-term rentals. On the other end, some cities choose to ban short-term rentals of any kind. Many cities do allow short-term rentals at least some zones, while also requiring permits for rental properties and including performance standards for short-term rentals.

At this time, the City’s Zoning Code does not include regulations specific to short-term vacation rentals. In early 2020, the City Council considered an ordinance to prohibit short-term vacation rentals within La Cañada Flintridge. However, based on input from the community in support of short-term vacation rentals, the Council instead decided to study the issue further and evaluate potentially allowing rentals with regulations. In the meantime, since the City’s Zoning Code is a permissive one, short-term vacation rentals are not allowed because they are not specifically called out as a permitted use.

9.3.2.4 Housing for Persons with Disabilities

Housing options for persons with disabilities are often limited. The Americans with Disability Act (ADA) came into effect in 1990. Multi-family housing built prior to 1990 does not typically include accessible units on the ground floor and the ADA does not cover single-family homes. Rehabilitation to accommodate the accessibility needs of disabled residents is needed, particularly to the older single-family housing stock. Therefore, it is important that the City’s codes, policies, and regulations are free of constraints to encourage rehabilitation of the existing housing stock and to comply with ADA requirements.

Compared to other cities in the region, La Cañada Flintridge has a lower percentage of people with a disability. In general, the percentage of people with disabilities in La Cañada Flintridge is lowest for the younger population and increases with age. However, even among people 65 years and older, residents of La Cañada Flintridge have fewer disabilities than residents of other nearby cities. Potential constraints on housing for persons with disabilities are addressed below.

Land Use Controls

The City's Zoning Code complies with the Lanterman Disability Services Act with regard to licensing for residential care facilities for the disabled. According to the State Department of Social Services, there are two residential care homes for the elderly, serving 12 residents, located in La Cañada Flintridge.

As described above, group care facilities for developmentally disabled adults serving six or fewer persons are permitted in the R-3 and RPD zones. Private institutions of 16 people or more are conditionally permitted in the CPD zone and the DVSP Institutional zone. Group care facilities of seven or more individuals are conditionally permitted in the CPD, MU and DVSP Institutional zones. As part of the comprehensive update to the Zoning Code that is currently in process, the code will be clarified to ensure that group care facilities are permitted in accordance with the requirements of state law, and to show clearly which zones permit group care facilities (Program 3).

As described above, supportive housing links the provision of housing and social services for people with disabilities. Supportive housing is recognized in the Zoning Code as a residential use to be permitted in the same manner as comparable residential uses in the same zone. When located within ½ mile of a transit stop, state law specifies that no off-street parking may be required for supportive housing. Program 15 includes updates to the Zoning Code to ensure that regulations for supportive housing comply with state law. With implementation of Program 15, the City's land use controls are not a constraint to development of housing for persons with disabilities.

Definition of Family

Local governments may restrict access to housing for households failing to qualify as a "family" by definition specified in the Zoning Code. Specifically, a restrictive definition of "family" that limits the number of and differentiates between related and unrelated individuals living together may illegally limit the development and siting of group homes for persons with disabilities but not for housing families that are similarly sized or situated.⁶ The City of La Cañada Flintridge Zoning Code does not contain a definition of family.

⁶ California court cases (*City of Santa Barbara v. Adamson*, 1980 and *City of Chula Vista v. Pagard*, 1981, etc.) have ruled an ordinance as invalid if it defines a "Family" as (a) an individual; (b) two or more persons related by blood, marriage, or adoption; (c) a group of not more than a specific number of unrelated persons as a single housekeeping unit. These cases have explained that defining a family in a manner that distinguishes between blood-related and non-blood related individuals does not serve any legitimate or useful objective or purpose recognized under the zoning and land use planning powers of a municipality, and therefore violates rights of privacy under the California Constitution.

Reasonable Accommodations Procedure

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws 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 waive a setback requirement so that a paved path of travel can be provided to residents who have mobility impairments. Another example would be to waive the maximum lot coverage requirement to allow a disabled person to create a bedroom on the ground floor.

In 2014 the City amended the Zoning Code to include a formal procedure that utilizes administrative procedures to provide for reasonable accommodation requests. The amendment established a process for requesting reasonable accommodation with the Planning Commission and the Director of Community Development as the reviewing authorities, depending on the nature of the request. Written decisions include findings and are consistent with fair housing laws. However, the City recognizes that additional changes would further facilitate the reasonable accommodation process. Program 15 includes changes to the reasonable accommodation procedure in the Zoning Code to make these requests significantly easier and the time frame shorter for applicants.

9.3.2.5 Building Codes

State Health and Safety Code Section 17958 mandates that the California Building Standards Commission adopt the California Building Standards Code every 3 years. In 2020 the City adopted the 2020 County of Los Angeles Building Code (Title 26) by reference. The Los Angeles County Building Code is based on the 2019 California Building Code and the 2018 International Building Code.

Code Enforcement

The City can enforce code compliance through two different Municipal Code Sections; Chapter 1.04 – Penalty Provisions, which makes violation of the Code a misdemeanor and subject to a fine, or Chapter 1.07 - Administrative Citations, which may result in fines. The administrative citation process provides the City an alternative to the civil citation process and may be utilized instead of prosecuting code violations as misdemeanors through the judicial system. The administrative citation process is available in addition to criminal, civil or other legal remedies that may be available to the city to enforce violations of the Municipal (including Zoning) Code or applicable state codes.

The City contracts for one full time code enforcement officer. Code enforcement is reactive, not proactive, and operates on a complaint basis. When a complaint is received, the officer conducts an inspection. If the complaint is determined to be

unfounded, no further action is taken. Approximately 25% of the complaints received by code enforcement each year are determined to be unfounded.

If the complaint is verified, it is escalated to a case and the responsible party is identified and provided written Notice of the Violation (NOV), corrective action, date of compliance and opportunity to request review of the NOV. The officer first provides a Courtesy Notice to the responsible party, unless the complaint requires immediate action based upon life/safety issues or if a previous case regarding the same issue occurred within a 12 month period. If voluntary compliance is not gained by the identified date, a second NOV is issued, and then a Final NOV if the case is still not resolved. At any point in the process, if the responsible party contacts the City and shows progress in correcting the violation, additional time is provided, since the goal is to obtain voluntary compliance. After the Final NOV, an Administrative Citation may be issued. The first citation is \$200, a second is \$500 and a third is \$1,000. Citations are processed through a third party vendor, who provides an Administrative Hearing Officer that hears appeals. If a citation is issued and payment not received within 30 days, a 50% penalty is applied. After 60-days of non-payment, a second 50% penalty is applied. If payment is not received after 90-days, the citation processing center forwards the information to the Franchise Tax Board for collections.

Property maintenance issues generally do not escalate to prosecution; however, those that do have generally been through 12-18 months of contact with the Code Enforcement officer, multiple meetings with staff, with essentially no progress before the case is referred to a prosecutor. The City's building and zoning code enforcement processes and procedures are not considered constraints on housing supply and affordability.

9.3.2.6 Off-Site Improvements

Requirements for on- and off-site improvements vary depending on the presence of existing improvements, as well as the size and nature of the proposed development. The Zoning Code holds any person constructing any building or parking lot, or developing any area responsible to pay for a number of potential improvements, including concrete curbs, gutters, asphalt concrete street pavement, and sidewalks, if a nexus can be determined between the proposed development and the public improvement.

Proposed public street widths are specified in Table HE-38; however, existing pavement widths, especially for residential streets, are often less than that identified within Table HE-38 given the age of development throughout the city. The Circulation Element establishes ultimate buildout street standards for various types of streets. For a typical new residential street, the standards width is a 52-foot right-of-way (ROW). Private streets must be wide enough to meet the standards established by the Los Angeles County Fire Department for

equipment needs. Additional information regarding street widths and off-site improvements can be found in the Circulation Element.

Table HE-38. Off-site Improvements

Street Type	Right-of-Way (feet)	Curb to Curb (feet)
Primary	100	80
Major	80	Varies
Special Major	66	Varies
Collector	88	68
Residential Collector	60	40
Local Residential	52	36

Source: City of La Cañada Flintridge Circulation Element, 2013

The City of La Cañada Flintridge’s fee structure includes some on- and off-site improvements, which are described in the section below. Off-site improvement fees include sewer connection fees and school fees. While these fees add to the cost of housing development, these fees are established to cover the costs of infrastructure, facilities, and improvements necessary to serve the development.

9.3.2.7 Fees and Permit Process

Planning and Development Fees

A limited set of fees and assessments are charged by the City to cover the costs of processing permits and providing services. Table HE-39 summarizes the planning fees charged by the City, while Table HE-40 summarizes the building permit fees for typical residential development. It should be noted that the City has no impact fees. The City does not charge or collect fees for water and sewer connections. Where the city is “sewered” and the purveyor charges connection fees, the City has a Sewer Connection Program that uses community block grant (CDBG) funds to assist very low-, low- and moderate-income households. The City collects the school fees on behalf of the La Cañada Unified School District. However, those fees are established by the district under state law, not by the City. Glendale Unified School District collects its own fee and developers are required to provide a receipt for payment of school fees before a building permit is issued. Current fees are available on the City’s website (<https://cityoflcf.org/masterfeeschedule/>).

Building plan check and permit fees are based on the valuation of construction. To determine valuation, the City references the Marshall-Swift Valuation Services Guide – October 2018, and utilizes the use, type of construction and square footage.

Table HE-39. Planning Fees

Fee Type	Fee
General Plan Amendment	1\$5,000 deposit minimum with charges at the fully allocated hourly rates for all personnel involved plus any outside costs
Zone Change	2\$4,955
Specific Plan	3\$10,000 deposit minimum with charges at the fully allocated hourly rates for all personnel involved plus any outside costs
CEQA - (Mitigated) Negative Declaration	4\$1,000 or deposit for full contract cost plus 20% for City administration
CEQA – Environmental Impact Report	Deposit for full contract cost plus 20% for City processing
Conditional Use Permit – Major	\$4,515
Conditional Use Permit - Minor	\$1,540
Zoning Clearance (for compliant single-story residence)	\$75-\$375
Hillside Development Permit	\$465-\$4,515
Design Review -Architectural	\$750
Director’s Review	\$200-\$530
Engineering Review	\$140
Variance	\$2,905
Final Parcel/Tract Map Review	\$1,500 and \$1,000 engineering deposit with charges at the fully allocated hourly rates for all personnel involved plus any outside costs
Lot Line Adjustment Review	\$1,000
Second-floor Review	\$530-\$2,905
Tentative Parcel Map	\$5,700
Tentative Tract Map	\$11,395
Public Noticing Fee	\$75-\$600
Source: City of La Cañada Flintridge	

Table HE-40. Building Permit Fees for Typical Residential Development

Use	Size	Building Plan Check Fees	Building Permit Fees (includes MEP*)	School Fees	Total
Apartment	1,000 sf	\$3,000	\$3,500	\$4,080	\$10,580
Condominium	1,300 sf	\$5,500	\$6,500	\$5,300	\$17,300
Single-family dwelling	2,000 sf	\$7,500	\$9,000	\$8,160	\$24,660

MEP = Mechanical, Electrical, Plumbing

Source: City of La Cañada Flintridge

Table HE-41 shows Planning Fees in adjacent jurisdictions. As shown in the table, fees in nearby jurisdictions are similar or higher to those in the City.

Table HE-41. Planning Fees in Adjacent Cities

	Pasadena	San Marino	Glendale	Burbank
Conditional Use Permit	\$5,471	\$3,165	\$11,760	\$3,640.50
Minor Conditional Use Permit	\$2,704	\$1,420	\$4,599	NA
Design Review	\$2,469	\$285-\$865	\$2,297-\$5,661	\$1,807.90

Source: City websites

Overall, total planning and development fees represent a small portion component of residential development costs in the city. For a 2,000 square foot one-story single-family residence on a non-hillside lot with a valuation of \$528,000, the Planning and Building fees would total approximately \$17,000. This is approximately 3% of the development costs for a single-family residence, excluding land acquisition cost.

Michael Baker International (MBI) prepared a Market Feasibility Analysis in support of the Housing Element that is presented in Appendix E. The purpose of the analysis was to determine at what density a multifamily development would be economically feasible in La Cañada Flintridge. As part of the same study, a potential 13 unit apartment building on 0.5 acres was also analyzed, and the cost per unit of permits and fees was determined to be approximately \$4,500. This was less than 1% of the total development cost, excluding land acquisition.

Reduction or deferral of fees can further incentivize residential development, particularly for affordable projects. As part of Program 4, the City will evaluate changes to fee policies in order to reduce, waive, or defer fees for residential development in order to encourage the construction of new market-rate and affordable projects.

Local Processing and Permit Procedures

La Cañada Flintridge's processing procedures for new housing developments and the modification of existing residential projects include the following permits and actions: tentative maps, administrative permits and appeals, discretionary permits (second-floor review, conditional use permit) and appeals, variances, hillside development, and planned developments. The City's Zoning Code, Residential Design Guidelines, Zoning Map, General Plan, and related resources are available on the City's website (<https://cityoflcf.org/planning/>).

The City complies with requirements under the state's Streamlining Review Act and makes all attempts to expedite permit processing. The Zoning Code is currently being updated to include modifications to permitting procedures to further streamline processing. The city is in the process of developing a dedicated application through the City's online permitting software that is specifically designed to address the requirements of SB 35. The application, and a written procedure for staff that would be made available to the public, will be available by the end of 2022. Program 4 includes changes to the City's permit processing procedures to minimize permitting time, and to modify permit requirements for some uses from a discretionary to a ministerial process.

Conditional Use Permit (CUP)

Most housing types are permitted by right in La Cañada Flintridge, with the exception of a few uses where the City must consider the location, access to services, and other site planning factors, in which case a Conditional Use Permit (CUP) is required. Currently, mixed use development and large group care facilities require approval of a CUP. The Zoning Code is in the process of being updated to allow residential development in the MU Zone (whether it is part of a mixed use project or is a stand-alone residential development) and large group care facilities as permitted uses (Program 3).

A project requiring a CUP must file an application with the Community Development Department. The application must generally include floor plans, elevations, landscape plans, and a site plan. A CUP application is a discretionary permit that requires review and approval by the Planning Commission via a public hearing. The Planning Commission must find the following to approve the CUP:

- The proposed project will not be in substantial conflict with the General Plan.
- The requested use will not adversely affect health, peace, comfort, or welfare of persons living or working in the surrounding area or be detrimental to the use of or other persons in the vicinity or jeopardize or otherwise be a menace to public, health, safety, or general welfare.
- The proposed site is adequate in size and shape to accommodate the requirements of the project.

- The proposed site is adequately served by highways, streets, and other public or private facilities as required.
- The proposed project preserves the existing scale and character of the surrounding neighborhood and protects public views and aesthetic values in the neighborhood.

These conditions are typical and do not constrain the development of housing. However, the City is proposing to streamline these findings as part of the comprehensive Zoning Code update.

Single-Family Development Review

The City employs three levels of development review, as follows:

Staff Level: While all submittals are now digital, staff uses the Zoning Code as an over-the-counter format when determining zoning compliance during the building permit process. This format does not require notification to neighbors and all review is generally performed the same day as submitted as part of the application for a building permit.

Director's Review: This level of review is required by the Zoning Code for certain projects, such as height modifications, modification of existing two-story residences, recreational vehicle parking or storage, minor hillside development, setback modifications, and requires electronic submittal of an application and fee. Notification to the surrounding neighbors will also be required. The Single-Family Residential Design Guidelines are used to assist in evaluating the project in conjunction with the requirements and findings of the special review; the Guidelines are not regulations. The processing and assessment of a Director's Review project can take one to four weeks.

Planning Commission Review: This level of review also requires electronic submittal of an application and fee associated with Modifications and Special Reviews required by the Zoning Code. However; the review process is more involved and requires a public hearing notice (notification through the newspaper and mailing) and a hearing before a single member of the Planning Commission acting as a Hearing Officer or the full five-member Planning Commission. The Commission will apply the Single-Family Residential Guidelines for projects that are subject to findings through Special Reviews. The members of the Planning Commission are appointed by the City Council and regular Planning Commission meetings are held the second and fourth weeks of each month.

Modifications and Special Reviews are triggered with setback modifications, large garage review, floor area review, height modifications and second floor reviews. The City Council has identified large second floor additions and new

two-story homes as projects with the most impacts on the compatibility of La Cañada Flintridge neighborhoods. Therefore, the tiered review process, from building permits and Director’s Review to Planning Commission level reviews, was created to capture all second floor projects. A project is approved if it is found to be in compliance with the following finding:

The proposed project preserves the existing scale and character of the surrounding neighborhood and protects public views and aesthetics and other property values in such neighborhoods in a manner which is compatible with reasonable development of the subject lot and is consistent with the Residential Design Guidelines as adopted by Resolution of the City Council.

Design Review

Under the current standards, a Design Review by the Design Commission is required for non-residential development, residential planned development, mixed use development, and multi-family development. In order for design review approval to be granted, the following findings must be made:

- The design and layout of the proposed development is consistent with the General Plan and any design criteria adopted for specialized areas, such as designated historic or other special districts, planned developments, master plans, or specific plans, or adopted for the project through conditions of approval or development agreements;
- The design and layout of the proposed development will accommodate the functions and activities that are proposed for the property, will not unreasonably interfere with the use and enjoyment of neighboring property, and will not create traffic or pedestrian hazards;
- The architectural design of the proposed development is compatible with the character of the surrounding neighborhood and that all reasonable design efforts have been made to maintain the harmonious, orderly, and attractive development contemplated by this title and the General Plan;
- The design of the proposed development will provide a desirable environment for its occupants and visiting public as well as its neighbors and that it is aesthetically of good composition, materials, texture, and color that will remain aesthetically appealing with the level of maintenance that might reasonably be expected.

The time frame for Design Review is generally two to eight weeks. Applicants are encouraged to consult with planning staff as early as possible in the design process. Review by the Design Commission involves the following:

Design Concept Review (Optional): Design concept review is the opportunity for initial Design Commission response to the project. Topics of review include building massing and siting, circulation, facade composition and articulation, and open space design.

Final Design Review: Final design review includes review for compliance with conditions set forth in design concept approval, as well as more detailed concerns including materials, colors, lighting, detailing, and landscape/hardscape specifications.

During Design Review, the Design Commission evaluates projects for compliance with the Zoning Code and architectural compatibility with the neighborhood. During the public hearing, City staff will present a report to the Commissioners, make a recommendation and the Commissioners will discuss the project with the applicant. The applicant is given the opportunity to make a presentation to the Design Commission and community members are invited to speak about the proposed project. Following the hearing, the project will be approved, approved with conditions, denied or continued to a future date for a redesign.

In cases for which Planning Commission action is required, Planning Commission review and action shall precede final Design Commission review and action. Design Commission review concurrent with planning commission review shall be used for those cases in which the Director of Community Development determines that design considerations are essential to project analysis for the purpose of the Planning Commission action.

The City has established design guidelines for single-family residential uses, which provides general guidelines, not regulations, on the architectural style, streetscape, scale and mass, setbacks, site planning and environmental considerations (e.g., shade and sun, imperious coverage, and sustainable building materials), physical design (e.g., façade treatment, roof treatment, lighting), and landscaping consideration.

The Downtown Village Specific Plan contains general design guidelines for multi-family residential developments in the Specific Plan area to avoid a massive appearance, give considerations to immediate edges, and unit sizes.

As noted previously, the comprehensive update of the Zoning Code includes preparation of objective design standards for all multifamily projects in La Cañada Flintridge, including the R-3, MU, and DVSP zones (Program 3). This would remove the discretion to deny based on current subjective guidelines. If a project were to be received prior to this occurring, state requirements would supersede the current code.

Hillside Development

Hillside development standards and approval procedures apply to any development that requires a building permit on a lot or parcel of land, residentially zoned and in residential use, which has an average slope of 15 percent or greater. The project must go through an approval process that varies based on the size of the unit of the addition. This process can include a

Director’s Review, Administrative Hearing, or Planning Commission Review (Table HE-42). Given the safety concerns related to hillside development discussed in other sections of this chapter, this permit procedure is considered reasonable. Furthermore, the City does not anticipate any affordable housing construction would be feasible on a hillside given the costs involved, with the possible exceptions of ADUs/JADUs, which can offer opportunities for affordable housing in the areas with appropriate access and egress, unless otherwise restricted due to safety concerns as addressed in Program 21.

Hillside development must also abide by parcel standards and guidelines, based on density and slope factors, grading guidelines, siting requirements, architectural design guidelines, and landscape and lighting guidelines.

Table HE-42. Hillside Development Procedure

Development Type	Director’s Review	Administrative Hearing	Planning Commission
New Developments			X
Existing Development			
<i>Ground Floor Increases</i>			
600 sq. ft. or less	X		
601-1,200 sq. ft.		X	
Greater than 1,200 sq. ft.			X
<i>Second Floor Additions</i>			
600 sq. ft. or less		X	
Greater than 600 sq. ft.			X
Source: City of La Cañada Flintridge Zoning Code (as of 2021).			

Project Approval Procedure

The project is initiated by an application that undergoes the necessary hearing procedures discussed earlier. Notification of the hearing must be provided to all property owners within 300 to 800 feet of the proposed site depending on the type of application 10 days prior to the hearing. Conditions of approval are authorized at any level of discretionary review.

Director’s Review involves a review of the project application by the Director of Community Development or his or her designee. The Director must find that the project is not in conflict with or detrimental to the public health, safety, or welfare of the community and conforms to the City’s General Plan.

During an Administrative Hearing, the application is reviewed by a delegated administrative hearing officer (one Planning Commissioner). An administrative

hearing officer must find the following in order to approve a hillside development project:

- The project, through elements of architecture and landscape design, will uphold the policies in place and be harmonious with the built and natural setting.
- The project will maximize potential for sensitive use and effective preservation of open space.
- The project will not be detrimental to public health, safety, or general welfare.
- The project will not adversely affect the orderly development of property within the city.
- The project will conform to the goals and policies set forth in the General Plan.
- The project will not create a nuisance, hazard, or enforcement problem within the neighborhood or the city or require the City to provide an unusual or disproportionate level of public services.
- The project possesses unique characteristics such as minimal views or the potential for reducing effectively viewed bulk, which justifies exceeding one or more of the provisions set forth in the Zoning Ordinance to permit project development.
- Any potential for the project to be viewed as excessively massive from any vantage point, near or far, is mitigated by screening or siting characteristics.
- The project does not create an avoidable or unreasonable impairment of the view from any other property.

Appeals may be made in person by filing a written letter within 15 days of the action. Actions of the Director or Administrative Hearing and actions of the administrative hearing authority are subject to appeal to the Planning Commission.

Processing Time

The average processing time for residential projects in the city varies depending on project complexity. Discretionary projects that can be approved by City staff typically require an initial plan check and a final plan check, each of which require two or three weeks to review upon submittal of a complete application. Any significant development in the hillsides or multi-family development requires Planning Commission approval, which generally takes eight to 10 weeks from time of complete application to public hearing. Appeals to the City Council take approximately one additional month to be placed on the Council Agenda. Table HE-43 provides the estimated timeframes for various processes. These

timeframes are considered typical and meet the requirements of the state Permit Streamlining Act.

Table HE-43. Processing Time

Action	Typical Processing Time
Director’s Review	2 weeks
Administrative Hearing	5 weeks
Design Commission Review	2-8 weeks
Planning Commission Hearing	4-12weeks
City Council	16 weeks

Source: City of La Cañada Flintridge, Planning Department, 2021

9.3.3 Environmental and Infrastructure Constraints

9.3.3.1 Environmental Constraints

Environmental constraints include physical features of the landscape that may impact the availability of land for housing construction, such as fault zones, steep slopes, floodplains, and fire hazard zones.

La Cañada Flintridge is subject to seismic activity from the Sierra Madre Fault zone. Regionally, several active faults are considered capable of affecting property within the city. With many homes constructed prior to the 1930s, the city’s housing stock includes unreinforced masonry structures that are particularly vulnerable in an earthquake. The exact number of such structures is not known, and the high quality of construction employed in the City suggests that many pre-1934 masonry structures may actually be reinforced. One area of the city (the 91011 zip code) was not included within the Earthquake Brace and Bolt program (EBB), which provides grants for seismic retrofitting, for several years. The City is currently working with the state to ensure all homes are eligible for the EBB program. Property owners who do seismic retrofitting voluntarily utilize the City of Los Angeles’ standard plans, which minimizes review by Building and Safety and cost and time for applicants. This program is still active, but registration is currently closed.

As a hillside community, La Cañada Flintridge is subject to landslides, increased likelihood of firestorms, and seasonal mudflows. However, several precautionary actions have been taken to protect hillside areas, including the establishment of a series of fire roads on open hillside areas, drainage debris basins, and flood control structures. The City regulates the number and degree of manmade cuts and fills through its Hillside Development Ordinance for all properties that have an average slope of 15 percent or greater. Site grading and building design are primary concerns of the City and new development must meet stringent requirements for geologic and soils stability. As part of the

comprehensive update to the Zoning Code, the City is adding a chapter that specifically addresses site grading to enhance the safety precautions.

Future residential development in the city will be focused primarily along the Foothill Boulevard corridor, either in the Downtown or in multifamily and mixed use areas. These sites are located outside of the hillside areas and therefore not subject to landslides or mudflows associated with hillside developments.

According to the City's Local Hazard Mitigation Plan, only 0.21 square mile of La Cañada Flintridge either has not had a flood risk assessed or is located within in a 500-year flood risk area. This equates to approximately 2.5 percent of the area within the city, which means that very little land is constrained by potential flooding concerns.

The Safety Element of the General Plan was updated concurrently with the Housing Element. Since the entire city is in the Very High Fire Hazard Severity Zone, the primary focus was on multiple aspects of fire safety. Properties located in these designated zones are subject to more stringent building code and vegetation management requirements than properties outside of these zones. Data from the wildfirerisk.org website published by the USDA Forest Service indicates that populated areas in La Cañada Flintridge have, on average, greater wildfire likelihood than 85% of all the communities in Los Angeles County.

The updated Safety Element includes more stringent policies to: ensure development review requires the use of current fire safe design methods; improve emergency evacuation procedures; enhanced education and communication of fire-related safety and mitigation practices; and ensure accessibility for emergency vehicles. The updated Safety Element identifies 15 neighborhoods in the City with a single point of ingress/egress. No new ADU development is allowed in these 15 neighborhoods to protect the public from wildfire hazards. This is not considered a constraint to new development.

In some situations, the implementation of these environmentally sound protection measures may reduce the total number of new housing units that can be developed from the number that would be developed in a non-hillside area. However, it is recognized that such protection is necessary for long-term stability and safety.

9.3.3.2 Infrastructure Constraints

Of critical importance to the maintenance of existing housing and development of new housing is the availability of adequate infrastructure, including water facilities, drainage and debris channels, sewage facilities, and streets and related elements (street trees, lighting, sidewalks, and curbs). The provision and maintenance of these facilities in a community enhances not only the character of the neighborhoods but also serves as an incentive to homeowners to routinely

maintain and keep up their homes. Within La Cañada Flintridge, infrastructure conditions vary as many neighborhoods lack certain street elements, including streetlights, sidewalks, and curbs. The absence of these elements is considered a desirable indication of a semi-rural residential area.

A significant infrastructure constraint has been the lack of sanitary sewers to serve the city. For a number of years, only two areas were served with public sewers: the northeastern section near the La Cañada Flintridge Country Club and the western-most section along Ocean View Boulevard and near Glen Haven Park.

In 1998, the City embarked on a process to provide sewers to all residences within the city limits. The City installed a sewer system along Foothill Boulevard to support intensified development along the Foothill Boulevard commercial corridor, including parcels designated for multi-family development. The possibility of connecting homes to the Glendale and Pasadena sewer system is also being pursued. To date, there are about 20 homes north of Foothill that are not connected to a sewer system.

Virtually all of the future residential development for fulfilling the RHNA is expected to be accommodated along the Foothill Boulevard corridor, which is the sewered portion of the city. However, lack of sewer availability continues to be a constraint on overall development outside areas served by sewers.

Adequate capacity is available to accommodate the sewered portion of the city. When additional areas are provided with sewers, additional capacity will be acquired from the districts. Lots to be designated for future residential within the Downtown Village Specific Plan and Mixed Use land use designations have already been annexed into either the Los Angeles County Sanitation District No. 28 and 34 (Sewer Assessment District 1, 2 and 3B) or the Crescenta Valley Water District (Sewer Assessment District 3A) that discharges via the City of Los Angeles Department of Public Works, Bureau of Sanitation. New development would be required to comply with either the LACSD or the City of Los Angeles requirements for trunk sewer system disposal facilities. The City offers has the Sewer Connection Grant Program to assist lower and moderate-income households, especially extremely low income households, with the costs of connecting single-family homes to the City's sewer system in the City's sewer districts (Program 11). The increase in wastewater at buildout of the General Plan in 2030 is estimated at about 0.5 percent of existing capacity and is not considered to result in the need for additional wastewater facilities.

As the City has no municipal water service, the Foothill Municipal Water District (FMWD), provides water to four retailing agencies that directly serve the city: the Mesa Crest Water Company, La Cañada Irrigation District, Valley Water Company, and Crescenta Valley Water District. These four agencies are responsible for the City's water infrastructure, providing both drinking water and water for firefighting purposes. According to the purveyors, the city has

adequate water supply to serve its projected population through 2040. Pursuant to State law, when water supply becomes an issue and an allocation system must be put in place, then the water purveyors are required to provide priority status to affordable housing projects for water allocation.

Due to the age of the city, which was mostly built prior to incorporation in 1976, water infrastructure and supply may not meet current standards. In many areas of La Cañada Flintridge, fire hydrants do not meet current Fire Code standards for spacing and the reliability of the water distribution infrastructure for firefighting is unknown. The City does not have jurisdiction to require the water agencies to routinely maintain and test the water infrastructure.

During the development review process, the City and the Los Angeles County Fire Department (LACoFD) will review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting. The City also will work with the four water districts listed above to encourage them to evaluate the adequacy of emergency water line capacity as it relates to fire flow requirements, and both test and evaluate the reliability of the water infrastructure.

Dry utilities generally consist of electricity, natural gas, telephone and cable. Electricity in La Cañada Flintridge is provided by Southern California Edison, and natural gas is provided by SoCal Gas Company. Southern California Edison has been performing upgrades in the community in the spring and summer months of 2022, improving their service and reducing the incidence of blackouts. As part of the City's recently adopted Safety Element, the City met with SoCal Gas Company to discuss wildfire hazards related to gas pipelines. SoCal Gas provided no indication that service to the City is a problem. Los Angeles County recently passed an ordinance banning the sale of new gas appliances. Once this action becomes part of the building code, this will likely lead to less reliance on natural gas in future years.

TV/Internet is provided by Charter Spectrum and others. Telephone service is provided by a number of carriers and the trend has been for many homeowners to switch from landlines to reliance on mobile phones only. Landline service is available through the cable company, and other providers such as AT&T. Dry utility service is easily obtainable and not a constraint to housing development.

9.4 Housing Opportunities and Resources

9.4.1 Future Housing Need

State Housing Element law requires a local jurisdiction to accommodate a share of the region's projected housing needs for the planning period. This share, known as the Regional Housing Needs Allocation (RHNA), is important because state law mandates that the jurisdiction must provide sufficient land to

accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction’s ability to provide adequate land to accommodate the RHNA. The Southern California Association of Governments (SCAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the six-county region.⁷

9.4.1.1 RHNA for 2021-2029 (6th Cycle RHNA Period)

La Cañada Flintridge’s share of regional future housing needs is a total of 612 new units for the 2021-2029 RHNA period (from June 30, 2021, through October 15, 2029). This allocation is distributed into four income categories, as shown below in Table HE-44 (While identified separately, the “Extremely Low” income category is a subset of the “Very Low” income category.) The RHNA includes a fair share adjustment which allocates future need by each income category in a way that meets the state mandate to reduce over-concentration of lower income households in historically lower income communities or areas within the region.

Table HE-44. Housing Needs for 2021-2029 RHNA

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less)*	126	20.6%
Very Low (31 to 50%)	126	20.6%
Low (51 to 80%)	135	22.0%
Moderate (81% to 120%)	139	22.7%
Above Moderate (Over 120%)	86	14.1%
Total	612	100.0%

Source: Final Regional Housing Needs Allocation, SCAG, March 2021.

AMI = Area Median Income (\$77,300 for 4-person household)

** “extremely low-income households” is a subset of “very low-income households”*

Through its Housing Element, the City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units throughout the 6th Cycle RHNA period, accounting for “no net loss” as required by state law.

9.4.1.2 Credits Toward the RHNA

The 6th cycle RHNA covers a planning period that is approximately 8.3 years, from June 30, 2021, through October 15, 2029. Housing units built, under construction, or approved June 30, 2021 onward, can be credited towards

⁷ Southern California Association of Governments (SCAG) covers a six-county region, including Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial.

meeting the City's RHNA. Units in various stages pending approval (aka pipeline projects) also can be credited toward the RHNA. These units can be subtracted from the City's share of regional housing needs. The City must demonstrate in this Housing Element its ability to meet the remaining housing needs, through the provision of sites, after subtracting credited units (

Table HE-45).

Units Approved

As of July 1, 2021, the City entitled a total of 35 housing units, which were all ADUs/JADUs⁸. See Table HE-45 for unit type and affordability category.

Units Pending Approval

As of July 13, 2022, a total of 91 units, including condominiums, ADUs/JADUsⁱⁱ and single-family homes, were at various stages of review and approval, but have not yet been approved. See Table HE-45 for unit type and affordability category.

Remaining Steps in the Approval Process

Approvals by outside agencies, such as LA County Fire Department is required for all new construction and additions to existing structures. LA County Department of Public Health is required where the property is on septic. The City has no control over the timeframes associated with these outside agencies. Within the City, review and approval or review and comments from Planning generally occurs within 1-3 days of submittal. Building plan check generally occurs within 3-5 weeks and if demonstrating compliance with Building Code, can be approved after the first plan check. However, most projects require 2-3 rounds of plan check. Second and subsequent plan checks generally take 1-3 weeks.

Remaining Housing Need to be Accommodated

After accounting for units approved and pending approval, a remaining need of 486 units exists. See Table HE-45 for unit type and affordability category. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029.

⁸ https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527) Accessed 4.16.21

Table HE-45. Credits Toward RHNA

	Unit Type	Lower	Moderate	Above Moderate	Total
RHNA		387	139	86	612
Net Units with Permits Issued after 7/1/21					
	SFD			0	0
	ADUs	24	1	10	35
Net Units Pending Approval or In Process as of 7/13/2022					
	SFD	---	---	4	4
	ADU/JADU	32	1	14	47
4600 Ocean View Blvd. (Pipeline Project)	Condo	---	---	20	20
Pipeline Project : APNs 5810-008-022, 5810-008- 050, 5810-008-053, 5810- 008-055	GPA & ZC to amend to R-3 (MFR)	---	---	20	20
Subtotal:		56	2	68	126
Remaining RHNA		331	137	18	486

9.4.1.3 Future Residential Development Potential

As has been noted, the City of La Cañada Flintridge is primarily built out. However, as is required by state Housing Element law, the City has identified sites that could accommodate La Cañada Flintridge's future housing needs in accordance with the 6th Cycle RHNA. Appendix C (Sites Inventory) provides a list of the vacant and underutilized properties in the City. With very little vacant land left in La Cañada Flintridge, the City's strategy is to identify remaining vacant properties and underutilized sites, primarily focusing along the Foothill Boulevard corridor.

The intent of the City's General Plan Land Use Element and the DVSP has been to encourage a walkable, mixed use village atmosphere along Foothill Boulevard, the City's primary commercial corridor. Promoting housing in mixed use areas via mixed use and stand-alone residential development also supports use of transit, bicycling, and walking as alternatives to the use of a personal automobile, which is beneficial to a broad spectrum of residents who depend on or choose alternative modes of transportation. This strategy is also consistent with the City's adopted Climate Action Plan and the objective of reducing VMT.

One of the factors that is making mixed use and residential development in predominantly commercial corridors more viable is the impact of e-commerce on local and national retail shopping. The last decade has brought a significant increase in online sales, with e-commerce sales rising steadily from 6.4 percent in

2010 to 21.3 percent in 2020.⁹ This national trend, which was exacerbated by the coronavirus disease (COVID-19) pandemic (which started in 2019 and is still ongoing as of the date of adoption of this Housing Element), is not expected to decline. One economic impact of the COVID-19 lockdown is the number of businesses that have permanently closed, with small businesses especially hard hit. Even many services are moving to an online platform, such as banking and insurance. The impact of the pandemic also has resulted in more people working remotely (usually from home); although many will return to their places of employment after the pandemic, estimates are that as many as 25-30% of the workforce will continue to work at home on a multiple-days-a-week basis.¹⁰

Due to a variety of factors, including online sales trends, businesses closing, and more people working remotely, cities across the country are recognizing the need to provide flexibility in land uses in traditionally commercial areas by allowing a greater mix of uses, including mixed use development (a mix of residential and compatible non-residential uses in the same building or on the same site), and even stand-alone residential uses in traditionally commercial areas to create mixed use areas. Additionally, there are many underutilized parcels in La Cañada Flintridge that were constructed prior to the 1980s, with 1953 as the median year these parcels were developed. Many are antiquated commercial uses with significant amounts of surface parking. These properties exhibit similar characteristics in terms of conditions and existing operations as other properties that have been redeveloped in the past, such as the Town Center project, which was the most significant redevelopment project in several decades.

According to the methodology developed by the University of California at Berkeley for the State of California Business, Transportation, and Housing Agency, the ratio of land improvements to land value (ILR) can facilitate identification of underutilized sites with potential for infill or redevelopment with higher density residential and/or mixed use developments. An improved site may be considered underutilized if it is located in a non-single-family area (e.g., commercial, industrial, multi-family, etc.) and the total value of improvements on the site is less than the total value of the underlying land (i.e., $ILR < 1.0$).

A parcel-specific analysis was conducted on properties within the City to identify vacant and underutilized properties by reviewing Los Angeles County assessor data of improvement and land values. The underutilized properties have an ILR less than 1.0, indicating the land is worth more than the improvements on site. Sites that are identified as being proposed for a Religious Institution Overlay Zone (see below) were not evaluated for their ILR value

⁹ US Ecommerce Grows 44.0% in 2020 (<https://www.digitalcommerce360.com/article/us-ecommerce-sales/#:~:text=Online's%20share%20of%20total%20retail,2019%20and%2014.3%25%20in%202018.>) Accessed 4.22.2

¹⁰ <https://globalworkplaceanalytics.com/work-at-home-after-covid-19-our-forecast>. Accessed 4.23.21

because the assumption is that the existing use will be retained, and the institution will add residential units to the property.

As a result of the issues and trends identified above and the City's land use policies expressed in the DVSP and Land Use Element, the Sites Inventory prepared for La Cañada Flintridge's 6th Cycle Housing Element anticipates and provides for additional opportunities for mixed use and stand-alone multifamily residential development, as summarized below. The City desires to retain and support its commercial and service establishments, which is why the mixed use land use designation and zones are retained, to encourage both development of new residential uses and maintenance of the community's commercial core. The RHNA also estimates the construction of additional ADUs/JADUs in the coming years.

9.4.1.4 Overview of Residential Development Potential and Realistic Capacity Assumptions by Zone

This section summarizes residential development potential by zone for the 6th Cycle RHNA. Pursuant to state law (AB 2348), development capacity must be estimated on a realistic basis, not theoretical basis; it must account for development trends and patterns, as well as development standards such as height limit, parking requirements, open space/landscaping requirements, and lot coverage/setbacks. An overview of each zone and/or residential use is provided, as well as recent trends, as applicable. To estimate development potential, the lower limit of development density is used, rather than the maximum density. As part of the City's discussions with developers, the City has identified development standards that can facilitate R-3 and mixed use development at the target density, which is a component of Program 4.

During the period represented by the 5th Cycle Housing Element, no single-family homes in the City were redeveloped with multifamily development and no new multifamily developments on mixed-use or multifamily zoned properties were constructed in La Cañada Flintridge, so there was no local trend from which to establish realistic capacity assumptions for multifamily housing.

To demonstrate a local track record of infill and mixed use development with all of or a portion containing residential units, the City looked at recent projects in comparable nearby cities, as shown in Table HE-46, including communities in foothill areas like Monrovia. The projects in the table were selected because they show recycling trends of non-residential properties to residential uses.

Table HE-46: Recycling Trends—Sampling of Entitled and Constructed Projects in Neighboring Jurisdictions

Jurisdiction	Address or Location	GP/Zone	Description	Previous Use(s)	Units	Acres	Density (du/ac)	Approval
Monrovia	Avalon Monrovia	Specific Plan	Mixed use with apartments, retail, and parking garage	Demolish three commercial buildings and two office buildings.	154	2.1	73	2021
Monrovia	Alexan Foothills	Specific Plan/PUD	Five story residential complex and parking structure	Lot consolidation of eight parcels and rezoned from manufacturing	436	6.77	64	2021
Monrovia	127 Pomona	Specific Plan	Seven story residential complex, commercial, and underground parking	Demolish light industrial buildings	232	1.83	127	2021
Monrovia	MODA at Monrovia Station, 400 feet north of Metro L (Gold) Line	Station Square Transit Village	Multifamily moderate income workforce housing	Converted market rate apartment building	261	4.6	57	2018
Monrovia	Station Square South 225 W Duarte Rd	Specific Plan	TOD, multifamily units	Demolish existing industrial, warehouse and fitness club use. Seven parcels merged, near L (Gold) Line and road vacation	296	3.8	78	proposed
Monrovia	Arroyo at Monrovia Station	Specific Plan	Live/work units, multifamily, commercial, and parking structure	Parcel consolidation; single-family homes, industrial structures, paved parking lots, and truck delivery facilities	302	2.9	104	2020
Monrovia	910 S Ivy Ave	RM/RH	Townhomes	Two homes	6	0.37	16	approved
Monrovia	425 W Duarte Rd	RH	Condominiums	Non-conforming use	6	0.35	17	approved

Jurisdiction	Address or Location	GP/Zone	Description	Previous Use(s)	Units	Acres	Density (du/ac)	Approval
Monrovia	715-721 W Duarte Rd	RH	Townhomes	Consolidate four residential parcels	12	0.63	19	2019
Pasadena	388 Cordova	CD-2	Condominiums	High-rise office building	62	0.43	144	2019
Pasadena	99 W Green St., Old Pasadena prime location	CD-1 AD-1	Mixed Use with commercial and 18 residential units	Former Twin Palms restaurant site	18	0.12	150	2021
Pasadena	444 N. Fair Oaks Ave and 425 Raymond	FGSP-C-3B	Multifamily	Throop Lumber Yard, a commercial hardware center and building materials supply company, and existing multifamily. Demolish existing 3,700 s/f of office.	206	2.08	73	proposed
South Pasadena	845 El Centro St	MSSP and RM	Mixed-Use, TOD, multifamily housing	Office building, three parcels were consolidated	60	1.6	45 on MSSP 9 on RM	2021
South Pasadena	1101, 1107, 1115 Mission St	MSSP	Mixed use and residential units	Portion of existing building demolish, adaptive reuse, and new buildings added	36	0.72	50	2021
South Pasadena	820 Mission St	MSSP	Mixed-Use, TOD, multifamily housing	Laboratories	38	1.90	20	2017
South Pasadena	625 Fair Oaks	CO	Senior Housing	Commercial retail with underutilized parking lot	86	2.62	33	2020
South Pasadena	Village Meridian Ave and Mission St	MSSP	Mixed-use, retail, loft condominiums, townhomes, and duplexes and single- family residences	Lower density, dilapidated homes, and a convalescent hospital	67	1.6	42	2005

Sources: Monrovia Revised HCD Draft 2021-2029 Housing Element; Pasadena Revised HCD Draft 2021-2029 Housing Element Update; City of South Pasadena April 2022, 2021-2029 Public Review Draft General Plan Housing Element Update; Los Angeles County Assessor parcel website.

As the City commenced work on modifying the second Draft Housing Element and revising the Sites Inventory, the City determined more analysis was

necessary to ensure realistic capacity assumptions were sound, and the Sites Inventory was based on current, reliable data. The City first eliminated sites with existing single-family homes that are an impediment to reuse, with one exception: one lot that contains two single-family homes on an almost one-half-acre parcel remains as part of the Sites Inventory. The site is included with the property owners' knowledge and agreement.

Given the fact that property values are higher in La Cañada Flintridge than in many of the surrounding communities, an economic analyst was retained to prepare a Market Feasibility Analysis to gauge the potential for developing multifamily housing in the City (Appendix E). The study looks at several factors that define the form and scale of residential development, including housing types, various densities, floor area ratios, market rents, and affordable rents. These factors were combined in various scenarios to give a picture of the range of possible residential projects that could be built on available sites in the city. The study was performed using current (spring/summer 2022) market values. A pro forma analysis was conducted, which involves assumptions about current and future market conditions affected by both national and global economic factors, including construction costs, and the availability and cost of financing. Current assumptions of these conditions are factored into the analysis. The pro forma analysis looked at three potential densities and concluded that a density of 26 units per acre is reasonably close to market feasibility in La Cañada Flintridge. For this reason, the base density for high density residential development was increased from 20, to a base of 25 and a range established of 25 – 30 dwelling units per acre. As a result, for purposes of calculating the realistic capacity of sites in Appendix C, Sites Inventory, the following density factors were used to meet the City's RHNA.

■ **High Density Residential / R-3 (minimum 25 to maximum 30 dwelling units per acre):**

The City currently has very little land (less than one percent) designated and zoned for multifamily residential development, and the majority of it is already built out as apartments and condominiums. As stated previously, while there are several properties that were redesignated and rezoned from R-1 (single-family residential) to R-3 (multifamily residential) as part of the 5th Cycle Housing Element program, none of these sites has recycled from single-family houses to multifamily developments during the 5th Cycle, so they have not been included in the 6th Cycle sites inventory for meeting the RHNA; they are, however, available as potential sites. The one exception of parcels containing single-family homes on the Sites Inventory is one lot that contains two single-family homes on a single parcel. The site is included with the property owners' knowledge and approval, as explained above.

The City is proposing to rezone two vacant adjacent parcels (see the parcels identified as Site #95 and #96) on Foothill Boulevard from R-1 to R-3. No other parcels are proposed to be rezoned to R-3 due to the built-out nature of

the city, the lack of vacant land, and the safety constraints noted in other chapters of this Housing Element.

■ **Hillside Residential (R-1—10 Acres) to Medium Density Residential (R-1—5,000)**

La Cañada Flintridge has been a predominately low density residential community since prior to its incorporation in 1976. It has five land use designations for single-family residential and eight corresponding zones, ranging from one unit per 10 acres to one unit per 5,000 square feet. Since the only units anticipated to accommodate the RHNA in any single-family zone are ADU/JADUs (which are described below), the Sites Inventory does not include specific sites that are currently zoned R-1 and proposed to stay R-1 and no density factor is provided.

■ **Mixed Use / MU (25-30 dwelling units per acre)**

The Land Use Element includes a Mixed Use land use designation, which is implemented by the Mixed Use (MU) Zone in the Zoning Code. Vacant and underutilized parcels in the Mixed Use land use designation are described in greater detail in Appendix C. Most of these properties contain low-intensity commercial uses with large surface parking lots. Some properties contain vacated businesses.

The City's existing Mixed Use Zone requires a minimum of 30 percent of a project's floor area to be developed and maintained with nonresidential uses; the density for residential use is a minimum of 20 units per acre to a maximum of 30 units per acre (not inclusive of state required density bonuses). Program 3 proposes to revise the MU Zone to establish the residential density range at 25 -30 du/ac, and to also allow 100 percent of a project's floor area to be developed with multifamily residential uses at a density of 25-30 du/ac, based on the Market Feasibility Study commissioned by the City to determine the appropriate base density for multifamily residential development in the City (Appendix E). A total FAR of 1.5 would apply to both the residential and non-residential component of a project proposed in the Mixed Use Zone. Revising the MU zone to only permit a FAR of 0.5 for a purely commercial project would provide an incentive for mixed use or residential projects.

The objective of the General Plan is to encourage mixed use/residential development on surface parking area to complement the existing uses. Allowing stand-alone residential development on MU-zoned properties promotes mixed use on the Foothill Boulevard corridor, which promotes the benefits of access to goods and services, transit and bicycle routes, and other community amenities. An added benefit is that additional households in proximity to commercial establishments provides more customers, which can further support local businesses.

Based on the declining trend of retail and potential impacts of COVID-19 on office and retail use discussed in this Housing Element, interest demonstrated by proposed and pipeline projects, and discussion with developers conducted for the Housing Element, this change is considered an incentive for development. The City is using the same density factor of 25 dwelling units per acre for the MU Zone as is being used for the R-3 Zone, due to the same density range and similar site conditions.

■ **Proposed Religious Institution Overlay Zone (25-30 dwelling units per acre)**

AB 1851 (2020) incentivizes religious institutions to construct housing on their properties by prohibiting a local agency from requiring the replacement of religious-use parking spaces that a developer of a religious institution affiliated housing development project proposes to eliminate as part of that project. Due to the built-out nature of La Cañada Flintridge, religious institutions in the city provide the potential to accommodate housing on their sites to assist the City in meeting the RHNA. The City proposes to facilitate housing on religious institution properties by establishing an affordable housing overlay [Religious Institution Overlay Zone (RI-OZ), Program 5]. These properties would be appropriate for the addition of multifamily housing due to their locations near transit, services, businesses, and other resident-serving uses. Not all religious institutions in the city are proposed for the RI-OZ due to the built-out nature of their properties; however, the RI-OZ is a tool that could be utilized by any religious institution should conditions change.

Due to the built-out nature of La Cañada Flintridge, this is a valuable strategy to provide additional housing opportunities for lower and moderate income households. Utilizing church land for affordable housing also provides an attractive opportunity for affordable housing developers by minimizing their cost for land, risk, and time to process development applications. This approach also helps congregations further their missions to support lower-income populations while providing enhanced financial stability for religious institutions, many of which have been impacted by declining attendance, which has been exacerbated by the COVID-19 pandemic.

During public outreach meetings held for the Housing Element update, several local ministers/pastors and developers of affordable housing commented on the potential benefits and expressed interest in the concept, and one participant noted he has been involved in such a project in another community and would be interested in assisting in a similar effort in La Cañada Flintridge.

Table HE-48 summarizes the proposed sites that are identified in Appendix C, Sites Inventory. While the actual size of the area a religious institution might propose for multifamily housing would vary from site to site, a conservative estimate of potentially available portions of seven properties have been identified for the purposes of the Sites Inventory, totaling

approximately 6.61 acres; this translates to a potential of 168 dwelling units. The City is using the same density (25-30 dwelling units per acre) for the proposed RI-OZ as is currently allowed for the R-3 and MU zones; therefore, the same density factor of 25 dwelling units per acre for the proposed RI-OZ is being used. Given the fact that most affordable housing requires density bonuses, the City considers the assumed density factor to be conservative.

■ **Downtown Village Specific Plan (DVSP)**

The DVSP was established by the City in November 2000, with the goal of strengthening the DVSP area as the “heart” of the community and as a logical place for people to gather, shop, do business, and live in a range of housing types. The DVSP area is characterized by a variety of low-intensity uses, with the majority of the non-vacant properties in the area constructed at least 60 years ago. The median year buildings in the area were constructed is 1955, making most of the structures at least 65 years old. (The exception to this is the Town Center project, which significantly transformed a portion of the DVSP, including revisions to the circulation plan in the area.). These older properties are occupied primarily by independent small businesses. Redevelopment of these properties or relocation of existing businesses would not involve the strategic planning of regional or national chains and therefore could occur independently and as market conditions evolve. While most buildings are in good condition and businesses seem to be economically viable operations, the intensification potential offered by the updated General Plan, high land values, the impact of the COVID-19 pandemic on small businesses and increasing market demand make redevelopment feasible. This section provides an overview of the DVSP as it relates to the Sites Inventory, including the density target.

- **Mixed Use 12 (MU-12):** Provides opportunities for residential development and commercial development within the same building. Program 4 proposes to expand the district to allow for residential and commercial development on the same parcel of land, or standalone residential. Program 4 proposes to remove the MU1 district and create the MU-12 district. The density for the MU-12 district is proposed to change from 0 – 15 dwelling units per acre to 12-15 dwelling units per acre, and a minimum density factor of 12 is identified. The MU-12 designation is applied in areas where a transition in density along Foothill Boulevard is desired.
- **Mixed Use 25 (MU-25):** Offers more flexible opportunities for residential development with housing permitted on the first or second story on the same parcel of land, or side by side within the same area. Multi-family residential development is currently permitted at densities of up to 15 units per acre without a requirement for retail or commercial uses. In order to encourage flexibility of uses and promote multi-family residential (including senior) development in the DVSP, Program 4 proposes to remove the MU2 district to create MU-25, and proposes to

increase the density from up to 15 dwelling units per acre to 25 to 30 units per acre and modify development standards to mitigate constraints to development. The MU-25 designation will allow all residential, or a combination of residential and commercial with an overall FAR of 1.5 for any project in this district. Since there are no development trends in the DVSP MU 25 district under the existing density or for the new density proposed, the City is using the average density of 25 dwelling units per acre as the density factor.

- **Residential:** This Land Use District is exclusively designated for residential development. Single-family homes, townhomes, apartments, and condominiums are permitted in this district at densities of 15 units per acre. In 2014, the City amended the DVSP designation to allow multi-family housing for all household types. No new development has occurred in this district recently, so the City is using the density factor of 12 dwelling units per acre as before. This would accommodate townhomes and other similar medium density residential building types.

The intensification currently permitted, increases in density proposed in the MU-12 and MU 25 district, and the revisions to development standards in the DVSP proposed by Program 5 (RI-OZ) all indicate that the DVSP offers potential for redevelopment to mixed use and stand-alone residential development in the 6th Cycle Housing Element.

■ **Accessory Dwelling Units (ADUs)**

The City allows and regulates accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) (collectively considered ADUs) in compliance with California Government Code Sections 65852.2 and 65852.22, with the most recent ADU/JADU ordinance adopted in 2020. New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of ADUs. As a result, the City has seen increases in ADUs in the community, increasing from just a few units annually in 2018 (five units) and 2019 (two units), to 13 units in 2020; in 2021, the City issued 10 building permits for ADUs/JADUs. In the first six months of 2022, the City issued 24 building permits for ADUs/JADUs. Therefore, averaging the number of building permits in 2020 (13), 2021 (10) and not yet completed 2022 (24), an average of 15.7 ADU/JADU permits have been issued. This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.

For the purpose of RHNA credits, the City assumes 15 ADUs annually for a total of 120 ADUs over the eight-year planning period of the Housing Element.

According to the SCAG Regional Accessory Dwelling Unit Affordability Analysis (for LA County II), which provides local governments in the SCAG region with assumptions for ADU affordability that can be used to assign ADUs to income categories for the purposes of 6th Cycle Housing Elements,

the following percentages of units may be applied to the required income categories:

- 23.5 percent of ADUs are considered affordable to very low income households;
- 44.6 percent to low income households;
- 2.1 percent to moderate income households, and
- 29.8 percent to above-moderate income households.

This is the estimate the City of La Cañada Flintridge uses to estimate the income affordability of ADUs for the 6th Cycle Housing Element, which is provided in Table HE-47.

Table HE-47. Estimated Number of ADUs During 6th Cycle Planning Period

Income Category	Percent of Units Per Income Category	Number of Units Per Income Category
Extremely Low	15.0%	18
Very Low	8.5%	10
Low	44.6%	53
Moderate	2.1%	3
Above Moderate	29.8%	36
Total:	100%	120 ADUs

Source: SCAG, Regional Accessory Dwelling Unit Affordability Analysis (for LA County II), 2020.

9.4.1.5 Public Services and Infrastructure Availability

All sites identified in Appendix C are located on or near Foothill Boulevard and no significant public service or infrastructure constraints have been identified. These locations also support the City’s safety policies as expressed in the updated Safety Element.

9.4.1.6 Summary of Adequacy of Sites Inventory to Meet the City’s RHNA

Table HE-48 summarizes the City’s accommodation of the RHNA for all income groups by zone, as provided in the Sites Inventory. Note that credits toward the 6th Cycle RHNA (approved and pipeline projects) are not included.

Table HE-48. Adequacy of Sites to Accommodate the 2021-2029 RHNA by Zone

Proposed Zoning District	Lower Income	Moderate Income	Above Moderate Income	Total
R-3 (Multifamily Residential)	45	---	---	45
Mixed Use	252	---	8	260
DVSP—MU-12	---	77	20	97
DVSP—MU-25	43	59	17	119
DVSP—RI-OZ	---	25	---	25
RI-OZ (PSP)	143	---	---	143
Total	483	161	45	689

Table HE-49 summarizes the City’s accommodation of the RHNA for all income groups during the 2021-2029 planning period, including a summary of the Sites Inventory (Appendix C), ADU projections, and units credited toward the RHNA as described in Section 9.4.1.2. Figures HE-A1 through HE-A5 in Appendix C depict the location of each parcel contained in Table HE-49, not including ADUs or credited units. After accounting for development credits, anticipated ADUs, and realistic capacity of vacant and underutilized sites, the

City has identified surplus capacity of 233 units in the lower income category (very low and low combined), which represents an average of 60 percent for the combined lower income category; and 27 surplus units (representing 19 percent) in the moderate income units.

Table HE-49. Complete Summary of 6th Cycle RHNA

Income	RHNA	Issued	Pending/ Pipeline	Sites Inventory	ADUs	Total	Surplus	% Surplus
Very Low	252	8	11	332	28	379	127	50%
Low	135	16	21	151	53	241	106	78%
Moderate	139	1	1	161	3	166	27	19%
Above Moderate	86	10	58	45	36	149	63	73%
Total	612	35	91	689	120	935	323	52%

9.4.2 Financial Resources

9.4.2.1 Community Development Block Grant (CDBG) Funds

Through the CDBG program, HUD provides funds to local governments for funding a wide range of community development activities for low-income persons. The CDBG program provides formula funding to larger cities and counties, while smaller cities (less than 50,000 in population) can either receive funding from the county or compete for funding that is allocated by the state. La Cañada Flintridge receives its allocation of CDBG funds through the Los Angeles County Community Development Commission.

The CDBG program is very flexible in that the funds can be used for a wide range of activities. The eligible activities include, but are not limited to: acquisition and/or disposition of real estate or property; public facilities and improvements; relocation, rehabilitation, and construction (under certain limitations) of housing; homeownership assistance; and clearance activities. Unfortunately, the City's CDBG allocation has been declining over the 5th Cycle of the Housing Element, dropping from \$114,950 in Fiscal Year (FY) 2013/2014, to \$60,488 in FY 2021-22. This is a 47 percent decline over the past 8 years, which negatively affects the City's ability to assist low income persons. The 2021-2022 FY allocation was recommended to be split between the Resident Rehabilitation Program (\$50,488) and the Sewer Connection program (\$10,000).

9.4.3 Administrative Resources

Non-profit agencies can assist the City in accessing outside funds in support of affordable housing and in implementing the City's housing programs. The following non-profit agencies have been involved in developing housing in nearby communities.

9.4.3.1 Habitat for Humanity—San Gabriel Valley

Habitat for Humanity is a non-profit, Christian organization dedicated to building affordable housing and rehabilitating homes for lower income families. With the help of volunteers and homeowners/partner families, Habitat for Humanity constructs and repairs homes for families, which are then sold to partner families at no profit with affordable, no-interest loans. Volunteers, churches, businesses, and other groups provide most of the labor for the construction of the homes. Land for new homes is usually donated by government agencies or individuals. Since its founding in 1990, the San Gabriel Valley Habitat for Humanity has partnered with numerous families and volunteers to construct single-family and attached housing throughout the San Gabriel Valley, including projects in Pasadena, Glendale, and El Monte. A representative from Habitat for Humanity participated in the focus group session the City held to gather input from non-profit developers.

9.4.3.2 HumanGood

HumanGood was created when three large nonprofits, including the former , Southern California Presbyterian Homes (SCPH), joined to provide senior housing projects throughout California, as well as several other states. Projects in nearby communities include multi-family projects in Glendale and Duarte.

9.4.3.4 National Community Renaissance (CORE)

National CORE, formerly known as the Southern California Housing Corporation, is one of the largest nonprofit developers and managers of affordable housing in southern California. Based in the Inland Empire, CORE finances, develops, and manages affordable housing throughout southern California, including properties in Orange, San Diego, and Los Angeles Counties.

9.4.4 Opportunities for Energy Conservation

There is a growing awareness at the national and state levels of the importance to implement green practices. State law mandates cities and regions to implement such practices in order to reduce impacts on the environment. For instance, cities must comply with SB 375, the goal of which is to reduce greenhouse gases in the state.

Although including energy efficient measures can increase production costs of ownership and rental housing, over time housing with energy conservation features reduces costs, as the consumption of fuel and electricity is decreased. This can result in monthly housing costs that are equal to or less than what they otherwise would have been had no energy conservation devices been incorporated in the new residential buildings. This section provides an overview of opportunities for energy conservation during the 2021 to 2029 Housing Element planning period.

9.4.4.1 State Regulations

Title 24 of the California Administrative Code establishes energy conservation standards that must be applied to all new residential buildings. The regulations specify energy saving design for walls, ceilings and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. Compliance with the energy standards is achieved by satisfying certain conservation requirements and an energy budget. Among the alternative ways to meeting the energy standards are the following:

- **Alternative 1:** The passive solar approach which requires proper solar orientation, appropriate levels of thermal mass, south facing windows, and moderate insulation levels.
- **Alternative 2:** Generally requires higher levels of insulation than Alternative 1, but has no thermal mass or window orientation requirements.
- **Alternative 3:** Also is without passive solar design but requires active solar water heating in exchange for less stringent insulation and/or glazing requirements.

Residential developers must comply with these standards while localities are responsible for enforcing the energy conservation regulations.

9.4.4.2 State and Federal Programs

The California Department of Community Services and Development, in partnership with the network of local community services agencies that assist lower-income households, administers the Low Income Home Energy Assistance Program (LIHEAP). LIHEAP provides financial assistance to lower income households to offset the costs of heating and/or cooling their residences.

9.4.4.3 Local Measures

The City works to address energy conservation in a number of different ways. Two policy documents, the City's 2013 Energy Action Plan and 2016 Climate

Action Plan, identify a broad range of policies and implementation measures to reduce energy consumption across the City. The Energy Action Plan includes goals, policies, implementation strategies, and monitoring to reduce residential electricity use by 15 percent. Strategies include educating residents about energy use and encouraging them to replace household appliances for more energy efficient models. Developing a citywide Climate Action Plan is also part of the implementation for the Energy Action Plan.

The City's Climate Action Plan includes measures to address climate change across a set of six areas, including energy, water, transportation, solid waste, urban greening, and adaptation. Several of these areas have a direct impact on energy consumption and include strategies such as encouraging solar installations and promoting urban greening to reduce energy use by residential development. The Climate Action Plan also encourages compact, mixed use development patterns to reduce energy consumption.

The City's Residential Design Guidelines also address solar orientation. The building orientation, street layout, lot design, landscaping, and street tree configuration of all residential projects are reviewed to maximize solar access and energy conservation. The City also participates in the Construction and Demolition Debris Management program (C&D) and Calsense, both administered by the Public Works Department. Calsense provides irrigation controllers, water and labor saving accessories and water management software. The City uses this system at City facilities, medians, parks and school district sites. In addition, Calsense allows the City to detect water line breaks and reduce or stop the potential for slope failures, manpower efforts, and water loss. Over time, both programs have had significant success in reducing construction debris and water usage.

9.4.4.4 Private Sector Programs

In addition to the City's initiatives, local utility companies also offer assistance to make energy conservation improvements:

- **Southern California Gas Company** offers the Energy Assistance Program, which provides no-cost energy-saving home improvements and furnace repair or replacement services for qualified limited-income renters and homeowners.
- **Southern California Edison Company** offers the Energy Savings Assistance Program, which helps income-qualified households conserve energy and reduce their electricity costs. The program pays all costs of purchasing and installing energy-efficient appliances and equipment, which are free to eligible customers.

9.5 Housing Plan

This chapter of the Housing Element contains goals and policies the City will implement to address a number of important housing-related issues during the 2021-2029 planning period. While many of the programs have been carried forward from the previous period, others have been revised or added to reflect the community's needs and constraints as identified in previous chapters of the Housing Element and/or new circumstances and state laws.

As a built-out, affluent, predominantly single-family residential community with an extremely limited amount of remaining vacant land, the challenge for the City of La Cañada Flintridge is to promote a variety of individual choices regarding tenure, type, and location of housing throughout the community that accommodates the 6th Cycle RHNA, especially for lower- and moderate-income households and those with special needs. The following Housing Plan presents the City's eight-year Housing Plan for this 2021-2029 planning cycle, including goals and policies (Section 9.5.1) and Programs (Section 9.5.2), which are intended to overcome this challenge, address the identified housing needs of the community, and promote equal opportunity for all residents to reside in decent, safe housing.

- **Goals** are the results that the City desires to achieve over the housing planning period. They are general expressions of values or preferred outcomes, and therefore, are abstract in nature and may not be fully attained. The goals are the basis for City policies and actions during this period.
- **Policies** are specific statements that will guide decision-making. Policies serve as the directives to developers, builders, service providers, decision makers, and others who will initiate or review new development projects or seek to provide housing-related services in La Cañada Flintridge. Some policies stand alone as directives, but others require that additional actions be taken. These additional actions are listed under "programs" below.
- **Programs** are the core of the City's housing strategy. Programs translate goals and policies into actions. These include on-going programs, procedural changes, zoning ordinance changes, and other actions that implement the housing policies and help achieve housing goals. Each program identifies the responsible agency, funding source, timeframe for implementation, and specific objectives.

9.5.1 Goals and Policies

This section of the Housing Element contains the goals and policies the City intends to implement to address a number of important housing related issues. The following major issue areas are addressed by the goals and policies of this Element:

- Provide a wide variety of housing types to meet the needs of existing and future residents;
- Ensure that existing housing is maintained and preserved;
- Facilitate housing for lower- and moderate income households and those with special needs;
- Ensure compatibility with the natural and built environment and the safety of persons and property; and
- Promote equal housing opportunity for all (affirmatively further fair housing) in accordance with California Government Code Section 8899.50(b).

Each issue area and the supporting goals and policies are identified and discussed in the following section. Many of the goals and policies are mutually supportive and are intended to work together to accomplish the desired outcomes.

9.5.1.1 Variety of Housing Types

Providing a variety of housing in terms of types (e.g., single-family, accessory dwelling units, duplexes, apartments, and condominiums), tenure (rental and ownership), and cost will allow the City to fulfill a broad range of housing needs for households of all income categories. Maintaining diversity in housing choice and cost will allow existing and future La Cañada Flintridge residents an opportunity to find housing that meets their individual and household needs, regardless of age, disability, household type, income, or special need.

HE Goal 1: Provide a wide variety of housing types, tenure, affordability levels, and adequate supply of housing to meet the existing and future needs of city residents.

HE Policy 1.1: Facilitate a range of residential development types in the city, including low density single-family homes, accessory dwelling units, apartments and condominiums, and mixed use residential development, to accommodate the City's RHNA.

HE Policy 1.2: Remove governmental constraints to the development and preservation of housing that is affordable to moderate- and lower-income households and those with special needs through revision of appropriate development standards and land use controls and efficient permit processing procedures.

HE Policy 1.3: Facilitate mixed use, multifamily, and senior housing development within the Downtown Village Specific Plan area and other locations along Foothill Boulevard to expand housing opportunities for all income groups.

HE Policy 1.4: Assist residential developers in identifying land suitable for new housing development.

HE Policy 1.5: Support the dispersion of ADUs and JADUs throughout the city's lower density single-family neighborhoods, except for the neighborhoods with a single point of ingress/egress within the Very High Fire Hazard Severity Zone (VHFHSZ), as identified in the updated Safety Element.

HE Policy 1.6: Locate higher density residential development in proximity to public transportation, public sanitary sewer, public and private retail and service establishments, recreational opportunities, and other amenities.

HE Policy 1.7: Support the development of childcare facilities to provide improved housing conditions benefitting households lacking in-home childcare capability.

HE Policy 1.8: Promote and facilitate new partnerships with organizations that include, but are not limited to, religious institutions, school districts, social service providers, and healthcare providers to support housing for special needs populations.

HE Policy 1.9: Monitor all regulations, ordinances, departmental processing procedures, and fees related to the rehabilitation and/or construction of dwelling units to assess their impact on housing costs and make modifications as appropriate to reduce governmental constraints to development of housing.

9.5.1.2 Maintenance and Enhancement of Existing Housing

Housing and neighborhood conservation is an important component of maintaining and improving the quality of life for residents. In general, housing over 30 years old usually is in need of some major rehabilitation, such as a new roof, repair of termite damage, foundation work, plumbing, etc. With approximately 80 percent of La Cañada Flintridge's housing stock built prior to 1980, preventive maintenance is essential to ward off widespread housing deterioration.

HE Goal 2: Maintain and enhance the quality of existing residential neighborhoods in the city.

HE Policy 2.1: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term neighborhoods quality and housing values.

HE Policy 2.2: Use the City's code enforcement program to bring substandard units into compliance with the City's Property Maintenance Ordinance and other codes, and to ensure the maintenance of the overall condition of residential neighborhoods in La Cañada Flintridge.

HE Policy 2.3: Encourage property owners to consider the benefits of home repair and remodeling using design and materials consistent with the existing or historic character of the residence and that are deemed fire safe.

HE Policy 2.4: Encourage property owners to participate in the state Earthquake Brace and Bolt program and/or other programs designed to improve the quality and long-term viability of housing.

9.5.1.3 Adequate Residential Opportunities for a Broad Range of Needs

To facilitate new residential development that accommodates the 6th Cycle RHNA, the City plays an important role in both assisting in the identification and promotion of potential sites for future development. In addition, providing regulatory and available financial assistance will be essential to support the production of affordable housing. Promoting diversity in housing choice and cost will allow La Cañada Flintridge residents an opportunity to find housing that meets their individual and household needs, regardless of age, disability, household type, or income.

HE Goal 3: Facilitate and encourage the development of housing for lower- and moderate-income households and households with special needs, including seniors and persons with disabilities.

HE Policy 3.1: Encourage private sector and non-profit affordable housing developers to produce housing with particular emphasis on underserved segments of the community and households with special needs, including affordable and market-rate housing for seniors

HE Policy 3.2: Facilitate the development of low- and moderate-income housing by allowing developers a density bonus, as required by state law.

HE Policy 3.3: Accommodate the development of residential units that are accessible to or are adaptable for conversion to residential use by persons with disabilities.

HE Policy 3.4: Maintain an up-to-date residential sites inventory and provide to interested developers with information on available development incentives.

HE Policy 3.5: Support the assembly of small vacant or underutilized parcels to enhance the feasibility of redevelopment and infill development.

HE Policy 3.6: Encourage the integration, on a community level, of housing constructed expressly for lower- and moderate-income households with market-rate residential development.

HE Policy 3.7: Encourage the construction of ADUs and JADUs, such as fee reduction, streamlined permitting, public education, and other appropriate strategies.

HE Policy 3.8: Explore options for regulatory and available financial assistance to support the production of affordable housing.

9.5.1.4 Community Safety and Compatibility with the Natural and Built Environment

As a hillside community located in the Crescenta Valley in the foothills of the San Gabriel Mountains and the Angeles National Forest, residential development in La Cañada Flintridge is constrained by a variety of environmental factors. These factors, which are described in greater detail elsewhere in the Housing Element, include: steep slopes, drainage basins, with the associated risk of debris flows; the entire city being located within the Very High Fire Hazard Severity Zone (VHFHSZ); many long, narrow, winding roads; and 12 identified neighborhoods with a single point of ingress and egress. Protection of persons and property from environmental factors and human-made impacts, and conservation of the natural environment are all important considerations when identifying areas for new residential development, especially for persons with special needs and at-risk populations. The need to ensure adequate water supply for fire suppression and the City's transition from septic systems to installation of sewers also impact the appropriate location for higher density housing. (Note: City does not have a municipal-type water system and has no authority over water districts.)

HE GOAL 4: Ensure that new housing is located and designed to be sensitive to the existing natural and built environment and to mitigate safety concerns.

HE Policy 4.1: Protect residential neighborhoods from excessive noise through appropriate planning to minimize traffic and incompatible land uses.

HE Policy 4.2: Require that new residential development is coordinated with the provision of infrastructure and public services.

HE Policy 4.3: Locate new higher density residential development along the city's commercial corridors to promote the benefits of smart growth principles, including a reduction in vehicle miles travelled and greenhouse gas (GHG) emissions and associated energy consumption.

HE Policy 4.4: Encourage the use of energy conservation devices and passive design concepts, which make use of the natural climate to increase energy efficiency and reduce housing costs.

HE Policy 4.5: Regularly examine new residential construction methods and materials and upgrade the City's residential building and design standards as appropriate to ensure energy efficiency.

HE Policy 4.6: Provide affordable and special needs housing with priority for water and sewer allocations should water and sewer capacity become a constraining factor to housing development.

HE Policy 4.7: Provide residents the opportunity to approve benefit assessment districts for the installation of sewers.

HE Policy 4.8: Protect the safety of existing and future residents by implementing goals and policies in the Safety Element, especially those that

address impacts relating to: the city being located entirely within the VHFHSZ; the potential for debris flows; neighborhoods with only one point of ingress and egress; and streets that are narrow.

HE Policy 4.9: Encourage non-conforming development to upgrade to use more fire-safe building materials.

9.5.1.5 Affirmatively Further Fair Housing (AFFH)

In 2018, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. Specifically, these meaningful actions must aim to accomplish the following:

- Address significant disparities in housing needs and in access to opportunity;
- Replace segregated living patterns with truly integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster & maintain compliance with civil rights and fair housing laws.

AB 686 creates new requirements that apply to all Housing Elements due for revision on or after January 1, 2021, which includes the 6th Cycle Housing Element update for the SCAG region. Each jurisdiction’s Housing Element must include an assessment of fair housing (AFH) in each of five analysis areas:

1. Fair housing enforcement and outreach;
2. Segregation and integration;
3. Disparities in access to opportunity;
4. Disproportionate needs/displacement; and
5. Racially/ethnically concentrated areas of poverty.

Per HCD, the Sites Inventory required for the Housing Element also “...must assess whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns. Analysis should not be limited to the identification of sites for lower income households but should incorporate the jurisdiction’s projected housing development at all income levels. It should assess the extent to which it either further entrenches or ameliorates existing patterns of segregation and/or exclusion of protected class members.”

As discussed in Chapter 9.2 (Community Profile) and Appendix D (AFFH), households in La Cañada Flintridge are predominantly in the “above moderate” income category, and the city is considered a “high resource” area due to its

excellent schools, high labor market engagement, low poverty rate, proximity to quality employment opportunities, quality housing stock, and high environmental scores. Unlike many jurisdictions in the SCAG region, which have “Racially or Ethnically Concentrated Areas of Poverty,” (R/ECAPs), the AFFH Assessment prepared for the Housing Element update found that La Cañada Flintridge is a “racially or ethnically concentrated area of affluence” (R/ECAA) (see Appendix D for details). In order to make adequate provision for the housing needs of all segments of the community, the City must ensure equal and fair housing opportunities are available to all residents. This means that through its goals, policies, and programs, the City must identify meaningful actions to expand the range of housing opportunities provided in La Cañada Flintridge, including lower and moderate income residents (including extremely low income households), housing for seniors on fixed incomes, the disabled, large families, female-headed households with children, and the homeless.

HE GOAL 5: Promote equal housing opportunities for all persons in accordance with state and federal fair housing laws.

HE Policy 5.1: Affirmatively further fair housing and promote equal housing opportunities for persons of all socioeconomic segments.

HE Policy 5.2: Promote housing along with supportive services to meet the special housing and service needs of seniors, homeless individuals and families, large households, single parents, and persons with disabilities.

HE Policy 5.3: Assist in the enforcement of fair housing laws by cooperating with local fair housing agencies to promote fair housing practices, and monitor, investigate, and enforce violations of fair housing laws.

HE Policy 5.4: Refer individuals concerned with possible violations of applicable fair housing laws to the fair housing service provider to ensure timely and effective response to such concerns. Publish information on these services on the City’s website and provide brochures at public counters.

HE Policy 5.5: Provide increased outreach and education for the broader community of residents, residential property owners, and property managers regarding fair housing practices and requirements.

HE Policy 5.6 Administer all City programs and activities related to housing and community development in compliance with California Government Code Section 8899.50(b), in a manner that affirmatively furthers fair housing and is in no way materially inconsistent with the City’s obligation to affirmatively further fair housing.

9.5.2 Housing Programs

The goals and policies contained in the Housing Element address La Cañada Flintridge’s identified housing needs and are implemented through a series of housing programs offered through the Community Development Department and the Division of Building and Safety. Housing programs define the specific

actions the City will undertake to achieve the stated goals and policies within the eight-year (2021-2029) planning period. La Cañada Flintridge's housing programs address the following five major focus areas:

- Provide new housing opportunities;
- Conserve and maintaining existing housing;
- Facilitate the provision of housing for lower and moderate-income and special needs households;
- Ensure environmental sensitivity and community safety; and
- Promote equal housing opportunity

Some of the Housing Programs below entail updating the City's Codes and Ordinances to comply with State law. The City recognizes it must comply with State law, and seeks to update the Codes and Ordinance in a timely manner.

A major focus of La Cañada Flintridge's Housing Plan is to adequately provide a balanced inventory of housing types, style, and prices to allow the City to meet the housing needs of all residents in the community in accordance with the City's RHNA. La Cañada Flintridge is primarily built out and few vacant residentially zoned sites remain in the city. Much of the land area is constrained by topographic and other environmental features, and the entire city is located within the Very High Fire Hazard Severity Zone. Recent and future development relies primarily on the redevelopment of nonvacant properties, particularly along Foothill Boulevard, where mixed use and multifamily residential development are permitted. The following programs are intended to provide adequate residential sites to meet the City's RHNA.

PROGRAM 1: Adequate Residential Sites to Accommodate the RHNA

With very little vacant land, significant environmental, safety, and infrastructure constraints regarding the majority of existing residentially zoned property, and the lack of transit service beyond primary arterials, the City's strategy to provide adequate sites to accommodate the RHNA is to identify and facilitate opportunities for future residential development via recycling of existing commercial sites to mixed use and stand-alone multifamily development in high opportunity areas along and near Foothill Boulevard. This will be accomplished by redesignating and rezoning certain properties to accommodate the densities identified in the Sites Inventory.

Quantified Objectives and Time Frame:

1. **Rezoning of Adequate Sites:** The rezoning of adequate sites is due October 15, 2022. The City is proposing to adopt the Housing Element in early October 2022, and is actively pursuing the implementation of the rezoning program. Following adoption of the Housing Element, the City will amend the Land Use Element to redesignate and amend the Zoning Map to rezone the properties identified in the Sites Inventory to accommodate the RHNA by October 2023. A total of 72 properties consisting of 30.5 total acres (including properties in the DVSP) will allow

residential development. Of the 72 total sites, 25 properties (19.14 acres) will be appropriately zoned to allow by-right approval of lower income units at a density of 25-30 dwelling units per acre for a net potential of 483 units. For a lower income development, residential use must occupy at least 50% of the total floor area of a mixed-use project. Total FAR for both the residential and nonresidential portion of a mixed use building shall not exceed 1.5.

2. **Rezoning of Adequate Sites in the DVSP:** See Program 4 regarding rezoning property within the Downtown Village Specific Plan (DVSP).
3. **Information:** Provide information on sites within the city and development incentives available through the City's density bonus ordinance in support of affordable housing and on available financial assistance through the City, county, and state. (Ongoing)

Responsible Agencies: Community Development Department

Funding Source: General fund

PROGRAM 2: No Net Loss

The City will ensure that it monitors its compliance with SB 166 (No Net Loss) and maintains an inventory of residential sites to accommodate the City's total 6th Cycle Regional Housing Needs Assessment of 612 units, including 252 very low, 135 low, 139 moderate, and 86 above moderate income units.

Quantified Objectives and Time Frame:

1. **Sites Monitoring Program:** By April 2023, develop a procedure to monitor the development of vacant and nonvacant sites in the sites inventory and ensure that adequate sites are available to accommodate the City's RHNA allocation by income category throughout the 6th Cycle planning period. The procedure will monitor:
 - a. Unit count and income/affordability assumed on parcels included in the sites inventory.
 - b. Actual units constructed and income/affordability when parcels are developed.
 - c. Net change in capacity and summary of remaining capacity in meeting the City's remaining RHNA.
2. **Additional Sites:** Create and maintain a list of additional sites with appropriate zoning that could be added to the City's Sites Inventory if and when an analysis provided through the Annual Progress Report (APR) indicates that sufficient sites may not exist to accommodate the City's remaining RHNA, by income level, for the planning period. (By April 2023)
3. **Sites Information:** Provide information on available sites and development incentives to interested developers and property owners on the City's website (By April 2023 through October 2029 (end of 6th Cycle).

Responsible Agency: Community Development Department

Funding Source: General fund

PROGRAM 3: Governmental Constraints to Housing Development

Governmental constraints to development of multifamily and affordable housing in La Cañada Flintridge were identified in Section 9.3 (Constraints) and via discussions with market-rate and non-profit developers. As a part of the comprehensive update to the Zoning Code, the City will amend certain development standards to mitigate the identified constraints and ensure that the development standards are adequate to allow the achievement of the maximum density permitted to accommodate housing types that are affordable to households in all income categories, while preserving and revitalizing existing communities. The comprehensive Zoning Code update also proposes amendments to permitting processes to revise development review processes for residential uses, including changing the requirement for a CUP for residential uses in the MU zone to a ministerial permit. The update also proposes to add a separate use category for senior housing that would be allowed via a ministerial permit.

Quantified Objectives and Time Frame:

1. **Development Standards:** The City is currently in the process of comprehensively updating the Zoning Code. Several chapters pertaining to residential development standards have already been reviewed and recommendations have been proposed by the Planning Commission to mitigate constraints to development, including reducing parking standards, reducing setbacks, reducing open space requirements, and modifying the way building height is measured. The Michael Baker Market Feasibility Analysis resulted in a recommendation to establish a base density of 25 dwelling units per acre for high density housing. A component of that study (currently underway) is to test existing development standards and revise them to ensure that high density housing can feasibly be built in the City. A series of scenarios are being analyzed to match the average parcel sizes in the City to ensure target densities can feasibly be achieved. As a result of the constraints analysis prepared for the Housing Element update, those draft sections will be reviewed to determine if additional revisions are needed. In particular, parking standards and building height will be reconsidered. The Zoning Code will be amended by October 2023.
2. **Objective Design Standards:** The Zoning Code currently includes design standards for multifamily and mixed use development. As a part of the comprehensive update to the Zoning Code, the City has initiated the preparation of objective design standards and will delete the discretionary design guidelines. (By October 2023)

3. **Permits:** Revise the Zoning Code to change the requirement for a CUP for multifamily uses in the MU zone to a ministerial permit. (By October 2023)
4. **Residential as an Allowable Use in the MU Zone:** Revise the Zoning Code to allow multifamily residential development in the MU zone without a commercial component. A combined total FAR of 1.5 is proposed for both the residential and commercial components of a mixed-use development. A purely multifamily development must comply with the minimum density for the zone. (By October 2023)
5. **“Round Up” Density Calculation:** Revise the Zoning Code to “round up” to the next whole number in all cases when calculating allowable density. For example, 0.48 acres at 30 du/ac = 14.4, which is rounded up to 15 units allowed. (By October 2023)
6. **Permit Fees:** Develop a policy and implementing procedures to reduce various permit fees for affordable housing and special needs housing. (By October 2024)
7. **Modifications to the DVSP:** See Program 4 regarding removal of governmental constraints in the DVSP.
8. **SB 35 Implementation:** The City is in the process of developing dedicated application through the City’s online permitting software that is specifically designed to address the requirements of SB 35. Both the application, plus a written procedure for staff that will be made available to the public, will be available by October 2022.
9. **Monitoring:** Monitor the effectiveness of the City’s Zoning Code in facilitating a range of housing options in the city. Monitoring will occur beginning April 1, 2023 as a part of the Sites Monitoring Program (Program 2) and preparation of the state-mandated annual APR. Address impediments as appropriate and to the extent legally feasible. (Ongoing)
10. **Outreach:** Invite developers, architects, and members of the public to participate in the public workshops that will be held to amend the Zoning Code and other actions to remove governmental constraints. (Starting October 2022)

Responsible Agency: Community Development Department

Funding Sources: General funds, state housing funds

PROGRAM 4: Downtown Village Specific Plan (DVSP)

In November of 2000, the City adopted the DVSP, consisting of areas along Foothill Boulevard in the center of La Cañada Flintridge. The primary focus of the DVSP is to enhance Foothill Boulevard with place-based strategies that create a community-oriented town center that includes a mixture of commercial, office, and residential uses. The DVSP provides for integration of residential uses in

designated Mixed Use areas as a means of enhancing 24-hour activity along Foothill Boulevard.

On February 10, 2014, the City Council adopted amendments to the DVSP prior to adoption of the 2013-2021 (5th Cycle) Housing Element at the same hearing, to allow multi-family housing for all household types, not just senior multi-family housing. (Note: Planning Commission held public hearings on November 26 and December 10, 2013, to review the amendments; upon conclusion of the public hearings, the Planning Commission recommended that the City Council adopt the amendments.) Since that time, no mixed use or solely residential project has been approved in the DVSP. To encourage mixed use and stand-alone residential development in the DVPS, the City will amend the DVSP to increase the multifamily residential density for mixed use and stand-alone residential development for specified sites, modify development standards, and adopt objective design standards.

Quantified Objectives and Time Frame:

1. **Rezoning of Adequate Sites in the DVSP:** The rezoning of adequate sites is due October 15, 2022. The City is proposing to adopt the Housing Element in early October 2022, and is actively pursuing the implementation of the rezoning program. Following adoption of the Housing Element, the City will amend the DVSP to redesignate and amend the Zoning Map to rezone the properties identified in the Sites Inventory to accommodate the RHNA by October 2023. Within the DVSP, there are 46 properties on the Sites Inventory consisting of 12.78 acres, which will be redesignated and rezoned to allow residential development with a net potential of 241 units. Of the 46 properties, 2 sites (1.7 acres) will be appropriately zoned to allow by-right approval of lower income units at a density of 25-30 dwelling units per acre, for a net potential of 43 units. As noted in Program 3, Action 5, rounding-up was used for the density calculation to achieve the unit count.
2. Revise the DVSP to implement the Sites Inventory and mitigate identified constraints to development of housing and allow standalone residential development in mixed use districts. Amend the DVSP to remove MU-1 and create MU-12 and increase the base density from 0 - 15 dwelling units per acre to 12 - 15 dwelling units per acre; and remove MU-2 and create MU-25 and increase the density from 0-15 dwelling units per acre to 25-30 dwelling units per acre. For the MU-25 District, a combined total FAR of 1.5 is proposed for both the residential and nonresidential components of a mixed-use development. For a lower income development, residential use must occupy at least 50% of the total floor area of a mixed-use project. (By October 2023).
3. **Development Standards:** Revise development standards in the Downtown Village Specific Plan to mitigate identified constraints to development of housing, including increasing building height and FAR, reducing setbacks, open space, and parking requirements, and modifying other standards as appropriate. (By October 2023)

4. **Objective Design Standards:** Adopt objective design standards for the DVSP. (By October 2023)
5. **Land Use:** Revise the use matrix for the DVSP to allow stand-alone residential uses in the DVSP, and to allow all residential uses in the DVSP (whether stand-alone or as part of a mixed use project) ministerially. (By October 2023)
6. **Outreach:** Invite developers, architects, and members of the public to participate in the public workshops that will be held to amend the DVSP. (Starting October 2022 through adoption of ordinance)

Responsible Agency: Community Development Department

Funding Sources: CDBG; state housing funds

PROGRAM 5: Religious Institution Housing Overlay Zone

Encouraging religious institutions to build housing on property owned by religious institutions (also known as congregational land) would provide sites that otherwise would not be available for affordable housing. Due to the built-out nature of La Cañada Flintridge, this is a valuable strategy to provide additional housing opportunities for lower income households. Adopting a religious institution housing overlay zone (RI-OZ) would enable churches to build or partner with others to build affordable housing by-right. This is a significant opportunity in built-out cities such as La Cañada Flintridge that have so few vacant sites. Utilizing church land for affordable housing also provides an attractive opportunity for affordable housing developers by minimizing their cost for land, risk, and time to process development applications. This approach also helps congregations further their missions to support lower-income populations while providing enhanced financial stability for religious institutions, many of which have been impacted by declining attendance, which has been exacerbated by the COVID-19 pandemic.

Preparing a RI-OZ is a program that builds on the provisions of AB 1851, adopted in 2020, which facilitates housing on religious institution properties by prohibiting a local agency from requiring the replacement more than 50 percent of religious-use parking spaces that a developer proposes to eliminate as part of that housing development project.

During public outreach meetings held for the Housing Element update, several local ministers/pastors and developers of affordable housing commented on the potential benefits and expressed interest in the concept, and one participant noted he has been involved in such a project in another community and would be interested in assisting in a similar effort in La Cañada Flintridge.

Quantified Objectives and Timeframe:

1. Adopt a Religious Institution Housing Overlay (RI-OZ) that applies to most of the religious institutions in the city. Require units to be affordable to extremely low (0-30% AMI) and lower (below 80% AMI) and/or

moderate income (81-120% AMI) households at a percentage to be determined. (By October 2023)

2. Update parking requirements to create flexibility in accommodating RI-OZ and church parking needs. (By October 2023)
3. **RI-OZ Information and Outreach:** Concurrently with the establishment of the RI-OZ, the City will develop a program to inform religious institutions of the new RI-OZ and to assist them through the newly established process. The outreach program would outline the ins and outs of development timelines, construction, housing options and regulations, and provide information regarding potential partnerships with affordable housing developers. (Starting October 2023 and ongoing)

Responsible Agencies: Community Development Department

Funding Source: General fund and/or state housing funds

PROGRAM 6: By-Right Approval for Projects with 20 Percent Affordable Units

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Code to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower income households, applicable to the following types of sites:

- Sites being used to meet the 6th cycle RHNA that represent a “reuse” of sites previously identified in the 4th and 5th cycles Housing Element. The “reuse” sites are specifically identified in the inventory (see Appendix C).
- Sites being redesignated/rezoned after the statutory deadline of the Housing Element to accommodate the RHNA shortfall (see Program 1: and Appendix C).

Quantified Objectives and Time Frame:

Amend the Zoning Code to create the by-right approval process. (By October 2023) ((City acknowledges this is current State law and will be implemented prior to the code amendment) **Responsible Agencies:** Community Development Department

Funding Sources: CDBG; state housing funds

PROGRAM 7: Lot Consolidation (Merger of Parcels)

Much of the future residential development is expected to occur in the DVSP area and in the Mixed Use and High Density Residential zones. The City will facilitate lot consolidation for mixed use and housing developments in these areas.

Quantified Objectives and Time Frame:

1. **Administrative Process of Lot Consolidation:** As a part of the City's current comprehensive Zoning Code update, the City has prepared a draft revision to the existing Chapter 11.63 (Merger of Parcels) to create an administrative procedure to allow for voluntary merger of parcels by property owners (lot consolidation) instead of requiring Planning Commission approval. The draft has been reviewed by the Planning Commission and recommended for adoption. (By October 2024)
2. **Sites Identification of Potential Lot Mergers:** The City will provide assistance with site identification and entitlement processing and will work with property owners to facilitate lot consolidation and identify redevelopment potential. (Immediate implementation)
3. **Fee Reduction for Lot Mergers:** The City will develop a program to offer no fee lot consolidation applications and expedited processing for qualifying lower-income housing development. (By February 2023)

Responsible Agencies: Community Development Department

Funding Sources: CDBG; state housing funds

PROGRAM 8: Accessory Dwelling Units (ADUs)

ADUs (including JADUs) units represent a viable means of dispersing lower cost rental housing in the community while assisting homeowners, such as seniors on fixed incomes, to obtain rental income. The City has been amending Chapter 11.33 (Accessory Dwelling Units) of the Zoning Code to remain consistent with the changes to state law on an ongoing basis, and will continue to do so. The City has seen a significant increase in the number of ADUs that have been constructed in the city in recent years as many property owners have developed second units pursuant to the City's ADU ordinance to use for guests, family members, domestic workers, and as independent rental units. The City's goal is to encourage continued development of ADUs and JADUs, which provide opportunities for rental housing to low- and moderate-income households with the exception of locations in city with a single point of ingress/egress (see Program 21).

Quantified Objectives and Timeframe:

1. **Changes in State ADU Law:** Monitor changes in state law regarding ADUs (ongoing). Within six months of a change to state law regarding ADUs, the City will update the Zoning Code to remain consistent with state ADU law.
2. **Programs to Facilitate ADU Construction:** The City will develop and advertise programs that facilitate the development of a minimum of 15 ADUs/JADUs per year with immediate implementation. Examples of programs the City is considering include, but are not limited to,

concurrent Planning and Building permit review with only one fee required (versus separate fees for Planning and Building permits), no zoning clearance required, and reduction of other City fees. Example methods used to advertise information and provide public education regarding ADUs includes posting information on the City's website, holding workshops to provide residents with information about the ADU development process and any associated fees, making information available at the public counter and public buildings/facilities, including articles in the City's *LCF Vista* newsletter, utilizing social media, and utilizing the City's government access channel; additional methods will be considered as well.

3. **ADU Monitoring Program:** The City is required to submit Annual Progress Reports (APRs) to HCD annually regarding housing production, including production of ADUs. The City will develop a monitoring program to ensure the City is on track to meeting the construction goals in advance of the 2023 APR which is due April 1, 2023. The City will evaluate the production data annually and identify trends. If by April 2024 a trend indicates the City is not meeting its ADU construction goals, the City will review and revise policies and efforts to increase ADU construction as necessary within 6 months of any given APR. To determine affordability of new ADU units, the City will add a question or two to the ADU building permit application asking what rent the applicant is proposing to collect for the unit. This will assist the City in preparing their annual rent survey of comparable size units and demonstrate income categories for ADUs rentals, which is also part of the APR.
4. **ADU Amnesty Program:** Adopt an amnesty program to allow conversion of unpermitted, existing accessory structures that function as ADUs into accessory dwelling units without the double fee penalty for unpermitted construction, and a building plan check and fee reduction of 30% if the property owner guarantees the ADU would be rented to senior(s), extremely low income or low-income person(s), or persons with disabilities, provided that all other applicable Code requirements are met. (By April 2023).
5. **ADU Fair Housing Information:** Prepare a flyer explaining fair housing legal requirements to provide to every permit applicant for ADU/JADU construction, and require applicants to verify receipt of the information. Send flyer to existing ADU/JADU permit holders in the City's database which includes permits issued since 2018.
6. **ADU Information:** Provide information to the public regarding ADUs, including their benefits and procedures and programs for expedited approval, as noted in (2) above. (By April 2023 and ongoing, especially as programs and procedures evolve).

Responsible Agency: Community Development Department

Funding Sources: General fund

PROGRAM 9: Code Enforcement (Community Preservation)

The objective of the City's Code Enforcement Program is to preserve communities, ensure the safety of residents, and prevent structures and properties from falling into substandard condition. Potential code violations are identified based on complaints reported to the City. Exterior inspections are then performed and if necessary, a notification of violation is issued to the property owners.

Quantified Objectives and Time Frame:

1. **Residential Maintenance:** Enforce the City's Property Maintenance Ordinance to preserve existing units, maintain property values, and support a high quality of life for residents. (Ongoing)
2. **Information:** When a Code Enforcement case is received for property or building maintenance issues, the property owner is provided information on the Residential Rehabilitation Program (RRP) to ensure those that may qualify for the program receive direct information on how to apply (Ongoing; see also Program 10).

Responsible Agencies: Building and Safety Division; Community Development Department Code Enforcement

Funding Sources: Departmental budget

PROGRAM 10: Residential Rehabilitation Program (RRP)

The City utilizes Community Development Block Grant (CDBG) funding for two programs that target lower income households; the Sewer Connection Grant and the RRP. The purpose of the RRP is to provide grants to owner occupants of single family detached dwellings for the preservation of decent safe and sanitary housing; to correct hazardous structural conditions; to make improvements considered necessary to eliminate blight and improve handicapped access; and, to correct building and health code violations through the awarding of grants. Grants shall be given to eligible low- and moderate-income owner occupied homeowners of single family detached homes to cover the cost of necessary housing repairs.

Given limited staffing, the City contracts with a company to provide CDBG program management. Since the CDBG funding has been decreasing for a number of years, the City also annually budgets additional funds to pay the CDBG consultant, since the 20% administrative costs allowed by the program generally does not cover all costs.

The RRP Guidelines are updated on a regular basis to adjust the program to ensure the program can meet the needs of lower income residents. In 2018 the

program was modified to allow for CDBG applicants to reapply for the Program after a three-year period as opposed to a five-year period and in 2019 the program was adjusted to increase the grant limit from \$15,000 to \$20,000.

Examples of specific eligible activities include plumbing and electrical work, roof repairs, windows, foundation and exterior painting, water heaters, handicapped accessibility, and energy efficiency improvements.

Quantified Objectives and Timeframe:

1. **Advertising and Targeting Outreach:** The City maintains a webpage (<https://cityoflcf.org/cdbg-grant/>) that provides information to residents on the CDBG program. The City will also annually include an article on the CDBG program within the *LCF Vista*, a community newsletter prepared by the City and direct mailed to every property within the City. When a Code Enforcement case is received for property or building maintenance issues, the property owner is provided information on the RRP to ensure those that may qualify for the program receive direct information on how to apply. The City will conduct targeted advertising annually beginning January 2023 regarding the availability of the RRP to the lower and extremely low-income households, including seniors and persons with disabilities (including persons with developmental disabilities).
2. **Information:** Other avenues of outreach the City will initiate is partnering with the school district, religious organizations and other organizations that provide services within the community to provide information on the availability of the CDBG program. The City will advertise the availability of the CDBG grant programs through email blasts, social media, cable television channel as well as handouts at City Hall, the Los Angeles County Library Branch located within the City and other public buildings and facilities. The City will also reach out to local organizations, institutions, and agencies (such as school districts, religious organizations, social and service organizations, non-profits, etc.) who have special needs populations and very low/low income residents as members or clients and will provide them with the information to share with their members/clients. (Annually, beginning in 2023).
3. **Funding:** Provide CDBG funds to achieve approximately two to three grants per year. At least annually, the City will seek other state and federal programs that offer funding and other incentives for housing rehabilitation and energy efficiency improvements for special needs populations and very low/low income households. (For Immediate Implementation)
4. **Review of the RRP:** The City currently reviews and updates (as appropriate) the RRP on a regular basis to adjust the program to ensure it

can meet the needs of lower income residents. The City will review the RRP annually beginning in January 2023.

Responsible Agencies: Community Development Department

Funding Sources: CDBG

PROGRAM 11: Sewer Connection Grant Program

The City implemented a Sewer Connection Grant Program to assist lower and moderate-income households, especially extremely low income households, with the costs of connecting single-family homes to the City's sewer system in the City's sewer districts. (This program is targeted for single-family homes because multifamily development is already connected to the sewer system).

Quantified Objectives and Time Frame:

1. **Funding:** Provide grants for approximately two to four lower and moderate-income households annually. (For Immediate Implementation)
2. **SB 1087:** Consistent with state law (SB 1087), establish a written policy document to provide affordable housing with priority for water and sewer services. (By June 2023)
3. **Advertising and Outreach:** The City will conduct targeted advertising regarding the availability of the Sewer Connection Grant program to the lower and extremely low income households, including seniors and persons with disabilities (including persons with developmental disabilities). The City will advertise the availability of the Sewer Connection Grant Program through brochures at the public counter, the Los Angeles County Library branch located within the city and at other public buildings and facilities; posting on the City's website; the City's newsletter (*LCF Vista*); email blasts; the City's government access channel; and other appropriate venues. The City will annually include an article on the Sewer Connection Grant program within the *LCF Vista*, a community newsletter prepared by the City and direct-mailed to every property within the city. The City will reach out to local organizations, institutions, and agencies (such as school districts, religious organizations, social and service organizations, non-profits, etc.) who have special needs populations and very low/low income residents as members or clients and will provide them with the information to share with their members/clients. (Annually, beginning January 2023)
4. **Review of the Sewer Connection Grant Program:** The City will review the Sewer Connection Grant Program and will adjust it if appropriate to better meet the needs of recipients. (Annually, beginning in 2023)

Responsible Agencies: Public Works Department; Community Development Department

Funding Sources: CDBG

PROGRAM 12: Condominium Conversion Ordinance

The City has adopted a condominium conversion ordinance that sets forth criteria for the conversion of existing multi-family rental housing to condominiums. Included in the ordinance are a number of tenant provisions to reduce the risk of displacement, such as priority of purchase, notice of hearing, relocation assistance, and adequate notice to vacate. In addition, the applicant must file a report indicating the impact of the condominium conversion upon the rental market in the community and the availability of adequate replacement units. Before approving a conversion, the Planning Commission must consider the effect of the proposed conversion on the City's low- and moderate-income housing supply. This City is updating the Condominium Conversion Ordinance as a part of the comprehensive update of the Zoning Code.

Quantified Objectives and Time Frame:

1. Update the Condominium Conversion Ordinance to ensure it is reflective of state law and continues to protect tenants. (By October 2024)
2. Enforce condominium conversion regulations to help conserve existing rental housing and provide tenant protections. (By October 2022)

Responsible Agencies: Community Development Department

Funding Sources: Departmental budget

PROGRAM 13: Multi-Family Housing Acquisition and Rehabilitation

The City contains several older apartment buildings in need of upgrading and repair. These could potentially provide new housing opportunities for lower income persons in key areas of the City. Several non-profit housing providers active in the greater Los Angeles area have acquired similar aging apartment buildings and rehabilitated these buildings as long-term affordable housing. The City is a member of the San Gabriel Valley Regional Housing Trust Fund (SGV RHTF) Joint Powers Authority. The City paid \$2,000 per year to participate in the SGV RHTF in FY 20-21, dedicated \$36,873 in FY 20-21 and \$18,162 in FY 21-22 to help fund affordable housing projects in the San Gabriel Valley. Given the City's size and the small amount of funding therefore allocated, the City Council voted to participate in the program to ensure that funds were spent locally to support housing projects that benefitted lower-income residents. The SGV RHTF notified the City in 2021 that its contributions had helped to fund 71 affordable units within the San Gabriel Valley. The City intends to continue annual participation in the SGV RHTF and dedicate funding to support the RHTF. As a member agency, if a project within the City included affordable units, the City would support a development through the RHTF funding process.

Quantified Objectives and Time Frame:

1. The City will participate in the SGV RHTF on an annual basis, as described above with the goal of pursuing the acquisition and rehabilitation of one project over the eight-year Housing Element period. Program will target assistance to units occupied by lower income

households (especially extremely low income households, extremely low income senior households and persons with disabilities). (October 2022 – October 2029)

Responsible Agencies: Community Development Department; Community Development Commission

Funding Sources: CDBG; HOME; state and federal housing funds

PROGRAM 14: Density Bonus

Density bonuses, together with the incentives and/or concessions, can result in a lower average cost of land per dwelling unit, thereby making the provision of affordable housing more feasible. The City maintains its Zoning Code to comply with current state density bonus law.

Quantified Objectives and Time Frame:

1. Update the Affordable Housing Density Ordinance to ensure to remains consistent with state density bonus law, to ensure it is reflective of state law. (By October 2023)
2. Promote the use of density bonus incentives to developers and provide technical assistance to developers in utilizing density bonus for maximized feasibility and to meet local housing needs.(October 2023 – October 2029)

Responsible Agencies: Community Development Department

Funding Sources: Departmental budget

PROGRAM 15: Special Needs Housing

On February 10, 2014, the City amended the Zoning Code prior to adoption of the 2013-2021 Housing Element to specifically address the siting of transitional housing, emergency shelters, supportive housing, and single-room occupancy units (SROs), which are housing options appropriate for special needs households and lower income households, including extremely low-income households. Since that time, AB 139 amended certain standards for emergency shelter housing by requiring parking for emergency shelters be established based on staffing levels only. Additionally, AB 101 requires added the Low Barrier Navigation Center (LBNC) as another type of housing for those with special needs, which must be allowed by right in areas zoned for mixed use and multifamily residential zones permitting multifamily uses if it meets certain specified requirements. The City will amend the Zoning Code in compliance with state law to update and/or add these special needs housing uses. Finally, large group homes must be similarly permitted as small group homes, which will require a revision to the City's use standards. As a part of the comprehensive update to the Zoning Code, the City proposes to amend the Reasonable Accommodation ordinance (2014) to simplify the approval process to better accommodate persons with disabilities.

Quantitative Objectives and Time Frame:

1. Update the Zoning Code to modify parking requirements to emergency shelters in accordance with state law. (By April 2023)
2. Update the Zoning Code to adopt a Low Barrier Navigation Center Ordinance. (By April 2023)
3. Update the Zoning Code and DVSP to allow LBNC and permanent supportive housing by-right in zones where multifamily and mixed uses are permitted, as required by state law. (By April 2023)
4. Update the Zoning Code and the DVSP to allow LBNC in areas zoned for mixed use. (By April 2023)
5. Review and revise the provisions for permitting large group homes to be similarly permitted as small group homes or develop other mitigating strategies to remove constraints to the development of group homes for more than six persons. (By April 2023)
6. Amend the Reasonable Accommodation ordinance for persons requesting modification to development standards to accommodate their disabilities to make the process easier and less expensive. (Currently being proposed as part of the comprehensive Zoning Code update. By April 2023)
7. Monitor state law and update the Zoning Code as necessary to maintain compliance with state law for all special needs housing. (By April 2023 and ongoing)

Responsible Agencies: Community Development Department

Funding Sources: Departmental budget

PROGRAM 16: Senior and Workforce Housing

Providing adequate and affordable housing for senior residents is an important goal for La Cañada Flintridge in order to meet the needs of the City's senior population and allow them to continue to live within the community. According to the 2010 Census, 28 percent of the City's households were occupied by seniors (age 65+); by 2019, that percentage had grown to 33 percent. Based on trends, as this population continues to age, the City will experience a significant increase in demand for housing that is geared toward seniors as they choose to downsize into condominiums and apartments, and for services that support the needs of seniors. In particular, those aged 75+ will begin to require housing with a supportive services component. Currently, there are two small senior care facilities in the community, each with a six-bed capacity.

The limited supply of rental apartments in La Cañada Flintridge, combined with relatively high rental costs and low vacancy rates, has also increased the need for rental housing affordable to the local workforce, which often falls within the moderate and lower income ranges. In many cases this includes people who grew up in La Cañada Flintridge but who cannot afford to establish their own households in their own community. Workforce occupations that may be precluded from residing in La Cañada Flintridge due to high housing costs include teachers, firefighters, nurses, many City and other government

employees, and persons employed in local retail, service, and construction industries.

The City will pursue several avenues to assist in establishing senior and workforce housing. The DVSP and Mixed Use designations represent expanded opportunities in the City to create quality, affordable housing that is within easy access to shops, services, and employment centers. As a means of facilitating senior and workforce housing development, the City will offer regulatory incentives and/or direct financial assistance appropriate to the project. The following are among the types of incentives that may be provided:

- Flexible development standards (reduced parking requirements, modified setbacks, etc.);
- Density bonuses;
- City support in affordable housing funding applications;
- Reduction in development fees; and
- Direct financial assistance, where available.

A portion of the City's CDBG funds can be used to assist in the financing of senior and workforce housing projects. New housing developments in La Cañada Flintridge may also be eligible for other state and federal financing.

Quantified Objectives and Timeframe:

1. Inform the development community of opportunity sites (such as the sites rezoned as high density multi-family use), development incentives, and financial assistance for development of workforce and senior housing. (By October 2022)
2. Prioritize funding assistance to affordable housing projects that include units affordable to extremely low income households, seniors and those with disabilities. (By October 2022)
3. Support funding applications for county, state, and other financial resources for projects that further the community's housing goals. (By October 2022)
4. Work with qualified housing developers to pursue affordable housing (including projects that provide set-aside units for extremely low income households and persons with disabilities, including those with developmental disabilities) in the community. (By October 2022)

Responsible Agencies: Community Development Department; Los Angeles County Community Development Authority; San Gabriel Valley Regional Housing Trust Fund

Funding Sources: CDBG; state and federal housing funds

PROGRAM 17: Mortgage Credit Certificate (MCC) Program

The Mortgage Credit Certificate (MCC) program is a federal program that allows qualified first-time homebuyers to take an annual credit against federal income taxes of up to 15 percent of the annual interest paid on the applicant's mortgage. This enables homebuyers to have more income available to qualify for a

mortgage loan and make the monthly payments. The value of the MCC program has covenant restrictions to ensure the affordability of the participating home for a period of 15 years. MCCs can be used in conjunction with the County's Home Ownership Program (HOP).

Quantified Objectives and Timeframe:

1. Advertise the MCC program in the City's *LCF Vista* newsletter, on the City's website, through email blasts and social media, and on the City's government access channel, and provide brochures at the public counter and public buildings and facilities to interested homebuyers. (Expand advertising methods by October 2023; maintain advertising on an ongoing basis).
2. Work with local realtors to make them aware of these programs. (By October 2022)

Responsible Agencies: Community Development Department; Los Angeles County Community Development Authority

Funding Sources: MCC credit allocations

PROGRAM 18: Home Ownership Program (HOP)

The Los Angeles County HOP provides zero-interest loans with no repayment due until the home is sold, transferred, or refinanced. The loan is secured by second trust deed and a promissory note. The home must be owner occupied for the 20-year life of the loan.

Quantified Objectives and Timeframe:

1. Advertise the programs in the City newsletter and website and provide brochures at the public counter to interested homebuyers. (By October 2022)
2. Work with local realtors to make them aware of these programs. (By October 2022)

Responsible Agencies: Community Development Department; Los Angeles County Community Development Authority

Funding Sources: HOME Investment Partnerships Program (HOME) funds

PROGRAM 19: Housing Choice Voucher Program

The Housing Choice Voucher Program extends rental subsidies to extremely low- and very low-income households who spend more than 30 percent of their gross income on housing. The Los Angeles County Housing Authority coordinates the Housing Choice Voucher Program on behalf of the City.

Quantified Objectives and Timeframe:

1. Participate in the Housing Choice Voucher Program. Encourage property owners, particularly owners of ADUs/JADUs, to accept the vouchers. (By October 2022)

2. Promote program to extremely low-income households. (By October 2022)

Responsible Agencies: Community Development Department; Los Angeles County Housing Authority

Funding Sources: HUD Section 8 allocations

PROGRAM 20: Energy Use and Greenhouse Gas Emissions Reduction

The City's Climate Action Plan (CAP), which was adopted in 2016, is a long-range plan to reduce greenhouse gas emissions (GHGs) from City government operations and community activities in La Cañada Flintridge and prepare for the anticipated effects of climate change. The CAP also will help achieve multiple community goals that relate to housing, such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life for persons of all socioeconomic sectors of the community.

The City has been convening a Green Task Force to explore measures to promote energy conservation in the community since 2010. Specifically, the Task Force has held several meetings and met with utility companies to identify resources available. The Task Force has also identified a list of recommendations regarding outreach and education; municipal code and City policy; demonstration projects; and funding. Since establishment of the Green Task Force, the City has already updated its website to include resources for residential energy and water conservation, and reduced the fee schedule to subsidize the use of solar photovoltaic panels.

Quantified Objectives and Timeframe:

1. Implement the City's CAP. (Ongoing)
2. When the CAP is updated, consider additional policies and programs that specifically benefit lower- and moderate-income households. (During the next update of the City's CAP)
3. Post and expand resources for energy and water conservation on the City website (By October 2022).
4. Implement the Construction and Demolition Debris Management program and Calsense (an irrigation controller that uses local weather data to modify irrigation times and days based on real world local conditions) by the Public Works Department.
5. Implement recommendations of the Green Task Force as funding permits.

Responsible Agencies: Community Development Department, Public Works Department

Funding Sources: General funds

PROGRAM 21: Community Safety

As identified in the recently updated and adopted Safety Element, there are several environmental hazards that could impact the health and safety of the community. Because La Cañada Flintridge is located entirely within the VHFHSZ, persons and property are at greater risk from wildfires, and the many debris basins located on the city's slopes have the potential to be dangerous because they move quickly, destroy objects (and structures, such as houses) in their paths, and often strike without warning. The updated Safety Element identifies housing-related goals and policies that, when implemented, will reduce risks to persons and property. While the goals and policies are not duplicated here, the following program supports their implementation as it relates to the Housing Element.

Quantified Objectives and Timeframe:

1. Update the Zoning Code to require all new residential development and redevelopment to incorporate fire safe design, including sufficient ingress/egress, evacuation routes, emergency vehicle access, defensible space, visible home addressing and signage, and fuel modification zones, in accordance with the updated Safety Element. (By October 2024)
2. Update the Zoning Code to prohibit the construction of ADUs and JADUs and the conversion of existing spaces to ADUs and JADUs in areas with only one point of ingress and egress, in accordance with the updated Safety Element. (By October 2024)

Responsible Agencies: Community Development Department; Los Angeles County Fire Department

Funding Sources: General fund

PROGRAM 22: Removal of Racial Covenants

Although racial covenants and similar race-based deed restrictions have long been illegal and unenforceable, this language has not always been removed entirely from home titles. In order to confirm its commitment to making housing available to people of all races and ethnicities, the City will provide homeowners with instructions detailing how to remove these types of restrictions from their property titles. Information will be provided via public bulletins at the planning counter, as well as on the City's website.

Quantified Objectives and Timeframe:

1. Develop detailed instructions for removing race-based restrictions from residential property titles, and provide as public information online and at the planning counter. (By April 2023)

Responsible Agencies: Community Development Department

PROGRAM 23: Affirmatively Furthering Fair Housing

To affirmatively further fair housing in accordance with AB 686, and adequately meet the housing needs of all segments of the community, the Housing Plan must promote housing opportunities for all people. The City will be engaged in a variety of activities and programs to achieve this. The City's quantified objectives and time frames are provided as meaningful actions below in Table HE-50. See Appendix D for additional discussion of fair housing issues.

The City's Housing Plan includes programs and objectives that address all the issues identified in the Housing Element, including those to mitigate AFFH issues identified in Appendix D. Figure D-25 shows the geographic distribution of the Sites Inventory by census tract. Of the five census tracts in the City, four are entirely within the City of La Cañada Flintridge, and one census tract is approximately two-thirds encompasses a portion of Montrose and approximately one-third in the City. The census tracts were assigned a geographic name that describes their location. All but one of the census tracts contains sites in the Sites Inventory. The Northeast La Cañada Flintridge census tract is the exception because Foothill Boulevard does not pass through the area and all the sites in the Sites Inventory are along or very near Foothill Boulevard.

As required, Table HE 50 below highlights meaningful actions to address the priority issues identified in Appendix D, including the programs/objectives, specific commitments, timeline, geographic targeting, and metrics.

Table HE-50. AFFH Meaningful Actions Matrix				
HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2021-2029 Metrics
New Opportunity in High Resource Areas – Highest Priority				
Program 1: Adequate Residential Sites to Accommodate the RHNA	Rezone sites on the Sites Inventory to allow for standalone residential in mixed use districts.	By October 2023	Northwest La Cañada Flintridge, Central La Cañada Flintridge, Southeast La Cañada Flintridge, West La Cañada Flintridge/Montrose	Facilitate the construction of 387 lower-income units
Program 2: No Net Loss	Monitor development on sites in the sites inventory to ensure adequate sites remain available to accommodate the City’s RHNA	By April 2023		
Program 3: Government Constraints to Housing Development	Develop a policy and implementing procedures to reduce permit fees for affordable housing and special needs housing	By October 2024	Northwest La Cañada Flintridge, Central La Cañada Flintridge, Southeast La Cañada Flintridge and West La Cañada Flintridge/Montrose	Facilitate the construction of 387 lower-income units
Program 4: DVSP	Amend the Downtown Village Specific Plan to increase densities and allow by-right approval of lower income units.	By October 2023	Central La Cañada Flintridge	Facilitate the development of 80 lower-income housing units.
Housing Mobility- Highest Priority				
Program 5: Religious Institution Housing Overlay Zone	Adopt and promote a Religious Institution Housing Overlay that requires a certain percentage of units to be affordable to lower and moderate income households	Ongoing beginning in October 2023	Citywide	Facilitate the development of 30 affordable units on religious institution properties
Program 8: Accessory Dwelling Units (ADUs)	Include ADU fair housing legal requirements’ fact sheet with every permit application for ADU/JADU construction, and require applicants to verify receipt	Annually beginning in January 2023	Citywide	Reach all 70 property owners issued ADU/JADU permits since 2018, and all future ADU/JADU applicants.
Program 15: Special Needs Housing	Amend the Reasonable Accommodation ordinance for persons requesting modification to development standards to accommodate their disabilities to make the process easier and less expensive.	By April 2023	Citywide	Process 1 Reasonable Accommodation request per year.
Program 16: Senior and Workforce Housing	Prioritize funding assistance to affordable housing projects that include units affordable to extremely low income households, seniors and those with disabilities, and work with qualified housing developers to pursue affordable housing in the community	Beginning in October 2022	Citywide	Assist one housing development that includes extremely low income housing, through the SGV RHTF or other available funding programs.

	Inform the development community of opportunity sites (such as the sites rezoned as high density multi-family use), development incentives, and financial assistance for development of workforce and senior housing.	By October 2022	Citywide	Facilitate the construction of 387 lower-income units
	Advertise the Mortgage Credit Certificate and Home Ownership programs to residents and realtors through printed materials, print, and online media	Ongoing, beginning in October 2022	Citywide	Expand advertising to include three new methods, including at least one targeted email to local realtors each year.
Program 19: Housing Choice Voucher Program	Encourage property owners, particularly owners of ADUs/JADUs, to accept the Housing Choice Vouchers, and promote to extremely low-income households.	By October 2022	Northwest La Cañada Flintridge, Central La Cañada Flintridge, Southeast La Cañada Flintridge and West La Cañada Flintridge/Montrose	Reach all current ADU/JADU permit holders since 2018 with information about vouchers. The baseline is one person in the City currently receiving housing assistance through the HCV program. Reach 100 low-income households in surrounding communities with HCV information. .
Fair Housing Outreach and Enforcement – Medium Priority				
Program 8: Accessory Dwelling Units (ADUs)	Include ADU fair housing legal requirements with every permit application for ADU/JADU construction, and require applicants to verify receipt	Annually beginning in January 2023	Citywide	Reach all 70 property owners issued an ADU/JADU permit since 2018 and all future ADU/JADU applicants.
	Adopt an amnesty program to permit existing or unpermitted ADUs/JADUs that the owner guarantees will be rented to special needs and extremely low income or low income households	April 2023	Citywide	Target 3 amnesty ADUs/JADUs per year.
Program 22: Removal of Racial Covenants	Develop detailed instructions for removing race-based restrictions from residential property titles, and provide as public information online and at the planning counter. Target information to realtors.	By April 2023	Citywide	Twice a year send to all realtors licensed in the City and coordinate annually with the County Registrar/Recorder of Deeds to ensure the information is correct.

Other Actions: LCF Vista Newsletter	Publish one article annually informing residents of fair housing rights and resources available to residents.	Annually beginning in January 2023	Citywide	Publish one article annually in the LCF Vista and distribute to all residents via direct mailing.
Other Actions: City Webpage	Provide a dedicated webpage on the City's website to Fair Housing issues.	By October 2022	Citywide	Provide a link from the City's homepage to the dedicated Fair Housing webpage and update annually or as needed.
Tenant Protection and Anti-Displacement – Medium Priority				
Program 12: Condo Conversion	Update the Condominium Conversion Ordinance to comply with state law	October 2024	Citywide	No net loss of rental units in the City.
Program 13: Multi-Family Housing Acquisition and Rehabilitation	Recommend aging apartment buildings be acquired, and rehabilitate these buildings as long-term affordable housing in the City, using targeted assistance by the San Gabriel Valley Regional Housing Trust Fund.	October 2022 – October 2029	West La Cañada Flintridge/Montrose	The City will participate in the SGV RHTF on an annual basis, dedicate funding sources such as the City's Permanent Local Housing Allocation (PLHA) to the RHTF, with the goal of pursuing the acquisition and rehabilitation of one project over the eight-year Housing Element period.
Place-based Strategies for Neighborhood Improvement – Medium Priority				
Program 1: Adequate Residential Sites to Accommodate the RHNA	Rezone sites on the Sites Inventory to allow for standalone residential in mixed use districts	By October 2023	Northwest La Cañada Flintridge, Central La Cañada Flintridge, Southeast La Cañada Flintridge and West La Cañada Flintridge/Montrose	Facilitate the construction of 387 lower-income units
Program 9: Code Enforcement (Community Preservation)	Enforce the City's Property Maintenance Ordinance and provide property owners in violation of the ordinance with information about the RRP.	Ongoing	Citywide	Provide RRP funding to 16 households over 8 years.

Program 10: Residential Rehabilitation Program (RRP)	Provide CDBG funds through the RRP to achieve approximately two to three grants per year.	Immediate Implementation	Citywide	Provide RRP funding to 16 households over 8 years.
Program 11: Sewer Connection Grant Program	Conduct targeted advertising regarding the Sewer Connection Grant program to seniors using a wide variety of means as described in Objective 3	Annually, beginning January 2023	Citywide	Assist 2-4 lower and moderate income households/year
Other Actions: Coordination with La Cañada Unified School District	Coordinate with the local school district to ensure adequate capacity for increases to student enrollment with new housing.	Annually, beginning August 2022	Citywide	Facilitate the development of 612 dwelling units.
Other Actions: Capital Improvement Projects (CIP)	Review CIP for projects that will improve accessibility, traffic flow, non-motorized transportation options and other city-sponsored improvements for future residential developments.	Annually, beginning January 2023	Foothill Boulevard corridor	Complete 1 project per year that will improve accessibility, traffic flow, non-motorized transportation options and other city-sponsored improvements for future residential developments

Responsible Agencies: Community Development Department; Los Angeles Community Development Authority; fair housing service providers (Housing Rights Center and Fair Housing Council of San Fernando Valley)

Funding Source: CDBG; General Fund

9.5.3 Quantified Objectives

Table HE-51 provides a summary of quantified housing objectives from the various housing programs identified above.

Table HE-51. Summary of Quantified Objectives

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Units to be Constructed (RHNA)	126	126	135	139	86	612
Units to be Rehabilitated	4	5	5	2	0	16*
At-Risk Units to be Preserved	0	0	0	0	0	0
Households to be Assisted (Section 8)	0	1	0	0	0	1

*Note: Due to above-moderate income levels of the majority of existing households in La Cañada Flintridge, it is difficult for the City to qualify people for CDBG funds. (See Chapter 9.2 and Appendix D)

APPENDICES

Appendix A: Outreach Efforts

A.1. Housing Workshops

Outreach List

In addition to municipal, regional, and state agencies, including school districts and utilities, the following organizations and agencies were sent invitations - to attend the Housing Element Workshops held on March 11, 2021, and June 10, 2021.

Table A-1: Outreach List

Organization	Category
Abundant Housing Los Angeles	Housing Services
Arroyo Foothills Conservancy	Community Organization
Assistance League of La Cañada	Community Organization
AT&T	Utility
Athena Services	Utility
City Ventures	Developer
Crescenta Valley Water District	Utility
KB Home	Developer
La Cañada Irrigation District	Utility
LCF Residents for Climate Action Plan	Community Organization
Liberty Utilities	Utility
Lutheran Church of the Foothills	Potential partner w/affordable housing developer
Paradise Valley HOA	Community Organization
Together La Cañada	Community Organization
Province Group, LLC/ Newport Equities, LLC	Developer
USC Verdugo Hills Hospital	Community Organization
Valley Water Company	Utility
YMCA of the Foothills	Community Organization

Outreach Notification Methods

Notification included:

- Publication in local newspaper of NOP (Outlook Valley Sun)
- Direct mailing of NOP to attached agencies and interested parties
- Publication in local newspaper of HE Workshops #1 and #2 (Outlook Valley Sun)
- Notice on City's website of NOP <https://cityoflcf.org/public-hearings-and-legal-notices/> and <https://cityoflcf.org/housing-element-update/>
- Notice on City's website of HE Workshop #1 and #2 (<https://cityoflcf.org/public-hearings-and-legal-notices/>) and <https://cityoflcf.org/housing-element-update/>
- Direct emailing of invitation to attend HE Workshop #1 and #2 to interested parties - included Chamber of Commerce, Business and Support Development Committee members (mixture of local businesses and residents), local residents that are advocating for action on climate action, builders or affordable and market rate housing.

Workshop Participants

Date: March 11, 2021

Verbal Participants:

Beth Fabinsky (Resident)
David Haxton (Resident)
Don Vandervort (Resident)
Michael Gross (Resident)
Sharon Raghavachary - Crescenta Valley Water District

Email Comments from:

Barbara Goto - Arroyo Foothills Conservancy
Beth Fabinsky
Arun Jain
Julie Kane-Ritsch
Scott Van Dellen

Date: June 10, 2021

Verbal Participants:

David Haxton (Resident)
Janice (Resident)
Michael Gross (Resident)
Adam Bookbinder – Coalition for Fair Housing
Mary Blencoe (Resident)
Lisa Brownfield (Resident)
Andrew Verillo (Resident)
Charles Aires – Campaign for Fair Housing

Email Comments from:

Mary Berry
Mary Blencoe

Comments Received

The key comments received at the meetings include:

- Concern that reducing parking requirements for future multi-family development would not provide adequate parking.
- Observation that the cost of housing in the city is so high, and the affordable housing options so low, younger people are being priced out of housing in the city, and that even young people born in La Cañada Flintridge are not able to remain once they reach adulthood.
- Question asked about what the City could do to incentivize affordable housing?
- Suggestion to ask religious institutions whether they are interested in being part of a proposed overlay to allow housing on their parking lots.

The 2021-2029 Housing Element includes a program to create an overlay to facilitate religious institutions in developing affordable housing on a portion of their parking lots. In addition, facilitating multi-family housing can increase the opportunity for affordable housing options.

A.2. Focus Group Interviews

Service Providers and Non-Profit Developers

Date: May 5, 2021

Attendees: Scott Peterson (Pastor, Lutheran Church of the Foothills); Dennis Fors (President, La Cañada Flintridge Kiwanis); Grant Power and Brian Wong (Executive Director) (both from Habitat for Humanity)

Removing constraints to the development of affordable housing, expanding community outreach, forming partnerships, assisting seniors and expanding the offering of housing types in La Cañada Flintridge are some of the key issues identified. Because of the built-out nature of the City, the Housing Element identifies housing sites located primarily along the Foothill Boulevard corridor, with new opportunities being located in areas near transit and amenities.

Table A-2: Service Provider and Non-Profit Developers Focus Group Comments

Remove Constraints
<ul style="list-style-type: none">▪ When asked what would be helpful to them to build affordable housing:<ul style="list-style-type: none">○ Zoning to allow it○ An expedited process○ Financial incentives○ Fee waivers

Community Outreach
<ul style="list-style-type: none"> It is important to have conversations with the community and local neighborhoods to help them understand affordable housing is a benefit to the city. Also important to show examples of affordable housing that looks good and blends with the neighborhood. Community outreach also was identified as important for many of the other topics that were discussed.
Partnerships
<ul style="list-style-type: none"> Partnerships are key to building affordable housing. Faith-based entities, such as churches, can partner with non-profit developers to produce housing that benefits the church, developer, and community. One participant has experience with constructing affordable housing on a church site in another community and thinks it would be a good option for La Cañada Flintridge.
Help for Seniors
<ul style="list-style-type: none"> It's important to help many local seniors who want to stay in their homes to enhance and preserve houses. Even though they may have equity, if they are cash-strapped, they may need help with home repairs. Need to improve ways to educate seniors about the City's programs. Many are not "tech-savvy," so outreach via mail and local publications is important. Don't rely on the City's website.
Types of Housing Needed in La Cañada Flintridge
<ul style="list-style-type: none"> Housing for seniors – there are no places for seniors who want to stay in La Cañada Flintridge to downsize if they leave their existing single-family homes. Senior housing is a big need because of the city's demographics. Essential worker housing is needed. Young professionals who grew up in La Cañada Flintridge and want to return with their families cannot afford to live here. Bungalow court housing is a good option and something to find a way to permit.

Developers

Date: May 5, 2021

Attendees: Alexandra Hack & Gary Weyand (involved in developing 600 Foothill Blvd.), Jonathan Watts, Joseph Schafer (at southwest corner of Foothill Blvd and Briggs Ave)

Developers expressed the need for development standards to be relaxed and revised. There is a shortage of sites available for affordable housing and very little diversity of housing types in the City. The City is in the process of completely redoing their Zoning Code which will result in revised development standards and densities. Incentives are needed for affordable housing, particularly for seniors.

Table A-4: Developer Focus Group Comments and Responses

Revised/Relaxed Development Standards Needed
<ul style="list-style-type: none"> Height is a constraining factor in La Cañada Flintridge, both the maximum height allowed and how the City measures height. More efficient housing design can be provided at 4 stories/45 feet.

Table A-4: Developer Focus Group Comments and Responses

<ul style="list-style-type: none"> ▪ Need to increase density in La Cañada Flintridge. 30 du/ac should be the base density, not the maximum. Developers of affordable housing usually need 50-100 units to make a project financially feasible. ▪ Rather than density, just provide FAR and allow the developers to fit the number of units they can within the envelope created by the FAR. <ul style="list-style-type: none"> ○ Suggested a base FAR of 1.75:1 for mixed use (no density maximum) ○ For 100% affordable development, suggested allowing 2.5:1 FAR, and ¼ parking space per unit (no density maximum) ▪ For mixed use, lower the limit for the percent that must be commercial and allow residential units on the ground floor. ▪ Consider allowing smaller units, such as 350 square feet. Smaller units can be “affordable by design.”
Sites Appropriate for Multi-Family Housing
<ul style="list-style-type: none"> ▪ Properties that were rezoned from single-family residential to multi-family residential for the 5th Cycle Housing Element are too difficult to develop due to the need to assemble parcels and consolidate the property. ▪ The City should identify sites that are appropriate for multifamily development.
Incentives
<ul style="list-style-type: none"> ▪ Look for ways to incentivize senior housing. Suggest four stories. Look at South Pasadena for examples of revised development standards that incentivize senior housing. ▪ Small lots in LCF often require structured parking, which is expensive (approximately \$45,000/space). Reducing or eliminating parking requirements is the best incentive.
Affordability
<ul style="list-style-type: none"> ▪ Concerned that there has not been any new apartments in La Cañada Flintridge in many years. There is no housing that is affordable to youth or young professionals who grew up here and would like to move back.

A.3 Public Outreach Following Receipt of HCD Comment Letter Dated December 3, 2021

City Council Meeting
2/8/22

NOTICE AND AGENDAS

**SPECIAL MEETINGS
OF THE
LA CAÑADA FLINTRIDGE CITY COUNCIL**

**SPECIAL MEETING CLOSED SESSION 5:15 P.M.
SPECIAL MEETING 6:00 P.M.
(VIA TELECONFERENCE)**

TUESDAY, FEBRUARY 8, 2022

**PHONE NO.: 1 (669) 900-9128
ZOOM MEETING ID: 872 4660 7829**



**Terry Walker, Mayor
Keith Eich, Mayor Pro Tem
Jonathan C. Curtis, Councilmember
Michael T. Davitt, Councilmember
Richard B. Gunter III, Councilmember**

**CITY HALL
One Civic Center Drive
La Cañada Flintridge, CA 91011
(818) 790-8880**

SPECIAL NOTE: IN ACCORDANCE WITH AB 361, DUE TO COVID-19, THE CITY OF LA CAÑADA FLINTRIDGE IS AUTHORIZED TO MAKE PUBLIC MEETINGS ACCESSIBLE ELECTRONICALLY FOR MEMBERS OF THE PUBLIC WISHING TO ADDRESS THE CITY COUNCIL DURING BOTH THE PUBLIC COMMENT PORTION OF THE MEETING AND ON ITEMS LISTED ON THE AGENDA.

PUBLIC COMMENT MAY BE MADE LIVE OR SUBMITTED VIA EMAIL, AS INDICATED BELOW

FOR LIVE PUBLIC COMMENT, YOU MUST JOIN THE MEETING BY ZOOM OR BY TELEPHONE, AS INDICATED BELOW

TO ONLY VIEW THE CITY COUNCIL MEETING, IT IS AVAILABLE VIA THE CITY WEBSITE OR CABLE LIVESTREAM:

(URL: <https://cityoflcf.org/city-clerk/agenda-minutes>) or Charter Spectrum (Channel 3 or 16)

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Pursuant to provisions of the Brown Act, no action may be taken on a matter unless it is listed on the agenda, or unless certain emergency or special circumstances exist. The City Council may direct staff to investigate and/or schedule certain matters for consideration at a future City Council meeting.

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If you wish to participate and provide live public comment during the meeting, you must participate via Zoom or telephonically and speak (1) during the "public comment" period of the agenda for non-agenda items and consent calendar items, and/or (2) during the time for public comment/public testimony for each agenda item. You can access the meeting by logging into the Zoom meeting or by dialing the following telephone number. You will be placed into listen-only mode and muted until it is your turn to speak:

Phone No.: 1 (669) 900-9128
Zoom meeting ID: 872 4660 7829

You will be placed into "listen only" mode until the "public comment" portion of the agenda items begins. Speakers will be called upon by the moderator at the appropriate time and each person will be allowed three (3) minutes speaking time. To request an opportunity to speak during the "public comment" portion of the listed item, use the "Raise Hand" icon in the Zoom application or dial *9 if calling in. When called upon to speak, unmute yourself either through the Zoom application or dial *6 on your phone when calling into the meeting.

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If you are interested in addressing the City Council on any matter posted on the agenda or on any other non-agenda matter within the City Council's jurisdiction, please submit your comment(s) via e-mail to ccpubliccomment@lcf.ca.gov.

E-mails will be accepted beginning at the time this agenda is posted on the City's website and bulletin board until the public comment period has ended for the specific agenda item. E-mail submissions will: (1) be acknowledged as received by the City Clerk, but not read aloud; (2) be included in the official minutes of the meeting; (3) be transmitted to each City Council member at the time it is received; and (4) be posted on the City's official website as soon as reasonably practicable, either during the meeting or immediately thereafter, to ensure public access and knowledge of the public comment (found here: <https://cityoflcf.org/city-clerk/agenda-minutes>).

AMERICANS WITH DISABILITIES ACT

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office, (818) 790-8880 no later than Friday prior to the Tuesday meeting. (28 CFR 34.102.104 ADA TITLE II)

**SPECIAL CITY COUNCIL MEETING
5:15 P.M. CLOSED SESSION****CALL TO ORDER:**

ROLL CALL: Councilmember Jonathan C. Curtis
Councilmember Michael T. Davitt
Councilmember Richard B. Gunter III
Mayor Pro Tem Keith Eich
Mayor Terry Walker

COMMENTS FROM THE PUBLIC:

Please Note: This is the opportunity for members of the public to comment on items listed on Agenda or on any items not appearing on the agenda but within the subject matter jurisdiction of the City Council. Because of restrictions contained in California Law, the City Council may not discuss or act on any item not listed on the agenda but may briefly respond to statements made or ask a question for clarification. The Mayor may also request a brief response from staff to questions raised during public comment or may request that a matter be agendaized for a future meeting.

CLOSED SESSION**1. CONFERENCE WITH LEGAL COUNSEL - INITIATION OF LITIGATION**

Pursuant to Government Code Section 54956.9(c)

Number of Cases: One

RECONVENE OPEN SESSION AND ANNOUNCE ANY ACTION TAKEN**ADJOURNMENT****6:00 P.M. SPECIAL CITY COUNCIL MEETING****CALL TO ORDER:**

ROLL CALL: Councilmember Jonathan C. Curtis
Councilmember Michael T. Davitt
Councilmember Richard B. Gunter III
Mayor Pro Tem Keith Eich
Mayor Terry Walker

COMMENTS FROM THE PUBLIC:

Please Note: This is the opportunity for members of the public to comment on items listed on Agenda or on any items not appearing on the agenda but within the subject matter jurisdiction of the City Council. Because of restrictions contained in California Law, the City Council may not discuss or act on any item not listed on the agenda but may briefly respond to statements made or ask a question for clarification. The Mayor may also request a brief response from staff to questions raised during public comment or may request that a matter be agendaized for a future meeting.

PRESENTATIONS:

a) Legislative Update



AGENDA ITEM 8

CITY COUNCIL AGENDA REPORT

MEETING DATE: February 8, 2022

SUBJECT: Policy Discussion on 2021-2029 (6th Cycle) Housing Element

PRESENTER: Susan Koleda, Director of Community Development

PROPOSED ACTION: Consider and provide direction to staff

ENVIRONMENTAL
IMPACT: None at this time. Adoption of the Housing Element and rezoning to implement the Housing Element must be reviewed pursuant to the California Environmental Quality Act prior to adoption

FISCAL IMPACT: Unknown

SUMMARY: The City of La Cañada Flintridge is currently updating the General Plan Housing Element. The 6th Cycle Housing Element will cover the eight-year planning period from October 2021 – October 2029. Local governments across California are required by State Housing Element law to adequately plan to meet their share of the State's overall housing need. The Department of Housing and Community Development (HCD) is the State department that is responsible for administering Housing Element Law and certifying local jurisdiction's Housing Elements. To adequately plan for their share of the State's housing need, local governments adopt Housing Elements as part of their General Plans. Housing Elements provide goals, policies, and programs to create opportunities for housing development.

A Draft Housing Element was released for public review and comment on September 22, 2021 (Attachment 1). In October 2021, the Draft Housing Element was submitted to the Department of Housing and Community Development (HCD) for review and comment. The City received numerous comments on the draft element from HCD on December 3, 2021.

DISCUSSION: Since 1969, California has required that all local governments adequately plan to meet the housing needs of everyone in the community. The Housing Element is a State-mandated policy document within the General Plan that guides the implementation of various programs to meet future housing needs for residents of all income levels. The housing needs are determined through the Regional Housing Needs Assessment (RHNA). The Housing Element identifies available land that is suitable for housing development, as well as goals, policies, and programs to accommodate the City's housing need, provide opportunities for new housing, and preserve the existing housing stock.

Key components of the Housing Element include:

- A demographic profile and analysis of population growth and trends in the community;
- Identification and analysis of existing and projected housing needs for all economic segments of the community;
- Identification of adequate sites that are zoned and available within the 8-year housing cycle to meet the city's fair share of regional housing needs at all income levels, as prescribed by RHNA;
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing; and
- Housing goals, policies, quantified objectives and scheduled programs to preserve, improve and develop housing within the City.

During preparation of the draft, two public workshops were held during Planning Commission meetings and input obtained from both the Planning Commission and public. Additionally, staff and the City's consultant met with both non-profit and for-profit developers and representatives of various groups within the community to obtain feedback and comments. All information gathered was included within the draft that was released for public review on September 22, 2021. The draft was then submitted to HCD as required for a 60-day review and comments. Formal comments from HCD were received by staff on December 3, 2021.

Based on comments received from HCD, as well as public comments on the draft Housing Element, staff and the consultant are asking the City Council to review the draft and comments on the draft, and provide direction to staff and the consultant prior to staff proceeding.

1. New Housing-Related State Laws

Since the preparation of the 2014-2021 5th Cycle Housing Element, there have been a number of changes to housing-related state law including, but not limited to, the following:

- a) AB 686, passed in 2017, requires that the outreach activities be informed by Affirmatively Furthering Fair Housing (AFFH) characteristics.
- b) New State laws on addressing the adequate sites requirement (AB 1397 and SB 166) have significant impacts on the sites inventory. AB 1397 places higher standards on the reuse of sites, reliance on nonvacant sites, and extreme sizes of sites (too small and too large). SB 166 requires a no-net loss accounting that necessitates a sites inventory with a comfortable 15-30 percent buffer.
- c) The 6th cycle update will address new requirements for:
 - AB 101 – Low Barrier Navigation Centers
 - AB 139 – Parking standards for emergency shelters
 - AB 2162 – Supportive housing meeting specific criteria and located within 0.5 mile from transit

- AB 1762, SB 1227, and AB 2345 – Density bonus
 - SB 35 and objective development standards
 - Compliance with transparency in development regulations
- d) New State laws require that the Housing Plan include specific programs:
- By-right approval of reuse sites if 20 percent is set aside for affordable housing (AB 1397)
 - Replacement housing for development on sites with existing uses (AB 1397)
 - Monitoring of no net loss (SB 166) – If Housing Element sites are developed with lower density and different income distribution than anticipated in the Housing Element, resulting in a shortfall of sites for the remaining RHNA, jurisdictions have to identify replacement sites or to rezone/upzone within six months to replenish the sites inventory. Because of this requirement, HCD recommends including a buffer of 15-30 percent in the sites inventory.
 - Incentives to facilitate ADU development
 - SB 35 and object development standards
 - AFFH meaningful actions to promote housing mobility, access to opportunity, reduce displacement, provide fair housing outreach and enforcement, and implement place-based neighborhood improvements. (AB 686)
- e) AB 215, passed in 2021 (effective January 1, 2022), changes the public review process for the Housing Element:
- The Draft Housing Element must be available for a 30-day review period prior to submitting to HCD for review
 - If comments are received, the City must take at least 10 business days to address the comments prior to submitting to HCD for review
 - HCD review of the Draft Housing Element is extended to 90 days (from the 60-day review under old law)
- f) AB 1398, passed in 2021, changes the requirements of the Housing Element regarding timeline for rezoning. The Housing Element is due within 120-day from the statutory deadline. This 120-day period is commonly known as the “grace period.” Prior to AB 1398, the Housing Element was required to be adopted within the grace period or jurisdictions would be subject to a four-year mid-term update requirement. AB 1398 eliminated the four-year mid-term penalty and instead focuses on making jurisdictions complete the necessary rezoning to accommodate the RHNA as soon as possible. Under AB 1398, a jurisdiction must achieve substantial compliance status within the grace period to have three years to complete the rezoning. If the City is unable to achieve compliance status within the grace period, it will only get one year to complete the necessary rezoning for RHNA. The City falls into this category, therefore, we must complete the rezoning by October 15, 2022.

2. Regional Housing Needs Assessment

To comply with State law, each jurisdiction's Housing Element must be updated to ensure its policies and programs can accommodate its share of the housing units assigned to the City through the Regional Housing Needs Assessment (RHNA). For the upcoming 6th Cycle Housing Element update, the City's share of the RHNA is 612 units, divided among a range of income or affordability levels (based on Area Median Income, or AMI), as shown in the following table.

6th Cycle RHNA for La Cañada Flintridge		
Income Category/Affordability Level*	Number of Units	Percent of Total Units
Very Low Income (0-50% of AMI)	252	41%
Low Income (50-80% of AMI)	135	22%
Moderate Income (80-120% of AMI)	139	23%
Above Moderate Income (More than 120% of AMI)	86	14%
TOTAL UNITS	612	100%

There are other requirements that affect a jurisdiction's strategy for accommodating its RHNA. The "No Net Loss" law requires that sufficient adequate sites must be available at all times throughout the planning period. Because cities often have projects built at lower density than their Zoning Codes allow, HCD recommends that jurisdictions include a buffer in the Sites Inventory of approximately 15-30 percent more capacity than required for lower and moderate income RHNA so that it remains compliant throughout the planning period. Adding a 20 percent buffer to the City's RHNA results in the following units La Cañada Flintridge must demonstrate that it can accommodate:

6th Cycle RHNA for La Cañada Flintridge			
Income Category/Affordability Level*	Number of Units	20% Buffer	Total
Very Low & Lower Income (0-80% of AMI)	387	77	464
Moderate Income (80-120% of AMI)	139	28	167
Above Moderate Income (More than 120% of AMI)	86	N/A	86
TOTAL UNITS	612	100%	717

3. Sites Inventory

Through the Housing Element update process, the City must show that it has the regulatory and land use policies to accommodate its assigned RHNA. Local governments are not required to build the housing—the actual development of housing is typically done by for-profit and non-profit developers. However, the Housing Element is required to demonstrate potential sites where housing can be accommodated to meet all the income levels of a jurisdiction's RHNA. Identification of a site's capacity does not guarantee that construction will occur on that site. If

there are insufficient sites and capacity to meet the RHNA allocation, the Housing Element is required to identify a rezoning program to accommodate the required capacity. If the City does not identify capacity for its RHNA allocation, the City could be deemed out of compliance and risk losing important sources of funding currently provided by the State as well as facing legal challenges.

Strategies for Accommodating RHNA:

To ensure the City has adequate sites zoned appropriately to accommodate the total number of units within the RHNA, and the following steps are being taken:

1. Identify any entitled projects
2. Identify “pipeline projects” (in application/review/approval stages)
3. Estimate future permits for Accessory Dwelling Units (based on recent trends over the past three years)
4. Prepare a Sites Inventory – identify available vacant and underutilized properties:
 - A. That already permit residential development
 - B. That need to be redesignated & rezoned to permit residential development
 - C. For lower income housing (very-low and low categories) – must meet certain requirements to be deemed adequate sites:
 - 1) At least 20 du/acre allowed density
 - 2) Between 0.5–10 acres

For a site to be considered adequate for lower income housing, it must meet certain requirements - for La Cañada Flintridge, that requires a “default” density of a minimum of 20 dwelling units per acre and the site must be between 0.5 to 10 acres (note that multiple parcels may be combined into one “site”).

Another requirement that impacts the RHNA is the Fair Housing law, which requires that the sites that are identified as feasible for affordable units are distributed throughout City, rather than concentrated in one area.

A jurisdiction’s strategy to meet its RHNA can take many forms. While some cities have an abundance of vacant land to accommodate their RHNA, others, such as La Cañada Flintridge, are mostly built out and have very few vacant sites. This can be even more challenging if the jurisdictions also have identified constraints to development of housing at the required affordability levels, such as, densities are too low, parking standards are too high, setbacks are too large, building heights are too low, and/or floor area ratios are too low.

One of the strategies a jurisdiction can use to meet a portion of its RHNA is to estimate the potential number of accessory dwelling units (ADUs) that could be built over the 8-year planning period; however, the estimate must be based on recent trends over the past three years. Based on recent trends, the City estimates that approximately 120 ADUs could be built over the 8-year planning period. SCAG provides a method that jurisdictions can use for how those units can be allocated by income category. For La Cañada Flintridge, the distribution of ADUs by income level is as follows:

- 23.5% are considered affordable to very low income households (or 28 units)
- 44.6% to low income households (or 54 units)
- 2.1% to moderate income households (or 2 units)
- 29.8% to above-moderate income households (or 36 units)

The City has prepared a draft Sites Inventory (see Appendix C (Sites Inventory) of the Draft Housing Element (Attachment 1)) to plan for the RHNA noted above, based upon the following strategy:

1. Identify sites from the 5th Cycle Housing Element that are still available
2. Identify projects that are “in the pipeline” (proposed or entitled but will not have building permits issued by July 1, 2021)
3. Identify additional sites that are appropriate
4. Propose changes to increase the allowable density for certain properties
5. Include an overlay for religious institutions to construct affordable housing on their properties, in accordance with AB 1851

Due to the fact that La Cañada Flintridge’s RHNA numbers are significantly higher than they were for the 5th Cycle Housing Element, the number of remaining sites that were identified in the 5th Cycle Housing Element are not adequate to meet the 6th Cycle RHNA, nor does the City currently have enough sites that are zoned at the default density for the lower income category (20 dwelling units per acre). As a result, the City’s proposed Sites Inventory strategy includes redesignating and rezoning the Mixed Use 2 (MU-2) portion of the Downtown Village Specific Plan (DVSP) from the current maximum of 15 dwelling units per acre to 20 dwelling units per acre.

4. Constraints To Development of Housing

State housing law also requires jurisdictions to identify factors that can constrain the development, maintenance and improvement of housing. These include market constraints (price of land, construction costs, and market financing), and governmental constraints (land use controls, development standards, types of housing, housing for persons with disabilities, building codes, off-site improvements, fees and permit processes) and environmental and infrastructure constraints. The following program will address this issue:

Program 3: Governmental Constraints to Housing Development (Draft Housing Element, page 99-100). The City must amend certain development standards to mitigate the identified constraints and ensure that the development standards are adequate to allow the achievement of the maximum density permitted to accommodate housing types that are affordable to households in all income categories. Proposed actions include:

- Reducing parking standards, reducing setbacks, reducing open space requirements, and modifying the way building height is measured.
- Deletion of design guidelines for multifamily and mixed use development and adoption of objective design standards.

- Amendment of the requirement for a CUP for multifamily uses in the MU zone to a ministerial permit.
- Permitting multifamily residential development in the MU zone without a commercial component and without discretionary review.
- Development of a policy and implementing procedures to reduce various permit fees for affordable housing and special needs housing.

5. Proposed Amendments to the Zoning Code/Downtown Village Specific Plan

Pursuant to state law (AB 2348), development capacity must be estimated on a realistic basis, not theoretical basis; it must account for development trends and patterns, as well as development standards such as height limit, parking requirements, open space/landscaping requirements, and lot coverage/setbacks. Therefore, programs to mitigate identified constraints to affordable development, both in the DVSP and in other areas of the City, must be considered. Many of them, such as reducing parking requirements and modifying development standards for R-3 and Mixed Use properties that are not within the DVSP, are under consideration through the current Zoning Code update process.

Program 4: Downtown Village Specific Plan (DVSP) (Draft Housing Element, page 100-101) would redesignate and rezone the Mixed Use 2 (MU-2) portion of the Downtown Village Specific Plan (DVSP) from the current maximum of 15 dwelling units per acre to a minimum of 20 dwelling units per acre. Other proposed changes to the DVSP include:

- Deleting the requirement that all properties designated Mixed Use include commercial use in a portion of the development, which would allow them to be developed as 100% residential developments;
- Increasing the height for MU-2 properties to three stories or 35 feet, increase Floor Area Ratio (FAR), reduce setbacks and parking requirements.

Program 5: Religious Institution Housing Overlay Zone (Draft Housing Element, page 101-102) would encourage religious institutions to build housing on property owned by religious institutions (also known as congregational land), thus providing sites that otherwise would not be available for affordable housing. This approach also helps congregations further their missions to support lower-income populations while providing enhanced financial stability for religious institutions, many of which have been impacted by declining attendance, which has been exacerbated by the COVID-19 pandemic.

- Builds on the provisions of AB 1851, adopted in 2020, which facilitates housing on religious institution properties by prohibiting a local agency from requiring the replacement of more than 50 percent of religious-use parking spaces that a developer proposes to eliminate as part of that housing development project.
- The Religious Institution Housing Overlay (RI-OZ) would apply to all religious institutions in the City. Require a certain percentage of units to be affordable to lower (below 80% AMI) and moderate income (81-120% AMI) households.
- Would update parking requirements to create flexibility in accommodating church parking needs.

SUMMARY:

Changes in housing-related state laws since the adoption of the 5th cycle Housing Element in 2014 will require the City to designate additional land for lower-income housing, modify densities within those same areas, allow multifamily uses ministerially and modify development standards to remove constraints on housing development. Such changes will require amendments to the General Plan Land Use Element, Downtown Village Specific Plan and Zoning Code and must be completed by October 15, 2022.

OPTIONS:

1. Consider and provide direction to staff.
2. Motion to: Receive and file.

RECOMMENDATION:

Option # 1 - Consider and provide direction to staff.

ATTACHMENT:

1. Draft Housing Element (September 2021)
2. California Department of Housing and Community Development Comment



CITY OF LA CAÑADA FLINTRIDGE

2021-2029 Housing Element

Public Review Draft
September 2021

DRAFT

City of La Canada Flintridge
Community Development Department
One Civic Center Drive
La Cañada Flintridge, CA 91011
(818) 790-8881

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



December 3, 2021

Susan Koleda, Director of Community Development
Planning Division
City of La Canada Flintridge
One City Center Drive
La Canada Flintridge, CA 91011

Dear Susan Koleda:

RE: City of La Canada Flintridge's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of La Canada Flintridge's (City) draft housing element received for review on October 6, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 29, 2021 with you and consultants Veronica Tam, Patricia Bluman, Claudia Tedford, and Katie Matchett. In addition, HCD considered comments from Adam Buchbinder from Campaign for Fair Housing Elements pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). For example, the Affirmatively Furthering Fair Housing (AFFH) analysis should provide local data and programs should have definitive timelines to provide a beneficial impact in the planning period. The enclosed Appendix describes these, and other revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local

government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact John Buettner, of our staff, at john.buettner@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul McDougall", with a stylized flourish at the end.

Paul McDougall

Senior Program Manager

Enclosure

APPENDIX CITY OF LA CANADA FLINTRIDGE

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Fair Housing Enforcement and Outreach: The element must include the City's ability to provide enforcement and outreach capacity which can consist of actions such as the City's ability to investigate complaints, obtain remedies, or the City's ability to engage in fair housing testing. While the element provides basic information and data in this area, it should explain the types of outreach and educational efforts relative to furthering fair housing, including affecting groups with protected characteristics.

Racial/Ethnic Areas of Concentration of Poverty(R/ECAP): The element includes information relative to (R/ECAP) but should also address concentrated areas of affluence. The combination of the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues. The analysis should evaluate the patterns and changes over time at a local (e.g., neighborhood to neighborhood) and regional level (e.g., city to region).

Local Data and Knowledge, and Other Relevant Factors: The element does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

Sites Inventory: The element must include an analysis demonstrating whether sites identified to meet the RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income

groups and how that effects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).

Contributing Factors: While the Summary of Fair Housing Issues (p. D44) briefly summarizes fair housing issues, these issues do not appear to be rooted in the analysis and do not appear adequate to facilitate the formulation of meaningful action. The element must list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing.

Goals, Actions, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

While the element quantifies the projected extremely low-income households, it must also analyze the needs of extremely low-income (ELI) households. The analysis of ELI housing needs should consider tenure, rates and trends of overcrowding and overpayment.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

The element identifies the approximate age of the housing stock (p. 31-32) and general information on code compliance but it must also estimate the number of units in need of rehabilitation and replacement.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a regional housing need allocation (RHNA) of 612 housing units, of which 387 are for lower-income households. To address this need, the element relies on vacant and underutilized sites, including sites in Specific Plan Areas. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Progress in Meeting the RHNA: As you know, the City's RHNA may be reduced by the number of new units pending, approved, permitted or built since July 1, 2021 by demonstrating availability and affordability based on rents, sale prices or other mechanisms ensuring affordability (e.g., deed restrictions). The element notes 64 units of which 23 units are affordable to lower-income households are pending approval. The element should indicate what remaining approvals are necessary for this process, expected timing for those approvals and demonstrate their availability in the planning period.

Sites Inventory: While the element provides an inventory of sites in Appendix C, the inventory does not describe existing uses for these sites nor indicate whether the sites are vacant or nonvacant. The inventory must be revised to include this information. Descriptions of existing uses should include sufficient detail to facilitate an analysis of the potential for addition development on nonvacant sites.

Suitability of Nonvacant Sites: The element identifies nonvacant sites to accommodate the regional housing need for households of all incomes, stating that "a specific analysis was conducted on properties within the City to identify vacant and underutilized properties" (p. 77). This statement alone is not adequate to demonstrate the potential for additional development in the planning period. A complete analysis should describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g)). Development trends and market analysis should relate to the sites identified in the sites inventory. For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.

Realistic Capacity: The element appears to assume residential development on sites with zoning that allow 100 percent non-residential uses, but to support this assumption, the element must analyze the likelihood of residential development in nonresidential zones. The element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts.

Small Sites and Lot Consolidation: The element identifies several sites consisting of aggregated small parcels less than half acre. For parcels anticipated to be consolidated, the element must demonstrate the potential for lot consolidation. For example, analysis describing the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and information on the owners of each aggregated site. For parcels anticipated to develop individually, the element must describe existing and proposed policies or incentives the City will offer to facilitate development of small sites. Please be aware sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that sites are adequate to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).)

Accessory Dwelling Units (ADU): ADUs may be counted toward the RHNA based on past permitted units and other factors. In the element, the City projects 120 ADUs to be constructed over the planning period, averaging 15 units per year. This projection differs from past ADU annual permit figures of 5 in 2018, 2 in 2019, and 13 in 2020, averaging approximately 7 units per year. The element should be revised to reconcile these figures, adjust assumptions as necessary or include additional analysis and programs to demonstrate the increase over past trends.

Infrastructure: While the element describes water and sewer infrastructure, it must also demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities, to accommodate the City's RHNA.

Sites with Zoning for a Variety of Housing Types:

- *Accessory Dwelling Units (ADUs)*: The element indicates the City modifies its zoning code to ease barriers to the development of ADU's. However, after a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. This includes, but is not limited to, zones where ADUs are allowed, conversion restrictions, among other factors. HCD will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance in order to comply with state law.

In addition, the element states that the City in the process of updating its Safety Element, which is proposing to "prohibit ADUs and junior accessory dwelling units (JADUs) in" twelve neighborhoods due to safety concerns (p. 48) and will be updating the City's zoning codes within two years of adoption of the housing element (Program 15, p. 111). However, the element must provide an analysis of whether this is a potential constraint.

- *Low Barrier Navigation Centers and Permanent Supportive Housing*: Low barrier navigation centers and permanent supportive housing shall be a use by-right in

zones where multifamily and mixed uses are permitted, including nonresidential zones. The element should either demonstrate compliance with these requirements or add or modify program as appropriate.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).*

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including building and impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing.

Codes and Enforcement: The element must describe the City's building and zoning code enforcement processes and procedures and analyze their impact as potential constraints on housing supply and affordability.

Constraints on Housing for Persons with Disabilities: The element briefly describes its reasonable accommodation procedures and states that Program 15 is to accommodate changes in the procedures and zoning code that make requests easier and time frames for approvals shorter. However, the element should also analyze any potential constraints on housing for persons with disabilities and revise programs, as appropriate, to address identified constraints.

Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1, subdivision (a)(1).

SB 35 Streamlined Ministerial Approval Process: The element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and add a program, if necessary, to address these requirements.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between*

receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6)).

Developed Densities and Permit Times: The element must be revised to include analysis of requests to develop housing at densities below those anticipated, and the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Farmworker Housing: The element indicates that there are no farmworkers employed in fulltime farming occupations in the City. However, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. As a result, the element should at least acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

B. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subd. (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials.

Numerous programs indicate an "ongoing" implementation status or do not contain definitive implementation timelines (e.g., month and year) other than broad periods of time after adoption of the element. While this may be appropriate for some programs, programs

with specific implementation actions must include completion dates resulting in beneficial impacts within the planning period. All programs should be revisited and revised as necessary.

In addition, Program 8 (ADUs) commits to 1) monitoring changes in state law and updating zoning codes regularly, 2) facilitating the development of ADUs, 3) developing a monitoring program to ensure the City is on track for ADU production, and 4) providing information to the public regarding benefits and procedures for approval. Action 1 should be revised to clarify what is meant by “regularly” and offer a more definitive time frame for these updates. Action 2 states that the City will be “facilitating the development” of ADUs but should clarify how the City will facilitate development and if the City will offer incentives. Action 3 states that the City will develop a monitoring program to track goals within six months of adoption of the element and provides a date of April 2025 to review production and revise the program if the City is not meeting its goals. This Action should include monitoring of affordability assumptions in addition to production. The City should also consider more frequent reviews other than every four years and adjust the date of review accordingly.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.*
(Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding A4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

Shortfall of Adequate Sites: Currently, the element identifies a shortfall of adequate sites with zoning to accommodate the RHNA within the planning period. In order to provide sufficient sites to accommodate the RHNA, Program 1 (Adequate Residential Sites to Accommodate the RHNA) and Program 4 (Downtown Village Specific Plan) should commit to, among other things, redesignate and amend the Zoning Map to rezone the properties identified in the Sites Inventory to accommodate the RHNA. In addition, these programs must specifically commit to acreage, allowable densities and anticipated units and, if necessary to accommodate the housing needs of lower-income households, commit to meeting all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). For example, Program 4 states that the City will amend the DVSP to increase the density in the MU-2 district to 15-25 dwelling units per acre. However, this range does not meet the minimum density standard of 20 units per acre for lower-income sites.

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

While the element provides for assistance in the development of adequate housing to meet the needs of extremely low- and lower-income households in Programs 13, 15 and 16, these programs do not adequately meet the requirements. The programs must include specific actions and timelines to assist in the development of housing for (ELI) households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to (ELI) households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings A5 and A6, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

5. *The housing element shall include programs to conserve and improve the condition of the existing affordable housing stock. (Gov. Code, § 65583, subd. (c)(4).)*

Program 10: Residential Rehabilitation Program: Action 2 should commit to how the City will target lower-income, including ELI, and special needs populations, what types of outreach will be performed, and provide a definitive timeline as to when these actions will take place other than on an “ongoing” basis.

Program 13: Multi-Family Housing Acquisition and Rehabilitation: This Program should commit to provide more information on when the City will apply for funds and how the City intends on targeting lower-income households, including definitive timelines.

6. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a

complete analysis. Currently the element only addresses AFFH in Program 22. The element could revise other program actions to address the City's obligation to AFFH including how programs address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. In addition, the element should describe how all the City's housing programs comply with and further the requirements and goals of Government Code section 8899.50, subdivision (b).

C. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

While the element includes a summary of the public participation process (p. 4 and Appendix A), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should describe the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element.

In addition, HCD understands the City made the element available to the public just prior to submittal to HCD, but the element is not clear as to when this took place. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City may not yet have complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in the course of its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

**Planning Commission
Meeting
3/10/22**



PLANNING COMMISSION STAFF REPORT

March 10, 2022 Hearing

Project/Case Number:

2021-2029 (6th Cycle) Housing Element

Applicant:

City of La Cañada Flintridge

Project Location:

Citywide

Project Planner:

Susan Koleda, AICP

Director of Community Development

Consultant:

CityPlace Planning

Veronica Tam and Associates

Background:

The City has been working for more than one-year on the Housing Element Update. There have been two workshops conducted during Planning Commission meetings, on March 11 and June 10, 2021. Additionally, on February 8, 2022, a policy discussion was held during the City Council meeting to discuss the Housing Element, sites inventory and rezoning required to implement the Housing Element Update.

Sites Inventory:

The Sites Inventory is the method by which jurisdictions are required to demonstrate that they have adequate sites to accommodate their assigned RHNA. The City must identify sites that are vacant or underutilized, and that those sites permit residential development of the requisite density. If a jurisdiction does not have adequate sites that are already designated and zoned appropriately, it must identify how the sites will be redesignated and rezoned to permit residential density in accordance with the Sites Inventory.

The number of residential units that must be accommodated in the 2021-2029 housing cycle is shown in the table, broken down by income category and includes a 20 percent buffer, which is required for income categories other than above moderate.

6th Cycle RHNA with 20% Buffer for La Cañada Flintridge			
Income Category/Affordability Level*	Number of Units	20% Buffer	Total
Lower Income (0-80% of AMI)	387	77	464
Moderate Income (80-120% of AMI)	139	28	167
Above Moderate Income (More than 120% of AMI)	86	N/A	86
TOTAL UNITS	612	100%	717

During the City Council meeting of February 8, 2022, staff and the consultant were requested to look into the issues identified below.

1. Additional use of Accessory Dwelling Units (ADUs)

The draft Housing Element identifies a total of 120 ADUs that can be accommodated during the period, a total of 15 per year. This total was questioned by the Department of Housing and Community Development (HCD) within the December 2021 comments, included as Attachment 2 to this report. Staff and the consultant believe 15 ADUs per year is a realistic estimate given that 2 permits were issued in 2019, 13 permits were issued in 2020, 24 permits were issued in 2021 and so far in 2022, 11 permits have been issued.

Staff did review other local jurisdiction's estimates for ADUs within their draft Housing Elements, including Sierra Madre and San Marino. Both jurisdictions had issued fewer permits than LCF but were proposing higher annual number of permits than LCF during the 2021-2029 period. HCD has been consistently questioning the proposed number of ADUs based on a three year average. Therefore, staff do not believe that increasing the number of ADUs beyond 15 per year would be a feasible alternative.

2. Should the gas stations within the Downtown Village Specific Plan (DVSP) be included within the Sites Inventory?

Three gas stations were identified as potential sites: ARCO at 550 Foothill Boulevard (intersection with Woodleigh Lane), Chevron at 623 Foothill Boulevard (intersection with Rinetti Lane), and 76 at 1001 Foothill Boulevard (intersection with Angeles Crest Highway). Given the age of the ARCO gas station and the traffic safety issues identified at ARCO during recent public hearings, staff would recommend including this location on the Sites Inventory. Additionally, given the age and vehicle accidents at the intersection of Foothill Boulevard and Angeles Crest Highway, it is recommended to keep the 76 station within the Sites Inventory. The Chevron station does not present the same types of issues and is therefore less likely to transition to a residential use within the planning period. Therefore, this site has been removed, with the loss of 10 moderate units.

Additionally, staff note that the State of California has a goal to transition to 100 percent electric vehicles by 2030, thereby reducing the need for gas stations.

3. Include additional sites within the Religious Institution Overlay Zone.

When the Planning Commission had previously reviewed the Housing Element, they had requested that both St Bede the Venerable and Saint Francis High School be reviewed for inclusion within the overlay zone. The City Council made an identical request. The sites were reviewed and determined to be ineligible for inclusion based on several factors. The only area of St Bede that could be developed is the parking area. This is utilized as both parking for the religious use as well as play area for the associated school. As such, it is highly unlikely that it would transition over the eight year period, and therefore, cannot be included. Both Saint Francis High School and Flintridge Sacred Heart Academy were reviewed and determined to be ineligible based on the use of the sites as schools rather than religious institutions.

The City Council request that the First Church of Christ Scientist site also be reviewed. The new site at 827 Foothill Boulevard is less than 5,000 square feet in area with less than five parking spaces. The site at 600 Foothill Boulevard that was previously owned by the Church is no longer eligible for inclusion within the overlay zone given that it is now under private ownership. However, the site at 600 Foothill Boulevard is included within the revised Sites Inventory (see Attachment 1).

4. Inclusion of the parking lot at USC Verdugo Hills Hospital

The City has initiated discussions with USC Verdugo Hills Hospital over the inclusion of this site. For sites such as this, HCD have been requesting additional information from local jurisdictions as to whether the institution controlling the site has been contacted and is open to any rezoning that may be required and open to potential residential development. The site has the potential to accommodate 80 lower income units at 20-30 dwelling units per acre (du/ac).

5. Inclusion of the corridor along Verdugo Blvd between Foothill Boulevard and the west City boundary.

Staff has reviewed this area and noted challenges with regards to sewer access and the number of existing single family residential properties. If all or a portion of this area were to be included within the Sites Inventory, rezoning to a higher residential density would be necessary. As such, the existing single family residences would be made non-conforming. Since to be included on the Sites Inventory there must be an opportunity for the sites to be developed within the planning period, if the area was rezoned, the existing single-family residences could not be permitted to be modified in such a way as to extend the life of the structure or increase the value to such a level that the property would not transition to a higher residential density. There are approximately 26 single family residences located on the north side of Verdugo Boulevard between Alta Canyada Road and La Tour Road and 6-8 single family residences located on the south side of Verdugo

Boulevard between Wishing Hill Drive and Descanso Drive. Based on the lack of sewer access and the number of single-family residences that would be made non-conforming, staff do not recommend this area be included within the Sites Inventory.

6. Assess the viability of inclusion of Mayor's Discovery Park or other City owned land.

To be included within the Sites Inventory, City owned land must be available if a housing developer requested to partner with the City in developing a project or to sell the land. If City owned land was available for sale, it must be reported to the State under the Surplus Land Act. Rather, the City reported that there was no surplus land available. Additionally, there is no realistic opportunity to develop a residential housing project on any of the City park sites. Therefore, this option was determined to be unfeasible.

7. Assess viability of inclusion of the La Cañada Country Club /golf course.

As noted above, if identified as a potential site, there must be an opportunity for the land to transition to residential over the planning period, meaning the golf course would cease operation. Additionally, based on the requirements of the Affirmatively Furthering Fair Housing (AFFH) requirements, the site could not be utilized exclusively for moderate and above moderate units, which could be developed at lower densities similar to the existing development within the area. If identified within the Sites Inventory, the area would have to include lower income units at a minimum density of 20 du/ac, resulting in three-story development.

After reviewing the larger parcels that make up the golf course area, several of the parcels exceed 10 acres in size, which is inconsistent with HCD's guidance for lower units. Additionally, based on the existing parcel location and configuration, and after reviewing the topography of the area, staff do not believe it would be possible to prohibit potential development within the vicinity of the existing ridgelines. For these reasons, staff do not recommend including the golf course area within the Sites Inventory.

8. Provide different residential densities within the DVSP areas for areas north and south of Foothill Boulevard.

The existing DVSP allows residential units at a density of up to 15 du/ac within both the Mixed Use -1 (MU-1) and Mixed Use-2 (MU-2) land use districts of the DVSP, though in the MU-1, residential units are permitted on the upper level only. Staff and the consultant believe it would be possible to revise the area to include a mixed use zone north of Foothill Boulevard (MU-N) that would permit a density of 20-30 du/ac and a mixed use south of Foothill Boulevard (MU-S) that would permit a density of 12-15 du/ac.

For those areas south of Foothill Boulevard, there would be no change in the maximum density permitted and within these areas, development could be limited to two-stories in height. For designated areas north of Foothill Boulevard, the development standards

would need to be revised to allow at least three-story structures to accommodate the 20-30 du/ac density.

If this option is utilized, it would also result in those areas included within the Religious Institution Overlay Zone south of Foothill Boulevard having a density of 12-15 du/ac, rather than the 20-30 du/ac that is proposed outside the DVSP. Since the minimum density would not meet the threshold of 20 du/ac, these sites would not be acceptable for lower income units, resulting in the loss of 32 lower units at the Presbyterian Church and 9 lower units at St George Episcopal Church. However, they would be replaced with 17 moderate units.

Additional Modifications to the Sites Inventory

1. Site 53 (House America Financial at 1010 Foothill Boulevard) was removed based on the age and condition of the structure, with a loss of 4 moderate units.
2. Site 62 (4537 Indianola Way) has been removed at a loss of 5 moderate units based on the submittal of building permits for the site.
3. Site 63 (Post office parking lot) has been removed as the site is owned by the US Postal Service, with a loss of 6 moderate units.
4. Site 73 (Caltrans site with UA theater and commercial development on Verdugo Boulevard under State Route 2) was removed. Staff did speak with the leaseholder for the site and confirmed that residential development was not a permitted use of the ground lease. Therefore, the site was removed with the loss of 96 lower income units.
5. Site 87 (Big Lots) was included within the 5th cycle and was utilized again for the 6th cycle. The acreage identified for the site within the 5th cycle was incorrect and was listed as 3.14 acres, when in reality the site was approximately 31,410 square feet in size. The acreage has been correct, but this resulted in the number of units be accommodated being adjusted down from 75 to 18, a loss of 57 lower units.
6. The following sites have been added: Site 98-99 (JoAnn Fabric – already zoned R-3), Sites 100-103 (formerly Pier 1 Imports, 2196 Foothill and surrounding parking lots currently zoned CPD).
7. The following sites have been added/modified on the south side of Foothill Boulevard within the DVSP, with a proposed density of 12-15 du/ac, consistent with the existing MU-2: Site 97 (600 Foothill Boulevard), Sites 110-113 (800 block of Foothill Boulevard, owned by St George Episcopal Church but zoned MU-2), Sites 105-109 (between Gould Avenue and Georgian Road).

Recommendations:

Staff and the consultant recommend that the applicable codes be amended to allow for the rounding up, rather than rounding down, of density. This is done when the allowable density results in a fraction of a unit and can make a difference when viewed across the city. Rounding up is currently only permitted as it applies to the Density Bonus chapter of the Zoning Code (Chapter 11.19).

With the changes and additions identified above, the Sites Inventory alone is as follows:

	UNITS	RHNA		
Income Category	Units from Sites Inventory (dated 3.2.22)	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	56	86	N/A	N/A
Moderate	198	139	167	180
Lower	572	387	465	503

- Number of Above Moderate-Income units exceeds RHNA by 6 units
- Number of Moderate-Income units exceeds RHNA plus 30% buffer by 2 units
- Number of Lower-Income units exceeds RHNA plus 30% buffer by 69

When the 120 units proposed through ADUs are included, the following numbers are achievable:

	UNITS			RHNA		
Income Category	Units from Sites Inventory (3.2.22)	ADUs	Total	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	56	36	92	86	N/A	N/A
Moderate	198	2	200	139	167	180
Lower	572	82	654	387	465	503

Staff is requesting that the Planning Commission invite public comment on the revised draft sites inventory, review of revised Sites Inventory and provide direction to staff on any changes. After reviewing any comments received, staff intend to schedule a joint City Council and Planning Commission meeting to expedite completion of the Sites Inventory in order to resubmit the draft Housing Element to HCD for a second review.

Attachments

1. Draft Sites Inventory and associated maps dated March 3, 2022
2. Comment letter from HCD dated December 3, 2021
3. Sites Inventory Map (Appendix C of Public Review Draft dated September 2021)



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The draft Housing Element identifies a total of 120 ADUs that can be accommodated during the period, a total of 15 per year. This total was questioned by the Department of Housing and Community Development (HCD) within the December 2021 comments, included as Attachment 2 to this report. Staff and the consultant believe 15 ADUs per year is a realistic estimate given that 2 permits were issued in 2019, 13 permits were issued in 2020, 24 permits were issued in 2021 and so far in 2022, 11 permits have been issued.

Staff did review other local jurisdiction's estimates for ADUs within their draft Housing Elements, including Sierra Madre and San Marino. Both jurisdictions had issued fewer permits than LCF but were proposing higher annual number of permits than LCF during the 2021-2029 period. HCD has been consistently questioning the proposed number of ADUs based on a three year average. Therefore, staff do not believe that increasing the number of ADUs beyond 15 per year would be a feasible alternative.

2. Should the gas stations within the Downtown Village Specific Plan (DVSP) be included within the Sites Inventory?

Three gas stations were identified as potential sites: ARCO at 550 Foothill Boulevard (intersection with Woodleigh Lane), Chevron at 623 Foothill Boulevard (intersection with Rinetti Lane), and 76 at 1001 Foothill Boulevard (intersection with Angeles Crest Highway). Given the age of the ARCO gas station and the traffic safety issues identified at ARCO during recent public hearings, staff would recommend including this location on the Sites Inventory. Additionally, given the age and vehicle accidents at the intersection of Foothill Boulevard and Angeles Crest Highway, it is recommended to keep the 76 station within the Sites Inventory. The Chevron station does not present the same types of issues and is therefore less likely to transition to a residential use within the planning period. Therefore, this site has been removed, with the loss of 10 moderate units.

Additionally, staff note that the State of California has a goal to transition to 100 percent electric vehicles by 2030, thereby reducing the need for gas stations.

3. Include additional sites within the Religious Institution Overlay Zone.

When the Planning Commission had previously reviewed the Housing Element, they had requested that both St Bede the Venerable and Saint Francis High School be reviewed for inclusion within the overlay zone. The City Council made an identical request. The sites were reviewed and determined to be ineligible for inclusion based on several factors. The only area of St Bede that could be developed is the parking area. This is utilized as both parking for the religious use as well as play area for the associated school. As such, it is highly unlikely that it would transition over the eight year period, and therefore, cannot be included. Both Saint Francis High School and Flintridge Sacred Heart Academy were reviewed and determined to be ineligible based on the use of the sites as schools rather than religious institutions.

The City Council request that the First Church of Christ Scientist site also be reviewed. The new site at 827 Foothill Boulevard is less than 5,000 square feet in area with less than five parking spaces. The site at 600 Foothill Boulevard that was previously owned by the Church is no longer eligible for inclusion within the overlay zone given that it is now under private ownership. However, the site at 600 Foothill Boulevard is included within the revised Sites Inventory (see Attachment 1).

4. Inclusion of the parking lot at USC Verdugo Hills Hospital

The City has initiated discussions with USC Verdugo Hills Hospital over the inclusion of this site. For sites such as this, HCD have been requesting additional information from local jurisdictions as to whether the institution controlling the site has been contacted and is open to any rezoning that may be required and open to potential residential development. The site has the potential to accommodate 80 lower income units at 20-30 dwelling units per acre (du/ac).

5. Inclusion of the corridor along Verdugo Blvd between Foothill Boulevard and the west City boundary.

Staff has reviewed this area and noted challenges with regards to sewer access and the number of existing single family residential properties. If all or a portion of this area were to be included within the Sites Inventory, rezoning to a higher residential density would be necessary. As such, the existing single family residences would be made non-conforming. Since to be included on the Sites Inventory there must be an opportunity for the sites to be developed within the planning period, if the area was rezoned, the existing single-family residences could not be permitted to be modified in such a way as to extend the life of the structure or increase the value to such a level that the property would not transition to a higher residential density. There are approximately 26 single family residences located on the north side of Verdugo Boulevard between Alta Canyada Road and La Tour Road and 6-8 single family residences located on the south side of Verdugo

Boulevard between Wishing Hill Drive and Descanso Drive. Based on the lack of sewer access and the number of single-family residences that would be made non-conforming, staff do not recommend this area be included within the Sites Inventory.

6. Assess the viability of inclusion of Mayor's Discovery Park or other City owned land.

To be included within the Sites Inventory, City owned land must be available if a housing developer requested to partner with the City in developing a project or to sell the land. If City owned land was available for sale, it must be reported to the State under the Surplus Land Act. Rather, the City reported that there was no surplus land available. Additionally, there is no realistic opportunity to develop a residential housing project on any of the City park sites. Therefore, this option was determined to be unfeasible.

7. Assess viability of inclusion of the La Cañada Country Club /golf course.

As noted above, if identified as a potential site, there must be an opportunity for the land to transition to residential over the planning period, meaning the golf course would cease operation. Additionally, based on the requirements of the Affirmatively Furthering Fair Housing (AFFH) requirements, the site could not be utilized exclusively for moderate and above moderate units, which could be developed at lower densities similar to the existing development within the area. If identified within the Sites Inventory, the area would have to include lower income units at a minimum density of 20 du/ac, resulting in three-story development.

After reviewing the larger parcels that make up the golf course area, several of the parcels exceed 10 acres in size, which is inconsistent with HCD's guidance for lower units. Additionally, based on the existing parcel location and configuration, and after reviewing the topography of the area, staff do not believe it would be possible to prohibit potential development within the vicinity of the existing ridgelines. For these reasons, staff do not recommend including the golf course area within the Sites Inventory.

8. Provide different residential densities within the DVSP areas for areas north and south of Foothill Boulevard.

The existing DVSP allows residential units at a density of up to 15 du/ac within both the Mixed Use -1 (MU-1) and Mixed Use-2 (MU-2) land use districts of the DVSP, though in the MU-1, residential units are permitted on the upper level only. Staff and the consultant believe it would be possible to revise the area to include a mixed use zone north of Foothill Boulevard (MU-N) that would permit a density of 20-30 du/ac and a mixed use south of Foothill Boulevard (MU-S) that would permit a density of 12-15 du/ac.

For those areas south of Foothill Boulevard, there would be no change in the maximum density permitted and within these areas, development could be limited to two-stories in height. For designated areas north of Foothill Boulevard, the development standards

would need to be revised to allow at least three-story structures to accommodate the 20-30 du/ac density.

If this option is utilized, it would also result in those areas included within the Religious Institution Overlay Zone south of Foothill Boulevard having a density of 12-15 du/ac, rather than the 20-30 du/ac that is proposed outside the DVSP. Since the minimum density would not meet the threshold of 20 du/ac, these sites would not be acceptable for lower income units, resulting in the loss of 32 lower units at the Presbyterian Church and 9 lower units at St George Episcopal Church. However, they would be replaced with 17 moderate units.

Additional Modifications to the Sites Inventory

1. Site 53 (House America Financial at 1010 Foothill Boulevard) was removed based on the age and condition of the structure, with a loss of 4 moderate units.
2. Site 62 (4537 Indianola Way) has been removed at a loss of 5 moderate units based on the submittal of building permits for the site.
3. Site 63 (Post office parking lot) has been removed as the site is owned by the US Postal Service, with a loss of 6 moderate units.
4. Site 73 (Caltrans site with UA theater and commercial development on Verdugo Boulevard under State Route 2) was removed. Staff did speak with the leaseholder for the site and confirmed that residential development was not a permitted use of the ground lease. Therefore, the site was removed with the loss of 96 lower income units.
5. Site 87 (Big Lots) was included within the 5th cycle and was utilized again for the 6th cycle. The acreage identified for the site within the 5th cycle was incorrect and was listed as 3.14 acres, when in reality the site was approximately 31,410 square feet in size. The acreage has been correct, but this resulted in the number of units be accommodated being adjusted down from 75 to 18, a loss of 57 lower units.
6. The following sites have been added: Site 98-99 (JoAnn Fabric – already zoned R-3), Sites 100-103 (formerly Pier 1 Imports, 2196 Foothill and surrounding parking lots currently zoned CPD).
7. The following sites have been added/modified on the south side of Foothill Boulevard within the DVSP, with a proposed density of 12-15 du/ac, consistent with the existing MU-2: Site 97 (600 Foothill Boulevard), Sites 110-113 (800 block of Foothill Boulevard, owned by St George Episcopal Church but zoned MU-2), Sites 105-109 (between Gould Avenue and Georgian Road).

Recommendations:

Staff and the consultant recommend that the applicable codes be amended to allow for the rounding up, rather than rounding down, of density. This is done when the allowable density results in a fraction of a unit and can make a difference when viewed across the city. Rounding up is currently only permitted as it applies to the Density Bonus chapter of the Zoning Code (Chapter 11.19).

With the changes and additions identified above, the Sites Inventory alone is as follows:

	UNITS	RHNA		
Income Category	Units from Sites Inventory (dated 3.2.22)	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	56	86	N/A	N/A
Moderate	198	139	167	180
Lower	572	387	465	503

- Number of Above Moderate-Income units exceeds RHNA by 6 units
- Number of Moderate-Income units exceeds RHNA plus 30% buffer by 2 units
- Number of Lower-Income units exceeds RHNA plus 30% buffer by 69

When the 120 units proposed through ADUs are included, the following numbers are achievable:

	UNITS			RHNA		
Income Category	Units from Sites Inventory (3.2.22)	ADUs	Total	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	56	36	92	86	N/A	N/A
Moderate	198	2	200	139	167	180
Lower	572	82	654	387	465	503

Staff is requesting that the Planning Commission invite public comment on the revised draft sites inventory, review of revised Sites Inventory and provide direction to staff on any changes. After reviewing any comments received, staff intend to schedule a joint City Council and Planning Commission meeting to expedite completion of the Sites Inventory in order to resubmit the draft Housing Element to HCD for a second review.

Attachments

1. Draft Sites Inventory and associated maps dated March 3, 2022
2. Comment letter from HCD dated December 3, 2021
3. Sites Inventory Map (Appendix C of Public Review Draft dated September 2021)

**Joint Planning
Commission/City Council
Workshop
4/5/22**

CITY COUNCIL AGENDA REPORT

MEETING DATE: April 5, 2022

SUBJECT: Joint Meeting of the City Council and Planning Commission to Discuss the 2021-2029 (6th Cycle) Housing Element

PRESENTER: Susan Koleda, Director of Community Development

PROPOSED ACTION: Consider and provide direction to staff

ENVIRONMENTAL IMPACT: None at this time. Adoption of the Housing Element and rezoning to implement the Housing Element must be reviewed pursuant to the California Environmental Quality Act prior to adoption

FISCAL IMPACT: Unknown

SUMMARY: The City of La Cañada Flintridge is currently updating its General Plan Housing Element. The 6th Cycle Housing Element will cover the eight-year planning period from October 2021 – October 2029. Local governments across California are required by State Housing Element law to adequately plan to meet their share of the State’s overall housing need. A Draft Housing Element was released for public review and comment on September 22, 2021, and was submitted to the Department of Housing and Community Development (HCD) for review and comment in October 2021. The City received comments on the draft element from HCD on December 3, 2021. Since then, the City Council held a policy discussion on the Housing Element on February 8, 2022 and the Planning Commission reviewed and received public comments on a revised Sites Inventory on March 10, 2022.

DISCUSSION: Since receiving comments from HCD on the first draft of the Housing Element, the consultants and staff have been revising relevant sections of the Housing Element. One of the last pieces that must be addressed prior to public review and submittal to HCD of the second draft is the Sites Inventory. The Sites Inventory is the method by which jurisdictions are required to demonstrate that they have adequate sites to accommodate their assigned RHNA. The City must identify sites that are vacant or underutilized, and demonstrate that those sites permit, or will permit, housing development based on rezoning, density allowance and reduction or elimination of development constraints. If a jurisdiction does not have adequate sites that are already designated and zoned appropriately, it must identify how the sites will be redesignated and rezoned to permit residential density in accordance with the Sites Inventory.

The number of residential units that must be accommodated in the 2021-2029 housing cycle is shown in the table, broken down by income category and includes a 20 percent buffer. A 15-30 percent buffer is required for income categories other than above moderate.

6th Cycle RHNA with 20% Buffer for La Cañada Flintridge			
Income Category/Affordability Level*	Number of Units	20% Buffer	Total
Lower Income (0-80% of AMI)	387	77	464
Moderate Income (80-120% of AMI)	139	28	167
Above Moderate Income (More than 120% of AMI)	86	N/A	86
TOTAL UNITS	612	100%	717

During the City Council meeting of February 8, 2022, the City Council directed staff and the consultant to review the following to determine if these methods or sites could be utilized for the Sites Inventory:

1. Additional use of Accessory Dwelling Units (ADUs);
2. Inclusion of gas stations within the Downtown Village Specific Plan (DVSP);
3. Inclusion of additional sites within the Religious Institution Overlay Zone;
4. Inclusion of the parking lot at USC Verdugo Hills Hospital;
5. Inclusion of the corridor along Verdugo Boulevard between Foothill Boulevard and the west city boundary;
6. Inclusion of Mayor's Discovery Park or other City owned land;
7. Inclusion of the La Cañada Flintridge Country Club /golf course;
8. Providing different residential densities within the DVSP for areas north and south of Foothill Boulevard.

Of the eight directives identified, the only one that would provide potential additional housing units is the inclusion of the USC Verdugo Hills Hospital parking lot. This has been included at the current time; however, additional work to demonstrate the site is suitable to HCD will be required. Providing a lower residential density on the south side of Foothill Boulevard lowered the overall number of units and options available within the Sites Inventory, resulting in the inclusion of additional sites, identified and mapped within the Planning Commission Staff Report for the March 10, 2022 meeting, included as Attachment 1. Additional information and analysis as to the feasibility and implications of the other options can also be found within the attached report.

After public review and comments from the City Council and Planning Commission, some additional sites identified within the first draft of the Housing Element have been removed based on known impediments, including ownership by a federal agency, submitted building permits and known limitations on use. To ensure sufficient sites were available, additional sites were added or

modified, including Site 98-99 (Jo-Ann Fabrics and Crafts – already zoned R-3), Sites 100-103 (formerly Pier 1 Imports, 2196 Foothill and surrounding parking lots currently zoned CPD), Site 97 (600 Foothill Boulevard), Sites 110-113 (800 block of Foothill Boulevard, owned by St George Episcopal Church but zoned MU-2), Sites 105-109 (between Gould Avenue and Georgian Road).

The revised Sites Inventory and associated maps are included as Attachment 1 and 3, respectively, to the Planning Commission Staff Report dated March 10, 2022.

After reviewing the revised Sites Inventory, the Planning Commission disagreed with the City Council on providing a lower density on the south side of Foothill Boulevard. The Planning Commission believes that increasing the density throughout the Downtown Village Specific Plan would allow the City to meet the RHNA obligation and found there was not a clear rational or objective standards for such a division. By providing a density of 12-15 dwelling units per acre (du/ac) south of Foothill Boulevard, none of the sites would provide a minimum density of 20 du/ac, the minimum density required for lower income units, forcing all lower income units to the north side of Foothill Boulevard within the DVSP. Additionally, the Planning Commission felt completing due diligence on all parcels included on the Sites Inventory, including discussing the potential for rezoning with property owners and identifying any impediments, was necessary. While opposition to inclusion within the Sites Inventory by a property owner may be an issue, after speaking with HCD, this does not necessarily preclude a parcel from inclusion.

SUMMARY: Staff and the consultant recommend that the applicable codes be amended to allow for the rounding up, rather than rounding down, of density. This is done when the allowable density results in a fraction of a unit and can make a difference when viewed across the city. Rounding up is currently only permitted as it applies to the Density Bonus chapter of the Zoning Code (Chapter 11.19).

With the changes and additions identified above, the Sites Inventory alone is as follows:

	UNITS	RHNA		
Income Category	Units from Sites Inventory (dated 3.2.22)	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	74	86	N/A	N/A
Moderate	194	139	167	180
Lower	572	387	465	503

With Sites Inventory alone:

- Number of Above Moderate-Income units: shortfall of RHNA by 12 units
- Number of Moderate-Income units: exceeds RHNA plus 30% buffer by 14 units
- Number of Lower-Income units exceeds: RHNA plus 30% buffer by 69

When the 120 units proposed through ADUs are included, the following numbers are achievable:

	UNITS			RHNA		
Income Category	Units from Sites Inventory (3.2.22)	ADUs	Total	Required RHNA	Required RHNA + 20% Buffer	Required RHNA + 30% Buffer
Above Moderate	74	36	110	86	N/A	N/A
Moderate	194	2	196	139	167	180
Lower	572	82	654	387	465	503

With Sites Inventory plus ADUs:

- Number of Above Moderate-Income units: exceeds RHNA by 24 units
- Number of Moderate-Income units: exceeds RHNA plus 30% buffer by 16 units
- Number of Lower-Income units exceeds RHNA plus 30% buffer by 151 units

OPTIONS:

1. Consider and provide direction to staff.
2. Motion to: Receive and file.

RECOMMENDATION: Option # 1 - Consider and provide direction to staff.

ATTACHMENT:

1. Planning Commission Staff Report dated March 10, 2022



City of La Cañada Flintridge

Housing Element Update

Joint Planning Commission/City Council
Workshop

Tuesday, April 5, 2022
6:00 p.m.

Meet the Team

City Staff

Susan Koleda, Director of Community Development



Veronica Tam and Associates, Inc.

Veronica Tam



CityPlace Planning, Inc.

Claudia Tedford

Patricia Bluman



Status of 6th Cycle Housing Element

- Draft Housing Element released for public review in September 2021 and submitted to HCD in October 2021
- Received comments from HCD December 3, 2021
- City Council held policy discussion on February 8, 2022, to provide direction regarding potential methods and sites to update Sites Inventory:
 1. Additional use of ADUs
 2. Include gas stations within Downtown Village Specific Plan (DVSP)
 3. Add sites to Religious Institution Overlay Zone (RIOZ)
 4. Include parking lot at USC Verdugo Hills Hospital

Status, continued

5. Include corridor on Verdugo between Foothill and west city boundary
 6. Include Mayor's Discovery Park or other City-owned land
 7. Include La Cañada Flintridge Country Club/golf course
 8. Provide different densities in DVSP on south and north sides (lower on south, higher on north)
- Of 8 directives identified by City Council, the only one that would provide addition units is USC Verdugo Hills Hospital; however, additional work to demonstrate suitability is needed.

Status, continued

- Staff and consultant spoke to HCD staff, who provided additional information and clarification.
- Next step is to prepare a revised Sites Inventory that can address identified issues and receive HCD approval.

Issues

- Sites Inventory is problematic as currently proposed:
 - HCD is aware that past rezoning of land to allow 20-30 du/ac (Mixed Use and R-3/high density residential) has not resulted in production of any new multi-family housing in the last 8+ years, regardless of income.
 - Likelihood that HCD will not accept a density of 20-30 du/ac for lower-income units due to lack of evidence of production and concerns expressed by the public.
 - City has received feedback that some property owners object to have their property included because they do not intend to discontinue their existing use during the 8-year cycle. While some indicate it is because they do not intend to discontinue the existing use, others indicate it is because the proposed densities will not “pencil out.”

Issues, continued

- Sites Inventory is problematic as currently proposed (continued):
 - City's existing development standards have been identified as constraints to development to achieve densities that facilitate the RHNA. (Existing Draft Housing Plan acknowledges this and includes programs to revise them—however, based on expressed public opposition to reducing existing development standards, staff and consultant are concerned that revising them without “real world” testing could result in standards that would continue to be a constraint to development.)
 - Due diligence with property owners is necessary to find out if there is interest/likelihood that the property would be available for development and recycle to mixed or residential use.
 - Moderate-income and lower-income units are not likely to be constructed in LCF without a requirement to do so, such as inclusionary regulations.

Recommendations

- Retain the services of an architecture/economist team to conduct a “real world” analysis to evaluate densities and development standards necessary to achieve development projects that would “pencil out,” including moderate- and lower-income units.
 - Architect/site planner to prepare and test prototypes of mixed use and multi-family residential developments to achieve various densities. Would identify the degree to which existing development standards are a constraint to development.
 - Consider and evaluate densities necessary to achieve affordable units
 - Economic analyst to conduct a pro forma financial analysis of the prototypes to determine feasibility for La Cañada Flintridge.

Recommendations, continued

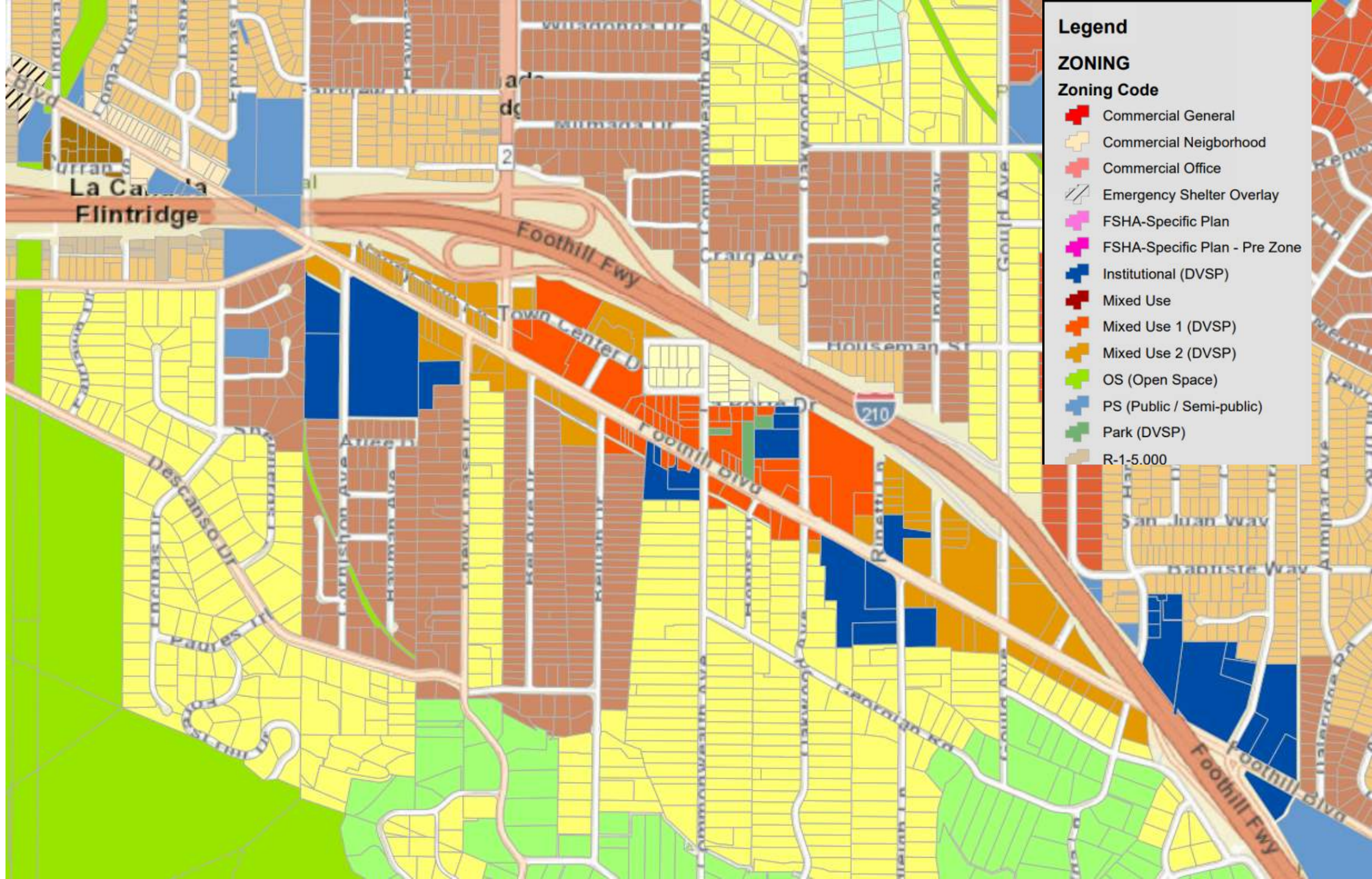
- Results of the prototype and pro forma analysis would:
 - Provide the City Council, Planning Commission, and the public with viable options for development.
 - Provide the City with viable densities to share with property owners when the City conducts its due diligence, which could inform decisions regarding the likelihood of sites turning over within the planning period.
 - Inform the preparation of the Sites Inventory to demonstrate to HCD the City's ability and realistic capacity to achieve the RHNA.
 - Provide revisions to the City's Zoning Code for the appropriate densities and development standards to implement the Housing Element. Ideally the revisions to the Zoning Code could be adopted with the Housing Element in time to meet the October 15, 2022 deadline.

- If you have any questions, please email them to:

Susan Koleda: skoleda@lcf.ca.gov

- Please check the City's website for additional information:

<https://cityoflcf.org/housing-element-update/>



City Council Meeting
7/5/22

CITY COUNCIL AGENDA REPORT

MEETING DATE: July 5, 2022

SUBJECT: Discussion on Potential Housing Density for Lower Income Units Required to Accommodate the Regional Housing Needs Assessment within the 2021-2029 6th Cycle Housing Element

PRESENTER: Susan Koleda, Director of Community Development

PROPOSED ACTION: Consider and provide direction to staff

ENVIRONMENTAL IMPACT: Undetermined at the current time

FISCAL IMPACT: None

SUMMARY: The City of La Cañada Flintridge is currently updating its 2021-2029 6th Cycle Housing Element. The City is required by State housing law to adequately plan to meet its share of the State's overall housing need. To adequately plan for the sharing of the State's housing need, local governments adopt Housing Elements as part of their General Plans. Housing Elements provide goals, policies, and programs to create opportunities for housing development.

DISCUSSION: To comply with State law, the City's Housing Element must be updated to ensure that policies and programs encourage the accommodation of our share of the housing units assigned to the City through the Regional Housing Needs Assessment (RHNA). For the current 6th Cycle Housing Element update, the City's share of the RHNA is 612 units, divided among a range of income or affordability levels (based on Area Median Income, or AMI), as shown in the following table.

6 th Cycle RHNA for La Cañada Flintridge		
Income Category/Affordability Level*	Number of Units	Percent of Total Units
Very Low Income (0-50% of AMI)	252	41%
Low Income (50-80% of AMI)	135	22%
Moderate Income (80-120% of AMI)	139	23%
Above Moderate Income (More than 120% of AMI)	86	14%
TOTAL UNITS	612	100%

There are other requirements that affect a jurisdiction’s strategy for accommodating its RHNA. The “No Net Loss” law requires that sufficient adequate sites must be available at all times throughout the planning period. Because cities often have projects built at lower density than their Zoning Codes allow, HCD recommends that jurisdictions include a buffer in the Sites Inventory of approximately 15-30 percent more capacity than required for lower and moderate income RHNA so that it remains compliant throughout the planning period. Adding a 20 percent buffer to the City’s RHNA results in the following units La Cañada Flintridge must demonstrate that it can accommodate:

6th Cycle RHNA for La Cañada Flintridge			
Income Category/Affordability Level*	Number of Units	20% Buffer	Total
Very Low & Lower Income (0-80% of AMI)	387	77	464
Moderate Income (80-120% of AMI)	139	28	167
Above Moderate Income (More than 120% of AMI)	86	N/A	86
TOTAL UNITS	612	100%	717

After comments were received from HCD on the first draft of the Housing Element update and from property owners included on the Sites Inventory, the City Council decided to hire Michael Baker International (MBI) as a subconsultant to CityPlace Planning, the Housing Element consultant, to conduct an economic analysis and housing prototype feasibility study to determine the housing density range appropriate to accommodate lower income units and the associated development standards required to implement the Housing Element. State law identifies specific requirements for lower income housing sites which, for the City, includes a density of at least 20 dwelling units per acres (du/ac) and sites of between 0.5–10 acres. Multiple parcels can be grouped to meet the 0.5 acre minimum site requirement. Sites must be realistically available for redevelopment within the 2021-2029 planning period and constraints, such as existing leases and lack of infrastructure, are taken into consideration by the State Department of Housing and Community Development when reviewing the Housing Element for consistency with state law.

MBI utilized a recent sale (late 2021) on Foothill Boulevard that is currently being converted to medical office as the base for comparison. Medical office was utilized as the per square foot assessed value was one of the highest of all uses identified within the Economic Development Analysis of the Commercial Properties within the Downtown Village Specific Plan, prepared in November 2020 by Applied Development Economics. MBI utilized the most recent land values, soft and hard development costs, and found that both a 100% above moderate housing project and a project with 15% lower income units with a minimum density of 26 du/ac was comparable to the medical office use in terms of the rate of return. It should be noted that a project with 15% lower income units would be eligible for a density bonus under state law and City ordinance and could be constructed at a higher density than that adopted within the Housing Element, potentially increasing the rate of return.

The current R-3 (Multifamily) zone allows for a density of up to 30 du/ac, the Mixed Use (MX) zone allows for a density of 20-30 du/ac and the Mixed Use 1 and 2 land use districts of the DVSP allow up to 15 du/ac. As noted above, sites identified to accommodate lower income units must have a minimum density of 20 du/ac per state law and, based on the state's Affirmatively Furthering Fair Housing requirements, sites to accommodate lower income units must be spread throughout the community, which will require sites to be identified within the area of the DVSP.

When preparing the Sites Inventory, the City must use the minimum base density when calculating the number of potential units that can be accommodated on a site since there have been no approved projects that demonstrate a higher density is feasible. Therefore, the first draft of the Housing Element utilized 20 du/ac for all sites identified for lower income units.

If the density range were modified to 25-30 or 25-35 du/ac based on the economic analysis conducted by MBI that identified 26 du/ac as comparable to other commercial uses with regards to financial return, the number of sites required to accommodate the lower income units would be reduced. Additionally, the consultant and staff could approach property owners with objective data showing that multifamily development at the higher density was financially beneficial to them. This might persuade property owners, who previously objected to inclusion on the Sites Inventory, to reconsider.

Any increase in density will likely require modification of development standards. An analysis to determine appropriate development standards will begin in the coming weeks and will include public input through both an online survey and public hearings before the Planning Commission and/or City Council. This work will be included in the FY 2022-23 contract with CityPlace Planning.

- OPTIONS:
1. Consider and provide direction to staff.
 2. Motion to: Receive and file.

RECOMMENDATION: Option # 1 - Consider and provide direction to staff.

Stakeholder Engagement List

Crescenta-Cañada Family YMCA
1930 Foothill Blvd.
La Cañada Flintridge, CA 91011

Housing Rights Center
3255 Wilshire Blvd #1150
Los Angeles, CA 90010

Armenian Relief Society
Regional Executive Board
517 W. Glenoaks Blvd.
Glendale, CA 91202

La Cañada Flintridge Kiwanis - AM Club
Joyce Ruygrok, President
c/o Lutheran Church in the Foothills
1700 Foothill Blvd.
La Cañada Flintridge, CA 91011

Assistance League(R) of Flintridge
4607 Oakwood Avenue
La Cañada Flintridge, CA 91011

Salvation Army Meals on Wheels
320 West Windsor Road
Glendale, California 91204

Rotary Club of La Cañada Flintridge
P.O. Box 44
La Cañada Flintridge, CA 91011

Family Promise of San Gabriel
Valley
1005 E Las Tunas Dr #525, San
Gabriel, CA 91776

Elderly Services Consortium for
Asian/Pacific American
767 N. Hill Street, Suite 400
Los Angeles, CA 90012

Anthony Dedousis
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071

The Olson Company
3010 Old Ranch Parkway
Suite 100
Seal Beach, CA 90740

Zentmyer Properties
1434 Foothill Boulevard
La Cañada Flintridge, CA 91011

Jet Propulsion Laboratory
Manager, Facilities Division
Institute of Technology
4800 Oak Grove Drive
Pasadena, CA 91109

La Cañada Flintridge Chamber of
Commerce
One Civic Center Drive, Suite A
La Cañada Flintridge, CA 91011

Housing Rights Center
1020 N Fair Oaks Ave
Pasadena, CA 91103

Santa Monica Mountains Conservancy
State of California – The Resources
Agency
570 West Avenue Twenty-Six, Suite 100
Los Angeles, CA 90065

Altadena Foothill Conservancy
PO Box 3
Altadena, CA 91003

Arroyos & Foothills Conservancy
P.O. Box 1
Pasadena, CA 91102

Kingdom Hall of Jehovah's Witnesses
4450 Briggs Avenue
Montrose, CA 91020

Saint Luke's Anglican Church
2416 Montrose Avenue
Montrose, CA 91020

PATH
340 N Madison Ave
Los Angeles, CA 90004

Saint Luke's of the Mountain Episcopal
Church
2563 Foothill Blvd, La Crescenta-
Montrose, CA 91214

Crescenta Valley Korean United
Methodist Church
2700 Montrose Avenue
Montrose, CA 91020

Lutheran Church in the Foothills
1700 Foothill Blvd.
La Cañada Flintridge, CA 91011

La Cañada Congregational Church
1200 Foothill Blvd
La Cañada Flintridge, CA 91011

La Cañada United Methodist Church
104 Berkshire Place
La Cañada Flintridge, CA 91011

La Cañada Presbyterian Church
626 Foothill Boulevard
La Cañada Flintridge, CA 91011

St Bede the Venerable Church
215 Foothill Blvd.,
La Cañada Flintridge, CA 91011

Church of Jesus Christ of
Latter Day Saints
1830 Foothill Blvd.
La Cañada Flintridge, CA 91011

St. George's Episcopal Church
808 Foothill Boulevard
La Cañada Flintridge, CA 91011

Union Station Adult Center
412 S Raymond Avenue
Pasadena, CA 91104

Union Station Homeless Services
825 E Orange Grove Blvd,
Pasadena, CA 91104

Ascencia
1851 Tyburn St,
Glendale, CA 91204

Jovenes Inc. Center
1208 Pleasant Ave
Los Angeles, CA 90033

Homeless Outreach Program
Integrated Care System
5849 Crocker St
Los Angeles, CA 90003

Centennial Place
235 E Holly St #145
Pasadena, CA 91101

Project New Hope
601 E Glenoaks Blvd #100,
Glendale, CA 91207

Door of Hope
669 N Los Robles Ave
Pasadena, CA 91101

San Gabriel Habitat for Humanity
724 E Huntington Drive
Monrovia, CA 91016

Compass Real Estate
964 Foothill Blvd, La Cañada
Flintridge, CA 91011

Keller Williams Realty
848 Foothill Blvd
La Cañada Flintridge, CA 91011

Coldwell Banker Realty
657 Foothill Blvd, La Cañada
Flintridge, CA 91011

Re/Max Tri-City Realty
1433 Foothill Blvd
La Cañada Flintridge, CA 91011

JohnHart Real Estate
1420 Foothill Blvd
La Cañada Flintridge, CA 91011

Dilbeck Real Estate Agents
1030 Foothill Blvd, La Cañada
Flintridge, CA 91011

Town & Ranch Realty
739 Foothill Blvd, La Cañada
Flintridge, CA 91011

Ballard & Ballard Real Estate
1313 Foothill Blvd Suite 8, La
Cañada Flintridge, CA 91011

Kobeissi Properties
711 Foothill Blvd H, La Cañada
Flintridge, CA 91011

The Campbell Center
6512 San Fernando Rd,
Glendale, CA 91201

Disability Law Center
117 S Louise St #313
Glendale, CA 91205

NAACP Pasadena Branch
595 Lincoln Ave, Pasadena, CA
91103

Chinatown Service Center
112 N Chandler Ave # 105,
Monterey Park, CA 91754

Hope
634 S Spring St #920, Los
Angeles, CA 90014

Catholic Charities
4322 San Fernando Rd #2522,
Glendale, CA 91204

Neighborhood Housing Services
of Los Angeles County
3926 Wilshire Blvd., Suite 200
Los Angeles, CA 90010

Abode Communities
1149 S Hill St.
Los Angeles, CA 90015

Homes for Life Foundation
8939 S. Sepulveda Blvd., Suite
460
Los Angeles, CA 90045

National CORESM and
Hope Through Housing
Foundation
9421 Haven Avenue
Rancho Cucamonga, CA 91730

Jamboree Housing Corporation
17701 Cowan Ave
Suite 200
Irvine, California 92614

Southern California Association
of Non-Profit Housing
340 E. 2nd St., Suite 406
Los Angeles, CA 90012

**Letters from City Council and
Property Owner Distribution
List**



City Council
Terry Walker, Mayor
Keith Eich, Mayor Pro Tem
Jonathan C. Curtis
Michael T. Davitt
Richard Gunter

June 30, 2022

RE: Future Planning for Housing in our City

Dear Commercial Property Owners and Faith-based Organizations,

The City of La Cañada Flintridge is in the process of updating its Housing Element as required by State law, and we would like to request your *input and cooperation* in this effort. One of the requirements is for the City to identify sites where multi-family housing could feasibly be constructed over the next 8-year period.

We are focusing on commercially designated properties and faith-based campuses to develop this sites inventory. Past experience has shown that single-family homes in our City do not tend to be redeveloped into multi-family dwellings. We are asking property owners if they there are constraints that would preclude their properties from being included in the Sites Inventory. The location and Assessor Parcel Number of the site are:

Location: 845 FOOTHILL BLVD

APN: 5815-013-012

The City is considering some changes to the Zoning Code that would allow these commercial properties to have the option to develop with multi-family residential or mixed use. This would not impose a requirement to build housing, however it would expand the flexibility for properties that meet certain criteria to do so in the future and potentially increase the value of the property.

This may be new to you, so please see some additional information below:

- If your property is currently zoned as commercial, the City is proposing to either change your zoning or add a zoning overlay to your property that would allow the existing commercial use, mixed-use (commercial and residential in the same development) or stand-alone multi-family residential, but would not require it. In effect, this action would provide you with more options for future development of your property than you have currently.
- If your property is owned and operated as a religious use, the City is proposing to add an overlay to your property that would allow you to construct affordable housing while maintaining your current use. As with the other actions noted above that the City is proposing, this would provide you an option for development on your site that may not currently be available to you under current zoning.
- There would be no cost to you to add the overlay zone to your property. You would not have to apply for or pay to have the zoning on your property changed.

Please note that the City does not build housing – the private market builds housing. The Housing Element “sets the stage” for housing developers to build projects consistent with the City’s General Plan (including Housing and Land Use Elements), zoning ordinance, and other planning documents.

The City of La Cañada Flintridge will be sending a follow-up letter to property owners whose properties meet the criteria of the sites inventory (minimum size and location) in the coming weeks. In the meantime, if this potential opportunity interests you, or you would like additional information, please contact Susan Koleda, Community Development Director at skoleda@lcf.ca.gov or (818) 790-8881.

Sincerely,

Keith Eich, Mayor Pro Tem

Rick Gunter, Councilmember



City Council
Terry Walker, Mayor
Keith Eich, Mayor Pro Tem
Jonathan C. Curtis
Michael T. Davitt
Richard Gunter

July 14, 2022

RE: Future Planning for Housing in our City

Dear «OWNERNAME1»,

The City of La Cañada Flintridge is in the process of updating its Housing Element as required by State law, and we would like to request your *input and cooperation* in this effort. In a letter dated June 30, 2022, the City asked if there were constraints on your property or if you had an interest in rezoning the property to allow for multi-family and/or mixed use development.

The location and Assessor Parcel Number of your parcel are:

Location: «Address»

APN: «APN»

Since the first letter, the City Council has held a discussion and gathered public feedback on the proposed density of multifamily housing. The discussion was based on an economic analysis by Michael Baker International and utilized a recent sale on Foothill Boulevard as a comparison, which is being redeveloped for medical use. The analysis utilized current development costs and anticipated rental income, amongst other factors, to determine that housing development with a density of 26 dwelling units per acre would be comparable to the medical office use when the gross value per square foot of parcel area is determined. Therefore, the City Council and Housing Element Subcommittee directed that a minimum density of 25 dwelling units per acre, with a top density yet to be determined, be utilized when looking to rezone properties to accommodate the City's fair share of housing, as allocated by the State and the Southern California Association of Governments.

The City is considering changes to the Zoning Code and Downtown Village Specific Plan that would allow commercial properties to have the option to develop with multi-family residential, commercial or mixed use and allow religious organizations to partner with developers to provide multifamily housing on their parcels. This would not impose a requirement to build housing, however it would expand the flexibility for properties that meet certain criteria to do so in the future and potentially increase the value of the property.

If this potential opportunity interests you, please contact email housingelement@lcf.ca.gov or contact Emily Stadnicki, Principal Planner at (818) 790-8881.

Sincerely,

Susan Koleda, AICP
Director of Community Development

5815-013-012
SIGO GROUP MANAGEMENT LLC
1141 Fremont Ave
South Pasadena, CA 91030

5815-013-014
A PLUS APPLIANCE SERVICES INC
614 ACACIA AVE
Glendale, CA 91205

5815-013-016
Katherina Sivov
1038 Linden Ave
Glendale, CA 91201

5815-014-005
Joe Family Trust
2117 Sunnybank Dr
LA CANADA FLINTRIDGE, CA 91011

5815-014-009
BOYAJIAN ARSEN AND BELLA TRUST
1050 Camann St
Glendale, CA 91208

5815-014-010
BOYAJIAN ARSEN AND BELLA TRUST
1050 Camann St
Glendale, CA 91208

5815-014-011
Ankor Realtors LLC
PO BOX 1248
LA CANADA FLINTRIDGE, CA 91011

5815-014-043
HOVIK KHATCHATURIAN TRUST
1412 Valley View Road
Glendale, CA 91202

5814-020-001
George A Jacobs LLC
551 Georgian Road
La Canada Flintridge, CA 91011

5814-020-014
712 Foothill LLC
51 Dayton St
Pasadena, CA 91105

5814-020-028
ALL STATES REALTY CO INC
1683 WALNUT GROVE AVE
ROSEMEAD, CA 91770

5812-023-006
SERENDIB HOLDINGS GROUP LLC
504 SOUTH SIERRA MADRE BLVD
PASADENA, CA 91107

5812-023-007
Kingsley Family Trust
649 Via Lido Soud
Newport Beach, CA 92663

5812-023-034
Kingsley Family Trust
649 Via Lido Soud
Newport Beach, CA 92663

5812-023-035
Kingsley Family Trust
649 Via Lido Soud
Newport Beach, CA 92663

5812-023-010
Kingsley Family Trust
649 Via Lido Soud
Newport Beach, CA 92663

5812-023-001
SIMISON FAMILY TRUST
4828 Tocaloma Ln
La Canada Flintridge, CA 91011

5812-023-003
Ace Development LLC
162 Starlight Crest Dr
La Canada Flintridge, CA 91011

5812-023-004
CALSTAR REALTY AND MORTGAGE
1033 FOOTHILL BLVD
La Canada Flintridge, CA 91011

5812-023-005
Moss Family Trust
5214 Palm Dr
La Canada Flintridge, CA 91011

5812-023-018
PCA Properties LLC
1155 Sweetbriar Dr
Glendale, CA 91206

5812-023-019
PCA Properties LLC
1155 Sweetbriar Dr
Glendale, CA 91206

5812-023-020
PCA Properties LLC
1155 Sweetbriar Dr
Glendale, CA 91206

5812-023-022
BARBARA MARSHALL TRUST
5309 La Forest Drive
La Canada Flintridge, CA 91011

5812-023-024
B AND E WHITFIELD TRUST
4827 Del Monte Rd
La Canada Flintridge, CA 91011

5812-023-032
PCA Properties LLC
1155 Sweetbriar Dr
Glendale, CA 91206

5812-023-033
PCA Properties LLC
1155 Sweetbriar Dr
Glendale, CA 91206

5814-002-002
TOI VANASIN TRUST
PO BOX 1296
La Canada Flintridge, CA 91011

5814-002-003
D AND S L MCFARLANE TRUST
1038 FOOTHILL BLVD
La Canada Flintridge, CA 91011

5814-002-018
B AND Q YEGHIAIAN TRUST
4806 Indianola Way
La Canada Flintridge, CA 91011

5814-008-024
PLM PROPERTIES
964 Foothill Blvd
La Canada Flintridge, CA 91011

5814-008-026
LIM FAMILY TRUST
1004 FOOTHILL BLVD
La Canada Flintridge, CA 91011

5814-008-028
LIM FAMILY TRUST
1004 FOOTHILL BLVD
La Canada Flintridge, CA 91011

5814-009-013
928 930 FOOTHILL BOULEVARD
LLC
4417 Oakwood Ave
La Canada Flintridge, CA 91011

5814-009-025
WINCHELLS DONUT HOUSE
OPERATING CO
CENTURY BLVD
LOS ANGELES, CA 90045

5820-001-008
FOOTHILL 91011 LLC
3009 MANHATTAN AVE
LA CRESCENTA, CA 91214

5820-001-014
LA CANADA THURSDAY CLUB
PO BOX 282
La Canada Flintridge, CA 91011

5815-021-038
PARENTS AND CHILDRENS
NURSERY SCHOOL
4603 INDIANOLA WAY
La Canada Flintridge, CA 91011

5815-021-010
ERCC TRUST
4532 RINETTI LN
La Canada Flintridge, CA 91011

5815-021-011
KAMDIN PROPERTIES LLC
201 Bay Ave
Newport Beach, CA 92661

5820-001-002
FOOTGOULD III LLC
PO BOX 5159
Pasadena, CA 91117

5820-001-003
FOOTGOULD I LLC
PO BOX 5159
Pasadena, CA 91117

5815-022-002
RAYMOND LEE TRUST
4522 INDIANOLA WAY
La Canada Flintridge, CA 91011

5815-022-003
JOSEPH FAMILY TRUST
4339 Chevy Chase Dr
La Canada Flintridge, CA 91011

5815-022-004
JOSEPH FAMILY TRUST
4339 Chevy Chase Dr
La Canada Flintridge, CA 91011

5815-021-033
WORLD SAVINGS BANK FSB
PO BOX 2609
CARLSBAD, CA 92018

5823-001-016
LA CANADA UNITED METHODIST
CHURCH
104 BERKSHIRE PL
La Canada Flintridge, CA 91011

5810-023-001
Church of Jesus Christ of Latter Day
Saints
50 North Temple
Salt Lake City, UT 84150

5814-027-019
LA CANADA Presbyterian Church
626 Foothill Blvd
La Canada Flintridge, CA 91011

5814-018-030
ST GEORGES EPISCOPAL
CHURCH
4467 Commonwealth Ave
La Canada Flintridge, CA 91011

5813-006-022
EVANGELICAL LUTHERAN CHURCH
1700 FOOTHILL BLVD
La Canada Flintridge, CA 91011

5813-015-055
La Canada Congregational Church
1200 Foothill Blvd
La Canada Flintridge, CA 91011

5870-001-013
LA CANADA ASSOCIATES LLC
11812 San Vicente Blvd, Suite 500
Los Angeles, CA 90049

5870-001-014
LA CANADA ASSOCIATES LLC
11812 San Vicente Blvd, Suite 500
Los Angeles, CA 90049

5870-001-015
F AN M ALSKAF TRUST
3405 KILDARE CT
Burbank, CA 91504

5870-001-016
Lorel Properties LLC
9135 86th Way
Scottsdale, AZ 85258

5870-001-017
AAB LLC
2137 Foothill Blvd
La Canada Flintridge, CA 91011

5870-001-018
SIMPLICIO TRUST
11907 Louise Ave
Granada Hills, CA 91344

5870-010-046
Lippman La Canada LLC
1021 Hilts Ave
Los Angeles, CA 90024

5870-010-043
LA CANADA ENTERPRISE LL
PO BOX 1248
La Canada Flintridge, CA 91011

5870-010-044
GTR REALTY LLC
PO BOX 990
MINNEAPOLIS, MN 55440

5870-010-045
GTR REALTY LLC
PO BOX 1046
La Canada Flintridge, CA 91011

5870-011-056
Lee Family Trust
817 CHEHALEM RD
La Canada Flintridge, CA 91011

5870-011-057
Lee Family Trust
87 Chehalm Rd
La Canada Flintridge, CA 91011

5810-014-002
Berkman Family Trust
101 Exeter Ave
San Carlos, CA 94070

5810-014-003
LA CANADA ENTERPRISE LLC
PO BOX 1248
La Canada Flintridge, CA 91011

5810-014-004
LA CANADA ENTERPRISE LLC
PO BOX 1248
La Canada Flintridge, CA 91011

5808-008-020
Robert Ford
PO BOX 10563
Glendale, CA 91209

5808-008-021
Robert Ford
PO BOX 10563
Glendale, CA 91209

5814-028-009
600 FOOTHILL OWNER LP
4811 Palm Dr
La Canada Flintridge, CA 91011

5810-015-016
WINKAL HOLDINGS L L C
10 RYE RIDGE PLAZA
Rye Brook, NY 10573

5810-015-015
WINKAL HOLDINGS L L C
10 RYE RIDGE PLAZA
Rye Brook, NY 10573

5810-014-018
Khatchaturian Family Trust
3302 Deer Creek Ln
Glendale, CA 91208

5810-014-019
Khatchaturian Family Trust
3302 Deer Creek Ln
Glendale, CA 91208

5810-014-020
EUCLID ROMNEYA CO
1860 Cottontail Creek Rd
Cayucos, CA 93430

5810-014-021
EUCLID ROMNEYA CO
1860 Cottontail Creek Rd
Cayucos, CA 93430

5813-005-074
University of Southern California
620 McCarthy Way
Los Angeles, CA 90089

5820-009-017
ESHAGHZADEH FAMILY LTD PTNSHP
631 Olive St
Los Angeles, CA 90014

5820-009-021
ESHAGHZADEH FAMILY LTD PTNSHP
631 Olive St
Los Angeles, CA 90014

5820-009-016
KAZANJIAN TRUST
662 Starlight Crest Dr #310
Pasadena, CA 91101

5820-009-014
CLUB CHAMPION PRESENTS LLC
145 Vista Ave
Pasadena, CA 91107

5820-009-019
GOODYEAR TIRE AND RUBBER CO
1144 MARKET ST
AKRON, OH 44316

5814-0180-029
ST GEORGES EPISCOPAL CHURCH
4467 Commonwealth Ave
La Canada Flintridge, CA 91011

5814-018-017
ST GEORGES EPISCOPAL CHURCH
4467 Commonwealth Ave
La Canada Flintridge, CA 91011

5814-018-018
ST GEORGES EPISCOPAL CHURCH
4467 Commonwealth Ave
La Canada Flintridge, CA 91011

5814-018-019
ST GEORGES EPISCOPAL CHURCH
4467 Commonwealth Ave
La Canada Flintridge, CA 91011

5810008019
Schaefer Funds LLC
14250 Ventura Blvd
Sherman Oaks, CA 91423

5810008020
Schaefer Funds LLC
14250 Ventura Blvd
Sherman Oaks, CA 91423

5810008052
Schaefer Funds LLC
14250 Ventura Blvd
Sherman Oaks, CA 91423

5810008054
Schaefer Funds LLC
14250 Ventura Blvd
Sherman Oaks, CA 91423

5870011048
Kurt and Cherie Alvord
4515 Ocean View Blvd
La Canada Flintridge, CA 91011

5870011022
Kurt and Cherie Alvord
4515 Ocean View Blvd
La Canada Flintridge, CA 91011

5870011053
Kurt and Cherie Alvord
4515 Ocean View Blvd
La Canada Flintridge, CA 91011

5870011047
Arlak Inc
PO Box 10783
Beverly Hills, CA 90213

5870011049
Arlak Inc
PO Box 10783
Beverly Hills, CA 90213

5870011055
Arlak Inc
PO Box 10783
Beverly Hills, CA 90213

5810009002
Jehovah's Witness Church
4450 Brigss Ave
Montrose, CA 91020

5810009001
Jehovah's Witness Church
4450 Brigss Ave
Montrose, CA 91020

5810009009
M and N Kisacky Trust
318 San Juan Way
La Canada Flintridge, CA 91011

5810009029
Fanticola Ltd Partership
1422 Edinger Avenue
Tustin, CA 92780

5870010037
NUBY M AND SUSANA SERIJAN
22621 Quinta Road
Woodland Hills, CA 91364

5810013001
Piazza Family Trust
611 Verdugo Blvd
Glendale, CA 91206

5810013002
Piazza Family Trust
611 Verdugo Blvd
Glendale, CA 91206

5810013031
2258 Foothill Blvd LLC
2320 Mountain Avenue
La Crescenta, CA 91214

5810014052
Zentmyer Properties
1434 Foothill Blvd
La Canada Flintridge, CA 91011

5810014053
Zentmyer Properties
1434 Foothill Blvd
La Canada Flintridge, CA 91011

5810014051
Zentmyer Properties
1434 Foothill Blvd
La Canada Flintridge, CA 91011

5870008024
ANRU MANAGEMENT LLC
1143 Sweetbriar Dr
Glendale, CA 91206

5870008025
Christopher Wessing & Asuka Morikami
4510 Castle Rd
La Canada Flintridge, CA 91011

5870008026
ANRU MANAGEMENT LLC
1143 Sweetbriar Dr
Glendale, CA 91206

5870008001
Driscoll Trust
4535 Viro Rd
La Canada Flintridge, CA 91011

5870008002
CASTLE ROAD INVESTMENTS LLC
PO BOX 55333
Sherman Oaks, CA 91413

5808006009
HOWARD A RENMAN TRUST
601 Glenoaks Blvd
Glendale, CA 91207

5808006022
JOSEPH FAMILY TRUST
4439 Chevy Chase Blvd
La Canada Flintridge, CA 91011

5813007001
CHARLES T MIDGLEY TRUST
27370 Dartmouth St
Hemet, CA 92544

5813007003
Locker Family Trust
601 Glenoaks Blvd
Glendale, CA 91207

5813007018
APPLE CART INC
1512 Foothill Blvd
La Canada Flintridge, CA 91011

5812003004
LACY PARK REAL ESTATE
INVESTMENT LLC
1421 PASQUALITO DR
San Marino, CA 91108

5812003028
COSTA BARGELIOTES TRUST
2016 Oak St
Santa Monica, CA 90405

5812006019
1433 FOOTHILL BOULEVARD LP
1708 Grand View Blvd
Glendale, CA 91201

5812006020
1433 FOOTHILL BOULEVARD LP
1708 Grand View Blvd
Glendale, CA 91201

5812007027
VISIONARY VENTURES LLC
1419 Foothill Blvd
La Canada Flintridge, CA 91011

5812007028
VISIONARY VENTURES LLC
1419 Foothill Blvd
La Canada Flintridge, CA 91011

5812007025
VISIONARY VENTURES LLC
1419 Foothill Blvd
La Canada Flintridge, CA 91011

5812007026
VISIONARY VENTURES LLC
1419 Foothill Blvd
La Canada Flintridge, CA 91011

5812007024
1415 FOOTHILL BOULEVARD LLC
2108 Orange St
Alhambra, CA 91803

5812007023
HAMPARTZOUMIAN FAMILY TRUST
352 San Juan Way
La Canada Flintridge, CA 91011

5812007022
SCHUBERT FAMILY TRUST
1407 Foothill Blvd
La Canada Flintridge, CA 91011

5812007021
KENNETH & DONNA KAESER TRUST
3297 Dunsmere Rd
Glendale, CA 91206

5812007020
LEFEVRE CLAUDETTE DECD EST
OF
45 Woodlyn Rd
Bradbury, CA 91008

5812007019
BARMATZ AND SMALL TRUST
2304 Pickens Canyon Rd
La Crescenta, CA 91214

5812007018
GARY W KLEIN TRUST
1708 Grand Oaks Ave
Altadena, CA 91001

5812007017
OATES TRUST
1450 Shadow Mountain Ct
Auburn, CA 95602

5812007016
David Oates and Donald Oates
2740 SUNRISE DR
Meadow Vista, CA 95722

5812007015
CIANCIARULO TRUST
5775 SUMMIT CREST DR
La Canada Flintridge, CA 91011

5812007014
CIANCIARULO TRUST
5775 SUMMIT CREST DR
La Canada Flintridge, CA 91011

5812007012
FARESTVEIT FAMILY TRUST
1351 Foothill Blvd
La Canada Flintridge, CA 91011

5812007011
LUCILLE ALOSI TRUST
24469 Mockingbird Ct
Valencia, CA 91355

5813014034
Church of the Lighted Window
1200 Foothill Blvd
La Canada Flintridge, CA 91011

5813014032
GIRALDI TRUST LESSOR
128 Oak Knoll Ave
Pasadena, CA 91101

5813014028
GIRALDI TRUST LESSOR
128 Oak Knoll Ave
Pasadena, CA 91101

5813014023
GIRALDI TRUST LESSOR
128 Oak Knoll Ave
Pasadena, CA 91101

5812007043
Manny Mashoud, Knight Insurance
1327 Foothill Blvd
La Canada Flintridge, CA 91011

5812007035
DRISCOLL FAMILY TRUST
4535 Viro Rd
La Canada Flintridge, CA 91011

5812007042
1313 FOOTHILL BLVD LLC
1313 Foothill Blvd
La Canada Flintridge, CA 91011

5812021026
CAMPBELL FOOTHILL LLC
PO BOX 1058
Montrose, CA 91021

5813017002
PETROTTA FAMILY TRUST
1150 Foothill Blvd
La Canada Flintridge, CA 91011

5812022009
BALIJA FAMILY TRUST
19746 Paige Pl
Santa Clarita, CA 91350

5812022010
FRAZIER FAMILY TRUST
4646 Encinas Dr
La Canada Flintridge, CA 91011

5812022011
Peter and Pamela Glynn
2504 Harmony Pl
La Crescenta, CA 91214

5812022012 Amin Baltazar 7000 Estepa Drive Tujunga, CA 91042	5812022013 GEORGE & MARIA BALIJA TRUST 19746 Paige Pl Santa Clarita, CA 91350	5812022014 1117 Foothill Assoicates LLC 4932 Commonwealth Ave La Canada Flintridge, CA 91011
5812022015 JULIE DADAYAN/DAV MEG LLC 1010 N CENTRAL AVE Glendale, CA 91202	5812022041 Kaesler Family Trust 1135 Green lane La Canada Flintridge, CA 91011	5812022019 CANCELOSI FAMILY TRUST 4810 JANVIER WAY La Crescenta, CA 91214
5812022020 FOOTHILL & HILL PROPERTIES LLC 171 SAINT THOMAS WAY TIBURON, CA 94920	5812023030 BEAN FAMILY TRUST 3920 CALLE LOMA VISTA Newbury Park, CA 91320	5812023031 Flintridge Park Inc 4828 Tocalona Ln La Canada Flintridge, CA 91011
5812023015 SERENDIB HOLDINGS GROUP LLC 504 S. Sierra Madre Blvd Pasadena, CA 91107	5812023025 ANGELES CREST ASSOCIATES LLC 4529 Angeles Crest Hwy La Canada Flintridge, CA 91011	5812023011 ALLEN LUND CO LLC 4529 Angeles Crest Hwy La Canada Flintridge, CA 91011
5814002004 FERRANTE AND FRIENDS 1030 Foothill Blvd La Canada Flintridge, CA 91011	5814002005 KRUEGER PENG FAMILY TRUST 2025 Hayloft Pl Hacienda Heights, CA 91745	5814008027 1010 FOOTHILL LLC 1401 GLENCREST TERRACE Glendale, CA 91208
5815001026 LA CANADA LANDLORD LLC 4530 Angeles Crest Hwy La Canada Flintridge, CA 91011	5815001029 BURBANK AIRPORT CORPORATION 5134 Kanan Rd Agoura Hills, CA 91301	5815-00-041 LA CANADA LANDLORD LLC 4530 Angeles Crest Hwy La Canada Flintridge, CA 91011
5815-013-012 SIGO GROUP MANAGEMENT LLC 1141 Fremont Ave South Pasadena, CA 91030	5815001037 La Canada Retail LLC 515 Figueroa St Los Angeles, CA 90071	5815001036 La Canada Retail LLC 515 Figueroa St Los Angeles, CA 90071
5815001035 La Canada Retail LLC 515 Figueroa St Los Angeles, CA 90071	5815001039 La Canada Retail LLC 515 Figueroa St Los Angeles, CA 90071	5815001034 La Canada Retail LLC 515 Figueroa St Los Angeles, CA 90071
5815013017 Mark Geragos 644 Figueroa St Los Angeles, CA 90017	5815013015 FIRST CHURCH OF CHRIST SCIENTIST PO BOX 741 La Canada Flintridge, CA 91011	5815013059 Caltech Employees Federal Credit Union PO BOX 11001 La Canada Flintridge, CA 91011
5815013060 Caltech Employees Federal Credit Union PO BOX 11001 La Canada Flintridge, CA 91011	5814009028 LA CANADA HOLDINGS 5 HUTTON CENTRE DR, SUITE 860 Santa Ana, CA 92707	5814018001 VENNERI FAMILY LLC 842 Foothill Blvd La Canada Flintridge, CA 91011

5814018002
VENNERI FAMILY LLC
842 Foothill Blvd
La Canada Flintridge, CA 91011

5814018003
VENNERI FAMILY LLC
842 Foothill Blvd
La Canada Flintridge, CA 91011

5814018004
VENNERI FAMILY LLC
842 Foothill Blvd
La Canada Flintridge, CA 91011

5814018005
R AND G APRAMIAN TRUST
105 Irvine Cove Ct
Laguna Beach, CA 92651

5814018006
VENNERI FAMILY LLC
842 Foothill Blvd
La Canada Flintridge, CA 91011

5814018020
GROVER GARLAND DECD TRUST
PO BOX 758
CARPINTERIA, CA 93014

5815014044
JPMORGAN CHASE BANK
1111 POLARIS PKWY
COLUMBUS, OH 43240

5815014008
KEITH E SERXNER TRUST
PO BOX 942
Genoa, NV 89411

5815014035
La Canada Real Property Holdings LLC
1811 EARLMONT AVE
La Canada Flintridge, CA 91011

5815014042
HOVIK KHATCHATURIAN TRUST
1412 Valley View Rd
Glendale, CA 91202

5815014041
HOVIK KHATCHATURIAN TRUST
1412 Valley View Rd
Glendale, CA 91202

5814019024
FRANKEL CHORUB CB LLC
9538 BRIGHTON WAY
BEVERLY HILLS, CA 90210

5814019001
VASILY INVESTMENTS LLC
3605 GREVE DR
RANCHO PALOS VERDES, CA 90275

5814028001
HAWGOOD FAMILY TRUST
211 INVERNESS DR
La Canada Flintridge, CA 91011

5815020032
ROIC CALIFORNIA LLC
PO BOX 130339
Carlsbad, CA 92013

5815020030
ROIC CALIFORNIA LLC
PO BOX 130339
Carlsbad, CA 92013

5815020031
CARESIO FAMILY TRUST
PO BOX 130339
Carlsbad, CA 92013

5815020023
Chevron USA
PO BOX 285
HOUSTON, TX 77001

5814028008
La Canada Presbyterian Church
626 Foothill Blvd
La Canada Flintridge, CA 91011

5820001009
Caltech Employees Fed Credit Union
PO BOX 11001
La Canada Flintridge, CA 91011

5820001015
Caltech Employees Fed Credit Union
PO BOX 11001
La Canada Flintridge, CA 91011

5820001002
FOOTGOULD III LLC
PO BOX 5159
Pasadena, CA 91117

5820001003
FOOTGOULD I LLC
PO BOX 5159
Pasadena, CA 91117

5820009015
FOUR STORE FRANKEL FAMILY LP
210 Palm Dr
La Canada Flintridge, CA 91011

5820009013
ESTHER L SNEED Trust
430 Foothill Blvd
La Canada Flintridge, CA 91011

5820009010
Ho Trust
400 Foothill Blvd
La Canada Flintridge, CA 91011

5819005016
Franchise Realty Interstate Corp
1150 Foothill Blvd
La Canada Flintridge, CA 91011

5819001025
LA CANADA REAL ESTATE INC
3840 KESWICK RD
La Canada Flintridge, CA 91011

5819001024
B K LA CANADA PROPERTY LLC
PO BOX 1818
MONROVIA, CA 91017

5819001029
B K LA CANADA PROPERTY LLC
PO BOX 1818
MONROVIA, CA 91017

5819001026
B K LA CANADA PROPERTY LLC
PO BOX 1818
MONROVIA, CA 91017

5815022020
Frankel Chorub La Canada Center LLC
9538 BRIGHTON WAY
BEVERLY HILLS, CA 92210

5815021012
4522 Rinetti LLC
845 Foothill Blvd
La Canada Flintridge, CA 91011

5815021037
PADOVA 84 LP
1554 Normandy Dr
La Canada Flintridge, CA 91011

5815021009
GILLESPIE FAMILY TRUST
4536 Rinetti Lane
La Canada Flintridge, CA 91011

5815022020
FRANKEL CHORUB CB LLC
9538 BRIGHTON WAY
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5819030008
FLINTRIDGE RIDING CLUB
4625 Oak Grove Drive
La Canada Flintridge, CA 91011

**Planning Commission
Meeting 08/25/22**



AGENDA ITEM 2

Planning Commission 08/25/2022



PLANNING COMMISSION STAFF REPORT

August 25, 2022 Hearing

Case Type/Numbers:

General Plan Amendment (PLAN-2022-0003) – 2021-2029 Housing Element

Applicant:

City of La Cañada Flintridge

Project Location:

Citywide

Project Planner:

Susan Koleda, AICP

Director of Community Development

1. Request:

General Plan Amendment (PLAN-2022-0003) is a request to adopt the 2021-2029 Housing Element, in compliance with state law.

2. Location:

The proposed General Plan Housing Element is a policy document that applies to properties citywide.

3. Staff Recommendation:

Staff recommends that the Planning Commission adopt the proposed resolution, recommending that the City Council adopt General Plan Amendment (PLAN-2022-0003) for the 2021-2029 Housing Element.

4. California Environmental Quality Act Review:

The project is exempt under the "Common Sense" exemption. The project is exempt pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA.

Any future project, including ordinances required to implement the 2021-2029 Housing Element or development projects will be reviewed for compliance with CEQA at the time submitted once sufficient project details are known.

Background: All jurisdictions within California are mandated by state law to prepare a Housing Element every eight years. The City's existing Housing Element was adopted in February 2014 and expired in October 2021. This update covers the housing planning period between 2021 and 2029, referred to as the 6th Cycle. The Housing Element must be reviewed and found to be in compliance with state law by the California Department of Housing and Community Development (HCD).

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. RHNA quantifies the need for housing within each jurisdiction during specified planning periods. For the 6th cycle, the Southern California Association of Governments (SCAG) received a need of 1,341,827 housing units, which was distributed to all 197 SCAG jurisdictions. The City of La Cañada Flintridge received a total of 612 units, which are distributed by income level, including 252 units for very low income, 135 units for lower income, 139 units for moderate income, and 86 units for above moderate income. The Housing Element Update provides the capacity needed to accommodate the RHNA for the planning period.

Statutory Requirements: State law requires a Housing Element to include:

- An analysis of population and employment trends;
- An analysis of household characteristics;
- An inventory of suitable land for residential development;
- An identification of a zone or zones where emergency shelters are permitted by right;
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing;
- An analysis of special housing needs;
- An analysis of opportunities for energy conservation;
- An analysis of publicly assisted housing developments that may convert to non-assisted housing developments; and
- An assessment of fair housing practices in order to develop policies and programs designed to affirmatively further fair housing.

Recent changes to State law have imposed new requirements for the 2021-2029 Housing Element. This has introduced substantial challenges to the City's ability to identify sites to accommodate the required RHNA allocation. New Housing Element requirements include:

1. Higher RHNA Allocations: The City's 2014-2021 Housing Element RHNA allocation was a total of 112 units. Comparatively, the 2021-2029 Housing Element RHNA allocation is a total of 612 units, over five times higher than the previous element's allocation.

2. **Affirmative Further Fair Housing (AFFH):** Assembly Bill (AB) 686, which became effective in 2018, is a statewide framework to Affirmatively Further Fair Housing (AFFH). The objective is to promote inclusive communities, further housing choice and address racial and economic disparities through government programs, policies, and operations. AB 686 defines “affirmatively furthering fair housing” to mean “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities and other protected classes. The bill added an assessment of fair housing to the Housing Element Update, which includes the following components: a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities; an assessment of contributing factors; and an identification of fair housing goals and actions. See Appendix D – Assessment of Fair Housing of Attachment 2 for the full AFFH assessment.
3. **Eligible Lower-Income Sites:** There are new regulations on whether a City can reuse sites included in previously adopted Housing Elements. There is also increased scrutiny when using small and/or non-vacant sites to accommodate units for very lower- and low-income households.
4. **No Net Loss:** A 2017 amendment to Government Code Section 65863 (No Net Loss) requires that jurisdictions preserve sufficient and available sites for lower-income housing throughout the RHNA planning period at all times. The City cannot permit the reduction of residential density for any site unless the reduction is consistent with the adopted General Plan, including the Housing Element. Additionally, if the City allows development of any site with less units by income level than identified in the Housing Element for that site, it must determine if the remaining sites identified in the housing element are adequate to meet that need by income level. If sites identified for lower-income housing are developed with less units than identified in the Housing Element or developed for a higher income group, the City shall either identify and rezone adequate substitute sites or demonstrate that the land inventory already contains adequate substitute sites so that there is no net loss of residential unit capacity.

Organization: The Housing Element is organized into five primary chapters:

9.1 – Introduction: Provides an overview of the purpose, scope, and organization of the Housing Element.

The Housing Element is an integral component of the City’s General Plan that addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the city’s housing needs

9.2 – Community Profile: Provides a summary of the City’s demographic and housing characteristics, and associated housing needs.

The city saw a slight increase of approximately 21 dwelling units between 2013 and 2020. There were a total of 6,423 households in the city in 2019, a decrease of 6.2 percent from 2010. While housing stock is relatively stable, the city has experienced changes in its population characteristics, which impacts housing needs. For example, while the city’s population grew by only 1.1 percent between 2010 and 2020, it has seen a considerable increase in its Asian population, growing from 26 percent to 31 percent between 2010 and 2019.

The age distribution in the community has also shifted over the period. Between 2010 and 2019, the median age in the community decreased slightly from 45.9 to 45.1 years. In 2010 seniors 55 years and over accounted for 31 percent of the population, with this proportion increasing to 35 percent between 2010 and 2019 as persons in their 50s and early 60s aged in place. The city currently lacks housing options tailored for seniors.

Home prices in La Cañada Flintridge are significantly higher than those in most surrounding communities, with the typical sales price as of July 30, 2021 for a single-family home in the middle price tier at nearly \$2 million. As of August 16, 2021, only three properties were available for rent in the city. One two-bedroom apartment was available for \$2,495/month, and two four-bedroom single-family homes were offered for rent at \$7,000/month and \$9500/month. Land, environmental, and infrastructure constraints combine to keep land prices high, and housing growth has not occurred aside from the construction of accessory dwelling units on single-family parcels.

La Cañada Flintridge’s median household income, which is \$175,788, is significantly higher than the median incomes of all neighboring communities. Approximately 77 percent of households in the city are classified as above moderate income. A total of 438 households are considered extremely low-income, or approximately 6.7% of all city households.

34.88 percent of La Cañada Flintridge households were overpaying for housing during the period 2013-2017. The percentage of households overpaying was significantly higher for lower-income households compared to those with higher incomes.

The composition of the city’s housing stock has remained virtually unchanged, with single-family detached homes comprising the majority of the housing stock in La Cañada Flintridge (92 percent). The remaining share of homes consists of mobile homes, multi-family units, and single-family attached units, which together accounted for approximately eight percent of units.

Special needs populations in La Cañada Flintridge include seniors, persons with disabilities, large households, single-parent households and farmworkers. Senior-headed households (34.3%) were the largest special needs group in the City, followed by persons aged 65 and older (18.7%) and large households with five or more persons (12.7%). The American Community Survey estimates that 2,879 residents (14.1 percent of the

population) in La Cañada Flintridge had one or more disabilities in 2019. The majority of the city's disabled population is comprised of seniors with self-care and independent living difficulties. The 2010 Census counted 2,738 family households with children under 18 years of age. The Greater Los Angeles Homeless Count conducted in January 2020 showed that there were two people experiencing homelessness in La Cañada Flintridge.

9.3 – Housing Constraints: Provides an assessment of the various constraints to housing development and preservation.

State law requires cities to identify governmental constraints to the production of housing such as land use regulations, housing policies, fees, zoning and other factors that influence the price and availability of housing opportunities. Specifically, the Housing Element Update must analyze land use controls, fees and exactions, on- and off-site improvement requirements, building codes and their enforcement, permit and processing procedures, and potential constraints on the developments or improvements of housing for persons with disabilities. It was found that some of the development standards, specifically height and how it is measured and parking, create unnecessary constraints to housing development. The Zoning Code Update will be addressing these constraints.

Non-governmental constraints must also be analyzed, including the availability and cost of land, as well as construction. These constraints are often out of the City's control and can result in housing that is not affordable to low- and moderate-income households.

9.4 – Housing Opportunities and Resources: Provides an inventory of resources available for meeting the City's existing and projected housing needs.

Housing Resources refer to land, financial and administrative resources that are available to assist the City in meeting its housing needs. The city is predominantly built out and lacks significant vacant land for new housing. Thus, the Housing Element must identify underutilized parcels (residential or nonresidential) that have or will have land use designations, zoning, and appropriate development standards in place to facilitate the construction of new housing. The Housing Element Update identifies sites to accommodate the projected housing needs, on both the north and south sides of Foothill Boulevard, and one site along Oak Grove Drive. Sites were identified and parcel-specific analysis was conducted on properties to identify vacant and underutilized properties.

La Cañada Flintridge's share of regional future housing needs is a total of 612 new units for the 2021-2029 RHNA period (from June 30, 2021, through October 15, 2029). This allocation is distributed into four income categories, as shown below. The RHNA includes a fair share adjustment which allocates future need by each income category in a way that meets the state mandate to reduce over-concentration of lower income households in historically lower income communities or areas within the region.

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less)*	126	20.6%
Very Low (31 to 50%)	126	20.6%
Low (51 to 80%)	135	22.0%
Moderate (81% to 120%)	139	22.7%
Above Moderate (Over 120%)	86	14.1%
Total	612	100.0%

Source: Final Regional Housing Needs Allocation, SCAG, March 2021.

AMI = Area Median Income (\$77,300 for 4-person household)

* “extremely low-income households” is a subset of “very low-income households”

In May 2020, the City adopted new regulations for Accessory Dwelling Units (ADUs) to comply with state legislation, including AB 68, AB 881, AB 587, AB 671, and SB 13. This legislation promotes the construction of new ADUs and Junior ADUs and limits the ways cities can regulate their design. The increase in approvals of ADUs in 2020, 2021 and 2022 indicates that the updated regulations have incentivized ADUs and the City will work to incentivize new ADUs and provide an amnesty program for currently unpermitted ADUs to accommodate additional housing units within the city. It is anticipated that 120 ADUs will be credited toward the RHNA requirement over the 2021-2029 housing cycle.

However, to accommodate the total RHNA and the appropriate buffer required, rezoning will have to occur. This will include increasing the minimum residential density of the R-3 (Multifamily) and Mixed Use zones to 25 dwelling units per acre (du/ac), increasing the density of some Mixed Use 1 and Mixed Use 2 parcels within the Downtown Village Specific Plan (DVSP) to 12-15 du/ac and increasing the density of other Mixed Use 1 and Mixed Use 2 parcels within the DVSP to 25-30 du/ac. In addition, a new Religious Institution Overlay Zone (RIOZ) would be created with a density of 25-30 du/ac.

9.5 – Housing Plan: Outlines the City’s commitments to providing and preserving housing opportunities in the community. The section includes Goals and Policies, Housing Programs and Quantified Objectives.

The following major issue areas are addressed by the goals and policies of the Housing Element:

- Provide a wide variety of housing types to meet the needs of existing and future residents;
- Ensure that existing housing is maintained and preserved;
- Facilitate housing for lower- and moderate income households and those with special needs;
- Ensure compatibility with the natural and built environment and the safety of persons and property; and
- Promote equal housing opportunity for all (affirmatively further fair housing) in accordance with California Government Code Section 8899.50(b).

The goals and policies contained in the Housing Element address La Cañada Flintridge's identified housing needs and are implemented through a series of housing programs offered through the Community Development Department and the Division of Building and Safety. Housing programs define the specific actions the City will undertake to achieve the stated goals and policies within the eight-year (2021-2029) planning period. La Cañada Flintridge's housing programs address the following five major focus areas:

- Provide new housing opportunities;
- Conserve and maintaining existing housing;
- Facilitate the provision of housing for lower and moderate-income and special needs households;
- Ensure environmental sensitivity and community safety; and
- Promote equal housing opportunity

The Housing Element includes 22 programs, with each incorporating quantified objects and timeframes, the responsible agency and funding sources. The programs are as outlined below.

PROGRAM 1: Adequate Residential Sites to Accommodate the RHNA

1. Rezoning of Adequate Sites
2. Rezoning of Adequate Sites in the DVSP
3. Information

PROGRAM 2: No Net Loss

1. Sites Monitoring Program
2. Additional Sites
3. Sites Information

PROGRAM 3: Governmental Constraints to Housing Development

1. Development Standards
2. Objective Design Standards
3. Permits
4. Residential as an Allowable Use in the MU Zone
5. "Round Up" Density Calculation
6. Permit Fees
7. Modification of DVSP
8. SB 35 Implementation
9. Monitoring
10. Outreach

PROGRAM 4: Downtown Village Specific Plan (DVSP)

1. Rezoning of Adequate Sites in the DVSP
2. Residential as an Allowable Use
3. Development Standards
4. Objective Design Standards
5. Land Use

6. Outreach

PROGRAM 5: Religious Institution Housing Overlay Zone

1. Adopt a Religious Institution Housing Overlay (RI-OZ)
2. Update Parking Requirements
3. RI-OZ Information and Outreach

PROGRAM 6: By-Right Approval for Projects with 20 Percent Affordable Units

1. Administrative Process of Lot Consolidation
2. Sites Identification of Potential Lot Mergers
3. Fee Reduction for Lot Mergers

PROGRAM 8: Accessory Dwelling Units (ADUs)

1. Changes in State ADU Law
2. Programs to Facilitate ADU Construction
3. ADU Monitoring Program
4. ADU Amnesty Program
5. ADU Information

PROGRAM 9: Code Enforcement (Community Preservation)

1. Residential Maintenance
2. Information

PROGRAM 10: Residential Rehabilitation Program (RRP)

1. Advertising and Targeting Outreach
2. Information
3. Funding
4. Review of the RRP

PROGRAM 11: Sewer Connection Grant Program

1. Funding
2. SB 1087
3. Advertising and Outreach
4. Review of the Sewer Connection Grant Program

PROGRAM 12: Condominium Conversion Ordinance

1. Update the Condominium Conversion Ordinance
2. Continue to enforce condominium conversion regulations

PROGRAM 13: Multi-Family Housing Acquisition and Rehabilitation

1. San Gabriel Valley Regional Housing Trust Fund

PROGRAM 14: Density Bonus

1. Affordable Housing Density Ordinance
2. Promote Density Bonus Incentives

PROGRAM 15: Special Needs Housing

1. Emergency Shelters
2. Low Barrier Navigation Center
3. Permanent Supportive Housing
4. Large Group Homes
5. Reasonable Accommodation
6. Monitoring

PROGRAM 16: Senior and Workforce Housing

1. Opportunity Sites
2. Funding Assistance
3. Support
4. Affordable Housing

PROGRAM 17: Mortgage Credit Certificate (MCC) Program and PROGRAM 18: Home Ownership Program (HOP)

1. Advertisement
2. Awareness

PROGRAM 19: Housing Choice Voucher Program

1. Participation
2. Promotion

PROGRAM 20: Energy Use and Greenhouse Gas Emissions Reduction

1. Implementation
2. Update
3. Expand Resources
4. Construction and Demolition Debris Management
5. Green Task Force

PROGRAM 21: Community Safety

1. Fire Safe Design
2. ADU/JADU Limitations

PROGRAM 22: Removal of Racial Covenants

1. Instructions

PROGRAM 22: Removal of Racial Covenants

See Table of Actions (Table HE-20. AFFH Meaningful Actions Matrix)

Future Actions: Upon approval by the Planning Commission, the 2021-2029 Housing Element will be forwarded to the City Council for approval. Once approved by the City Council, it will be forwarded to HCD for review and certification.

HCD Review: The attached 2021-2029 Housing Element is the second version that will be submitted to HCD. The first version, submitted in October 2021, was reviewed by HCD

and comments were provided to the City via a letter dated December 3, 2021. All comments have been addressed within the second version of the Housing Element. The consultant will prepare a response to HCD with a matrix of the comments and how the Housing Element has been revised to address each comment.

Recommendation: Staff recommends that the Planning Commission take the following action:

1. Adopt a Resolution Recommending that the City Council approved General Plan Amendment (PLAN-2022-0003) for the 2021-2029 Housing Element

Attachments:

1. Resolution No. 22-51
2. 2021-2029 Housing Element

Attachment 1



RESOLUTION NO. 22-51

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF LA CAÑADA FLINTRIDGE RECOMMENDING THAT THE CITY COUNCIL APPROVE GENERAL PLAN AMENDMENT (PLAN-2022-0003) ADOPTING THE 2021-2029 HOUSING ELEMENT UPDATE AND FIND THE PROJECT EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, in accordance with California state law, the City of La Cañada Flintridge (the "City") adopted an updated General Plan in 2013, a legislative act which serves as a comprehensive, long-term plan to guide the physical development of the City and serves as the official statement of policies governing all City Council, advisory commission, and administrative decisions regarding zoning and land use, subdivisions, and public improvements; and

WHEREAS, the State of California Government Code Section 65588 requires the review and adoption of a Housing Element that may be updated according to the Southern California Association of Governments Regional Housing Needs Assessment ("RHNA") planning cycle; and

WHEREAS, the State of California Government Code Section 65583(c)(9) requires that local jurisdictions make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort, the City conducted two virtual stakeholder sessions on March 5, 2021, held two Planning Commission study sessions on May 11, 2021 and September 14, 2021, held a special City Council meetings on February 8, 2022, meet with industry professionals on February 18, 2022, conducted a Planning Commission workshop on March 10, 2022, held a joint City Council/Planning Commission workshop on April 5, 2022, posted a Regional Housing Needs Assessment (RHNA) video on the City's website on April 25, 2022, directly contacted property owners that could potentially be included on the Sites Inventory on June 20, 2022 and July 14, 2022, and posted the revised Sites Inventory for public review and comment on the City's website from July 20-29, 2022. Comments provided and issues raised during these public participation events were addressed in the 2021-2029 Housing Element; and

WHEREAS, on October 3, 2021 a draft of the 2021-2029 Housing Element was submitted to the California Department of Housing and Community Development (HCD) and on December 3, 2021, per Government Code Section 65585(b), a response/comment letter from the HCD was received by Staff for the review of the draft 2021-2029 Housing Element. The document has been revised to comply with State housing element law (Article 10.6 of the Government Code) and the comments received from HCD; and

WHEREAS, based on the age and condition of non-residential structures on nonvacant sites, as well as the likelihood of commercial uses on nonvacant sites converting to mixed-use or residential developments due to the continued decline of retail- only uses, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be integrated with new residential uses or discontinued during the planning period, and therefore are not considered significant impediments to additional residential development during the period covered by the 2021-2029 Housing Element; and

WHEREAS, on August 25, 2022, the Planning Commission held a duly-noticed public hearing, at which time all interested parties were given an opportunity to be heard and present evidence on the 2021-2029 Housing Element Update; and

WHEREAS, this Planning Commission duly authorizes City Manager or Community Development Director to make minor amendments to the Housing Element to correct inconsistencies within the document and recommends that the City Council duly authorize the City Manager or Community Development Director to make iterative changes to the Housing Element in response to comments from HCD to support State certification of the 2021-2029 Housing Element; and

WHEREAS, the adoption of the 2021-2029 Housing Element is exempt under the "Common Sense" exemption of the California Environmental Quality Act (CEQA). The project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA. Any future project, including ordinances required to implement the 2021-2029 Housing Element or development projects will be reviewed for compliance with CEQA at the time submitted once sufficient project details are known; and

WHEREAS, all legal prerequisites for the adoption of this Resolution have occurred.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF LA CAÑADA FLINTRIDGE DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The Planning Commission finds and determines that the above recitals are true and correct and are incorporated herein by reference.

SECTION 2. The Planning Commission hereby recommends that the City Council adopt General Plan Amendment (PLAN-2022-0003) adopting the 2021-2029 Housing Element and find that the project is exempt from the provisions of the California Environmental Quality Act.

PASSED, APPROVED and ADOPTED this 25th day of August, 2022.

Henry Oh
Chair

ATTEST:

Susan Koleda, AICP
Secretary to the Planning Commission

Special City Council Meeting
09/12/22

CITY COUNCIL AGENDA REPORT

MEETING DATE: September 12, 2022

SUBJECT: Approval of General Plan Amendment (PLAN-2022-0003) adopting the Draft 2021-2029 Housing Element

PRESENTER: Susan Koleda, Director of Community Development

PROPOSED ACTION: Motion to hold a public hearing on the Draft 2021-2029 Housing Element, adopt the proposed Resolution approving General Plan Amendment (PLAN-2022-0003) adopting the Draft 2021-2029 Housing Element and direct staff to forward the Adopted Housing Element to the Department of Housing and Community Development

ENVIRONMENTAL IMPACT: The project is exempt under the "Common Sense" exemption. The project is exempt pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that the Housing Element adoption would have a significant effect on the environment and will not result in any changes in the existing physical environment, therefore, is not subject to CEQA.

FISCAL IMPACT: Undetermined at the current time. Implementation of the 2021-2029 Housing Element includes multiple Zoning Code amendments as well as ongoing outreach and implementation actions to meet the metrics of the Affirmatively Furthering Fair Housing Meaningful Actions Matrix (Table HE-50). Staffing needs will be evaluated and may result in a request for an additional planner to be presented to the City Council at a future date.

SUMMARY: Staff and CityPlace Planning, the City's consultant, have been working on the 2021-2029 Housing Element since December 2020. The first draft of the Housing Element was submitted to the HCD in October 2021. On December 3, 2021, HCD issued a letter requesting

revisions. The requested revisions have been incorporated into the second draft Housing Element, which was reviewed and recommended for adoption by the Planning Commission on August 25, 2022. Once adopted by the City Council, the second draft Housing Element will be submitted to HCD for review.

DISCUSSION: All jurisdictions within California are mandated by state law to prepare a Housing Element every eight years. This update covers the housing planning period between 2021 and 2029, referred to as the 6th Cycle. The Housing Element must be reviewed and found to be in compliance with state law by the California Department of Housing and Community Development (HCD).

Statutory Requirements

State law requires a Housing Element to include:

- An analysis of population and employment trends;
- An analysis of household characteristics;
- An inventory of suitable land for residential development;
- An identification of a zone or zones where emergency shelters are permitted by right;
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing;
- An analysis of special housing needs;
- An analysis of opportunities for energy conservation;
- An analysis of publicly assisted housing developments that may convert to non-assisted housing developments; and
- An assessment of fair housing practices in order to develop policies and programs designed to affirmatively further fair housing.

Recent changes to State law have imposed new requirements for the 2021-2029 Housing Element. This has introduced substantial challenges to the City's ability to identify sites to accommodate the required Regional Housing Needs Allocation (RHNA). New Housing Element requirements include:

1. **Higher RHNA Allocations:** The City's 2014-2021 Housing Element RHNA allocation was a total of 112 units. Comparatively, the 2021-2029 Housing Element RHNA allocation is a total of 612 units, over five times higher than the previous element's allocation.
2. **Affirmative Further Fair Housing (AFFH):** Assembly Bill (AB) 686, which became effective in 2018, is a statewide framework to Affirmatively Further Fair Housing (AFFH). The objective is to promote inclusive communities, further housing choice and address racial and economic disparities through government programs, policies, and operations. AB 686 defines "affirmatively furthering fair housing" to mean "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities and other protected classes. The bill added an assessment of fair housing to the Housing Element Update, which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and

outreach capacity; an analysis of segregation patterns and disparities in access to opportunities; an assessment of contributing factors; and an identification of fair housing goals and actions.

3. Eligible Lower-Income Sites: There are new regulations on whether a City can reuse sites included in previously adopted Housing Elements. There is also increased scrutiny when using small and/or non-vacant sites to accommodate units for very low- and low-income households.
4. No Net Loss: A 2017 amendment to Government Code Section 65863 (No Net Loss) requires that jurisdictions preserve sufficient and available sites for lower-income housing throughout the RHNA planning period at all times. The City cannot permit the reduction of residential density for any site unless the reduction is consistent with the adopted General Plan, including the Housing Element. Additionally, if the City allows development of any site with less units by income level than identified in the Housing Element for that site, it must determine if the remaining sites identified in the housing element are adequate to meet that need by income level. If sites identified for lower-income housing are developed with less units than identified in the Housing Element or developed for a higher income group, the City shall either identify and rezone adequate substitute sites or demonstrate that the land inventory already contains adequate substitute sites so that there is no net loss of residential unit capacity. For these reasons, more sites than necessary to accommodate the RHNA are identified to provide an adequate buffer.

Public Participation

Government Code Section 65583(c)(9) requires that local jurisdictions make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort. In compliance with this requirement, community meetings, public workshops, public meetings and outreach on the Draft Housing Element were held on the following dates:

- March 5, 2021 - two virtual stakeholder sessions
- May 11, 2021 - Planning Commission workshop (via Zoom)
- September 14, 2021 - Planning Commission workshop (via Zoom)
- February 8, 2022 - Special City Council meeting
- February 18, 2022 - meet with industry professionals (virtual)
- March 10, 2022 - Planning Commission workshop
- April 5, 2022 - joint City Council/Planning Commission workshop

- April 25, 2022 - posted a Regional Housing Needs Assessment (RHNA) video on the City's website
- June 20, 2022 – direct mailed property owners that could potentially be included on the Sites Inventory
- July 14, 2022 - direct mailed property owners that could potentially be included on the Sites Inventory
- July 20-29, 2022 - posted the revised Sites Inventory for public review and comment on the City's website
- August 25, 2022 – Planning Commission public hearing
- September 2, 2022 – Second draft of 2021-2029 Housing Element posted on City website for public review and comment.

Notification of the stakeholder meetings and workshops were mailed to stakeholders such as housing advocates, developers, fair housing organizations. Notice of workshops and public meetings was published in the Outlook Valley Sun newspaper, posted on the City's website (www.cityoflcf.org) and at City Hall of meetings. Additionally, the City utilized its social media platforms to disseminate meeting information, as well as an e-mail distribution contact list. Due to the COVID-19 pandemic, online workshops/meetings and opportunities for engagement replaced the initial in-person meetings to meet social distancing requirements. All Planning Commission workshops and City Council meetings were recorded and broadcast on the City's government access channel and could be live-streamed or viewed later through the City website.

Sites Inventory

La Cañada Flintridge's share of regional future housing needs is a total of 612 new units for the 2021-2029 RHNA period (from June 30, 2021, through October 15, 2029). This allocation is distributed into four income categories. The RHNA includes a fair share adjustment which allocates future need by each income category in a way that meets the state mandate to reduce over-concentration of lower income households in historically lower income communities or areas within the region.

The city is predominantly built out and lacks significant vacant land for new housing. Thus, the Housing Element has identified underutilized parcels (residential and nonresidential) that have or will have land use designations, zoning, and appropriate development standards in place to facilitate the construction of new housing. The Housing Element Update identifies sites to accommodate the projected housing needs, on both the north and south sides of Foothill Boulevard, and one site along Oak Grove Drive. Sites must be distributed throughout the community to comply with the Affirmatively Furthering Fair Housing requirements of state law. Sites were identified based on numerous factors, including access to sewer and utilities, transportation and services, size (which may include combining several parcels). Lower income units must generally be accommodated on

sites with a minimum density of 20 dwelling units per acre. Additionally, identified sites must be free of known constraints, such as leases, and have a realistic opportunity to transition during the planning period. Single family residences were removed from the second draft of the Sites Inventory since there is no history of such uses transitioning to multifamily uses and to prevent existing homes from being identified as legal non-conforming, with the associated legal restrictions such a designation would bring.

To accommodate the total RHNA and the appropriate buffer required, rezoning will have to occur. This will include increasing the minimum residential density of the R-3 (Multifamily) and Mixed Use zones to 25 dwelling units per acre (du/ac) based on an economic analysis prepared by Michael Baker International, increasing the density of some Mixed Use 1 and Mixed Use 2 parcels within the Downtown Village Specific Plan (DVSP) to 12-15 du/ac and increasing the density of other Mixed Use 1 and Mixed Use 2 parcels within the DVSP to 25-30 du/ac. In addition, a new Religious Institution Overlay Zone (RI-OZ) would be created with a density of 25-30 du/ac. Typical objective development standards, such as setbacks, lot coverage, height, and objective design standards will be developed and will include numerous opportunities for public engagement after adoption of the Housing Element and identification of the density range.

A buffer of between 15-30 percent of the RHNA is also required by state housing law. The buffer proposed is 422 units, or 69%. A higher than required buffer is proposed to minimize opportunities for HCD require additional revisions to the Housing Element, to ensure that additional rezoning is not required during the planning period due to the time and expense associated with rezoning efforts, and to ensure that if the anticipated number and income distribution of Accessory Dwelling Units identified within the Housing Element is not achieved, there are adequate sites to cover any shortfall.

Organization

The Housing Element is organized into five primary chapters:

- 9.1 Introduction: Provides an overview of the purpose, scope, and organization of the Housing Element.
- 9.2 Community Profile: Provides a summary of the City's demographic and housing characteristics, and associated housing needs.
- 9.3 Housing Constraints: Provides as assessment of the various constraints to housing development and preservation.
- 9.4 Housing Opportunities and Resources: Provides an inventory of resources available for meeting the City's existing and projected housing needs.
- 9.5 Housing Plan: Outlines the City's commitments to providing and preserving housing opportunities in the community. The section includes Goals and Policies, Housing Programs and Quantified Objectives.

OPTIONS: 1. Motion to hold a public hearing on the Draft 2021-2029 Housing Element, adopt the attached Resolution approving General Plan Amendment (PLAN-2022-0003) adopting the Draft 2021-2029 Housing Element and direct staff to forward the Adopted Housing Element to the Department of Housing and Community Development.

2. Consider and provide direction to staff.

RECOMMENDATION: Option # 1 - Motion to hold a public hearing on the Draft 2021-2029 Housing Element, adopt the attached Resolution approving General Plan Amendment (PLAN-2022-0003) adopting the Draft 2021-2029 Housing Element and direct staff to forward the Adopted Housing Element to the Department of Housing and Community Development.

Attachments:

1. Resolution
2. 2021-2029 Housing Element

RESOLUTION NO. ____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA CAÑADA FLINTRIDGE APPROVING GENERAL PLAN AMENDMENT (PLAN-2022-0003) ADOPTING THE 2021-2029 HOUSING ELEMENT UPDATE AND FIND THE PROJECT EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, in accordance with California state law, the City of La Cañada Flintridge (the “City”) adopted an updated General Plan in 2013, a legislative act which serves as a comprehensive, long-term plan to guide the physical development of the City and serves as the official statement of policies governing all City Council, advisory commission, and administrative decisions regarding zoning and land use, subdivisions, and public improvements; and

WHEREAS, the State of California Government Code Section 65588 requires the review and adoption of a Housing Element that may be updated according to the Southern California Association of Governments Regional Housing Needs Assessment (“RHNA”) planning cycle; and

WHEREAS, the State of California Government Code Section 65583(c)(9) requires that local jurisdictions make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort, the City conducted two virtual stakeholder sessions on March 5, 2021, held two Planning Commission study sessions on May 11, 2021 and September 14, 2021, held a special City Council meetings on February 8, 2022, meet with industry professionals on February 18, 2022, conducted a Planning Commission workshop on March 10, 2022, held a joint City Council/Planning Commission workshop on April 5, 2022, posted a Regional Housing Needs Assessment (RHNA) video on the City’s website on April 25, 2022, directly contacted property owners that could potentially be included on the Sites Inventory on June 20, 2022 and July 14, 2022, and posted the revised Sites Inventory for public review and comment on the City’s website from July 20-29, 2022. Comments provided and issues raised during these public participation events were addressed in the 2021-2029 Housing Element; and

WHEREAS, on October 3, 2021 a draft of the 2021-2029 Housing Element was submitted to the California Department of Housing and Community Development (HCD) and on December 3, 2021, per Government Code Section 65585(b), a response/comment letter from the HCD was received by Staff for the review of the draft 2021-2029 Housing Element. The document has been revised to comply with State housing element law (Article 10.6 of the Government Code) and the comments received from HCD; and

WHEREAS, based on the age and condition of non-residential structures on nonvacant sites, as well as the likelihood of commercial uses on nonvacant sites converting to mixed-use or residential developments due to the continued decline of retail- only uses, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be integrated with new residential uses or discontinued during the planning period, and therefore are

not considered significant impediments to additional residential development during the period covered by the 2021-2029 Housing Element; and

WHEREAS, on August 25, 2022, the Planning Commission held a duly noticed public hearing, at which time all interested parties were given an opportunity to be heard and present evidence on the 2021-2029 Housing Element Update. After deliberating, the Planning Commission adopted Resolution No. 22-51 recommending that the City Council approve the General Plan Amendment adopting the 2021-2029 Housing Element; and

WHEREAS, on September 12, 2022, the City Council held a duly noticed public hearing, at which time all interested parties were given an opportunity to be heard and present evidence on the 2021-2029 Housing Element Update; and

WHEREAS, the City Council has considered said 2021-2029 Housing Element and all comments pertaining thereto, finds there have been no significant changes in said project and that the 2021-2029 Housing Element should be approved subject to any changes the City Council should insert in this Resolution; and

WHEREAS, the adoption of the 2021-2029 Housing Element is exempt under the "Common Sense" exemption of the California Environmental Quality Act (CEQA). The project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA. Any future project, including ordinances required to implement the 2021-2029 Housing Element or development projects will be reviewed for compliance with CEQA at the time submitted once sufficient project details are known; and

WHEREAS, all legal prerequisites for the adoption of this Resolution have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LA CAÑADA FLINTRIDGE DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The City Council finds and determines that the above recitals are true and correct and are incorporated herein by reference.

SECTION 2. The City Council hereby approves General Plan Amendment (PLAN-2022-0003) adopting the 2021-2029 Housing Element, which is hereby incorporated into the City of La Cañada Flintridge General Plan. Further, the City Manager or Community Development Director is hereby authorized to make minor modifications to the 2021-2029 Housing Element in response to comments from the California Department of Housing and Community Development, provided said modifications do not affect or contradict policies and programs adopted by the City Council.

SECTION 3. The City Council finds the 2021-2029 Housing Element has been adopted

in accordance with the terms and provision of the State of California Government Code, and after consideration and review by the City of La Cañada Flintridge Planning Commission and California Department of Housing and Community Development.

SECTION 4. The City Council finds that there is substantial evidence contained within the Section 9.4 Housing Opportunities and Resources and Appendix C: Sites Inventory of the 2021-2029 Housing Element that the existing uses identified are not impediments to accommodate new housing and will likely be discontinued during the 2021-2029 planning period.

SECTION 5. The City Council directs the Planning Commission to comply with the requirements of state Housing law, including the Government Code commencing with Section 65580, including the requirement to review and revision the City's Housing Element as frequently as appropriate (Section 65588), and to report to the City Council annually pertaining to the progress in this regard (Annual Progress Report on the Housing Element).

SECTION 6. The City Clerk shall certify to the page and adoption of this Resolution and enter it into the book or Resolutions. This Resolution shall be effective of the date of adoption.

PASSED, APPROVED and ADOPTED this 12th day of September, 2022.

Keith Eich
Mayor

ATTEST:

Carol Cowley
Interim City Clerk

**Housing Element Website
Update 09/30/22**



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Housing Element Update

DRAFT HOUSING ELEMENT DOCUMENTS:

Second Public Review Draft Revised (PDF 67MB) (posted September 30, 2022).

Second Public Review Draft (PDF 56MB) (posted September 2, 2022).

First Public Review Draft (posted September 21, 2021)

HOUSING ELEMENT UPDATE

The City of La Cañada Flintridge is currently updating its Housing Element of the General Plan. Local governments across California are required by State Housing Element law to adequately plan to meet their share of the State's overall housing need. The Department of Housing and Community Development (HCD) is the State department that is responsible for administering Housing Element Law and for identifying the State's overall housing need. To adequately plan for their share of the State's housing need, local governments adopt Housing Elements as part of their General Plans. Housing Elements provide goals, policies, and programs to create opportunities for housing development.

The 6th Cycle Hosing Element will cover the eight-year planning period from October 2021-October 2029. The community was invited and encouraged to participate in the planning process by providing written comments and attending workshops and Public Hearing held by the Planning Commission and City Council. See link below for the project timeline and upcoming meetings.

Timeline

This process began in January 2021 and outreach efforts started in March. [See summary of the City's outreach in preparation of the first draft.](#)

The first draft of the 6th Cycle Housing Element was submitted to HCD on October 6, 2021. [Here is a list of events since the first submittal.](#)

Upcoming Meetings

Community Development

Building & Safety

Code Enforcement

Community Preservation and Housing

ConnectLCF-Permits/Entitlements



Master Fee Schedule

Community Development FAQs

Contact Community Development

Call (818) 790-8881 or email us below:

Name

First

Last

Email

Message

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FAQ

BACKGROUND

RHNA/REGIONAL
HOUSING
NEEDS
ALLOCATION

SITES
INVENTORY

SUBMIT

CONTACT US

For more information about the Housing Element, please contact Susan Koleda at skoleda@lcf.ca.gov and (1.818.790.8881).



City Council Meeting
10/04/22

**CITY OF LA CAÑADA FLINTRIDGE CITY COUNCIL
NOTICE OF PUBLIC MEETING & AVAILABILITY OF SECOND DRAFT HOUSING
ELEMENT (REVISED)**

Case Number: General Plan Amendment (PLAN-2022-0003) - 2021-2029 Housing Element Update

Applicant: City of La Cañada Flintridge

Project Location: Citywide

NOTICE IS HEREBY GIVEN that on Tuesday, October 4, 2022, at 6:00 p.m., or as soon thereafter as possible, the City Council of the City of La Cañada Flintridge will hold a public meeting to consider adoption of a General Plan Amendment consisting of the 2021-2029 Housing Element. The Second Draft of the Housing Element (Revised) was posted on the City's website (<https://cityoflcf.org/housing-element-update/>) on September 30, 2022 and is available for public review and comment.

The hearing will be conducted in the Council Chambers on the first floor of City Hall, One Civic Center Drive, La Cañada Flintridge, CA 91011. The order of items on the agenda will be determined the week prior to the hearing. All interested persons will be given the opportunity to speak at the public hearing.

The project is exempt under the "Common Sense" exemption. The project is exempt pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA.

If you challenge the project and/or the environmental determination in court, you may be limited to raising only those issues raised at the public hearing described in this notice, or in correspondence delivered to the City Council at, or prior to, the public hearing.

Additional information, including pertinent materials related to this project, will be included within an agenda report attached to the City Council's meeting agenda. The meeting agenda and report was posted on the City's website on Thursday September 29, 2022 and can be accessed at cityoflcf.org/city-clerk/agenda-minutes/.



[Housing Element Update | City of La Cañada Flintridge](#)

HOUSING ELEMENT UPDATE The second draft of the 2021-2029 Housing Element (PDF 56MB) is available for review (posted September 2, 2022). The City of La Cañada Flintridge is currently updating its Housing Element of the General Plan. Local governments across California are required by State Housing Element law to adequately plan to
cityoflcf.org

RESOLUTION NO. 22-35

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA CAÑADA FLINTRIDGE APPROVING GENERAL PLAN AMENDMENT (PLAN-2022-0003) ADOPTING THE 2021-2029 HOUSING ELEMENT UPDATE AND FIND THE PROJECT EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, in accordance with California state law, the City of La Cañada Flintridge (the “City”) adopted an updated General Plan in 2013, a legislative act which serves as a comprehensive, long-term plan to guide the physical development of the City and serves as the official statement of policies governing all City Council, advisory commission, and administrative decisions regarding zoning and land use, subdivisions, and public improvements; and

WHEREAS, the State of California Government Code Section 65588 requires the review and adoption of a Housing Element that may be updated according to the Southern California Association of Governments Regional Housing Needs Assessment (“RHNA”) planning cycle; and

WHEREAS, the State of California Government Code Section 65583(c)(9) requires that local jurisdictions make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort, the City conducted two virtual stakeholder sessions on March 5, 2021, held two Planning Commission study sessions on March 11, 2021 and June 10, 2021, held a special City Council meetings on February 8, 2022, meet with industry professionals on February 18, 2022, conducted a Planning Commission workshop on March 10, 2022, held a joint City Council/Planning Commission workshop on April 5, 2022, posted a Regional Housing Needs Assessment (RHNA) video on the City’s website on April 25, 2022, directly contacted property owners that could potentially be included on the Sites Inventory on June 20, 2022 and July 14, 2022, and posted the revised Sites Inventory for public review and comment on the City’s website from July 20-29, 2022. Comments provided and issues raised during these public participation events were addressed in the 2021-2029 Housing Element; and

WHEREAS, on October 3, 2021 a draft of the 2021-2029 Housing Element was submitted to the California Department of Housing and Community Development (HCD) and on December 3, 2021, per Government Code Section 65585(b), a response/comment letter from the HCD was received by Staff for the review of the draft 2021-2029 Housing Element. The document has been revised to comply with State housing element law (Article 10.6 of the Government Code) and the comments received from HCD; and

WHEREAS, based on the age and condition of non-residential structures on nonvacant sites, as well as the likelihood of commercial uses on nonvacant sites converting to mixed-use or residential developments due to the continued decline of retail- only uses, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be integrated with new residential uses or discontinued during the planning period, and therefore are

not considered significant impediments to additional residential development during the period covered by the 2021-2029 Housing Element; and

WHEREAS, on August 25, 2022, the Planning Commission held a duly noticed public hearing, at which time all interested parties were given an opportunity to be heard and present evidence on the 2021-2029 Housing Element Update. After deliberating, the Planning Commission adopted Resolution No. 22-51 recommending that the City Council approve the General Plan Amendment adopting the 2021-2029 Housing Element; and

WHEREAS, on September 12, 2022, and October 4, 2022, the City Council held a duly noticed public hearing, at which time all interested parties were given an opportunity to be heard and present evidence on the 2021-2029 Housing Element Update; and

WHEREAS, the City Council has considered said 2021-2029 Housing Element and all comments pertaining thereto, finds there have been no significant changes in said project and that the 2021-2029 Housing Element should be approved subject to any changes the City Council should insert in this Resolution; and

WHEREAS, the adoption of the 2021-2029 Housing Element is exempt under the "Common Sense" exemption of the California Environmental Quality Act (CEQA). The project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA. Any future project, including ordinances required to implement the 2021-2029 Housing Element or development projects will be reviewed for compliance with CEQA at the time submitted once sufficient project details are known; and

WHEREAS, all legal prerequisites for the adoption of this Resolution have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LA CAÑADA FLINTRIDGE DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The City Council finds and determines that the above recitals are true and correct and are incorporated herein by reference.

SECTION 2. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA). Based upon the foregoing facts and based upon substantial evidence, the City Council hereby finds as follows:

A. The adoption of the 2021-2029 Housing Element is exempt under the "Common Sense" exemption of the California Environmental Quality Act. The project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development

project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment and will not result in any changes in the existing physical environment, and therefore is not subject to CEQA. Any future project, including ordinances required to implement the 2021-2029 Housing Element or development projects will be reviewed for compliance with CEQA at the time submitted once sufficient project details are known.

B. The custodian of records for the Notice of Exemption and all other materials which constitute the record of proceedings upon which the Planning Commission's decision is based, is the Director of Community Development of the City of La Cañada Flintridge. Those documents are available for public review in the Community Development Department of the City of La Cañada Flintridge located at One Civic Center Drive, La Cañada Flintridge, California, 91011, telephone (818) 790-8881.

SECTION 3. The City Council finds the 2021-2029 Housing Element has been adopted in accordance with the terms and provision of the State of California Government Code, and after consideration and review by the City of La Cañada Flintridge Planning Commission and California Department of Housing and Community Development.

SECTION 4. Because more than 50 percent of the parcels included in La Cañada Flintridge's Housing Element Sites Inventory are non-vacant, the City must adopt a finding that the existing uses on these nonvacant parcels are likely to be discontinued during the planning period, and the development potential on these nonvacant sites would not constitute an impediment to future housing development. The City Council finds that there is substantial evidence contained within the Section 9.4 Housing Opportunities and Resources and Appendix C: Sites Inventory of the 2021-2029 Housing Element that the existing uses identified are not impediments to accommodate new housing and will likely be discontinued during the 2021-2029 planning period. Based on general development trends resulting from continuously rising land values, changes in desired land uses, the financial pressures placed on religious institutions that have been impacted by falling congregation numbers, aging structures and underutilized properties, rising demand for housing, adjacency to public transportation and commercial services, and other factors/analysis as identified in the Section 9.4.1.3 Future Residential Development Potential and Section 9.4.1.4 Overview of Residential Development Potential and Realistic Capacity Assumptions by Zone of the Housing Element, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element.

SECTION 5. The City Council hereby approves General Plan Amendment (PLAN-2022-0003) adopting the 2021-2029 Housing Element, which is hereby incorporated into the City of La Cañada Flintridge General Plan. Further, the City Manager or Community Development Director is hereby authorized to make minor modifications to the 2021-2029 Housing Element in response to comments from the California Department of Housing and Community Development, provided said modifications do not affect or contradict policies and programs adopted by the City Council.

SECTION 6. The City Council directs the Planning Commission to comply with the requirements of state Housing law, including the Government Code commencing with Section 65580, including the requirement to review and revision the City's Housing Element as frequently as appropriate (Section 65588), and to report to the City Council annually pertaining to the progress in this regard (Annual Progress Report on the Housing Element).

SECTION 7. The City Clerk shall certify to the page and adoption of this Resolution and enter it into the book or Resolutions. This Resolution shall be effective of the date of adoption.

PASSED, APPROVED and ADOPTED this 4th day of October, 2022.

DocuSigned by:

289C652E08DD454...

Keith Eich
Mayor

ATTEST:

DocuSigned by:

45A6FFABE0094EA...

Carol Cowley
Interim City Clerk

CERTIFICATION

State of California)
County of Los Angeles) ss.
City of La Cañada Flintridge)

I, Carol Cowley, Interim City Clerk of the City of La Cañada Flintridge, California, do hereby certify that the foregoing Resolution No. 22-35 was duly adopted by the City Council of the City of La Cañada Flintridge at a Regular Meeting held on the 4th day of October 2022, by the following vote:

AYES: **COUNCILMEMBERS: Bowman, Davitt, Walker, Gunter, Eich**

NOES: **COUNCILMEMBERS: None**

ABSENT: **COUNCILMEMBERS: None**

ABSTAIN: COUNCILMEMBERS: None

Dated: October 4, 2022

DecuSigned by: Carol Cowley
45A6FFABE0094EA

Carol Cowley, Interim City Clerk

**Public Comment Letters
regarding Housing Element**

Re: Zone change for future housing

Susan Koleda <skoleda@lcf.ca.gov>

Tue 7/5/2022 10:15 AM

To: Bob Ford [REDACTED]

Cc: Claudia Tedford [REDACTED]

Good morning Bob,

Thank you for the email and the interest. At this time, your properties (5808-008-020 and 5808-008-021; NE corner of Foothill and El Camino Corto) are included on the Sites Inventory of the Housing Element. The draft Sites Inventory proposed to amend the zoning of the parcels to R-3 (Multifamily), which at the current time allows a density of up to 30 dwelling units per acre. During this process, the City Council may increase the density based on additional analysis that is currently underway to determine the most appropriate density. This will be decided over the coming months; however, if you are interested, the City Council will be having a discussion item on tonight's agenda regarding increasing multifamily density. Please feel free to attend the meeting and provide your input. The meeting is tonight at 6pm in the City Council Chamber.

Please let me know if you have any questions.

Susan

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: Bob Ford [REDACTED]

Sent: Monday, July 4, 2022 7:55 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

Subject: Zone change for future housing

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Susan,

I own the vacant lots at the N/E corner of Foothill Blvd and El Camino Corto St. I am very much interested in changing the zoning to multi-family housing. If I can be of any help my cell number is [REDACTED]

[REDACTED] Thanks, Bob Ford

Sent from my iPhone

Re: Your letter dated June 30th re: Future Planning for Housing in La Canada Flintridge

Susan Koleda <skoleda@lcf.ca.gov>

Thu 7/7/2022 3:51 PM

To: Alan Pezeshk

Cc: Claudia Tedford <claudia.tedford@cityplaceplanning.com>; Emily Stadnicki <estadnicki@lcf.ca.gov>

good afternoon Alan,

Thank you for the email and the interest. I apologize for the delay in getting back to you.

At the current time, your property is within the Downtown Village Specific Plan and has a designation of Mixed Use 2. Current zoning rules would allow mixed use development, with a density up to 15 dwelling units per acre. Your site had been included on the Sites Inventory of the first draft of the Housing Element; however, based on public comments made regarding the relatively recent sale and original construction date of the building, the complainant did not believe the site would potentially transition during the 2021-2029 housing element period. Neither your purchase date nor the age of the structure prohibit the inclusion of your parcel on the Sites Inventory if you wish to take advantage of this opportunity.

The draft Sites Inventory released in September 2021 proposed to amend the density of your parcel to 15-25 dwelling units per acre. However, the City Council had a discussion item on the July 5, 2022 agenda that discussed increasing the minimum density to 26 dwelling units to the acre, with the upper range not yet determined. This was based on a draft economic analysis that the City commissioned to determine the most appropriate density that would encourage property owners to take advantage of the rezoning. The final density range will be decided over the coming months. If you are interested, the City Council discussion during the July 5 meeting is available on the City's website.

If you are interested the being included on the Sites Inventory and the rezoning and would like additional information, please let me know. I have included the City's housing consultant and Emily Stadnicki, Principal Planner, on this email as I will be out of the office on vacation from July 15-August 15. If you have questions, please feel free to contact us.

Susan

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: Alan Pezeshkian

Sent: Tuesday, July 5, 2022 10:26 AM

To: Susan Koleda <skoleda@lcf.ca.gov>

Subject: Your letter dated June 30th re: Future Planning for Housing in La Canada Flintridge

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Good morning Susan,

This is Alan Pezeshkian - I own the building at 1010 Foothill Blvd (former bookstore) and am in receipt of your letter dated June 30th. Please know that I am interested in the opportunity that you have discussed in your letter and would be interested in learning more about it.

Thank you and I look forward to receiving more information from you.

Sincerely,

Alan

[REDACTED]

Re: 2235 Foothill APN 587-011-057

Marcy Berkman

Mon 7/11/2022 3:05 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

Cc: Claudia Tedford <[REDACTED]>; Emily Stadnicki <estadnicki@lcf.ca.gov>

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Thank you for the additional information.

As there is a good possibility that we will sell the property within the next 8 years, it seems that our property (2355 Foothill) would potentially be appropriate for inclusion in the housing element site inventory.

Our primary concern would be that if the property is included on the site list, that regardless of whether there is an overlay or a rezoning, that it leaves our property in a situation where it is of equal or greater attraction to a range of potential buyers and an equal or greater value than it would be as sold under its current mixed use zoning. It would seem that the ideal situation would permit a potential buyer to develop either as a mixed use development or multi-family residential development so as to ensure that any rezoning or overlay does not impair the range of potential purchasers/development uses or its potential value.

Marcy L. Berkman

Trustee of the Berkman Family Trusts

On Thu, Jul 7, 2022 at 4:57 PM Susan Koleda <skoleda@lcf.ca.gov> wrote:
good afternoon Ms. Berkman,

Thank you for your email and your interest. I apologize for the mix-up on the address. I have provided answers to your questions in red below.

At the current time, your property is zoned Mixed Use. Current zoning rules would allow mixed use development, with a density up to 20-30 dwelling units per acre. Your site was included on the Sites Inventory of the first draft of the Housing Element.

The draft Sites Inventory released in September 2021 proposed to keep the density of your parcel at 20-30 dwelling units per acre. However, the City Council had a discussion item on the July 5, 2022 agenda that discussed increasing the minimum density to 26 dwelling units to the acre, with the upper range not yet determined. This was based on a draft economic analysis that the City commissioned to determine the most appropriate density that would encourage property owners to take advantage of the rezoning. The final density range will be decided over the coming months. If you are interested, the City Council discussion during the July 5 meeting is available on the City's website.

If you are interested the being included on the Sites Inventory and the rezoning opportunity and would like additional information, please let me know. I have included the City's housing consultant and Emily Stadnicki, Principal Planner, on this email as I will be out of the office on vacation from July 15-August 15. If you have questions, please feel free to contact us.

Susan

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: Marcy Berkman [REDACTED]
Sent: Tuesday, July 5, 2022 5:42 PM
To: Susan Koleda <skoleda@lcf.ca.gov>
Subject: 2235 Foothill APN 587-011-057

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Ms. Skoleda:

I am in receipt of your letter dated June 30, 2022 regarding Future Planning for Housing in Our City. The Berkman Family Trusts own 2355 Foothill Blvd APN 5870-011-057; our family's business, Foothill Carwash Lube and Oil, is located on that property.

Please note that your letter references 2242 Foothill Blvd APN 5810-014-002 -- we are not the owners of that property. This appears to be a clerical error within your correspondence.

Nevertheless, if recollection serves, our property --2355 Foothill Blvd -- was listed on the Draft Housing Element as one of the sites where multifamily housing might potentially feasibly be constructed over the next 8-year period, and which therefore might be included in the Housing Element Sites Inventory.

I would be interested in additional information please.

Our site (2355 Foothill Blvd) is approximately 1.5 acres (a portion of which is flat-pad and a portion of which is hillside) and is situated next to a similarly sized adjacent partial (Briggs plaza) which, parcel and shopping center are under unrelated ownership.

Our family has owned and run Foothill Carwash Lube and Oil Center located at 2355 Foothill since the mid 1970's; it is currently operated by my brother. As he hopes to retire sometime in the next 1-3 years, our site could potentially provide a location for potential multi-family housing and or mixed use development. In that regard, I have a few questions:

1. My recollection is that under the Land Use Element our property is currently zoned mixed use commercial residential with a 30 unit/acre FAR if developed as mixed use. Can you please confirm

whether that is accurate. This is accurate. The Mixed Use zone currently allows a density of 20-30 dwelling units per acre.

2. For 2355 Foothill, would the City be proposing to change the zoning, or to add a zoning overlay? What would be the different effects of each? It has not yet been determined whether the zoning would be changed to increase the density or whether an overlay zone would be added.

3. For 2355 Foothill, if the zoning were changed or an overlay were added, would any of the following still be possible:

1) Would a potential buyer of the property/business still be permitted to continue to operate the existing carwash and the lube and oil center if they wished to do so? Yes, the current use was legally established and therefore may continue provided the car wash does not stop operating for a period of 9 months or more. Car washes are not a permitted use in the Mixed Use zone that was adopted in 2014, so if the car wash ceased operation for more than 9 months, it could not reestablish use. Since the use is no longer permitted within the zone, the use is considered legal non-conforming.

2) If a potential buyer of the property wished to do so, would they be able to tear down the existing buildings and build an express wash tunnel on the property or otherwise make major modifications to the existing property structures to replace the existing labor-intensive full service carwash with a more modernized less labor-intensive carwash infrastructure? No, as stated above, the existing use is legal non-conforming, meaning no expansion or rebuilding of the structure can occur.

3) Would a potential buyer still be permitted to build mixed use commercial/residential on the property if they wished to do so? Yes, provided the development complied with current zoning standards.

4) Am I correct in understanding that if the site is included on the site list in the housing element, the FAR would increase to 40 units per acre if developed as multi-family residential; perhaps with an added bump to the FAR if development includes a certain number of lower income housing units as well? FAR typically applies to non-residential use and density to residential. The current zoning allows for 20-30 dwelling units per acre as well as commercial use of the property with a FAR of 1.5. If certain criteria are met, a residential development can exceed the 30 du/ac maximum based on state density bonus law. The density bonus permitted is a sliding scale depending on the type of density bonus being requested and the percentage of the units that are affordable. Density bonuses range from 5-80%. The City must change the development standards to ensure that the maximum number of units can be built on the site, and staff are working on this.

As my brother owns the business and my brother and I together own the real property, all these are considerations of serious interest to us as, over the next year or three, my brother looks to retire and we seek to sell the land, and/or the land and business.

Marcy L. Berkman, Esq.

Trustee of the Marcy L. Berkman Trust of the Berkman Family Trust



Re: Housing Density for St George's parcels

Susan Koleda <skoleda@lcf.ca.gov>

Wed 7/13/2022 11:03 AM

To: Amy Pringle [REDACTED]

The commercial properties along Foothill would stay Mixed Use but the density would increase. The church and rectory would have an overlay zone that would allow the multifamily residential at the higher density. I hope that makes sense.

Susan

--

Susan Koleda, AICP
 Director of Community Development
 City of La Cañada Flintridge
 One Civic Center Drive
 La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: Amy Pringle [REDACTED] >

Sent: Wednesday, July 13, 2022 10:26 AM

To: Susan Koleda <skoleda@lcf.ca.gov>; Amy Pringle [REDACTED] >

Subject: Re: Housing Density for St George's parcels

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That's great, Susan. Will we be zoned Mixed Use?

Amy

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, July 12, 2022, 7:38 PM, Susan Koleda <skoleda@lcf.ca.gov> wrote:

Good evening Amy,

I received a copy of your letter to the City Council regarding potential density for St George's. At the July 5 meeting, the City Council directed staff to utilize a base density around 26 dwelling units per acre (du/ac). After discussions with the Housing Element Subcommittee, the proposed density range will be 25-35 du/ac

I understand that you had spoken with a developer, who suggested a range of 40-50 du/ac. I wanted to let you know that although the proposed base range is 25-35 du/ac, with a minimum 15% density bonus permitted by state law and city ordinance, up to 42 du/ac could be achieved. With a 50% density bonus, up to 53 du/ac could

be achieved. At the maximum 80% density bonus, up to 63 du/ac could be achieved. State law allows for density bonus between 15%-80%, depending on the income range a specified percentage of the units are rented or sold to. Therefore, although the base range is proposed to be 25-35 du/ac, a higher number can be achieved, and that range does appear to be consistent with the information you provided to the City Council.

Per your request, staff and the consultant have included all parcels owned by St George's to the draft Sites Inventory, providing the church with the greatest flexibility moving forward.

Please let me know if you have any questions.

Susan

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov



St. George's Episcopal Church

808 Foothill Blvd.
La Canada CA 91011
(818) 790-3323

July 5, 2022

Dear Mayor Walker, and members of the La Canada-Flintridge City Council and Planning Commission,

I was delighted to meet with Keith Eich and Mayor Walker for a chat on May 25th, and subsequently with Jeff McConnell of the Planning Commission, to discuss the property of St. George's Episcopal Church.

As we discussed, St. George's has been in a long-term planning process for several years. Like many churches, our attendance is dwindling, and our physical space needs are not what they were back in the 1950's, when the church was built, and the Baby Boom was filling all of our pews, classrooms, and offices. Additionally, we worry about our Preschool, where enrollment is still low after being closed for COVID for a year, and which may be competing with free universal preschool in the near future.

Our immediate need is to replace the rectory house at 4463 Commonwealth Ave., which is well past its useful life, and already a money pit of ongoing repairs. But since all of our buildings date to roughly the same era as the house, we anticipate needing to make some decisions about those as well. And so, although we have no need to develop our entire property at this moment, we're trying to sketch out a plan for our whole campus, so that we can make decisions now with a planned future in mind.

After our conversations, I reached out to our Diocesan Real Estate Task Force, and also to Episcopal Communities and Services, (developers of Montecedro and Twelve Oaks senior communities), to get a sense of what the parameters of a housing development on our property would need to be. Their advice is that a housing project – affordable, seniors or otherwise – is only financially feasible if our property is zoned at a high enough density. 50 dwelling units per acre would be ideal, they said, and 40 about as low as they (ECS) could go, if they were going to partner with us – which we'd need them to do, as we don't have our own funding for a project.

I don't know whether that number is possible in the City's considerations, as our property was recently downgraded, in the latest draft of the Housing Element, from 30 units per acre to 15-20 units. So, if housing is what the City would like for us to build here, we'd need our zoning to be equal to other similar properties in town, where 30-40 or 30-50 DU's per acre is the most recent proposed density.

If that upper limit of density is not possible, then we'd like for our whole property to be zoned Mixed Use, with Institutional use included as part of the mixture. This would keep our options open to develop housing and/or something else, whenever the time comes to replace some of our other buildings.

In any case, we're here, we're engaged in discussions about our property, and we'd be delighted to partner with the City in your vision for its future.

The Rev. Amy Pringle
Rector, St. George's Episcopal Church


Sites Inventory 6th Housing Element La Canada Flintridge, Ca

GARRET WEYAND · [REDACTED]

Wed 3/30/2022 12:46 PM



Cc: john.buettner@hcd.ca.gov <john.buettner@hcd.ca.gov>

 7 attachments (5 MB)

Sites to be deleted. from Element.pdf; Site Inventory Lists by #.pdf; Low Income Distribution.pdf; Exhibit A LCF Sites Inventory List.pdf; Exhibit D sites photos (1).pdf; Letter to City Council_updated Sites Inventory 3-30.docx; Revised HE Sites Inventory_Solution v2.pdf;

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March 29, 2022

La Cañada Flintridge City Council, Planning Commission, Susan Koleda, and Mark Alexander
One Civic Center Drive
La Cañada Flintridge, California 91011

Re: City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Dear Honorable Members of City Council, Planning Commission Director of Planning and City Manager of the City of La Cañada Flintridge,

Please find the following comments and information pursuant to the ongoing updates to the City of La Cañada Flintridge's 6th Cycle Housing Element, particularly the Sites Inventory.

We have included exhibits as additional attachments to support the analysis provided herein, which includes:

- Exhibit A - City of La Cañada Flintridge's 6th Cycle Sites Inventory List
- Exhibit B – List of Ineligible Sites that do not have a realistic capacity for redevelopment over the next planning cycle for reasons including:
 - Existing uses are an impediment to additional residential development
 - Long-term commercial leases in place do not expire during the next planning period
 - Property owner provided letter stating its intention to retain the existing commercial use, and has no intention of redeveloping the site for housing
 - Properties recently sold (within past 4 years) but existing use has been retained
- Exhibit C – Percentage (%) of Lower Income RHNA by City Grid
- Exhibit D – Sites photos
- HCD Memorandum: Housing Element Sites Inventory Guidebook

As detailed in the HCD Housing Element Sites Inventory Guidebook (2020), “nonvacant sites with differing existing uses and lacking in common ownership, whether contiguous or located in the same general area, may not rely on a generalized analysis.” Individual owners may not wish to sell their

property or redevelop their site with residential uses. In addition, each site's existing commercial use may have lease agreements of different lengths of time. Existing leases and uses are presumed to be an impediment to residential redevelopment without substantial evidence showing the contrary. Properties that should be removed for these reasons and more are detailed in Exhibit B. Individual site photos for context and reference are in Exhibit D.

In the analysis that follows, we've copied excerpts from HCD's correspondence letter to the City of La Cañada Flintridge dated December 3, 2021, to preface our commentary. The HCD correspondence is italicized to distinguish between our comments in red.

Finally, we present a simple solution which includes rezoning three sites with realistic capacities for housing development for lower income. By simply allowing for densities at 20-30 du/acre in line with state requirements for lower income RHNA, the City would resolve the issue by zoning for 104 lower income units on these sites in the DVSP with a realistic capacity for housing. Realistic sites outside of the DVSP, like the former Pier One, can accommodate densities that exceed 20-30 du/acre. This solution would equalize the low-income distribution throughout the city, avoiding any risk of violating AFFH.

Regards,

Garret Weyand

La Canada Site Inventory Proeties to Delete

Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consoli- dation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improve- nt Value: LV > IV	Year Built	Public Comments
1	5815-013-012	845 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.131	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial- Professional	Yes	1953	Purchased on 8/03/2020 for \$3,600,000. Land cost alone for three units would be \$1,200,000. Infeasible for residential development.
3	5815-013-016	831 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	Purchased on 11/19/2020 for \$1,560,000. Land cost alone for three units would be \$520,000. Infeasible for residential development.
11	5815-013-061	814 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Two different densities for MU1 North? (i.e. site #12 is same zone MU1/DV-MU-N @ 12-15 du/acre)
12	5815-013-027	811 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.172	B	15-Dec	12	2	1	Moderate	Yes	SFR	Yes	1957	Two different densities for MU1 North? (i.e. site #11 is same zone MU1/DV-MU-N @ 20-30 du/acre)
26	5815-014-043	N/W OF N/W CORNER OF FOOTHILL BLV & OAKWOOD AVE	DVSP	MU1	DVSP	DV-MU-N	0.873	C	20-30	20	18	18	Lower	Yes	Parking lot (for 707 Foothill Blvd.)	Yes	N/A	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
29	5814-020-028	700 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.42	D	15-Dec	12	5	5	Moderate	Yes	Commercial- Restaurant	Yes	1999	Owner-user operates Panda Express and has no plans to discontinue use over next planning period
30	5812-023-006	1021 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	20-30	20	3	3	Moderate	Yes	Commercial- Store/office	Yes	1939	Purchased by corporate user in Dec 2021 for \$3.95MM.
31	5812-023-007	1017 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	15-25	20	2	2	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
32	5812-023-034	MID- BLOCK BETWEEN CHEVY CHASE DR & ANGELES	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.

La Canada Site Inventory Proeties to Delete

33	5812-023-035	MID-BLOCK BETWEEN CHEVY	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
34	5812-023-010	1001 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.19	E	15-25	20	3	3	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
52	5814-008-026	1004 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.405	H	15-Dec	12	5	5	Moderate	Yes	Commercial-Store	Yes	1966	Hill St Café. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
54	5814-008-028	CHEVY CHASE DR SOUTH OF FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.434	H	15-Dec	12	6	6	Moderate	Yes	Parking lot	Yes	1961	Hill St Café Parking lot. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
55	5814-009-013	928 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.137	I	15-Dec	12	2	2	Moderate	Yes	Commercial-Store/office	Yes	1957	Purchased on 03/14/2018 for \$1,725,000. Land cost alone for three units would be \$862,500. Infeasible for residential development.
56	5814-009-025	942 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.296	I	15-Dec	12	4	4	Moderate	Yes	Commercial-Fast food	Yes	1977	Verizon just signed lease in 2021.
57	5820-001-008	548 FOOTHILL BLVD	DVSP	MU2			0.464	J	15-25	20	9	9	Moderate	Yes	Arco Gas Station	Yes	1971	Arco Gas Station. Signed renewed franchise agreement in Q1 2022. Owner/Operator is currently looking to expand hydrogen fueling stations (two installed in 2019).
58	5820-001-014	4440 WOODLEIGH LN	DVSP	MU2	---	---	1.32	J	15-25	20	26	26	Moderate	Yes	Commercial-Club (Thursday Club)	Yes	1926	Thursday Club. This non-profit service organization has been in existence at this site since 1912 They will not sell the property.
64	5820-001-002	514 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.441	L	15-Dec	12	6	6	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
65	5820-001-003	502 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.657	L	15-Dec	12	8	8	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
67	5815-022-002	4522 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.267	M	20-30	20	6	6	Moderate	Yes	Commercial-Medical/dental	Yes	1948	Medical Office.

La Canada Site Inventory Proeties to Delete

68	5815-022-003	4526 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.27	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
69	5815-022-004	4532 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.256	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
70	5815-022-019	4536 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.28	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	Post Office Government owned. Not eligible for development
72	5815-021-033	555 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.94		20-30	20	19	19	Lower	Yes	Commercial-Bank	Yes	1973	Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale
75	5810-023-001	1830 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1.67	N/A	20-30	24	41	41	Lower	No	The Church of Jesus Christ of Latter Day Saints	No	1951	City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease
80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	20-30	24	10	9	Lower	Yes	Parking lot	Yes	N/A	Owned by same entity as Ross property. No intention of converting to housing in next 8 year period.
81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	20-30	24	65	65	Lower	Yes	Commercial-Shopping center (Ross Dress-for-Less)	Yes	1955	Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship Center)	Yes	1955	Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	20-30	24	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)	No	1955	Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	20-30	24	4	4	Lower	Yes	Commercial-Shopping center (Avianti Jewelry)	Yes	1955	Purchased in 2019. Long term tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	20-30	24	13	13	Lower	Yes	Commercial-Shopping center (Restaurant)	No	1955	Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

La Canada Site Inventory Proeties to Delete

86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	Commercial-Shopping center	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
88	5870-010-044	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	20-30	24	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
89	5870-010-045	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	20-30	24	6	6	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190)	Yes	1990	Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	20-30	24	16	16	Lower	No	Vacant commercial building (Formerly Pier 1)		1990	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial use going forward and does not have plans to redevelop into housing within the next planning period
104	5813-005-074	1716 VERDUGO BLVD	Institutional	PS	Commercial /Office	MU	3.32	N/A	20-30	24	80	80	Lower	No	Parking lot for USC Verdugo Hospital	Yes	1972	Not connected to sewer/inadequate infrastructure to support lower income housing. CA Gov Code 65583.2(b)(5)(B) states that "parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan" Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City’s sanitary sewer system. Any agreement would require approval by both City’s Councils. See enclosed sewer map and email from City of Glendale Dept of Public Works. Additionally, a parking easement agreement between all owners for parking use has been recorded on title.

La Canada Site Inventory Proeties to Delete

105	5820-009-017	458 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.47	DD	15-Dec	12	6	6	Moderate	No	Commercial	Yes	1959	
108	5820-009-014	440 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.23	N/A	15-Dec	12	3	3	Moderate	No	Commercial	Yes	1986	Previously Club Champion studio purchased Nov 2020 for \$2.85MM by owner-user. Repurposed to physical therapist clinic.
109	5820-009-019	420 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.45	N/A	15-Dec	12	6	6	Moderate	No	Commercial (tire store)	Yes	1976	Owner-user. Just Tires does not plan to vacate or change use during next 8 year period

Total Units that should be dropped from the 6th Housing Element

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La Canada Site Inventory (Site #)

Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consoli- dation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improve- ment Value: LV > IV	Year Built	Public Comments
1	5815-013-012	845 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.131	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial- Professional	Yes	1953	Purchased on 8/03/2020 for \$3,600,000. Land cost alone for three units would be \$1,200,000. Infeasible for residential development.
2	5815-013-014	823 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	
3	5815-013-016	831 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	Purchased on 11/19/2020 for \$1,560,000. Land cost alone for three units would be \$520,000. Infeasible for residential development.
5	5815-013-019	822 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.138	A	20-30	20	3	3	Above Moderate	Yes	SFR	Yes	1947	Homes well maintained. Not conducive to developed
6	5815-013-020	816 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	4	Above Moderate	Yes	SFR	Yes	1951	Homes well maintained. Not conducive to developed
7	5815-013-024	4527 COMMON WEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
8	5815-013-025	804 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.193	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1925	Homes well maintained. Not conducive to developed
9	5815-013-057	4519 COMMON WEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.152	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
10	5815-013-058	4521 COMMON WEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
11	5815-013-061	814 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Two different densities for MU1 North? (i.e. site #12 is same zone MU1/DV-MU-N @ 12-15 du/acre)
12	5815-013-027	811 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.172	B	15-Dec	12	2	1	Moderate	Yes	SFR	Yes	1957	Two different densities for MU1 North? (i.e. site #11 is same zone MU1/DV-MU-N @ 20-30 du/acre)
13	5815-013-028	817 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.287	B	15-Dec	12	3	2	Moderate	Yes	SFR	Yes	1940	SFR sold for 1,665,000 in 2021.
14	5815-013-032	818 HOUSEMA N ST	DVSP	MU1	DVSP	DV-MU-N	0.181	B	15-Dec	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed

La Canada Site Inventory (Site #)

15	5815-013-033	814 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.181	B	up to 15	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed
16	5815-013-034	806 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
17	5815-013-035	804 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1953	Homes well maintained. Not conducive to developed
18	5815-014-004	726 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.184	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	Homes well maintained. Not conducive to developed
19	5815-014-005	729 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.71	C	20-30	20	15	15	Lower	Yes	Commercial-Restaurant	Yes	1961	
21	5815-014-009	743 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.105	C	20-30	20	2	2	Above Moderate	Yes	Commercial-Auto service	Yes	1959	
22	5815-014-010	739 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Office	Yes	1950	
23	5815-014-011	737 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Store	Yes	1950	
24	5815-014-027	722 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.274	C	20-30	20	6	5	Above Moderate	Yes	SFR	Yes	1958	
25	5815-014-028	720 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.174	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	
26	5815-014-043	N/W OF N/W CORNER OF FOOTHILL BLV & OAKWOOD AVE	DVSP	MU1	DVSP	DV-MU-N	0.873	C	20-30	20	18	18	Lower	Yes	Parking lot (for 707 Foothill Blvd.)	Yes	N/A	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
27	5814-020-001	720 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.248	D	15-Dec	12	3	3	Moderate	Yes	Commercial-Restaurant	Yes	1948	
28	5814-020-014	712 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.292	D	15-Dec	12	4	4	Above Moderate	Yes	Commercial-Store	Yes	1960	
29	5814-020-028	700 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.42	D	15-Dec	12	5	5	Moderate	Yes	Commercial-Restaurant	Yes	1999	Owner-user operates Panda Express and has no plans to discontinue use over next planning period

La Canada Site Inventory (Site #)

30	5812-023-006	1021 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1939	Purchased by corporate user in Dec 2021 for \$3.95MM.
31	5812-023-007	1017 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	15-25	20	2	2	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
32	5812-023-034	MID-BLOCK BETWEEN CHEVY CHASE DR & ANGELES	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
33	5812-023-035	MID-BLOCK BETWEEN CHEVY	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
34	5812-023-010	1001 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.19	E	15-25	20	3	3	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
35	5812-023-001	1039 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	U	20-30	20	2		Moderate	Yes	Commercial-Store	Yes	1949	
37	5812-023-003	1037 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.08	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1956	
38	5812-023-004	1033 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1948	
39	5812-023-005	1029 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.112	V	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1949	
40	5812-023-018	1057 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.065	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
41	5812-023-019	1055 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
42	5812-023-020	1053 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
43	5812-023-022	1047 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.057	F	20-30	20	2	2	Moderate	Yes	Commercial-Store	Yes	1949	

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45	5812-023-024	1043 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.115	U	20-30	20	3	3	Moderate	Yes	Commercial-Office	Yes	1959	
46	5812-023-032	1051 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
47	5812-023-033	1049 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
48	5814-002-002	1040 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Restaurant	Yes	1951	
49	5814-002-003	1038 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Office	Yes	1946	
50	5814-002-018	1044 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Store	Yes	1949	
51	5814-008-024	954 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.563	H	15-Dec	12	7	7	Moderate	Yes	Commercial-Store	Yes	1946	
52	5814-008-026	1004 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.405	H	15-Dec	12	5	5	Moderate	Yes	Commercial-Store	Yes	1966	Hill St Café. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
54	5814-008-028	CHEVY CHASE DR SOUTH OF FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.434	H	15-Dec	12	6	6	Moderate	Yes	Parking lot	Yes	1961	Hill St Café Parking lot. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
55	5814-009-013	928 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.137	I	15-Dec	12	2	2	Moderate	Yes	Commercial-Store/office	Yes	1957	Purchased on 03/14/2018 for \$1,725,000. Land cost alone for three units would be \$862,500. Infeasible for residential development.
56	5814-009-025	942 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.296	I	15-Dec	12	4	4	Moderate	Yes	Commercial-Fast food	Yes	1977	Verizon just signed lease in 2021.
57	5820-001-008	548 FOOTHILL BLVD	DVSP	MU2			0.464	J	15-25	20	9	9	Moderate	Yes	Arco Gas Station	Yes	1971	Arco Gas Station. Signed renewed franchise agreement in Q1 2022. Owner/Operator is currently looking to expand hydrogen fueling stations (two installed in 2019).
58	5820-001-014	4440 WOODLEIGH LN	DVSP	MU2	---	---	1.32	J	15-25	20	26	26	Moderate	Yes	Commercial-Club (Thursday Club)	Yes	1926	Thursday Club. This non-profit service organization has been in existence at this site since 1912 They will not sell the property.

La Canada Site Inventory (Site #)

59	5815-021-038	4603 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.97	K	20-30	20	20	20	Lower	Yes	Institutional-Provate school	Yes	1948	
60	5815-021-010	4532 RINETTI LN	DVSP	MU2	DVSP	DV-MU-N	0.187	K	20-30	20	4	4	Moderate	Yes	Commercial-Office	Yes	1949	
61	5815-021-011	4526 RINETTI LN	DVSP	MU2	DVSP	DV-MU-N	0.186	K	20-30	20	4	4	Moderate	Yes	Commercial-Medical/dental	Yes	1950	
64	5820-001-002	514 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.441	L	15-Dec	12	6	6	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
65	5820-001-003	502 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.657	L	15-Dec	12	8	8	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
67	5815-022-002	4522 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.267	M	20-30	20	6	6	Moderate	Yes	Commercial-Medical/dental	Yes	1948	Medical Office.
68	5815-022-003	4526 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.27	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
69	5815-022-004	4532 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.256	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
70	5815-022-019	4536 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.28	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	Post Office Government owned. Not eligible for development
72	5815-021-033	555 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.94		20-30	20	19	19	Lower	Yes	Commercial-Bank	Yes	1973	Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale
74	5823-001-016	104 BERKSHIRE PL	Institutional	PS	Institutional	RI-OZ (PSP)	0.55	N/A	20-30	24	14	14	Lower	No	United Methodist Church	No	1977	
75	5810-023-001	1830 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1.67	N/A	20-30	24	41	41	Lower	No	The Church of Jesus Christ of Latter Day Saints	No	1951	City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease

La Canada Site Inventory (Site #)

76	5814-027-019	4435 WOODLEIGH LN	DVSP	DVSP-Institutional	DVSP-Institutional	RIOZ-DVSP (DVSP-I)	0.98	BB	15-Dec	12	12	12	Moderate	No	La Cañada Presbyterian Church—Parking lot	Yes	N/A	
77	5814-018-030	800 FOOTHILL BLVD	DVSP	DVSP-Institutional	DVSP	RI-OZ-DVSP (DVSP-I)	0.38	EE	15-Dec	12	5	5	Moderate	No	St. George Episcopal	No	1962	
78	5813-006-022	1700 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (PS)	0.87	N/A	20-30	24	21	21	Lower	No	Lutheran Church of the Foothills	No	1950	
79	5813-015-055	1200 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1	N/A	20-30	24	24	24	Lower	No	La Canada Congregational Church	No	1924	
80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	20-30	24	10	9	Lower	Yes	Parking lot	Yes	N/A	Owned by same entity as Ross property. No intention of converting to housing in next 8 year period.
81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	20-30	24	65	65	Lower	Yes	Commercial-Shopping center (Ross Dress-for-Less)	Yes	1955	Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship Center)	Yes	1955	Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	20-30	24	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)	No	1955	Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	20-30	24	4	4	Lower	Yes	Commercial-Shopping center (Avianti Jewelry)	Yes	1955	Purchased in 2019. Long term tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	20-30	24	13	13	Lower	Yes	Commercial-Shopping center (Restaurant)	No	1955	Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	Commercial-Shopping center	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011

La Canada Site Inventory (Site #)

88	5870-010-044	2243 W Foothill Blvd	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	20-30	24	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
89	5870-010-045	2251 W Foothill Blvd	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
90	5870-011-056	2383 Foothill Blvd	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.18	Q	20-30	24	29	29	Lower	Yes	Commercial-Shopping center	Yes	1977	
91	5870-011-057	2355 Foothill Blvd	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.48	Q	20-30	24	36	36	Lower	Yes	Commercial-Auto service (Car wash)	Yes	1967	
92	5810-014-002	2242 Foothill Blvd	Commercial /Office	CPD	Mixed Use	MU	0.12	R	20-30	24	3	3	Above Moderate	No	Commercial-Restaurant	Yes	1957	
93	5810-014-003	2238 Foothill Blvd	Commercial /Office	CPD	Mixed Use	MU	0.09	R	20-30	24	3	3	Above Moderate	No	Parking lot	Yes	1978	
94	5810-014-004	2236 Foothill Blvd	Commercial /Office	CPD	Mixed Use	MU	0.08	R	20-30	24	2	2	Above Moderate	No	Commercial-Restaurant	Yes	1958	
95	5808-008-020	N/E CORNER OF Foothill Blvd & El Camino Corto St	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
96	5808-008-021	EAST OF N/E CORNER OF Foothill Blvd & El Camino Corto St	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
97	5814-028-009	600 Foothill Blvd	DVSP-Instit.	Institutio nal	DVSP	DV-MU-S	1.28	N/A	15-Dec	12	16	16	Above moderate	No	Former Christian Science Church (owned by a private party)	Yes	1949	

La Canada Site Inventory (Site #)

100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	20-30	24	6	6	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190)	Yes	1990	Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	20-30	24	16	16	Lower	No	Vacant commercial building (Formerly Pier 1)		1990	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial use going forward and does not have plans to redevelop into housing within the next planning period
102	5810-014-020	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.32	CC	20-30	24	8	8	Lower	No	Parking lot for commercial center (see APN 5810- 014-021)	Yes (\$722,237:\$ 1 5,036)	1960	
103	5810-014-021	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.38	CC	20-30	24	10	10	Lower	No	Commercial center	No (\$951,547:\$ 1, 113,450)	1960	
104	5813-005-074	1716 VERDUGO BLVD	Institutional	PS	Commercial /Office	MU	3.32	N/A	20-30	24	80	80	Lower	No	Parking lot for USC Verdugo Hospital	Yes	1972	Not connected to sewer/inadequate infrastructure to support lower income housing. CA Gov Code 65583.2(b)(5)(B) states that "parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan" Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils. See enclosed sewer map and email from City of Glendale Dept of Public Works. Additionally, a parking easement agreement between all owners for parking use has been recorded on title.
105	5820-009-017	458 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.47	DD	15-Dec	12	6	6	Moderate	No	Commercial	Yes	1959	

[illegible]

La Canada Site Inventory (Site #)

Low Income Distribution By City Grid (All)

	Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improve nt Value: LV > IV	Year Built	Public Comments
A	80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	20-30	24	10	9	Lower	Yes	Parking lot	Yes	N/A	Owned by same entity as Ross property. No intention of converting to housing in next 8 year period.
A	81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	20-30	24	65	65	Lower	Yes	Commercial-Shopping center (Ross Dress-for-Less)	Yes	1955	Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
A	82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship Center)	Yes	1955	Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
A	83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	20-30	24	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)	No	1955	Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
A	84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	20-30	24	4	4	Lower	Yes	Commercial-Shopping center (Avianti Jewelry)	Yes	1955	Purchased in 2019. Long term tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
A	85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	20-30	24	13	13	Lower	Yes	Commercial-Shopping center (Restaurant)	No	1955	Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
A	86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	Commercial-Shopping center	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
A	87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)	No	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
A	88	5870-010-044	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	20-30	24	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
A	89	5870-010-045	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center	Yes	1966	Property Was Purchased in 2012 for 10.7 Million and use has been retained. This would be\$152,000 per unit in 2011
A	90	5870-011-056	2383 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.18	Q	20-30	24	29	29	Lower	Yes	Commercial-Shopping center	Yes	1977	
A	91	5870-011-057	2355 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.48	Q	20-30	24	36	36	Lower	Yes	Commercial-Auto service (Car wash)	Yes	1967	
A	100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	20-30	24	6	6	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190	Yes	1990	Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
A	101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	20-30	24	16	16	Lower	No	Vacant commercial building (Formerly Pier 1)		1990	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial use going forward and does not have plans to redevelop into housing within the next planning period
A	102	5810-014-020	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.32	CC	20-30	24	8	8	Lower	No	Parking lot for commercial center (see APN 5810-014-021)	Yes (\$722,237; \$1 5,036)	1960	
A	103	5810-014-021	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.38	CC	20-30	24	10	10	Lower	No	Commercial center	No (\$951,547; \$1, 113,450)	1960	
A	B98	5810-015-016	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.56	AA	20-30	24	14	14	Lower	Yes	JOANN Fabric & Crafts Store	Yes	1958	
A	C99	5810-015-015	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.27	AA	20-30	24	7	7	Lower	Yes	JOANN Fabric & Crafts Store	Yes	1958	

Total Lower Income Units in GRID "A"

306

% Of Total Lower Income RHNA

53.50%

Low Income Distribution By City Grid (All)

B	75	5810-023-001	1830 FOOTHILL BLVD	Institutional I	PS	Institutional I	RI-OZ (P/SP)	1.67	N/A	20-30	24	41	41	Lower	No	The Church of Jesus Christ of Latter Day Saints	No	1951	City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease
B	78	5813-006-022	1700 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (PS)	0.87	N/A	20-30	24	21	21	Lower	No	Lutheran Church of the Foothills	No	1950	
B	95	5808-008-020	N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
B	96	5808-008-021	EAST OF N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
B	104	5813-005-074	1716 VERDUGO BLVD	Institutional	PS	Commercial /Office	MU	3.32	N/A	20-30	24	80	80	Lower	No	Parking lot for USC Verdugo Hospital	Yes	1972	<p>Not connected to sewer/inadequate infrastructure to support lower income housing. CA Gov Code 65583.2(b)(5)(B) states that "parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan" Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils. See enclosed sewer map and email from City of Glendale Dept of Public Works.</p> <p>Additionally, a parking easement agreement between all owners for parking use has been recorded on title.</p>

Total Lower Income Units in GRID "B"

156

% Of Total Lower Income RHNA

27.27%

Low Income Distribution By City Grid (All)

C	79	5813-015-055	1200 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1	N/A	20-30	24	24	24	Lower	No	La Canada Congregational Church	No	1924	
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Total Lower Income Units in GRID "C" 24

% Of Total Lower Income RHNA 4.20%

D	19	5815-014-005	729 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.71	C	20-30	20	15	15	Lower	Yes	Commercial- Restaurant	Yes	1961	
D	26	5815-014-043	N/W OF N/W CORNER OF FOOTHILL BLV & OAKWOOD AVE	DVSP	MU1	DVSP	DV-MU-N	0.873	C	20-30	20	18	18	Lower	Yes	Parking lot (for 707 Foothill Blvd.)	Yes	N/A	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
D	59	5815-021-038	4603 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.97	K	20-30	20	20	20	Lower	Yes	Institutional- Provate school	Yes	1948	Private Pre School. Adjacent to 210 Freeway
D	72	5815-021-033	555 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.94		20-30	20	19	19	Lower	Yes	Commercial-Bank	Yes	1973	Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale

Total Lower Income Units in GRID "D" 72

% Of Total Lower Income RHNA 12.59%

E	74	5823-001-016	104 BERKSHIRE PL	Institutional	PS	Institutional	RI-OZ (PSP)	0.55	N/A	20-30	24	14	14	Lower	No	United Methodist Church	No	1977	
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Total Lower Income Units in GRID "E" 14

Total E % Of Total Lower Income RHNA 2.45%

Total 572 100.00%

EXHIBIT A: City of La Canada Flintridge 6th Cycle Housing Element Site Inventory

<u>Site #</u>	<u>APN</u>	<u>Address</u>	<u>General Plan</u>	<u>Zone/District</u>	<u>General Plan</u>	<u>Zone/District</u>	<u>Acres</u>	<u>Consolidation Potential (A-V)</u>	<u>Density Range (du/ac)*</u>	<u>Density Factor</u>	<u>Unit Potential (Assumes rounding up)</u>	<u>NET Unit Potential (Assumes rounding up)</u>	<u>Income Category</u>	<u>5th Cycle</u>	<u>Existing Use</u>	<u>Land to Improve Value: LV > IV</u>	<u>Year Built</u>	<u>Public Comments</u>
1	5815-013-012	845 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.131	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Professional	Yes	1953	Purchased on 8/03/2020 for \$3,600,000. Land cost alone for three units would be \$1,200,000. Infeasible for residential development.
2	5815-013-014	823 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	
3	5815-013-016	831 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	Purchased on 11/19/2020 for \$1,560,000. Land cost alone for three units would be \$520,000. Infeasible for residential development.
5	5815-013-019	822 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.138	A	20-30	20	3	3	Above Moderate	Yes	SFR	Yes	1947	Homes well maintained. Not conducive to developed
6	5815-013-020	816 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	4	Above Moderate	Yes	SFR	Yes	1951	Homes well maintained. Not conducive to developed
7	5815-013-024	4527 COMMON WEALTH	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
8	5815-013-025	804 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.193	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1925	Homes well maintained. Not conducive to developed
9	5815-013-057	4519 COMMON WEALTH	DVSP	MU1	DVSP	DV-MU-N	0.152	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
10	5815-013-058	4521 COMMON WEALTH	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
11	5815-013-061	814 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Two different densities for MU1 North? (i.e. site #12 is same zone MU1/DV-MU-N @ 12-15
12	5815-013-027	811 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.172	B	15-Dec	12	2	1	Moderate	Yes	SFR	Yes	1957	Two different densities for MU1 North? (i.e. site #11 is same zone MU1/DV-MU-N @ 20-30
13	5815-013-028	817 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.287	B	15-Dec	12	3	2	Moderate	Yes	SFR	Yes	1940	SFR sold for 1,665,000 in 2021.
14	5815-013-032	818 HOUSEMAN ST	DVSP	MU1	DVSP	DV-MU-N	0.181	B	15-Dec	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed
15	5815-013-033	814 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.181	B	up to 15	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed
16	5815-013-034	806 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
17	5815-013-035	804 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1953	Homes well maintained. Not conducive to developed
18	5815-014-004	726 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.184	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	Homes well maintained. Not conducive to developed

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19	5815-014-005	729 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.71	C	20-30	20	15	15	Lower	Yes	Commercial-Restaurant	Yes	1961	
21	5815-014-009	743 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.105	C	20-30	20	2	2	Above Moderate	Yes	Commercial-Auto service	Yes	1959	
22	5815-014-010	739 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Office	Yes	1950	
23	5815-014-011	737 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Store	Yes	1950	
24	5815-014-027	722 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.274	C	20-30	20	6	5	Above Moderate	Yes	SFR	Yes	1958	
25	5815-014-028	720 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.174	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	
26	5815-014-043	N/W OF N/W CORNER OF FOOTHILL BLV & OAKWOOD AVE	DVSP	MU1		DV-MU-N	0.873	C	20-30	20	18	18	Lower	Yes	Parking lot (for 707 Foothill Blvd.)	Yes	N/A	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
27	5814-020-001	720 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.248	D	15-Dec	12	3	3	Moderate	Yes	Commercial-Restaurant	Yes	1948	
28	5814-020-014	712 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.292	D	15-Dec	12	4	4	Above Moderate	Yes	Commercial-Store	Yes	1960	
29	5814-020-028	700 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.42	D	15-Dec	12	5	5	Moderate	Yes	Commercial-Restaurant	Yes	1999	Owner-user operates Panda Express and has no plans to discontinue use over next planning period
30	5812-023-006	1021 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1939	Purchased by corporate user in Dec 2021 for \$3.95MM.
31	5812-023-007	1017 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	15-25	20	2	2	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
32	5812-023-034	MID-BLOCK BETWEEN CHEVY CHASE DR &	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20		1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.

La Canada Site Inventory (Site #)

33	5812-023-035	MID-BLOCK BETWEEN CHEVY	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
34	5812-023-010	1001 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.19	E	15-25	20	3	3	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
35	5812-023-001	1039 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	U	20-30	20	2		Moderate	Yes	Commercial-Store	Yes	1949	
37	5812-023-003	1037 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.08	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1956	
38	5812-023-004	1033 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1948	
39	5812-023-005	1029 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.112	V	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1949	
40	5812-023-018	1057 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.065	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
41	5812-023-019	1055 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
42	5812-023-020	1053 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
43	5812-023-022	1047 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.057	F	20-30	20	2	2	Moderate	Yes	Commercial-Store	Yes	1949	
45	5812-023-024	1043 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.115	U	20-30	20	3	3	Moderate	Yes	Commercial-Office	Yes	1959	
46	5812-023-032	1051 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
47	5812-023-033	1049 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
48	5814-002-002	1040 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Restaurant	Yes	1951	
49	5814-002-003	1038 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Office	Yes	1946	
50	5814-002-018	1044 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	15-Dec	12	2	2	Moderate	Yes	Commercial-Store	Yes	1949	

La Canada Site Inventory (Site #)

51	5814-008-024	954 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.563	H	15-Dec	12	7	7	Moderate	Yes	Commercial-Store	Yes	1946	
52	5814-008-026	1004 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.405	H	15-Dec	12	5	5	Moderate	Yes	Commercial-Store	Yes	1966	Hill St Café. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
54	5814-008-028	CHEVY CHASE DR SOUTH OF FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.434	H	15-Dec	12	6	6	Moderate	Yes	Parking lot	Yes	1961	Hill St Café Parking lot. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
55	5814-009-013	928 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.137	I	15-Dec	12	2	2	Moderate	Yes	Commercial-Store/office	Yes	1957	Purchased on 03/14/2018 for \$1,725,000. Land cost alone for three units would be \$862,500. Infeasible for residential development.
56	5814-009-025	942 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.296	I	15-Dec	12	4	4	Moderate	Yes	Commercial-Fast food	Yes	1977	Verizon just signed lease in 2021.
57	5820-001-008	548 FOOTHILL BLVD	DVSP	MU2			0.464	J	15-25	20	9	9	Moderate	Yes	Arco Gas Station	Yes	1971	Arco Gas Station. Signed renewed franchise agreement in Q1 2022. Owner/Operator is currently looking to expand hydrogen fueling stations (two installed in 2019).
58	5820-001-014	4440 WOODLEIGH LN	DVSP	MU2	---	---	1.32	J	15-25	20	26	26	Moderate	Yes	Commercial-Club (Thursday Club)	Yes	1926	Thursday Club. This non-profit service organization has been in existence at this site since 1912 They will not sell the property.
59	5815-021-038	4603 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.97	K	20-30	20	20	20	Lower	Yes	Institutional-Private school	Yes	1948	
60	5815-021-010	4532 RINETTI	DVSP	MU2	DVSP	DV-MU-N	0.187	K	20-30	20	4	4	Moderate	Yes	Commercial-Office	Yes	1949	
61	5815-021-011	4526 RINETTI	DVSP	MU2	DVSP	DV-MU-N	0.186	K	20-30	20	4	4	Moderate	Yes	Commercial-Medical/dental	Yes	1950	
64	5820-001-002	514 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.441	L	15-Dec	12	6	6	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
65	5820-001-003	502 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.657	L	15-Dec	12	8	8	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
67	5815-022-002	4522 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.267	M	20-30	20	6	6	Moderate	Yes	Commercial-Medical/dental	Yes	1948	Medical Office.
68	5815-022-003	4526 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.27	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School

La Canada Site Inventory (Site #)

69	5815-022-004	4532 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.256	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
70	5815-022-019	4536 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.28	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	Post Office Government owned. Not eligible for development
72	5815-021-033	555 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.94		20-30	20	19	19	Lower	Yes	Commercial-Bank	Yes	1973	Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale
74	5823-001-016	104 BERKSHIRE PL	Institutional	PS	Institutional	RI-OZ (PSP)	0.55	N/A	20-30	24	14	14	Lower	No	United Methodist Church	No	1977	
75	5810-023-001	1830 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1.67	N/A	20-30	24	41	41	Lower	No	The Church of Jesus Christ of Latter Day Saints	No	1951	City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease
76	5814-027-019	4435 WOODLEIGH LN	DVSP	DVSP-Institutional	DVSP-Institutional	RIOZ-DVSP (DVSP-I)	0.98	BB	15-Dec	12	12	12	Moderate	No	La Cañada Presbyterian Church—Parking	Yes	N/A	
77	5814-018-030	800 FOOTHILL BLVD	DVSP	DVSP-Institutional	DVSP	RI-OZ-DVSP (DVSP-I)	0.38	EE	15-Dec	12	5	5	Moderate	No	St. George Episcopal	No	1962	
78	5813-006-022	1700 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (PS)	0.87	N/A	20-30	24	21	21	Lower	No	Lutheran Church of the Foothills	No	1950	
79	5813-015-055	1200 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1	N/A	20-30	24	24	24	Lower	No	La Canada Congregational Church	No	1924	
80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	20-30	24	10	9	Lower	Yes	Parking lot	Yes	N/A	Owned by same entity as Ross property. No intention of converting to housing in next 8 year period.
81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	20-30	24	65	65	Lower	Yes	Commercial-Shopping center (Ross Dress-for-Less)	Yes	1955	Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship	Yes	1955	Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

La Canada Site Inventory (Site #)

83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	20-30	24	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)	No	1955	Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	20-30	24	4	4	Lower	Yes	Commercial-Shopping center (Avianti Jewelry)	Yes	1955	Purchased in 2019. Long term tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	20-30	24	13	13	Lower	Yes	Commercial-Shopping center (Restaurant)	No	1955	Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	Commercial-Shopping center	No	1966	
87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)	No	1966	
88	5870-010-044	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	20-30	24	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)	Yes	1966	
89	5870-010-045	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center	Yes	1966	
90	5870-011-056	2383 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.18	Q	20-30	24	29	29	Lower	Yes	Commercial-Shopping center	Yes	1977	
91	5870-011-057	2355 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.48	Q	20-30	24	36	36	Lower	Yes	Commercial-Auto service (Car wash)	Yes	1967	
92	5810-014-002	2242 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.12	R	20-30	24	3	3	Above Moderate	No	Commercial-Restaurant	Yes	1957	
93	5810-014-003	2238 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.09	R	20-30	24	3	3	Above Moderate	No	Parking lot	Yes	1978	
94	5810-014-004	2236 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.08	R	20-30	24	2	2	Above Moderate	No	Commercial-Restaurant	Yes	1958	
95	5808-008-020	N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	

La Canada Site Inventory (Site #)

96	5808-008-021	EAST OF N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
97	5814-028-009	600 FOOTHILL BLVD	DVSP-Instit.	Institutional	DVSP	DV-MU-S	1.28	N/A	15-Dec	12	16	16	Above moderate	No	Former Christian Science Church (owned by a private party)	Yes	1949	
100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	20-30	24	6	6	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190)	Yes	1990	Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	20-30	24	16	16	Lower	No	Vacant commercial building (Formerly Pier 1)		1990	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial use going forward and does not have plans to redevelop into housing within the next planning period
102	5810-014-020	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.32	CC	20-30	24	8	8	Lower	No	Parking lot for commercial center (see APN 5810-014-021)	Yes (\$722,237: \$1 5,036)	1960	
103	5810-014-021	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.38	CC	20-30	24	10	10	Lower	No	Commercial center	No (\$951,547: \$1.	1960	

La Canada Site Inventory (Site #)

104	5813-005-074	1716 VERDUGO BLVD	Institutional	PS	Commercial /Office	MU	3.32	N/A	20-30	24	80	80	Lower	No	Parking lot for USC Verdugo Hospital	Yes	1972	NOT connected to sewer/ inadequate infrastructure to support lower income housing. CA Gov Code 65583.2(b)(5)(B) states that "parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan" Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils. See enclosed sewer map and email from City of Glendale Dept of Public Works. Additionally, a parking easement agreement between all owners for parking use has been
105	5820-009-017	458 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.47	DD	15-Dec	12	6	6	Moderate	No	Commercial	Yes	1959	
106	5820-009-021	N/A (directly south of 458	DVSP	R-1	DVSP	DV-MU-S	0.19	DD	15-Dec	12	3	3	Moderate	No	Parking lot for 5820-009-017 (behind building)	Yes	N/A	
107	5820-009-016	456 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.23	DD	15-Dec	12	3	3	Moderate	No	Commercial	Yes	1955	
108	5820-009-014	440 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.23	N/A	15-Dec	12	3	3	Moderate	No	Commercial	Yes	1986	Previously Club Champion studio purchased Nov 2020 for \$2.85MM by owner-user. Repurposed to physical therapist clinic.
109	5820-009-019	420 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.45	N/A	15-Dec	12	6	6	Moderate	No	Commercial (tire store)	Yes	1976	Owner-user. Just Tires does not plan to vacate or change use during next 8 year period
110	5814-0180-029	4467 COMMON WEALTH	DVSP	DVSP-Institutional	DVSP	RIOZ-DVSP (DVSP-I)	0.69	EE	15-Dec	12	5*	5*	Moderate	No	Parking lot for St. George Episcopal Church	Yes	1956	
111	5814-018-017	N/A (DIRECTLY WEST OF 820 FOOTHILL BLVD)	DVSP	DVSP-Institutional	DVSP	DV-MU-S	0.13	EE	15-Dec	12	2	2	Moderate	No	Parking lot for commercial property to the west	Yes	N/A	
112	5814-018-018	820 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.13	EE	15-Dec	12	2	2	Moderate	No	Stepping Stones Academy	Yes	1956	

La Canada Site Inventory (Site #)

[illegible]

EXHIBIT D: Sites Photos

<u>Site #</u>	<u>APN</u>	<u>Address</u>
1	5815-013-012	845 Foothill Blvd.



<u>Existing GP Designation</u>	<u>Zoning</u>	<u>Acres</u>	<u>Consolidation Potential (A-V)</u>	<u>Density Range (du/ac)*</u>	<u>Density Factor</u>	<u>Unit Potential</u>	<u>NET Unit Potential</u>	<u>Income Category</u>	<u>5th Cycle</u>	<u>4th Cycle</u>
DVSP #1	DV-MU-N	0.13	N/A	20-30	24	3	3	Above-Moderate	Yes	

**Comments on Sites
that should not be
included in 6th Cycle**

Purchased on 8/03/2020 for \$3,600,000. Land cost alone for three units would be \$1,200,000 per unit. Infeasible for residential development.

Site #	APN	Address
3	5815-013-016	831 Foothill Blvd.



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP #3	DV-MU-N	0.11	N/A	20-30	24	3	3	Above-Moderate	Yes	

Comments on Sites
that should not be
included in 6th Cycle

Purchased on 11/19/2020 for \$1,560,000. Land cost alone for three units would be \$520,000. Infeasible for residential development.

Site #	APN	Address
26	5815-014-043	Oakwood Plaza Parking Lot



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP #1	DV-MU-N	0.13	N/A	20-30	20	18	18	Lower	Yes	

Comments on Sites that should not be included in 6th Cycle

Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period

Site #	APN	Address
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29	5814-020-028	700 FOOTHILL BLVD
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Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-S	0.42	D	12-15	12	5	5	Above Moderate	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Owner-user operates Panda Express and has no plans to discontinue use over next planning period

Site #	APN	Address
31-34	5812-023-007,010,034,035	1001 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP #31	DV-MU-N	0.130	E	20-30	20	2	2	Moderate	Yes	Yes
DVSP #32	DV-MU-N	0.058	E	20-30	20	1	1	Moderate	Yes	Yes
DVSP #33	DV-MU-N	0.058	E	20-30	20	1	1	Moderate	Yes	Yes
DVSP #34	DV-MU-N	0.185	E	20-30	20	3	3	Moderate	Yes	Yes

Comments on Sites that should not be included in 6th Cycle

Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed

Site #	APN	Address
52,54	5814-008-026,028	1004 Foothill Blvd. (Hill St. Cafe)



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP #52	DV-MU-S	0.41	H	12-15	12	5	5	Moderate	Yes	Yes
DVSP #54	DV-MU-S	0.43	H	12-15	12	6	6	Moderate	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Hill St Café. Upgrade plans approved in 2016 and renovation work completed in 2018.
No plans to turn over to housing within next 8 year period

Site #	APN	Address
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53	5814-008-027	1010 FOOTHILL BLVD
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OUT



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DVSP-MU2	0.293	H	15-25	20	5	5	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

Owner purchased building in 2019 for 4.9 M. Re-habbed building and moved his financial business into building Will not be developed into housing. Should be removed.

Site #	APN	Address
55	5814-009-013	924 Foothill Blvd.



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP #3	DV-MU-s	0.14	N/A	12-15	12	2	2	Moderate	Yes	

Comments on Sites that should not be included in 6th Cycle

Purchased on 03/14/2018 for \$1,725,000. Land cost alone for three units would be \$862,500. Infeasible for residential development.

Site #	APN	Address
56	5814-009-025	942 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-S	0.296	I	12-15	12	4	4	Moderate	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Verizon just signed lease in 2021. Winchells owns the property and will not sell

<u>Site #</u>	<u>APN</u>	<u>Address</u>
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57	5820-001-008	548 FOOTHILL BLVD
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<u>Existing GP Designation</u>	<u>Zoning</u>	<u>Acres</u>	<u>Consolidation Potential (A-V)</u>	<u>Density Range (du/ac)*</u>	<u>Density Factor</u>	<u>Unit Potential</u>	<u>NET Unit Potential</u>	<u>Income Category</u>	<u>5th Cycle</u>	<u>4th Cycle</u>
DVSP	DV-MU-S	0.464	J	12-15	12	6	6	Moderate	Yes	

Comments on Sites
that should not be
included in 6th Cycle

Arco Gas Station. Signed renewed franchise agreement in Q1 2022. Owner/Operator is currently looking to expand hydrogen fueling stations (two installed in 2019).

Site #	APN	Address
58	5820-001-014	4440 WOODLEIGH LN



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-S	1.32	J	12-15	12	16	16	Moderate	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Thursday Club. This non-profit service organization has been in existence at this site since 1912 They will not sell the property.

Site #	APN	Address
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62	5815-021-027	4537 INDIANOLA WAY
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OUT



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DVSP-MU2	0.257	K	15-25	20	5	4	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

Owner has just began building a new office building. This was approved in 2020. There will be no housing on this lot

Site #	APN	Address
63	5815-021-900	4531 INDIANOLA WAY

X



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DVSP-MU2	0.28	M	15-25	20	5	4	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

Post Office Government owned. Not eligible for development

<u>Site #</u>	<u>APN</u>	<u>Address</u>
64	5820-001-002	514 FOOTHILL BLVD
65	5820-001-003	502 FOOTHILL BLVD



<u>Existing GP Designation</u>	<u>Zoning</u>	<u>Acres</u>	<u>Consolidation Potential (A-V)</u>	<u>Density Range (du/ac)*</u>	<u>Density Factor</u>	<u>Unit Potential</u>	<u>NET Unit Potential</u>	<u>Income Category</u>	<u>5th Cycle</u>	<u>4th Cycle</u>
DVSP	DV-MU-S	0.441	L	12-15	12	6	6	Moderate	Yes	Yes
DVSP	DV-MU-S	0.657	L	12-15	12	8	8	Moderate	Yes	Yes

Comments on Sites that should not be included in 6th Cycle

Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over in 6th Cycle

Site #	APN	Address
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67	5815-022-002	4522 INDIANOLA WAY
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Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-N	0.267	M	20-30	20	6	6	Moderate	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Medical Office. Not Moving.

Site #	APN	Address
68	5815-022-003	4526 INDIANOLA WAY



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-N	0.027	M	20-30	20	6	5	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

School

Site #	APN	Address
69	5815-022-004	4532 INDIANOLA WAY



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-N	0.256	M	15-25	20	6	5	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

School

Site #	APN	Address
71	5815-020-023	N/W CORNER OF FOOTHILL BLVD & RINETTI LN

OUT



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DVSP-MU2	0.53	N/A	15-25	20	10	10	Moderate	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

Chevron Gas Station and Food Mart. Property was recently remodeled. Will not be available for housing

Site #	APN	Address
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72	5815-021-033	555 FOOTHILL BLVD
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Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-N	0.94	N/A	20-30	20	19	19	Lower	Yes	Yes

Comments on Sites that should not be included in 6th Cycle

Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale

Site #	APN	Address
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73	Caltrans Site--No APN	S/E OF INTERSECTION OF I- 210/SR-2, ON VERDUGO BLVD
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OUT



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Cate gory	5th Cycle	4th Cycle
Mixed Use	Mixed Use	4.14	N/A	20-30	24	96	96	Lower	Yes	YES

**Comments on Sites
that should not be
included in 6th Cycle**

Site Owned by Caltrans. Under freeway right a way. From Caltrans: They will not permit housing under right a way. Property is under long term lease. Cal Trans will not sell property. Tenants include Starbucks, El Polla Loco, and Regal movie Theater

Site #	APN	Address
75	5810-023-001	1830 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Institutional	RI-OZ (P/SP)*	1.67	N/A	20-30	24	41	41	Lower	No	YES

Comments on Sites
that should not be
included in 6th Cycle

City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease

Site #	APN	Address
81	5870-001-014	2111 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	2.7	0	20-30	24	65	65	Lower	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

Site #	APN	Address
82	5870-001-015	2125 FOOTHILL BLVD



Existing_GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density_Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income_Cate gory	5th Cycle	4th Cycle
Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

Site #	APN	Address
83	5870-001-016	2135 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	0.307	0	20-30	24	8	8	Lower	Yes	

Comments on Sites that should not be included in 6th Cycle

Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

Site #	APN	Address
84	5870-001-017	2137 FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	0.128	0	20-30	24	3	3	Lower	Yes	

Comments on Sites
that should not be
included in 6th Cycle

Purchased in 2019. Long term Owner/Tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

Site #	APN	Address
85	5870-001-018	2139 FOOTHILL BLVD



Existing_GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density_Range (du/ac)*	Density Factor	Unit_Potential	NET_Unit Potential	Income_Cate gory	5th_Cycle	4th_Cycle
Mixed Use	Mixed Use	0.54	0	20-30	24	13	13	Lower	Yes	

Comments on Sites
that should not be
included in 6th Cycle

Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.

Site #	APN	Address
86	5870-010-046	2251 W FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	

Comments on Sites
that should not be
included in 6th Cycle

GTR owner Purchased in 2011 10.7 M. Big Lots Main Tenant. Will not turn over for Housing at 24 U/Acre

Site #	APN	Address
87	5870-010-043	2243 W FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	3.14 (0.73)	P	20-30	24	18	18	Lower	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

Property Lot size is wrong. Should be 0.73 Acres not 3.14 Acres. Should be only 17 units not 75 units. GTR owner Purchased in 2011 10.7 M. Big Lots Main Tenant. Will not turn over for Housing at 24 U/Acre

Site #	APN	Address
88	5870-010-044	2243 W FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	1.07	P	20-30	24	25	25	Lower	Yes	Yes

Comments on Sites
that should not be
included in 6th Cycle

GTR owner Purchased in 2011 10.7 M. Big Lots Main Tenant. Will not turn over for Housing at 24 U/Acre

Site #	APN	Address
89	5870-010-045	2251 W FOOTHILL BLVD



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	YES

Comments on Sites
that should not be
included in 6th Cycle

GTR owner Purchased in 2011 10.7 M. Big Lots Main Tenant. Will not turn over for Housing at 24 U/Acre

<u>Site #</u>	<u>APN</u>	<u>Address</u>
100-101	5810-014-020,021	2200 Foothill Blvd. (Pier 1)



<u>Existing GP Designation</u>	<u>Zoning</u>	<u>Acres</u>	<u>Consolidation Potential (A-V)</u>	<u>Density Range (du/ac)*</u>	<u>Density Factor</u>	<u>Unit Potential</u>	<u>NET Unit Potential</u>	<u>Income Category</u>	<u>5th Cycle</u>	<u>4th Cycle</u>
Conn/Office #100	CPD	0.25	BB	20-30	24	6	6	Lower	No	No
Conn/Office #101	CPD	0.63	BB	20-30	24	16	16	Lower	No	No

**Comments on Sites
that should not be
included in 6th Cycle**

Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period

Site #	APN	Address
--------	-----	---------

104	5813-005-074	1716 Verdugo Blvd. (Hospital Parking Lot)
-----	--------------	--



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
Institutional	PS	3.32	N/A	20-30	24	80	80	Lower	No	No

**Comments on Sites
that should not be
included in 6th Cycle**

Two different owners have a recorded(LA County 04-1433410) Parking and Easement Agreement. Both groups would have to sign off to re-zone property. Not connected to sewer/inadequate infrastructure to support lower income housing. CA Gov Code 65583.2(b)(5)(B) states that "parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan" Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils. See enclosed sewer map and email from City of Glendale Dept of Public Works.

Site #	APN	Address
108	5820-009-014	440 Foothill Blvd. (Aspire Physical Therapy)



Existing_GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-S	0.23	N/A	12-15	12	3	3	Moderate	No	No

Comments on Sites
that should not be
included in 6th Cycle

Previously Club Champion studio purchased Nov 2020 for \$2.85MM by owner-user.
Repurposed to physical therapist clinic.

Site #	APN	Address
109	5820-009-019	420 Foothill Blvd. (Just Tire)



Existing GP Designation	Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential	NET Unit Potential	Income Category	5th Cycle	4th Cycle
DVSP	DV-MU-S	0.45	N/A	12-15	12	6	6	Moderate	No	No

Comments on Sites that should not be included in 6th Cycle

Owner-user (Goodyear). Just Tires does not plan to vacate or change use during next 8 year period

March 30, 2022

La Cañada Flintridge City Council
One Civic Center Drive
La Cañada Flintridge, California 91011

Re: City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Dear Honorable Members of City Council of the City of La Cañada Flintridge,

Please find the following comments and information pursuant to the ongoing updates to the City of La Cañada Flintridge's 6th Cycle Housing Element, particularly the Sites Inventory.

We have included exhibits as additional attachments to support the analysis provided herein, which includes:

- Exhibit A - City of La Cañada Flintridge's 6th Cycle Sites Inventory List
- Exhibit B – List of Ineligible Sites that do not have a realistic capacity for redevelopment over the next planning cycle for reasons including:
 - Existing uses are an impediment to additional residential development
 - Long-term commercial leases in place do not expire during the next planning period
 - Property owner provided letter stating its intention to retain the existing commercial use, and has no intention of redeveloping the site for housing
 - Properties recently sold (within past 4 years) but existing use has been retained
- Exhibit C – Percentage (%) of Lower Income RHNA by City Grid
- Exhibit D – Sites photos
- HCD Memorandum: Housing Element Sites Inventory Guidebook

As detailed in the HCD Housing Element Sites Inventory Guidebook (2020), “nonvacant sites with differing existing uses and lacking in common ownership, whether contiguous or located in the same general area, may not rely on a generalized analysis.” Individual owners may not wish to sell their property or redevelop their site with residential uses. In addition, each site's existing commercial use may have lease agreements of different lengths of time. Existing leases and uses are presumed to be an impediment to residential redevelopment without substantial evidence showing the contrary. Properties that should be removed for these reasons and more are detailed in Exhibit B. Individual site photos for context and reference are in Exhibit D.

In the analysis that follows, we've copied excerpts from HCD's correspondence letter to the City of La Cañada Flintridge dated December 3, 2021 to preface our commentary. The HCD correspondence is italicized to distinguish between our comments in red.

Finally, we present a simple solution which includes rezoning three sites with realistic capacities for housing development for lower income. By simply allowing for densities at 20-30 du/acre in line with state requirements for lower income RHNA, the City would resolve the issue by zoning for 104 lower income units on these sites in the DVSP with a realistic capacity for housing. Realistic sites outside of the DVSP, like the former Pier One, can accommodate densities that exceed 20-30 du/acre. This solution would equalize the low income distribution throughout the City, avoiding any risk of violating AFFH.

Regards,

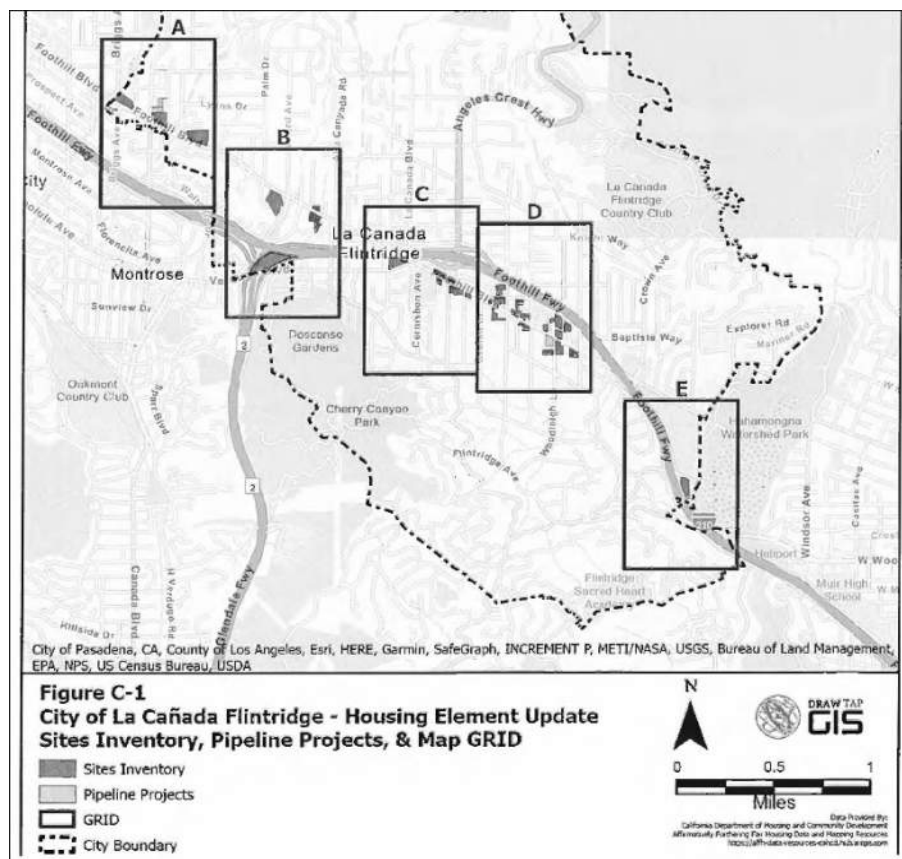
Garret Weyand

City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Comments

Sites Inventory: The element must include an analysis demonstrating whether sites identified to meet the RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that effects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).

Lower Income RHNA units are not distributed throughout the City of La Cañada Flintridge, representing a potential violation of AFFH. For the 6th Cycle Housing Element, the City of La Cañada Flintridge has a RHNA allocation of 572 low and very low-income units, which includes a 30% buffer per state Housing Element law requirements. Below is an excerpt from the Draft Housing Element showing the Sites Inventory located throughout the City.



Grid A contains 306 lower income units, representing 53% of the total lower income RHNA. Grid B contains 156 units, 27% of the total lower income RHNA. These two areas represent over 80% of the total lower income RHNA for the City, showing that there is a disproportionate concentration of lower income RHNA units on the far west-side (and less desirable) side of town.

By contrast, Grid C and Grid D contain 24 units (4%) and 72 units (13%) of lower income RHNA, respectively. These areas are all contained within the Downtown Village Specific Plan

City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Comments

area, which collectively contain 17% of the lower income RHNA. Compared with over 80% lower income RHNA concentrated on the west side outside of the Specific Plan area, it is clear that lower income units are not proportionately distributed throughout the City's Sites Inventory, which does not comply with AFFH requirements. See Exhibit C for calculations and additional detail.

Small Sites and Lot Consolidation: The element identifies several sites consisting of aggregated small parcels less than half acre. For parcels anticipated to be consolidated, the element must demonstrate the potential for lot consolidation. For example, analysis describing the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and information on the owners of each aggregated site. For parcels anticipated to develop individually, the element must describe existing and proposed policies or incentives the City will offer to facilitate development of small sites. Please be aware sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that sites are adequate to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).)

The City has had no track record of success in Lot Consolidation. Most of the properties listed are too small and far too expensive to contemplate residential development. For example, Site #1 just sold for \$3.6 Million and is slated for 3 units in the site inventory list. This would put the land cost alone at \$1.2 Million per unit, which is infeasible. Please see our site inventory list in Exhibit A and list of ineligible sites in Exhibit B. The City has also listed several properties that have sold in the last 4 years. In every case the commercial use has been maintained.

Suitability of Nonvacant Sites: *The element identifies non vacant sites to accommodate the regional housing need for households of all incomes, stating that "a specific analysis was conducted on properties within the City to identify vacant and underutilized properties" (p. 77). This statement alone is not adequate to demonstrate the potential for additional development in the planning period. A complete analysis should describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentive or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g)). Development trends and market analysis should relate to the sites identified in the sites inventory. For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.*

City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Comments

The existing use must be analyzed as a possible impediment to new development. Additionally, and in this case, more than 50% of the lower income need is accommodated on sites in use. Therefore, before the site may be identified as one available for housing, the jurisdiction must overcome the presumption by showing: 1) past experience with converting the existing use to higher density residential development, 2) the current market demand for the existing use will not impede redevelopment, and 3) existing leases or contracts would not legally prevent redevelopment of the site. Please see Exhibit A, B & D for more detail.

Governmental & Non-Governmental Constraints: An analysis of potential and actual governmental & non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).

After submitting a site inventory list in October of 2021, which stated that the DVSP would be rezoned to 20-30 units per acre, the City is now rezoning the North side of Foothill to 20-30 units per acre and keeping the South side at 12-15 units. This introduces greater governmental constraints on sites that are otherwise eligible for lower income housing, including two churches (Religious Overlay) and 600 Foothill.

LOWER INCOME (20-30 du/acre)

Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consoli- dation Potential (A-V)	Density Range (du/acre)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improvement Value: LV > IV	Year Built	Comments
76	5814-027-019	4435 WOODLEIGH LN	DVSP	DVSP- Institutional	DVSP- Institutional	RI/OZ-DVSP (DVSP- II)	0.98	BB	20-30	24	24	24	Lower	No	La Cañada Presbyterian Church--Parking lot	Yes	N/A	
	5814-028-008	N/A	DVSP	DVSP- Institutional	DVSP- Institutional		0.45		20-30	24	11	11	Lower		Partial parking lot of Presbyterian Church			Not currently included in Sites Inventory
77	5814-018-030	800 Foothill Blvd	DVSP	DVSP- Institutional	DVSP	RI-OZ- DVSP (DVSP-II)	0.38	EE	20-30	24	10	10	Lower	No	St. George Episcopal	No	1962	
110	5814-0180-029	4467 COMMONWEALTH AVE	DVSP	DVSP- Institutional	DVSP	RIOZ-DVSP (DVSP- II)	0.69	EE	20-30	24	17	17	Lower	No	Parking lot for St. George Episcopal Church	Yes	1956	
111	5814-018-017	N/A (DIRECTLY WEST OF 820 FOOTHILL BLVD)	DVSP	DVSP- Institutional	DVSP	DV-MU-S	0.13	EE	20-30	24	4	4	Lower	No	Parking lot for commercial property to the west	Yes	N/A	
112	5814-018-018	820 Foothill Blvd	DVSP	MU1	DVSP	DV-MU-S	0.13	EE	20-30	24	4	4	Lower	No	Stepping Stones Academy	Yes	1956	
113	5814-018-019	814 Foothill Blvd	DVSP	MU1	DVSP	DV-MU-S	0.09	EE	20-30	24	3	3	Lower	No	Jiu-Jitsu	No	1953	
97	5814-028-009	600 Foothill Blvd	DVSP-Instit.	Institutional	DVSP	DV-MU-S	1.28	N/A	20-30	24	31	31	Lower	No	Former Christian Science Church (owned by a private party)	Yes	1949	
TOTAL															104	104		

LOWER INCOME (40-50 units/acre)

Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consoli- dation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improvement Value: LV > IV	Year Built	Comments	
100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	40-50	40	10	10	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190)	Yes	1990		
101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	40-50	40	26	26	Lower	No	Vacant commercial building (Formerly Pier 1)		1990		
TOTAL																			36 36

Total Lower Income Units 140

From: Richard Harris [REDACTED]
Sent: Tuesday, July 19, 2022 1:23 PM
To: 'housingelement@lcf.ca.gov'
Subject: Future Planning for Housing in LCF

Categories: La Canada-Housing Emails

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

City of LCF officials,

I have oversight and authority over the properties located at:

1. 528 Foothill Blvd.
2. 542 Foothill Blvd.
3. 801 Foothill Blvd.
4. 817 Foothill Blvd.

All of these properties are owned by Caltech Employees Federal Credit Union. Options to develop with multi-family residential, commercial or mixed use for future development seem worthy of consideration on its face.

Future options seem somewhat straight forward. However, what change would occur to our properties immediately upon rezoning the property, if this were to occur? Would our property tax change? Would there be new restrictions with the approval of a new zoning code and Downtown Village Specific Plan? Would there be new traffic restriction consideration? These are just a few questions.

I would be interested in discussing these potential changes further without attending a public forum. Thank you.

Richard L. Harris
President/CEO
Caltech Employees Federal Credit Union

[REDACTED]



From: Keith Eich [REDACTED]
Sent: Wednesday, July 20, 2022 9:09 AM
To: Housing Element Email
Cc: Richard Gunter
Subject: Fw: New Housable ADU Projects in July 2022

Categories: La Canada-Housing Emails

Sharing an email that came in.

From: Scott Van Dellen [REDACTED]
Sent: [REDACTED]
To: Keith Eich <keich@lcf.ca.gov>
Subject: Fwd: New Housable ADU Projects in July 2022

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hi, Keith. The city should revisit the ADU and 2nd unit design standards. These are examples that would meet the need but not current design standards.

Scott Van Dellen
[REDACTED]

Begin forwarded message:

From: Scott Van Dellen [REDACTED]
Date: July 20, 2022 at 8:57:37 AM PDT

[REDACTED]

Subject: Re: New Housable ADU Projects in July 2022

Those don't meet LCF design standards.

Scott Van Dellen
[REDACTED]

On Jul 20, 2022, at 8:51 AM, Anita Hossepien <anitahossepien@gmail.com> wrote:

They (Housable Company) are already advertising the option of selling these ADUs and even adding a 7th unit to a 6-unit property. !!!!



Hi anita

This July, we are proud to feature a few of the projects that we have worked on over the past month. At Housable, we specialize in getting projects out of the idea phase and into construction reliably with our practical approach to project design and project management. This month we are sharing another glimpse into what we do every day for our clients across California.

Housable ADU Projects Update

July 2022

\$700k to \$1.8m in 6 months

We worked with the builder of this [Listing](#) to design and permit this garage conversion to ADU just in time to put this 1922 bungalow on the market. [View more photos of the finished ADU here...](#)



Duplex Adds Two New ADUs

This existing duplex got not one, but *two* new ADUs mirrored in the backyard. The property now has four total units, providing twice the housing. [View more photos of this project here...](#)

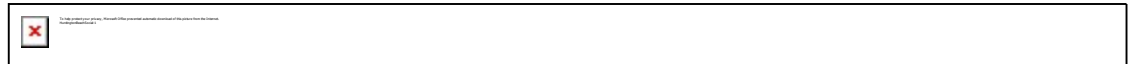
6-Unit Property Adds a 7th

This project is adding a new detached ADU to an existing 6-unit multi-family property in Pasadena. [View more photos of this project here...](#)



ADU Project Tour in HB

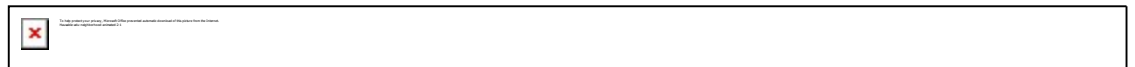
With just over 12 months since starting the design process with Housable, this project in Huntington Beach is nearing completion. In this video, LJ on our team takes you on a quick tour to give you the latest on this project. Enjoy!



Want to see more of our ADU completed projects?

[Browse More ADU Projects](#)

As always, all featured ADU projects were designed and built with Housable.



The ADU Marketplace for California

Housable, Inc., 1166 Mission St, San Francisco, CA, (415) 300-2387

[Unsubscribe](#) [Manage preferences](#)

--

Anita Hossepien



From: info@lcf.ca.gov
Sent: Wednesday, July 20, 2022 1:45 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Scott Van Dellen

Email

Message

Hi! I am writing to oppose the density increase for the 600 Foothill Blvd property from 12-15 du/ac in the Draft Housing Element the Council was going to consider on April 5, 2022 to 25-30. This will allow up to 39 dwelling units on the property, and with the 20% density bonus the Sponsor was requesting, the actual number of units would be 47. This is almost the same exact request that was voted down on a 4-0 vote of the City Council (same members still serving now). The draft site selection also includes the addition of 4435 Woodleigh (the LCPC parking lot south of 600 Foothill) for the same 25-30 du/ac designation. Of course, this would severely exacerbate the same problems that the former denied, and now currently proposed zoned, 600 Foothill Blvd project - times 2. It appears that 600 Foothill is the only property on the south side of Foothill with the 25-30 du/ac designation besides the House America "clock" property in the DVSP. that is not a church property. I also oppose that. That is a very busy intersection at the Angeles Crest Highway intersection, and also has the Community Center just across the street from the property on the west.

Finally, the St. George Church and surrounding commercial properties are also inappropriate for the 25-30 du/ac density proposed. Again, this would create great congestion and severe impacts on the contiguous residential properties to the south.

The City can make up for the loss of these units by INCREASING the density on some of the properties that can support more because of highway and freeway access and their remoteness from residential neighborhoods. Such properties might include 104 Berkshire - the United Methodist Church. I would also suggest that many of the North of Foothill, South of Freeway properties in the DVSP are appropriate for higher densities than 25-30 du/ac. The commercial properties on the western end of Verdugo Blvd and Foothill Blvd can also handle higher densities because they already support high intensity commercial and retail activities.

The Council could achieve its RHNA allocation by more appropriately scaling density to the capacity of the property and neighborhood. We all know that higher densities are more likely to create availability for low, moderate and above moderate income housing because of the high cost of land in LCF. One size (or in this case, two sizes - 12-15 and 25-30) does not fit all.

I have also recommended many times that the City make a more concerted effort to increase the ADU/2nd unit and lot split programs. Reducing the overkill design standards and actually publicizing and promoting their development will create more housing, more affordable housing, and less impactful housing, and all much quicker than 2 and 3 story, very dense, housing projects with underground parking. I would increase our ADU/2nd unit/lot split allocation to the RHNA above the current allocation, at least by the 20% leeway you have built into the RHNA requirement. You can explain how you will modify design standards and promote the development of these units to justify your increased allocation.

I think the City can make a very strong case to HCD that by flexibly increasing density where appropriate, and even higher in some cases than suggested in this site inventory, and promoting the development of ADU/2nd unit and lot splits, it has created a very good plan that should meet with their approval.

From: info@lcf.ca.gov
Sent: Wednesday, July 20, 2022 9:39 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Susan Mastrodemos

Email

[REDACTED]

Message

I believe that the 2100 and 2200 blocks of Foothill Blvd are suitable for high-density housing. The South side of the street could be a nice Senior village if a grocery store could be located in the retail level.

From: Bernard Shih [REDACTED]
Sent: Wednesday, July 20, 2022 11:58 PM
To: housingelement@lcf.ca.gov
Cc: Vanessa Koo [REDACTED] skoleda@lcf.ca.gov; Emily Stadnicki
Subject: 1535 Foothill Boulevard

Categories: La Canada-Housing Emails

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Thank you for your June 30 and July 14 letters concerning proposed updates to the city's Housing Element.

We strongly support changes in the Zoning Code to allow commercial properties such as ours to develop with multi-family residential, commercial or mixed use.

We most definitely have an interest in rezoning our property at 1535 Foothill Boulevard to allow for multi-family and/or mixed use development.

Best regards,

LACY PARK REAL ESTATE INVESTMENT LLC

Bernard Shih
Member - Manager
Lacy Park Real Estate Investment LLC
[REDACTED]

From: info@lcf.ca.gov
Sent: Thursday, July 21, 2022 8:25 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Patricia Wynne-Hughes

Email

[REDACTED]

Message

Has the city conducted an accurate inventory of the current number of guest houses or a D use in Lacanada? As you know, that may significantly decrease the need for more units. Also, will notice of an incentive/specifcics to build guest houses In the community be issued prior to making decisions about rezoning? Thank you

From: Alex Venneri [REDACTED]
Sent: Friday, July 22, 2022 9:59 AM
To: housingelement@lcf.ca.gov
Subject: 842-858 foothill

Categories: La Canada-Housing Emails

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i am in receipt of expanding the zoning in my area. Based on the letter, it seems to be in my interest to approve such zoning changes in addition to what we currently have which should be expanded to allow any tenant use vs the restrictions that are currently in place.

thank you

alex venneri

Sent from my iPhone

From: info@lcf.ca.gov
Sent: Friday, July 22, 2022 11:22 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Anita Hossepien

Email**Message**

- We are back to square one with the decisions made about the Housing Element
- The City Council voted UNANIMOUSLY (4 to zero) against the 600 Foothill Blvd project on Nov 16, 2021 to uphold the appeal of all six resolutions passed by the Planning Commission thereby denying the 600 Foothill Blvd project from going forward as proposed by the developer
- The LCF Community has been very clear in their OPPOSITION to high density multi family and commercial buildings butting up against residential properties on the South side of Foothill Blvd within the Downtown Village Specific Plan
- Over 300 petitions were signed by LCF residents expressing their opposition to the approval of the 600 Foothill project in October 2021 by the Planning Commission
- The prior mayors have written letters to the City Council members and the Outlook Newspaper to the 600 Foothill project that was approved by the Planning Commission in October 2021.
- At the Zoomed City Council meeting on February 7, 2022, the 4 City Council members present made the recommendation to Staff to EXCLUDE the South side of Foothill Blvd for projects higher than two stories. However, it has now been put back on the new Site Inventory list as of July 20, 2022.
- The congestion problems from the ARCO station needs to be taken into account. Upzoning the land across the street from them will exacerbate the traffic and parking issues (due to the narrow streets that intersect Foothill).
- We oppose the up-zoning of Housing America , the LC Presbyterian Church and St George's Church which are all on the South side of Foothill for the same reasons.
- We are requesting that other areas be considered that would be less impactful to the residential homes such as: USC/VHH area near the UA Theaters, Hillside and Methodist Church area, West side of Foothill near Ocean View Blvd. and the island north of Foothill Blvd and South of the freeway. Why are these areas not being considered?
- Our City can present a strong case about increasing the number of ADUs. By relaxing the City's design standards and showing HCD that our numbers have gone up 480%, we can make a case for not using an average based on the prior 2 years but using the numbers from this year (when the laws changed to allow for ADUs) to calculate the future demand for ADUs. We can increase the ADU numbers (48 units/year times 6 years= 288) and completely satisfy the very low-income requirements from the State.

Thank you,

Anita Hossepien

From: info@lcf.ca.gov
Sent: Sunday, July 24, 2022 8:03 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Anita Hossepien

Email**Message**

The reason the State's Housing plan will not work in our city:

- 1) LCF is rated as a Very High Fire Hazard Severity Zone by the State of California (VHFHSZ)
https://osfm.fire.ca.gov/media/5826/la_canada_flintridge.pdf
- 2) Many areas in LCF have only ONE STREET for entering or exiting. In addition, some of these streets are single car wide access and in windy hillside conditions.
- 3) About half the homes in LCF are on septic tanks therefore, the States' estimate of increasing LCF housing by 612 units needs to be adjusted down since increased density for additional units can not be accommodated in these septic areas.
- 4) LCF has ONE MAIN STREET: Foothill Blvd. Increasing density on this street will cause infrastructure issues (electricity, water, etc.) as well as emergency response problems (fire, ambulance)
- 5) We have already had many prior issues with So Cal Edison in LCF in the past few years (relating to the Utilities ability to provide reliable service). The UTILITIES will have difficulty supplying high density buildings in LCF.

If we must comply with the State's plans regardless of the above issues, we should discuss:

- A) East LCF: Only appropriate area is the "Island" surrounded by the freeway and North of Foothill Bl.
- B) West LCF: More options both North and South of Foothill Blvd.
- C) Property owners plans for the future: LCF does not need to get the approval or future plans of commercial/property owners in order to rezone areas.
- F) Low-income renters need units near job hubs and transit systems for access to employment. This does not make LCF a good choice.
- E) Due to the high cost of property/land in LCF, it is very unlikely that a developer would build low-income housing in LCF no matter how the city rezones it.
- D) Planning staff needs to explain to property owners that this rezoning does not force them to redevelop their property into high density multi-units housing. Also, the value of their property may go up with rezoning since future potential buyers of their property would have more options for developing the property.
- G) The only solution to the State's mandate for LCF is ADUs since the land it is built on is in essence free for the homeowner. Pre-build ADUs can cost about \$300,000 allowing it to be profitable for the homeowner to rent it out as low-income housing and cover the cost of the mortgage.

H) The planning staff needs to have educational sessions informing residents that the State allows ADUs now which were not allowed in LCF in the past. This would increase the number of requests to build ADUs. Once this is done, our numbers for ADUs would increase significantly. We should not be basing our ADU estimates on an average of the past 3 years. We should look at the most recent months when ADUs in LCF and throughout the state have grown exponentially and base our estimates on these months. If we do that, we can satisfy the State's requirements for low-income and 612 units with only one out of each 10 homes in LCF.

I) A better option for the State would be to provide their funding for low-income developments to developers who convert abandoned malls, underutilized office buildings and commercial sites which are closer to available transit.

J) LCF staff needs to negotiate with the State about the unique needs of our city. Having only ADUs would prevent any rezoning. Are they taking the easy way out and not trying to get what this city deserves?

K) If the staff cannot do this, then maybe we should look at joining the other 48 Californian cities that are suing the State for this unconstitutional mandate.

L) I am not sure that staying under the radar by rezoning as the State desires (in order to divert the State's attention to other cities who refuse to follow the mandate) will be the right answer since if it allows even one developer to build a massive multi-unit complex, it may negatively impact this city forever.

Scott Van Dellen
La Canada, CA. 91011

July 25, 2022

Councilmembers of the City of La Canada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011.

Dear Councilmembers,

I am writing to comment on the recently released Site Selection Draft for the Sixth Cycle Housing Element. I think it's a very comprehensive list of properties, fairly distributed throughout the City. It is easy to understand the criteria and application for each property and will help property owners, developers, and homeowners to understand where increased housing may be possible on their property or neighborhood.

I am, of course, VERY disappointed by the subcommittee's change to the criteria for determining the higher density application in the Downtown Village Specific Plan (DVSP). The subcommittee CHANGED the previous Council members' comments when it denied the previous 600 Foothill application on November 16, 2021, and the April 5, 2022, Draft Housing Element criteria. That former criterion expressed by the Council members **was 12-15 dwelling units per acre on the South side of Foothill in the DVSP area**. The subcommittee that released the Site Selection Draft changed this criterion to **only properties that directly abut a residential home**.

With this change, it was no surprise to find out that the density was increased for the 600 Foothill property from 12-15 du/ac in the Draft Housing Element the Council was going to consider on April 5, 2022, to 25-30 du/ac. This will allow up to 39 dwelling units (30 x 1.28 acres) on the property, and with the 20% density bonus the Sponsor was requesting for senior housing, the actual number of units would be 47. This is almost the same exact request that was voted down on a 4-0 vote of the City Council (same members still serving now). And you list it as "above moderate" income, so it does nothing for the harder to fill lower and moderate-income categories. Furthermore, the draft site selection also includes the addition of 4435 Woodleigh (the LCPC parking lot south of 600 Foothill) for the same 25-30 du/ac designation. Of course, this effectively DOUBLES the same traffic, congestion, and other problems that the former denied 600 Foothill Blvd project exhibited.

Checking over the list of other south side Foothill properties in the DVSP, I found only 4 other properties that qualify under this criterion: 1010 Foothill (House America clock building), 814 Foothill (JSB Motors, 820 Foothill (Gracie Barre studio) and the parking lot west of 820 Foothill. Those resulted in only 19 units to the 612 total.

I did the math. You don't need these 5 properties up zoned to meet the RHNA unit requirement. Adding up all the potential net units from the Site Selection list resulted in 775 units. The RHNA requirement is 612. With a 20% buffer that number is 734. Returning the 5 properties mentioned to the 12-15 du/ac, results in 20 (before any density bonus) for 600 Foothill, 5 for 1010 Foothill,

and 2 each for the remaining 3 properties, for a new net total of 755 units. STILL, more than the 734-unit requirement. THAT IS EVEN BEFORE ANY ALLOCATION FOR ADUs!

Let me comment on the 20 units available to 600 Foothill. At 1.28 acres, the owner could build a nice townhome project with a below grade driveway that enters below grade garages, with two story, detached homes above. Although we appear to be entering a slowdown in home sales, La Canada still has a dearth of single-family homes below \$2 million. Pricing these at \$1.5 million each would still result in gross sales of \$30 million.

Do you want a better way to really impress HCD? You should create a higher density zone where it is more appropriate – retail areas with huge parking lots, better access to buses and freeways, and not impacting adjacent residential neighborhoods. Those would include the commercial properties from 2111 Foothill through 2383 Foothill. These are better supported by commercial cross streets and already widened and street lighted for higher density traffic. You should also add sites such as 104 Berkshire - the United Methodist Church. This would help with geographic dispersion and placing housing nearer freeway and artery street access.

With these suggestions, the City should easily achieve its RHNA allocation and demonstrate to HCD that the City is taking this requirement to heart and actually expects to exceed the goal. You will be able to show a few years down the line that affordable housing actually gets built, by more appropriately scaling density to the capacity of the property and neighborhood. We all know that higher densities are more likely to create availability for low, moderate and above moderate-income housing because the high cost of land in LCF spread over more units will reduce the price of each unit. One size (or in this case, two sizes - 12-15 and 25-30 du/ac) does not fit all.

I also have recommended many times that the City make a more concerted effort to increase the production and counting of units created by the ADU/2nd unit and lot split programs. Reducing the current overkill design standards and actually publicizing and promoting their development will create more housing that will be more affordable, less impactful, and much quicker than 2 and 3 story, very dense, housing projects with underground parking. The current allocation of 82 units over 8 years is only 10.25 units per year. The recent history of 24 permitted units in 2022 through June 2022 (up from 10 in 2021 and 13 in 2020) suggests that this number is too low and does not consider the future benefit of the 2nd unit and lot split ordinance. By reducing the design standards in exchange for renting the units at lower and moderate-income affordable rents, you should easily be able to beat this number and tell a great story four years down the line when HCD is expected to audit the Housing Element.

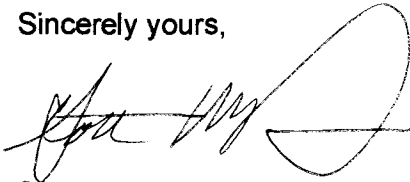
However, you won't need to fight this battle now with HCD. You don't need more. Here is my modification to the Site Selection numbers, even increasing the buffer to 30% before dividing by lower, moderate, and above moderate income AND CONSIDERING NO INCREASE TO ADUs would be:

ADUs/2 nd units/lot splits	82
<u>Up-zoning increase</u>	<u>734</u>
Total	816

Required	612
<u>30% buffer</u>	<u>184</u>
Total	796

I think the City can make a very strong case to HCD that by flexibly increasing density where appropriate, even higher in some cases than suggested in this site inventory and promoting the development of ADU/2nd unit and lot splits, it has created a very good plan that should meet with their approval.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Scott Van Dellen', with a large, stylized loop at the end.

Scott Van Dellen



From: Alex Khatchaturian [REDACTED]
Sent: Monday, July 25, 2022 1:31 PM
To: housingelement@lcf.ca.gov
Cc: [REDACTED]
Subject: La Canada Flintridge Sites Inventory (Second Draft) – Public Review – July 20-29, 2022
Attachments: Letter from LCF dated 6.30.2022.pdf; Letter from LCF dated 7.14.2022.pdf; 20220720_LCF_6thCycle_SitesInventory_2nd_DRAFT_4.pdf; 20220701_Draft_Scenarios.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: La Canada-Housing Emails

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Ms. Stadnicki,

I am writing in response to two letters recently sent from the City of La Canada Flintridge (LCF) to commercial property owners and faith-based organizations regarding future planning for housing in LCF. I have attached both letters, dated 6/30/2022 and 7/14/2022, to this email for reference.

My family owns the commercial property located at 2200 Foothill Boulevard, identified as sites #100 and #101 in the Sites Inventory (see attached). The building is currently unoccupied, but it is being marketed for a commercial use, and the property owner has no interest in developing residential units even if the density is doubled to 50 du/ac. Based on the economic analysis by Michael Baker International ("City Consultant"), specifically Development Scenario B, the land value of our property to a residential builder, assuming entitlements at a density of 50 du/ac, would be \$4.4M (50 du/ac x 0.88 ac x \$100K/du), which is over \$2M less than an unsolicited offer we received two months ago from an investor with the intent to convert the building into multi-tenant medical units. The analysis provided by the City Consultant unequivocally affirmed our own conclusion derived from our own independent feasibility study that commercial is the best and highest use for our property.

2200 Foothill Boulevard will not be available for the development of residential units during the 2021-2029 housing cycle. As previously mentioned in public comments to the planning commission, city council, and to city staff, we are negotiating with several parties to lease the existing building on a long term (10+ years) basis for a commercial use, as allowed under the existing zoning code. As such, I demand 2200 Foothill Boulevard, specifically sites #100 and #101, to be removed from the Sites Inventory.

In addition, I strongly object to the proposed zoning change for our property, from CPD to R-3, that would effectively render the anticipated commercial use non-conforming. I demand an explanation for this proposed zoning change, considering no other sites in the existing CPD zone are proposed to have their zoning changed to R-3.

Thank you,
 Alex Khatchaturian
 [REDACTED]

From: info@lcf.ca.gov
Sent: Tuesday, July 26, 2022 8:05 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Kendra Becker

Email

[REDACTED]

Message

I do not approve of this too high-per-acre new zoning. That it is too dense for Foothill Blvd and this town's other infrastructure.

From: info@lcf.ca.gov
Sent: Tuesday, July 26, 2022 4:08 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Edward Nowak

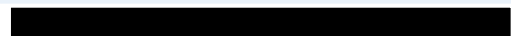
Email**Message**

The Housing Element Subcommittee's just-released position on unit density in the Downtown Village Specific Plan area is inexplicable (as well as unnecessary) in the face of the City Council's denial of the project previously proposed for 600 Foothill. There has apparently been no attempt to explain the reasoning behind this or provide a justification. The City Council should please maintain consistency with its previous decision and reject the Subcommittee's presentation in this regard.

From: info@lcf.ca.gov
Sent: Tuesday, July 26, 2022 4:54 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Name

Anne Buettner

Email**Message**

Dear Honorable Mayor Eich and Councilmembers:

La Canada Flintridge became our home in 1995. Since that time the Downtown Village Specific Plan ("DVSP") was developed after concerned citizens objected to the possible over-development of the commercial areas of Foothill Boulevard. The DVSP has served the City well. Now the City Council appears to be considering the rezoning of certain commercial property parcels to allow for the construction of 25 – 30 dwelling units per acre, a change that is not consistent with the DVSP.

Although I am on the Board of Directors of the Thursday Club, which is located at 4440 Woodleigh Lane in La Canada Flintridge, I make these comments solely on my behalf as a property owner in the City. Having attended many events at the Thursday Club, I have observed first-hand the traffic issues associated with Woodleigh Lane. Frequently cars attempting to enter the ARCO station are backed up onto the street making it difficult to pass through the Foothill/Woodleigh intersection. City residents have benefitted in the past from the minimal activity at 600 Foothill. Without significant roadway modifications that are likely not possible, any proposal to convert the 600 Foothill property into a high-density, high- traffic facility is untenable. This is just one example of the problems associated with rezoning commercial property to allow 25 – 30 dwelling units per acre. In order to meet the RHNA requirements, encouraging the construction of more ADUs in the City should be pursued as an alternative to this high-density rezoning.

As you prepare the revised Housing Element for submission to the State, I respectfully ask that you consider these comments as well as the comments of so many other concerned community members and require that the Housing Element revert to the 12 - 15 dwelling units per acre that the Council recently endorsed.

Thank you,
Anne Buettner

From: info@lcf.ca.gov
Sent: Tuesday, July 26, 2022 4:59 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Clayton Clark

Email

[REDACTED]

Message

Once again 600 Foothill is up for grabs and this proposal is even worse than the first.. Some council members are aware of just how terrible the corner of Woodleigh and Foothill is due to the ARCO station. It's absurd. I can't even turn onto my own street. A traffic signal will only make things worse. If units need to be built there PLEASE keep it to 15 dwellings and 2 stories. I understand we need to fill the state's requirements but don't make La Canada lose it's charm, safety and integrity. Please, please consider the neighborhood and the neighbors who live here. Thank you.

From: info@lcf.ca.gov
Sent: Tuesday, July 26, 2022 5:34 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

carol cupp

Email**Message**

LCF City Council

I have lived here for 55 years and obviously seen great changes, many good and some NOT (i.e. Sport Chalet Center comes to mind). Progress does occur but it appears our lovely city will be irrevocably changed when the 'housing units called for by the State' come to fruition. Calling out 600+ units certainly will create a scar. I am surprised that the 600 Foothill Blvd. project has been again upped to 25+ units; something that had already been reduced and approved at 12-15 units. WHY? This site is inappropriate for a large building and causes more congestion and potential accidents with the Mobile Station across the street. .

I also question calling out in the 'potential sites' Churches and their parking lots through La Canada; again WHY? Seems inappropriate.

Saying to the residents 'we just need to call out potential sites' doesn't give one confidence..... that all is fair game to build. Please reconsider some of your choices; especially since the residents of La Canada concerns aren't given due consideration.

From: Parham J Natanzi - [REDACTED]
Sent: Wednesday, July 27, 2022 12:00 PM
To: housingelement@lcf.ca.gov
Cc: Parviz David Natanzi; Bill Koury
Subject: Re: Future Planning for Housing in our City of La Canada Flintridge
Attachments: ParcelMap.pdf

Categories: La Canada-Housing Emails

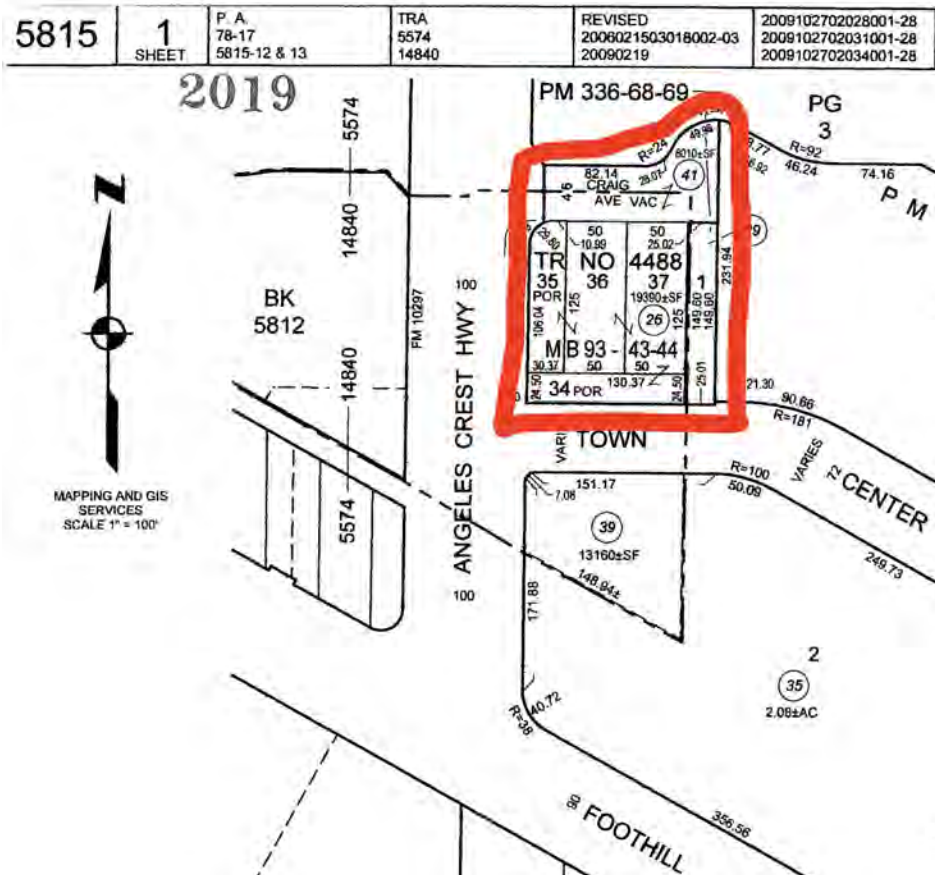
[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hello City of La Canada Flintridge Team,

Thank you for your letter regarding future planning for housing in our city (attached for reference).

We are interested in merging the parcels we own and changing the zoning to accommodate a mixed use building to be occupied by retail at ground level and apartment or condominium units above for the future.

Below is a screenshot of the parcels we own (full parcel map attached), which is currently occupied by a Shell gas station with car wash and the adjacent street just north of the property, Craig Avenue.



How should we proceed?

Thank you in advance for your assistance in this matter. We appreciate it.

Sincerely,
Parham

--

Parham J Natanzi
BHNVN

From: Keith Eich <keich@lcf.ca.gov>
Sent: Wednesday, July 27, 2022 2:20 PM
To: Housing Element Email
Cc: Mark Alexander
Subject: Fw: You all know this is too dense. Please be sensible.

Categories: La Canada-Housing Emails

From: Toni Cavanagh Johnson [REDACTED]
Sent: Wednesday, July 27, 2022 2:18 PM
To: Keith Eich <keich@lcf.ca.gov>
Subject: You all know this is too dense. Please be sensible.

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

The Subcommittee changed the rules **to allow 25-30 units per acre developments on the South Side of Foothill Blvd. in the Downtown Village Specific Plan** area. This is just after the City Council, on a **4-0 vote, DENIED** the high-density, three-story project championed by former CCouncilmemberCurtis on the South Side of Foothill Blvd. at basically the same density.

Toni Cavanagh Johnson
[REDACTED]

From: Keith Eich <keich@lcf.ca.gov>
Sent: Thursday, July 28, 2022 9:55 AM
To: Housing Element Email; Mark Alexander
Cc: Richard Gunter; Henry Oh; Jeffrey McConnell
Subject: Fw: 600 Foothill Blvd

Categories: La Canada-Housing Emails

Not sure if you got a copy of now; but trying to share everything I get.

From: Alexis Phillips [REDACTED]
Sent: Thursday, July 28, 2022 9:52 AM
To: Keith Eich <keich@lcf.ca.gov>
Subject: 600 Foothill Blvd

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Mayer Eich and City Council Members , I am writing you to state that I'm against changing the zoning at 600 Foothill Blvd. That corner is already impacted from the Arco station on Foothill and Woodleigh, LC Pres on the other side and traffic from the residents in the surrounding neighborhoods, and The Thursday Club, not to mention the everyday traffic on Foothill. This should not be a knee jerk decision, it should be brought before the community. There should be a meeting where the subject is the FIRST on the agenda and residents are given a chance to speak for more the 2 seconds. Your decision will affect the entire community. Please table the decision until this project is publish in the local paper and residents are made aware of the situation so everyone can voice their opinion.

Thank you,
Alexis Phillips
[REDACTED]

LCF

Sent from my iPad

From: info@lcf.ca.gov
Sent: Thursday, July 28, 2022 10:28 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Richard Asher

Email

[REDACTED]

Message

I oppose the 25-30 unit per acre zoning for 600 Foothill Blvd.!

This is wrong at so many different levels. Please do not destroy La Canada this way.

Most Sincerely,
Richard Asher

From: info@lcf.ca.gov
Sent: Thursday, July 28, 2022 2:30 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Glenn Fischel

Email

[REDACTED]

Message

NO NO NO. once again NO on development of 600 Foothill as multi unit residential complex. How many times does the public have to weigh in on this project. Shame on the subcommittee for reviving this horrible idea.

From: info@lcf.ca.gov
Sent: Thursday, July 28, 2022 4:26 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Linda Washburn

Email

[REDACTED]

Message

OH MY.....Looks like the 600 Foothill project is going to be crammed down our throats. THIS IS TOO HIGHT A DENSITY.
I OPPOSE 25-30 unit per acre zoning for 600 Foothill Blvd.

From: Keith Eich <keich@lcf.ca.gov>
Sent: Thursday, July 28, 2022 5:10 PM
To: Housing Element Email; Mark Alexander
Cc: Richard Gunter; Henry Oh; Jeffrey McConnell
Subject: Fw: Housing element subcommittee

Categories: La Canada-Housing Emails

From: Edward Nowak [REDACTED]
Sent: Thursday, July 28, 2022 5:09 PM
To: Keith Eich <keich@lcf.ca.gov>
Subject: Housing element subcommittee

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Mayor Keith Eich
City of La Canada Flintridge

Dear Mayor Eich:

The Housing Element Subcommittee's draft list of properties seems, with respect to the Downtown Village Specific Plan area, facially inconsistent with the principle behind, and the fact of, the City Council's earlier decision against the proposed development at 600 Foothill Boulevard. To the extent there has been disclosure to the public of the thinking behind this, the reasoning is both opaque and incomplete.

As troubling as the intended result of the draft is, as well as the so-far inexplicable basis for it, is the lack of transparency on the part of the Subcommittee on which you sit. As I understand it, the commissioned report that supposedly supports the draft Sites Inventory has yet to be released to the public. You are of course aware from the community's intense involvement last year of the mistrust engendered in the 600 Foothill planning process. If full disclosure is withheld and the public's ability to respond in a most-informed way is thus prejudiced, the current process can only look like more of the same. Against that background, the Council should be loath to put its credibility on the line and instead ensure that the report be made available. At the same time, the Council also needs to provide a detailed justification for all the assumptions made in developing the draft Sites Inventory. The community deserves a full and transparent explanation given what is at stake here.

Very truly yours,

Edward J. Nowak

[REDACTED]

From: info@lcf.ca.gov
Sent: Thursday, July 28, 2022 5:36 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Name

Bob Antonopolis

Email**Message**

In the draft Sites Inventory, the city provided the following one-size-fits-all, results oriented justification for awarding higher housing densities for certain properties along the north and south side of Foothill:

Where sites included on the inventory do not directly abut a single-family residence, allow a higher residential density of 25-30 du/ac.

Currently, the DVSP permits 12-15 dwelling units per acre, which is a key element of the overall goal of promoting a small town village atmosphere in La Canada. In its unanimous wholesale rejection of the proposed 600 Foothill development last November, all of the City Council members recognized the development differences between the north and south sides of Foothill, and all recommended lower density developments on the south side of Foothill within the DVSP.

Three non-church locations on the south side of Foothill received the 25-30 du/ac upgrade. Two of the three locations are quite small in size, which limits their utility for multifamily developments: (1) the 0.29 acre House America property on the southeast corner of Chevy Chase and Foothill; and (2) the contiguous properties on the southwest corner of Commonwealth and Foothill (814 Foothill: 0.13 acre; 820 Foothill: 0.09 acre, plus the tiny parking lot just west of 820 Foothill. The third property on the south side of Foothill, which in practical terms is the sole beneficiary of this density upgrade, is the large 1.28 acre parcel at 600 Foothill! It's as if the abutting criteria was created to achieve this very result.

Justifying the density upgrade for 600 Foothill solely because the property does not abut a single-family residence is arbitrary and capricious, and clearly shows the City has completely forgotten why the City Council completely rejected the 600 Foothill development in the first place.

Yes, the 600 Foothill property does abut the La Canada Presbyterian Church parking lot, but that is a fact without distinction or relevance. Does abutting a church parking lot change the fact that Woodleigh Lane is only 30 feet wide and is reduced to one-way traffic when cars are parked on both sides? No. Does abutting a church parking lot change the fact that a high density development will cause catastrophic traffic congestion at Foothill and Woodleigh (we've already seen what the ARCO station does by itself!)? Certainly not. Does abutting a church parking lot alleviate the neighborhood parking nightmare created by insufficient parking for residents, visitors, delivery trucks and vendors? Not one bit.

The bottom line, and one that was previously recognized by the City Council, is that the 600 Foothill property simply cannot support a high density development envisioned by the Sites Inventory or the 600 Foothill developers.

The City's Housing Element Grid D map notes that residences at 600 Foothill will be in the RHNA Above Moderate income category, a Housing Element category that the City already meets. Given that a 600 Foothill development doesn't help the city one bit in meeting the state's Housing Element all-important low-income or moderate-income housing requirements, let's remove the 600 Foothill property from the Sites Inventory list and come up with better rationale for awarding higher development densities in the Sites Inventory.

From: SDS Engineering [REDACTED]
Sent: Thursday, July 28, 2022 6:30 PM
To: housingelement@lcf.ca.gov
Cc: Aaron Kumetz; Jacqueline McDuffie
Subject: APNs: 58700011055 , 5870011047 , 5870011049

Categories: La Canada-Housing Emails

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Hello Emily,

It was nice speaking with you yesterday. As per your instructions, I'm sending this email on behalf of Arlak, Inc. (CC'd in this email) to express our interest for rezoning the above mentioned parcels to mixed use (commercial and multi residential). Based on the letters that we received from the planning department (dated June 30, 2022 and July 14, 2022), we understand that this rezoning would be at no cost to the owner. We also assume that the change of zoning will not affect the property taxes. Please inform us otherwise.

Sincerely,

Tom Salehi
Registered Professional Engineer
SDS Engineering, Inc.

From: Together La Canada <[REDACTED]>
Sent: Friday, July 29, 2022 11:50 AM
To: [REDACTED]
Subject: Letter to the Subcommittee and City Councilmembers regarding the Site Inventory List
Attachments: TLC Petition Signers 07292022.pdf; LCF Petition on Site Inventory 07292022.pdf

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Councilmembers: Attached please find the Letter and over 170 signers opposing the density designation for certain properties included in the Site Inventory list.

WHY IS 600 FOOTHILL BACK???

The City's Housing Element Subcommittee released its draft list of properties to include in the City's Housing Element which is due to the State on October 15, 2022.

The Subcommittee changed the rules **to allow 25-30 units per acre developments on the South Side of Foothill Blvd. in the Downtown Village Specific Plan area.** This is just after the City Council, on a **4-0 vote, DENIED** the high-density, three-story project championed by former Councilmember Curtis on the South Side of Foothill Blvd at basically the same density.

**THIS COULD MEAN THAT THE DEFEATED 600 FOOTHILL PROJECT
COULD BE BUILT AT UP TO 47 UNITS!**

PLEASE SIGN OUR PETITION BEFORE JULY 29 AT: www.change.org/600FoothillNo

And, by the Subcommittee's own calculations, we will meet our state required housing units **WITHOUT** zoning 600 Foothill at 25-30 units per acre.

We need to demand that the City Council keep its word and return the 600 Foothill property to the 12-15 dwelling unit per acre standard.



This is a density example at 28 dwelling units per acre. Source: City of La Canada Flintridge Housing Element & Safety Element Update Workshop #2 Planning Commission Meeting, Thursday, June 10, 2021, page 39.

WE NEED YOUR INPUT AND WE NEED IT BY JULY 29!

WHAT CAN YOU DO?

1. **PLEASE SIGN OUR PETITION BEFORE JULY 29 AT:**
www.change.org/600FoothillNo
2. **Please write to each councilmember about how you feel about their inclusion of 600 Foothill or any other property you see on their proposed list:**

Mayor Keith Eich	keich@lcf.ca.gov
Mayor Pro-Tem Rick Gunter	rgunter@lcf.ca.gov
Councilmember Terry Walker	twalker@lcf.ca.gov
Councilmember Michael Davitt	mdavitt@lcf.ca.gov
Councilmember Kim Bowman	kbowman@lcf.ca.gov

3. **You can comment on the City's website here:** <https://cityoflcf.org/sites-inventory-second-draft-public-review-july-20-29-2022/>
4. **Donate to Together La Canada so we can continue to keep the community informed throughout the ENTIRE Housing Element and Zoning update process. Please send \$300, \$500, \$1,000 or more, payable to TLC to:**

TLC
P.O. Box 1446
La Canada Flintridge, CA. 91012-5446
www.togetherlacanada.com
togetherlacanada@gmail.com

Together La Canada Petition Signers July 29, 2022

Alfred Plamann	Eileen Garabedian	LeRoy W	Rulin Wang
Allison Regan	Elaine Frame	Lijuan Deng	S L
Amanda Pndlyan	Elaine La Marr	Linda Li	S Ross
Amy Chang	Elza Gross	Linda Van Winkle	S.K. Chan
Andy Gaskill	Erika Deacon	Leiqian Chen	Samantha Heer
Anita Hossepian	Erin Olofson Palmer	Lisa Walker	Samantha Li
Anne Buettner	Fang Zhou	Liulu Fu	Sanaz Parsi
Barbara Weber	Faye McArthur	Lola Dietrich	Sara Nowak
Bert Bergen	Gail Jagels	lydia xie	Scott Christopher
betty winholtz	Gary Olson	Maggie Lang	Scott Tracy
Bob Antonopolis	George Nakashima	Mark Lessner	Scott Van Dellen
Brett Johnston	Gorik Hossepian	Margot Simpson	Shana Artz
Brian Wilcox	Greg Molinelli	Marjorie Hunglau	Shannon Loughrin
Cade Herman	Hope Schneider	Marshall Madison	Sheila Ceabtree
CAOTING WU	Hui Wang	Martin Weiss	Shujin Lan
Cardon Walker	Ivy Hou	Mary Tracy	Shujun Zhang
Caren Colburn	Jack Boutros	Michael Gross	Sue Komarek
Carl and Heather Emge	Jack Webster	Michael Xu	Susan Hodge
Carmen Porto	Jacqueline Giragosian	Michele Hantoot	Susan Schmidt
Carol Amico	Jane Penniall	Michele Hipolito	Tammy Hong
Carol Cupp	Jean Summers	Michelle Liang	Tanushree Mondkar
Carol Nakashima	Jeffery Frame	Michelle Washburn	Tatevik Tina Vanatur
Cassie Xu	Jennifer Mester	Michelle Washburn	Terry (Mary T) Liepmann
Catherine Bergen	Jennifer Webster	Min Liang	Thomas E Johnston
Chad Budde	Jiaqi Ma	Nancy Abbott	Till Liepmann
Charles Simpson	Jiaqi Ma	Nancy Antonopolis	Tom Komarek
Charlie Marix	Jim Hartman	Nancy Asher	Toni Bird
Christine Navarro	Jinsu Wang	Nancy Gunther	Vaijayanti Mondkar
Cindy Wilcox	John Webster	Nancy Plamann	Vivian Li
Claire Florentin	Joseph Shuster	Ning lin	Wendy Bianchi
Clayton Clark	Julia Gaskill	Njdeh Ghazaryan	William Stern
Craig Witt	Julia Kwon	Noralyn Peterson	William Weber
Dan Lucchesi	Jun Li	PATRICE GIBSON	Xia Chen
David Haskins	Karen Mathison	Patricia Chambers	Xiaoyu Chen
David McFadzean	Kathy Trumbo	Patty Wynne-Hughes	Xinying Zhang
david taggart	Katie Metz	Peter Raulli	Yael Yuma
Dean Brock	Keith Bradshaw	Phyllis Harb	Zhipeng Zhou
Debbie Tinkham	Kelly Chamberlain	Pius Joseph	
Debbie Weiss	Kent Schmidt	Purple Zhou	
Dede Hubbs	Kimberly Jiang	Rene Steinberg	
Dick Goodspeed	Kristene Hossepian	Richard Asher	
Don La Marr	Laura Campobasso	Robert Hennon	
Donna Shepherd	Laura Van Dellen	Robin Gruber	
Dorothy Juett	Lauren Oakes	Rosemary Plessner	
Edward Nowak	LeAnn Wei	ROYAL F OAKES	

From: Pamela v [REDACTED]
Sent: Thursday, July 28, 2022 6:44 PM
To: housingelement@lcf.ca.gov
Cc: Pamela woncik
Subject: Public comment on HE site inventory

Categories: La Canada-Housing Emails

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Why have you only identified businesses or churches on/near Foothill Blvd which in all likelihood never be replaced with housing structures? *How about you identify at least a few places where people might actually be comfortable living in La Canada Flintridge?* The Flintridge Riding Club & Willow Brook Stables comes to mind – if they ever go out of business or choose to sell off some of that property MANY employees at JPL would benefit from an apartment building or condo complex on that very large property & walk/bike to work. Or likewise the Flintridge Tennis Club? It seems there are many places like these scattered in La Canada Flintridge which are large properties situated in pleasant/homey locations which are nicer to live than busy/crowded Foothill Blvd. Also traffic on Foothill is already bad, multi-unit housing would tip it over the brink.

But that said, I think there are a few locations you've identified that would ***sincerely be great locations*** to build two (maybe even three) story condo/apartments and/or mixed-use structures with business on lower level and housing units on upper levels. Some of your sites are very feasible locations for much needed housing, they'd also actually beautify aging/neglected sections of Foothill Blvd BUT only if it's done right (i.e. you **must** require adequate parking to be built with them so they don't impact surrounding residential streets or residents). In fact I think the city should encourage and incentivize these property (and businesses) owners *right now* to consider replacing their current aging buildings with modern mixed-use multi-level buildings (business on lower level, housing units on upper level/s and including adequate parking structure/s or underground parking):

- Site # 30, 35, 37, 38, 39-43, 45, 46, 48-50 very good candidates for multi-use building as long as a multi-level parking structure/s is also built to replace the current teeny-tiny parking lots now between Valley Sun Ln and the freeway to serve the parking needs of the newly added housing units. The parking structure will also help block noise from the freeway for the residents of these new housing units making it more livable – these are probably all win-win locations.
- Site # 19, 21, 59-61, 90, 91, 98, 99 are second runners-up to the win-win list above.
- Maybe Site #114, 115 but I haven't really seen this location close up, I didn't even know this was part of La Canada LOL
- I've always thought Site #97 was perfect for **Senior Housing and Assisted Living** and always supported that. I took care of my sick elderly parents for over a decade while a single parent and working full time. It was very hard but a labor of sincere love, still it would have been so much easier if there were some place nearby where I could have housed them to. I think it's a perfect location for Senior's who usually don't drive and can only walk short distances. Its centrally located near post office, religious centers, shopping/groceries, dental/medical, etc. But you must require the builder to provide enough parking for all the staff and visitors on-site

Traffic and parking is already a serious hot-mess in the downtown village. Many of the sites (i.e. site# 1-3, 48-55, 77, 110-113) you list are old buildings that could beautified Foothill if replaced with multi-level mixed use & underground parking. BUT it will make traffic on Foothill unbearably worse which is why I suggested alternative locations in my first paragraph. You will make traffic so bad that customers/residents simply will refuse shop or eat in La Canada at all

because it's too uncomfortable to get there ... and the businesses will fail. I speak from experience, the downtown village is already so uncomfortable I typically avoid it and to be honest will drive to Pasadena or Montrose instead. And I'd like to know why we need all these "traffic calming" measures on Foothill like the curbs that jet out so far we can't safely turn right without widely going into other lanes or a traffic signal every 20ft LOL. And now you're restricting Foothill on the west end by the YMCA to "calm traffic" further? Seriously, I've looked at our accident records, and with the exception of Angeles Crest & the ACH/Foothill intersection (oh and the insanity around school drop off/pick up), there were historically relatively few major accidents on Foothill. But since "traffic calming" we now have more fender-benders and narrower dangerous lanes which can't support Public Transportation (if we ever get any in LCF). Why has the city been so determined to implement a solution to a problem that barely existed? What problem did "traffic calming" solve vs the problems it created?

WRT site # 67-69 they look like private homes. I know I'd hate it if I lived in one of those homes and the neighbor built an apartment building next door to me.

Also, WRT Sites #79 & 74 – isn't The Church of the Lighted Window (site 79) a historic site and protected (it's lovely & it should be protected)? But if it isn't protected ***the city should buy sites 79 & 74 ASAP and build your much needed Sports Complexes*** (soccer, football & baseball fields, basketball, Volleyball & Pickleball courts, a grassy gated dog park, meandering bike & walking paths, decent functioning/clean bathrooms and adequate on-site parking).

From: info@lcf.ca.gov
Sent: Thursday, July 28, 2022 7:04 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Annsley Strong

Email**Message**

Because I have not been actively following this debate, I do not know what any of these state mandates will cost and whom. Always true with voting in Propositions. Will these be taken by eminent domain? If 26 units is the threshold for a contractor to develop housing and the state requires us to come up with 612 such units, then it seems we should try to spread it out. Due to financing, that may not be possible, but the hoop!;a over the Curtis/600 Foothill development was just: it would change the face and footprint of La Canada Flintridge by inserting an obvious development in the center of our main section of town.

Of the properties proposed, the churches should be off the table unless the City is prepared to replace them—or it is a suggestion that the state would get so much pushback on (maybe not) that they would accept our plan. I think the west end of town (Big Lots/Ross/JoAnn's) represents the greatest opportunity to create senior housing. It's close to the Y and could have a (or more) bus stop. It needs the most rethinking. It also offers the largest acreage (I think) and opportunity to do something truly beautiful with some open space.

The thrust should be not just to get to 612 units, but to do it so it blends with the character of the existing community. Huge developments belie the Eddy Haskell character of the City. Look to Honolulu Avenue as a way to create these units: ground level replacement of stores with units above, a mixed use solution, that the long-time community supporters want to embrace rather than leave.

From: Keith Eich <keich@lcf.ca.gov>
Sent: Thursday, July 28, 2022 9:23 PM
To: Housing Element Email; Mark Alexander
Cc: Richard Gunter; Jeffrey McConnell; Henry Oh
Subject: Fwd: 600 Foothill

Categories: La Canada-Housing Emails

From: Bob Phillips <b[REDACTED]>
Sent: Thursday, July 28, 2022 9:10 PM
To: Keith Eich <keich@lcf.ca.gov>
Subject: 600 Foothill

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This project is all about money because it certainly not about esthetics and resident safety.

La Canada-Flintridge is a small city surrounded by major cities that look the part of a metropolis. This is not brought us to La Canada 50 years ago. Good schools, friendly neighbors, local shopping and a place where friends meet friends. The location is bad enough safety wise by having a semi busy street pouring onto a busy street without signals on the intersection. Speaking of signals, there are signals one block away on either side adding another signal would be like driving n downtown Los Angeles.

I am completely not in favor of adding a mid-size high rise there for the above reasons.

Vote no on 600 Foothill, please.

Sent from my iPhone

From: info@lcf.ca.gov
Sent: Friday, July 29, 2022 12:29 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

David McLaughlin

Email

[REDACTED]

Message

Please don't!!

From: info@lcf.ca.gov
Sent: Friday, July 29, 2022 1:22 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

David Haxton

Email**Message**

1. All properties in LCF currently zoned R-3 but not developed with multi-family housing should be on the sites inventory. This includes the dozen properties near Curran St. that were zoned R-3 as part of the last housing element. If the city leaves off from the sites inventory any R-3 properties not already developed with multi-family housing, there needs to be a written explanation of the reasons for not including that property. This is especially needed for the LC Pet Clinic if this R-3 property is left off the sites inventory, since the business is owned by a city councilmember. I promise to complain to HCD and other agencies if LC Pet Clinic is left off the sites inventory without a written and convincing explanation why.
2. A property's housing density should be based on more than just whether it directly abuts a single-family residence. A wider view of the area around the property needs to be considered - do the streets that serve the property also serve residences? how many residences? are there alternate streets for the residents to get to their homes? how busy are the streets now? how much busier will the streets be if multi-family residences are built on the property? how does the width of the streets compare to current standards? are there existing parking issues on the streets that would be exacerbated by the occasional overflow parking from multifamily housing? It is appropriate to establish setbacks that depend on whether properties directly abut a single-family residence, but it is not appropriate to set housing density solely on whether properties directly abut a single-family residence. While simple, bright-line rules are easier to implement, they are not always appropriate. You need to look at each property individually and holistically when deciding its housing density.
3. The low density of 12-15 dwellings units per acre is too low. It should instead be 10-20.
4. Property 97, at 600 Foothill, should be zoned with the lower density of 10-20 dwelling units per acre, due to its location across from a busy gas station, on a narrow street that serves as the primary access route for dozens of nearby houses.
5. Properties 95 & 96, which are vacant lots across the street from the Lutheran church, should be removed from the sites inventory because they are not developable. A decade ago the owner was told by the property's water supplier that any development would require the developer to pay to upgrade the water supply lines in the area because they are at capacity. This huge expense effectively makes the lots undevelopable, except as a pocket park.

From: info@lcf.ca.gov
Sent: Friday, July 29, 2022 6:32 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Joan Taylor

Email

[REDACTED]

Message

Please donot allow the multi unit building requested for the 600 Foothill project. This would be a problem for our city with the additional traffic and congestion it would become. It failed to be approved before for good reasons. We would have tremendous problems in the city if this would be permitted. DO NOT ALLOW

From: info@lcf.ca.gov
Sent: Saturday, July 30, 2022 12:24 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Name

Jennifer Taw

Email**Message**

I'm very supportive of removing/reducing housing restrictions to allow for denser and more affordable housing in LCF. I strongly support expanding the density of housing at 600 Foothill Blvd to 25-30 units/acre. Thank you for the work you're doing bringing the town into compliance with state requirements and making it friendlier and more accessible. Looking forward to further developments to also make it more bike- and pedestrian-friendly, to bring more shaded communal spaces, and to bring more small businesses to town.

From: Christopher Wessing [REDACTED]
Sent: Sunday, July 31, 2022 10:41 PM
To: housingelement@lcf.ca.gov
Subject: Re: LCF Rezoning Proposal

Categories: La Canada-Housing Emails

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Hello,

I don't believe we've received a response to this email. Can you please tell us if this is still being pursued?

Thanks,
Chris & Asuka Wessing
[REDACTED]

On Sat, Jul 16, 2022 at 4:56 PM Christopher J. Wessing [REDACTED] > wrote:

Hello,

We received the attached letter today regarding the zoning of our property at 4510 Castle Ln. We apologize for missing the letter sent on June 30, we have been traveling for the past 3 months and just got back into town.

We were actually considering re-zoning our property since it was split from the Jack In The Box property when we purchased it in 2019.

Can you please tell us what the possible options would be for our property? It seems pretty small to fit a multi-family dwelling on it.

Thanks,
Chris & Asuka Wessing

From: info@lcf.ca.gov
Sent: Sunday, July 31, 2022 8:03 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Categories: La Canada-Housing Emails

Name

Ronald Falasca

Email

[REDACTED]

Message

We strongly oppose the current development at 600 Foothill Blvd in LCF. The project should be denied or revised to suit the community better.

From: Alex Khatchaturian <[REDACTED]>
Sent: Monday, August 1, 2022 8:58 AM
To: estadnicki@lcf.ca.gov
Cc: [REDACTED]
Subject: La Canada Flintridge Sites Inventory Comments (AB 686, 2018; AB 1397, 2017)
Attachments: Site #80 aerial.jpg; Site #80 photo 1.jpg; Site #80 photo 2.jpg; Site #80 photo 3.jpg; Resolution No. 94-05.pdf; Deed of Trust dated 8.18.2016.pdf

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Ms. Stadnicki,

The following comments are being submitted in reference to the proposed La Canada Flintridge Sites Inventory (Second Draft). I relied on the HCD Housing Element Site Inventory memorandum, dated June 10, 2020, for guidance.

Locational requirements

Pursuant to AB 686, sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that **affirmatively furthers fair housing**. "The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development." (Government Code section 8899.50(a)(1)). The total NET Unit Potential for sites identified to accommodate the Lower Income Category RHNA is 543 units. Nearly 70% (377 out of 543) of the Lower Income Category units are concentrated on the west side of the Glendale (2) Freeway. However, this part of the city is not as well suited to accommodate lower income housing units as, say, the Downtown District (from La Canada Boulevard to the I-210 Freeway overpass at Crown Avenue). For instance, there are no grocery stores in the West Gateway District. On the other hand, near the Town Center and all along the DVSP area, households have access to Target, Sprouts, Ralphs, Gelson's and Trader Joe's. Moreover, the city should consider proximity to schools and health care facilities and access to amenities, such as parks, shopping malls, the Farmer's market, and other services when determining which sites are best suited to accommodate the RHNA for lower income households. The majority of the Lower Income Category sites, with the highest density development, should be centrally located in the city, preferably within the Downtown District near the Town Center. Relegating the lower income units to the weakest resourced end of the corridor is not consistent with affirmatively furthering fair housing.

Suitability of nonvacant sites

AB 1397 includes specific criteria for assessment of the realistic availability of nonvacant sites during the planning period. If nonvacant sites accommodate half or more of the lower income need (as is the case in La Canada Flintridge), the housing element must describe findings based on substantial evidence that the existing use does not constitute an impediment for additional residential use on the site.

Specifically, Government Code 65583.2(g)(2) states:

"In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. **An existing use shall be presumed to impede additional residential**

development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period."

The HCD Site Inventory Guidebook (page 27) clarifies the "substantial evidence" standard of proof by stating:

"In general, substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. An example of substantial evidence would be a nonvacant site with a grocery store and with a building lease expiring in a year, and evidence that the store has entered into a lease to relocate to another site subsequent to the lease expiring."

Furthermore, the HCD Site Inventory Guidebook adds:

"Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

- The lease for the existing use expires early within the planning period.
- The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses.
- There is a development agreement that exists to develop the site within the planning period.
- The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
- The property owner provides a letter stating its intention to develop the property with residences during the planning period."

The city must make its findings evidencing the suitability of the nonvacant sites available for public comment and review. If findings supporting the realistic development potential for certain lower income sites do not exist, as I believe is the case for most of the identified sites in the West Gateway District, then the city should seek alternative sites that meet the criteria required by AB 1397.

Sites #80-85

The Sites Inventory incorrectly describes the existing use for Site #80 as a "Parking lot". I attached an aerial photo of Site #80 which shows it to be vacant land with a very steep hillside topography. I also visited the site and attached several photos I took for reference. Notice there are power poles all along the west border with Site #81. There is a utility easement recorded on this parcel which combined with the steep topography renders the site essentially undevelopable.

Site #81, which is owned by the same entity as Site #80, is occupied by Ross Dress For Less. The property was refinanced in 2016 and there is a covenant in the deed of trust which prohibits the borrower from demolishing or making any structural modifications to the improvements without the lender's consent. This is a standard clause to protect the lender's collateral that is securing the loan. I attached the Deed of Trust for reference.

Sites #81 (Ross Dress For Less), #82 (FedEx Office), #83 (Lotte Market), #84 (Avianti Jewelry), and #85 (multi-tenant shopping center) all have different owners. The city should verify if there is a reciprocal access and parking easement agreement between the owners of these properties.

One of the conditions of approval for the CUP granted to the Taco Bell at 2151 Foothill is:

"An agreement ensuring full-time reciprocal access between the subject parcel and the adjacent parcel to the east shall be recorded to run with the land in perpetuity."

See condition #37 on page 9 of the attached document, Resolution No. 94-05. Please note the adjacent parcel to the east of Taco Bell is Site #85, a six unit shopping center (Marsh Village Pharmacy, Seoul BBQ, etc.).

The city should investigate the aforementioned impediments and evaluate whether they preclude additional residential development on Sites #80-85 during the planning period.

Sites #86-89

Sites #86-89 collectively measure 2.84 acres. The property is a multi-tenant shopping center with Big Lots as the anchor tenant. It was sold in June 2011 for \$10,700,000. Please note the sites were zoned Mixed Use throughout the previous planning period with up to 30 du/ac residential development potential, yet the use remained as a commercial shopping center.

Scenario C of the economic analysis by the city consultant, Michael Baker International, suggests a residual land value of about \$112,000 per unit for a 1.5 acre site, the closest match to this property. Assuming a density of 30 du/ac, the maximum of the range proposed in the Sites Inventory, Sites #86-89 can accommodate 86 units (2.84 ac x 30 du/ac). Therefore, the land value to a builder with the aim of developing residential units will be about \$9,700,000 (86 units x \$112,000 per unit). This is a million dollars less than what an investor paid for the commercial income property over a decade ago. It is inconceivable that these sites will turn over into residential units at the proposed density range of 25-30 du/ac.

Sites #92-94

Last week the owner of Sites #92-94 submitted plans for the construction of a two-story commercial building. He will not be developing residential units at the proposed density range of 25-30 du/ac. The property is being marketed for lease to prospective commercial tenants.

I urge the city to prepare the Housing Element Site Inventory through the lens of affirmatively furthering fair housing, and to publish findings, with a description of the substantial evidence they are based on, supporting the suitability of the nonvacant sites that have been identified to accommodate the lower income RHNA.

Thank you,
Alex Khatchaturian







ROSS PLAZA
CUSTOMER
PARKING ONLY
UNAUTHORIZED VEHICLES WILL BE
TOWED AWAY
AT VEHICLE OWNER'S EXPENSE
CITATION MAY BE ISSUED
JUN'S TOWING
818-771-1174
L.P.A. #10-548-3484
C.V. #20044* LINC 404043

ROSS PLAZA
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CITATION MAY BE ISSUED
JUN'S TOWING
818-771-1174
L.P.A. #10-548-3484
C.V. #20044* LINC 404043



RESOLUTION NO. 94-05

**A RESOLUTION OF THE PLANNING COMMISSION
OF THE CITY OF LA CAÑADA FLINTRIDGE APPROVING
CONDITIONAL USE PERMIT 166,
VARIANCE 93-14, AND
DESIGN REVIEW 93-05
TO ALLOW A TACO BELL RESTAURANT
WITH OUTDOOR DINING AND A DRIVE-THROUGH LANE
AT 2151 FOOTHILL BOULEVARD
FOR CENTURY FAST FOOD INC.**

WHEREAS, a request by GM Associates, on behalf of Century Fast Foods, has been received for a Conditional Use Permit to allow a Taco Bell restaurant with outdoor dining and a drive-through lane, and for a Variance to allow the drive-through lane at less than the required length, said request attached hereto and incorporated herein by reference; and

WHEREAS, the Planning Commission, on November 23, 1993, held a public hearing, conducted a review of the request, and continued the review to January 11, 1994; and

WHEREAS, the Planning Commission, on January 11, 1994, held a continued public hearing and further reviewed the request; and

WHEREAS, based on the review of the Initial Study Questionnaire and related materials, the Commission reviewed the project, determined that no significant environmental impacts would result from the project if the Mitigation Measures are incorporated, and adopts the Negative Declaration with Mitigation Measures; and

WHEREAS, upon consideration of the environmental questionnaire, related information and public testimony, the Planning Commission hereby determines that the project would have no potential for adverse effect on wildlife resources, and is therefore exempt from Section 711.4 of the California Fish and Game Code; and

WHEREAS, the Planning Commission finds that all the facts contained in the staff report dated November 23, 1993 and staff memorandum dated January 11, 1994, regarding the application for a Conditional Use Permit, Variance, and Design Review approval at 2151 Foothill Boulevard are true and correct, and the Planning Commission hereby adopts said staff report as its own findings of facts; and

WHEREAS, based on the evidence presented by the application materials, staff report, and public testimony, the Planning Commission finds the following:

Conditional Use Permit

1. The proposed use will not be in substantial conflict with the adopted general plan for the area, because the proposal would introduce a use which is consistent with the General

Plan and Foothill Boulevard Master Plan policies for the CPD zone and specific location to the point that those policies relate to the site in the context of the neighboring shopping center as exists.

2. The requested use of the location proposed will not:
 - a. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or
 - b. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or
 - c. Jeopardize, endanger or otherwise constitute a menace to public health, safety or general welfare, because

no adverse effects on nearby uses would result from traffic, as evidenced by the traffic study, and the other principal concern of noise would be masked by ambient noise levels during most hours of use, and, as conditioned, reasonably screened during all hours of use.

3. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features to integrate said use with the uses in the surrounding area, because the required parking for the enclosed restaurant is provided on site, and, due to the reciprocal access and staggered nature of the peak hours of nearby uses, the small amount of outdoor seating can be accommodated reasonably by existing parking facilities, and because the access easement at the north end of the site provides ample separate service access.
4. The proposed site is adequately served:
 - a. by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and
 - b. other public and private service facilities as are required, because

the traffic study indicated minimal impact on the circulation of public streets, and because no other public services would be significantly affected, and because private septic systems will be required to meet L. A. County Health Department standards.

Variance

5. This request shall not constitute a grant of special privilege of development or use which is inconsistent with the limitations upon other properties in the vicinity and zone in which the subject property is situated, because the project, as a restaurant use, is consistent with the limitations upon other properties in the area and zone.
6. Due to special circumstances applicable to the subject property, including size, shape, topography, location, or surroundings, the subject property is deprived of the privileges enjoyed by other properties in the vicinity and under identical zone classifications, because the conflict between competing constraints of an easement, limited site dimensions, the existing building line of the adjacent shopping center, a fixed floor plan,

and outdoor amenity objectives, led to the need for a level of parking lot efficiency which precludes the code standard with regard to landscaped areas between banks of parking stalls.

7. The granting of such Variance will not be contrary to the objectives of any part of the adopted General Plan, because the project is generally consistent with the scale and type of development allowed in the CPD zone, and, moreover, the project promotes Community Design Element and Land Use Element policies with regard to design integrity, outdoor use, and related concerns.
8. The granting of such Variance will not be materially detrimental to the public welfare or injurious to other properties or improvements in the vicinity and zone in which the subject property is located, because the landscaping effect over the entire site far exceeds code standards for landscaped area, and because the large landscaped areas will be far more effective than landscaping which merely meets the code standards.
9. The project preserves the existing scale and character of the surrounding neighborhood and protects public views and aesthetic values and other property values in the neighborhood, because the project provides a tastefully executed building of modest scale within a generous landscaped setting.

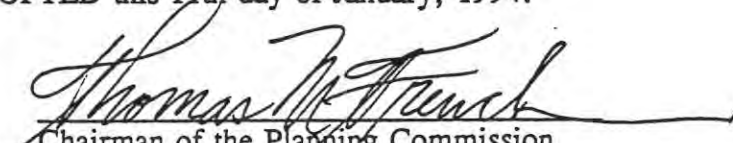
Design Review

10. The design and layout of the proposed development is consistent with the General Plan and any design criteria adopted for specialized areas, such as designated historic or other special districts, planned developments, master plans, or specific plans, or adopted for the project through conditions of approval or development agreements, because the design is consistent with the creation of varied open spaces and pedestrian-oriented points of interest as advocated in the Foothill Boulevard Master Plan and the General Plan Land Use Element.
11. The design and layout of the proposed development will accommodate the functions and activities that are proposed for the property, will not unreasonably interfere with the use and enjoyment of neighboring property, and will not create traffic or pedestrian hazards, because it is linked with the adjacent shopping center through reciprocal access, improving the circulation flexibility of that center without conflicting with parking patterns evident on that site.
12. The architectural design of the proposed development is compatible with the character of the surrounding neighborhood and that all reasonable design efforts have been made to maintain the harmonious, orderly, and attractive development contemplated by this title and the General Plan, because the standard corporate design has been refined to suit the surroundings, especially the Ross Dress for Less store, and provide a simple and fitting conclusion to the shopping center.
13. The design of the proposed development will provide a desirable environment for its

occupants and visiting public as well as its neighbors and that it is aesthetically of good composition, materials, texture, and color that will remain aesthetically appealing with the level of maintenance and upkeep that might reasonably be expected, because the proposal is attractive and will add interest to the boulevard and the option of outdoor dining for the users, and the simple stucco-faced treatment should be durable.

NOW, THEREFORE, be it resolved that the Planning Commission approves the Conditional Use Permit, Variance, and Design Review for the restaurant, with outdoor dining and a drive-through lane less than the code-required length, at 2151 Foothill Boulevard, with said approval and recommendation subject to the following 39 conditions attached to this resolution.

PASSED, APPROVED AND ADOPTED this 11th day of January, 1994.


Chairman of the Planning Commission

ATTEST:


Secretary to the Planning Commission

**CONDITIONS OF APPROVAL
CONDITIONAL USE PERMIT 166
VARIANCE 93-14
DESIGN REVIEW 93-05
2151 Foothill Boulevard**

General Conditions

1. This approval is granted for the land or land use as described in the application and any attachments thereto, and as shown on the plot plan submitted, labeled CUP 166, V 93-14, and DR 93-05, Exhibit A.
2. Prior to obtaining a building permit and within 30 days hereof, the applicant and property owner shall file with the Secretary of the Planning Commission written acknowledgements of the conditions stated herein on forms provided by the Planning Department.
3. All buildings, fences, signs, roadways, parking areas, and other facilities or features shall be located and maintained substantially as shown on the plot plan, floor plan, and landscape plans labeled CUP 166, V 93-14, and DR 93-05, Exhibits A, C, D and E, except as required to be amended.
4. All buildings and structures shall be substantially of the design as shown on the floor plans and elevation drawings labeled CUP 166, V 93-14, and DR 93-05, Exhibits C and D.
5. Compliance with and execution of all conditions listed herein shall be necessary prior to obtaining final building inspection clearance and/or prior to obtaining any occupancy clearance. Deviation from this requirement shall be only by written consent of the Director of Community Development. An occupancy inspection for compliance with health and safety standards shall be conducted, at the applicant's expense, prior to granting of occupancy clearance. Any modifications required to meet minimum health and safety requirements shall be completed and approved prior to granting of occupancy clearance.
6. Unless start of construction is commenced not later than 12 months after this approval is granted and is diligently pursued thereafter, this approval will automatically become null and void. However, if the approved plot plan, elevation plans, and adjacent areas are unchanged, the Director of Community Development may grant one additional 12-month extension of time for start of construction provided the initial 12-month period has not already expired. Start of construction is defined as:
 - a. All zoning and related approvals are effective; and
 - b. All required building and grading permits for the project have been issued; and

- c. The "foundation inspection" and "concrete slab or underfloor inspection" have been made and received approval from the Department of Building and Safety; i.e., all trenches must be excavated, forms erected, and all materials for the foundation delivered on the job and all in-slab or underfloor building service equipment, conduit, piping accessories and other ancillary equipment items must be in place. Nothing in this definition shall be construed to alter the applicable legal standards for determining when vested property rights to complete the project have arisen.
7. All applicable requirements of any law, ordinance, or regulation of the State of California, City of La Cañada Flintridge, and any other governmental entity shall be complied with.
 8. This approval is subject to the applicant paying all fees and assessments to the City of La Cañada Flintridge, as required by Ordinance.
 9. In the event the City determines that it is necessary to take legal action to enforce any of the provisions of these conditions, and such legal action is taken, the applicant shall be required to pay any and all costs of such legal action, including reasonable attorney's fees, incurred by the City, even if the matter is not prosecuted to a final judgement or is amicably resolved, unless the City should otherwise agree with the applicant to waive said fees or any part thereof. The foregoing shall not apply if the permittee prevails in the enforcement proceeding.
 10. The applicant shall defend, indemnify, and hold harmless the City and its officers, agents, and employees from any claim, action or proceeding against the City or its officers, agents, or employees to attach, set aside, void, or annul approval of this Conditional Use Permit, Variance, and/or Design Review approval. The City shall promptly notify the applicant of any such claim, action, or proceeding and shall cooperate fully in the defense.
 11. An approval granted by the Planning Commission does not constitute a building permit or authorization to begin any construction. An appropriate permit issued by the Department of Building and Safety must be obtained prior to construction, enlargement, relocation, conversion, or demolition of any building or structure within the City.

Environmental Mitigation Measures

12. During the grading phase of the project, all exposed soils shall be watered regularly to reduce fugitive dust emissions.
13. All surface drainage shall be directed to public drainage facilities. A drainage control plan shall be prepared by a licensed civil engineer and approved by the City of La Cañada Flintridge prior to issuance of building permits. All provisions of the plan shall be incorporated into the project and shall be implemented prior to issuance of any occupancy permits.

14. Prior to issuance of building permits, the applicant shall provide evidence from the Los Angeles County Public Works Department and, if necessary, the South Coast Air Quality Management District (SCAQMD) that the site is free of soil contaminants. All requirements of these approvals shall be incorporated into the project.
15. Prior to issuance of building permits, the applicant shall provide evidence from the California State Regional Water Quality Control Board (RWQCB) that the site is free of groundwater contamination. All requirements of the RWQCB shall be incorporated into the project.
16. Exterior lighting shall be designed to minimize glare as viewed from adjacent thoroughfares, and shall be subject to approval by the Director of Public Works prior to issuance of building permits.
17. A septic plan is required, and shall be subject to approval by the Health Services Department prior to issuance of building permits. All requirements of the Department shall be incorporated into the project.
18. All recommendations of the Traffic Impact Study by Daniel Benson and Associates shall be incorporated into the project, subject to approval of any work involving the public rights of way by the appropriate agencies.

Public Works Conditions

19. The fire hydrant shall be located to the satisfaction of the Director of Public Works and the Los Angeles County Fire Department prior to final occupancy clearance.
20. A new handicapped ramp shall be installed at the street intersection, facing across Foothill Boulevard, and the existing metal rail shall be removed. Said work shall be subject to the approval of the Director of Public Works prior to final occupancy clearance.
21. The gutter at the south end of Castle Road shall be reworked to eliminate ponding. Said gutter work shall be subject to approval by the Director of Public Works prior to final occupancy clearance.
22. The sidewalk along Castle shall be reconstructed, subject to approval by the Director of Public Works prior to final occupancy clearance.
23. Street trees shall be provided to the satisfaction of the Director of Public Works and the Design Options Committee, prior to final occupancy clearance.

Planning Department Conditions

24. Prior to issuance of any final occupancy clearance, the applicant shall obtain a business license in accordance with the provisions of Ordinance No. 210.

25. The applicant and subsequent owner(s) of the project shall waive the right to protest the creation of a sanitary sewer assessment district including the subject property, and shall connect to a sewer system upon it being made available.
26. Landscaping with a mature height of at least 25 feet shall be planted in the area between the project area and adjacent residential property to the north, subject to review and approval by the Design Review Board. Said landscaping approval shall be obtained prior to the issuance of building permits.
27. A 6-foot high solid-grouted 8" concrete block wall, or wall of similar mass, shall be constructed adjacent to the north side of the drive-through lane. Said wall shall be of a finish compatible with the primary building, and shall be subject to review and approval by the Design Review Board prior to the issuance of building permits.
28. Landscaping shall be used against the building wall and required buffer wall where said walls face the drive-through lane in order to diminish the possibility of sound reverberation. Said landscaping shall be subject to review and approval by the Design Review Board prior to issuance of building permits.
29. Service access shall be restricted to the hours between 9am and 5pm.
30. The restaurant and drive-through shall not be open any earlier than 6am or any later than 10pm.
31. The applicant shall provide a redcurb on Castle Drive the entire length of the project, subject to approval by the Public Works Director.
32. A landscape area of at least 5 feet in width shall be provided within the north row of parking stalls.
33. The parking space at the extreme east end of the site and situated primarily on the adjacent property, shall be eliminated.
34. The project shall be subject to review and approval by the Design Review Committee for the following items prior to the issuance of building permits:
 - a. *The color of the proposed flat roof tile.*
 - b. *The use of an awning vs. an exposed stucco soffit.*
 - c. *Landscape screening of the parking lot and the seating/play area.*
 - d. *Redesign of the wall sign to replace the plastic bell pictograph with a metal element.*
35. The mechanical equipment shall be visually and acoustically buffered by placement and by integral architectural elements, subject to Planning staff approval prior to the issuance of any building permits.

36. All signs shall be of a matte finish.
37. An agreement ensuring full-time reciprocal access between the subject parcel and the adjacent parcel to the east shall be recorded to run with the land in perpetuity. Said agreement shall be subject to approval by the Director of Community Development prior to the issuance of any building permits, and modification or revocation of the agreement shall occur only with approval as an amendment to the Conditional Use Permit.
38. The pavement of the access easement along the north side of the property shall be replaced.
39. Filtration to minimize cooking odors outside the building shall be provided to the satisfaction of Planning staff. Odors shall be reduced such that they are not detectable at the property line.

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Recorder's Office, Los Angeles County,
California

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SEQ:
02

DAR - Title Company (Hard Copy)



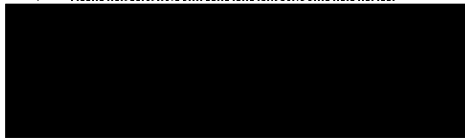
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CHICAGO TITLE COMPANY

When Recorded Return to:

Kroll, McNamara, Evans & Delehanty, LLP
65 Memorial Road, Suite 300
West Hartford, CT 06107
Attention: Adam F. Zweifler, Esq.



DEED OF TRUST, SECURITY AGREEMENT AND FIXTURE FILING BY AND AMONG

LA CANADA ASSOCIATES, LLC, a Delaware limited liability company
("BORROWER"),

CHICAGO TITLE INSURANCE COMPANY, a Nebraska corporation
("TRUSTEE")

AND

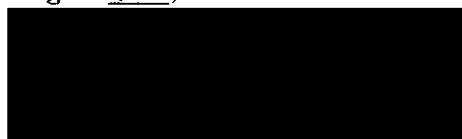
THE LINCOLN NATIONAL LIFE INSURANCE COMPANY, an Indiana corporation,
INDIVIDUALLY, AND AS AGENT FOR LINCOLN LIFE & ANNUITY COMPANY OF
NEW YORK, a New York corporation (collectively "LENDER")

DATED:

August 18, 2016

LOAN AMOUNT:

PROPERTY ADDRESS:



THIS INSTRUMENT IS ALSO TO BE INDEXED IN THE INDEX OF FINANCING
STATEMENTS.

THE NAMES OF THE DEBTOR AND THE SECURED PARTY, THE MAILING ADDRESS
OF THE SECURED PARTY FROM WHICH INFORMATION CONCERNING THE

The Lincoln National Life Insurance Company
Lincoln Life & Annuity Company of New York
Deed of Trust
Ross Plaza
La Canada, CA

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SLD011-x23 2A

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SECURITY INTEREST MAY BE OBTAINED, THE MAILING ADDRESS OF THE DEBTOR AND A STATEMENT INDICATING THE TYPES, OR DESCRIBING THE ITEMS, OF COLLATERAL, ARE DESCRIBED HEREIN, IN COMPLIANCE WITH THE REQUIREMENTS OF THE UNIFORM COMMERCIAL CODE.

This Deed of Trust secures the indebtedness of that certain Promissory Note of even date herewith executed by BORROWER and payable to the order of Lincoln (hereinafter defined) representing a retained interest in the original principal amount of One Million Six Hundred Thousand and 00/100 Dollars (\$1,600,000.00) (the "Retainage Note") and a Promissory Note payable to Participant (hereinafter defined) representing a participation in the original principal amount of One Million Five Hundred Thousand and 00/100 Dollars (\$1,500,000.00) (the "Participant Note") (the Retainage Note and the Participant Note being referred to collectively as the "Note").

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**DEED OF TRUST, SECURITY AGREEMENT AND FIXTURE FILING
(COLLATERAL IS OR INCLUDES FIXTURES)**

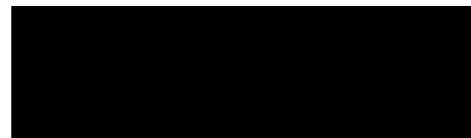
THIS DEED OF TRUST, SECURITY AGREEMENT AND FIXTURE FILING (the "Deed of Trust") is made as of this 18th day of August, 2016 by and among **LA CANADA ASSOCIATES, LLC**, a Delaware limited liability company, whose mailing address is 11812 San Vicente Boulevard, Suite 500, Los Angeles, California 90049, as trustor, (herein "**BORROWER**"), **CHICAGO TITLE INSURANCE COMPANY**, a Nebraska corporation, whose mailing address is 725 South Figueroa Street, Suite 200, Los Angeles, California 90017 (herein, "**TRUSTEE**"), for the benefit of **THE LINCOLN NATIONAL LIFE INSURANCE COMPANY**, an Indiana corporation ("**Lincoln**"), Individually, and as Agent for **LINCOLN LIFE & ANNUITY COMPANY OF NEW YORK**, a New York corporation ("**Participant**"), as beneficiary (Lincoln and Participant collectively referred to herein as "**LENDER**"), whose mailing address is 100 North Greene Street, Greensboro, North Carolina 27401, Attn: Loan Servicing, Loan No. L1609400.

BORROWER, in consideration of the indebtedness herein recited, hereby irrevocably grants, bargains, sells, conveys, transfers and assigns, to **TRUSTEE**, and to **TRUSTEE'S** successors and assigns, IN TRUST with power of sale and right of entry and possession, all of **BORROWER'S** estate, right, title and interest in, to and under that certain real property located in La Canada, California more particularly described in Exhibit A attached hereto and incorporated herein by this reference (the "**Land**");

TOGETHER with all of **BORROWER'S** now or hereafter acquired estate, right, title and interest in, to and under all buildings, structures, improvements and fixtures now existing or hereafter erected on the Land and all right, title and interest, if any, of **BORROWER** in and to the streets and roads, opened or proposed, abutting the Land to the center lines thereof, and strips within or adjoining the Land, the air space and right to use said air space above the Land, all rights of ingress and egress on or within the Land, all easements, rights and appurtenances thereto or used in connection with the Land, including, without limitation, air, lateral support, alley and drainage rights, all revenues, income, rents, cash or security deposits, advance rental deposits, and other benefits thereof or arising from the use or enjoyment of all or any portion thereof (subject however to the rights and authorities given herein to **BORROWER** to collect and apply such revenues, and other benefits), all interests in and rights, royalties and profits in connection with all minerals, oil and gas and other hydrocarbon substances thereon or therein, and water stock, all options to purchase or lease, all development or other rights relating to the Land or the operation thereof, or used in connection therewith, including all **BORROWER'S** right, title and interest in all fixtures, attachments, partitions, machinery, equipment, building materials, appliances and goods of every nature whatever now or hereafter located on, or attached to, the Land, all of which, including replacements and additions thereto, shall, to the fullest extent permitted by law and for the purposes of this Deed of Trust, be deemed to be real property and, whether affixed or annexed thereto or not, be deemed conclusively to be real property; and **BORROWER** agrees to execute and deliver, from time to time, such further

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instruments and documents (provided that such instruments and documents do not subject BORROWER to any additional liability or obligations beyond that contemplated by the Loan Documents) and as may be required by LENDER to confirm the legal operation and effect of this Deed of Trust on any of the foregoing. All of the foregoing property described in this section (the "**Improvements**"), together with the Land, shall be hereinafter referred to as the "**Property**".

TOGETHER with all of BORROWER'S now existing or hereafter acquired right, title and interest in the following:

(A) All equipment (including but not limited to all heating and air conditioning equipment), inventory, goods, instruments, appliances, furnishings, machinery, tools, raw materials, component parts, work in progress and materials, and all other tangible personal property of whatsoever kind, used or consumed in the improvement, use or enjoyment of the Property now or any time hereafter owned or acquired by BORROWER, wherever located and all products thereof whether in possession of BORROWER or whether located on the Property or elsewhere;

(B) To the extent general intangibles are assignable, all general intangibles relating to design, development, operation, management and use of the Property, including, but not limited to, (1) all names under which or by which the Property may at any time be owned and operated or any variant thereof, and all goodwill in any way relating to the Property and all service marks and logotypes used in connection therewith, (2) all permits, licenses, authorizations, variances, land use entitlements, approvals, consents, clearances, and rights obtained from governmental agencies issued or obtained in connection with the Property, (3) all permits, licenses, approvals, consents, authorizations, franchises and agreements issued or obtained in connection with the construction, use, occupation or operation of the Property, (4) all materials prepared for filing or filed with any governmental agency, and (5) the books and records of BORROWER relating to construction, or operation of the Property.

(C) All shares of stock or partnership interest or membership interest or other evidence of ownership of any part of the Property that is owned by BORROWER in common with others, including all water stock relating to the Property, if any, and all documents or rights of membership in any owners' or members' association or similar group having responsibility for managing or operating any part of the Property; provided, however, that the foregoing shall not include any ownership interests in the BORROWER;

(D) All accounts, deposit accounts, tax and insurance escrows held pursuant to this Deed of Trust, other escrow accounts held pursuant to this Deed of Trust, accounts receivable, instruments, documents, documents of title, general intangibles, rights to payment of every kind, all of BORROWER'S rights, direct or indirect, under or pursuant to any and all construction, development, financing, guaranty, indemnity, maintenance, management, service, supply and warranty agreements, commitments, contracts, subcontracts, insurance policies, licenses and

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bonds now or anytime hereafter arising from construction on the Land or the use or enjoyment of the Property to the extent such are assignable;

(E) All of BORROWER'S interest in and to all causes of action, claims, compensation, proceeds and recoveries for any damage or injury to the Property or any part thereof or for any loss or diminution in value of the Property;

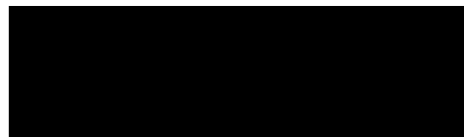
(F) All condemnation proceeds and insurance proceeds related to the Property;

(G) All articles of personal property now or hereafter attached to, placed upon for an indefinite term or used in connection with the Land, appurtenances to the Land, and the Improvements together with all goods and other property which are or at any time become so related to the Property that an interest in them arises under real estate law as fixtures.

TOGETHER with all additions to, substitutions for and the products of all of the above, and all proceeds therefrom, whether cash proceeds or noncash proceeds, received when any such property (or the proceeds thereof) is sold, exchanged, leased, licensed, or otherwise disposed of, whether voluntarily or involuntarily. Such proceeds shall include any of the foregoing specifically described property of BORROWER acquired with cash proceeds. Together with, and without limiting the above items, all Goods, Accounts, Documents, Instruments, Money, Chattel Paper and General Intangibles arising from or used in connection with the Property, as those terms are defined in the Uniform Commercial Code from time to time in effect in the state in which the Property is located (the "UCC"). All of the foregoing, including such products thereof, are collectively referred to as "Collateral".

The personal property in which LENDER has a security interest includes goods which are or shall become fixtures on the Property. This Deed of Trust is intended to serve as a fixture filing pursuant to the terms of the applicable provisions of the UCC. This filing is to be recorded in the real estate records of the appropriate city, town or county in which the Property is located. In that regard, the following information is provided:

Name of Debtor:



Address of Debtor:

Name of Secured Party: The Lincoln National Life Insurance Company

Address of Secured Party: See Section 4.02 hereof

BORROWER warrants and agrees that there is no financing statement or chattel mortgage covering the foregoing Collateral, the Property, or any part thereof, on file in any public office.

The Lincoln National Life Insurance Company
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HOWEVER, THIS IS A DEED OF TRUST AND THIS CONVEYANCE IS MADE FOR THE FOLLOWING USES AND FOR THE PURPOSE OF SECURING IN SUCH ORDER OF PRIORITY AS LENDER MAY ELECT:

(A) The repayment of the indebtedness (the "Loan") evidenced by that certain promissory note payable to Lincoln representing a retained interest in the original principal amount of One Million Six Hundred Thousand and 00/100 Dollars (\$1,600,000.00) (the "Retainage Note") and a note payable to Participant representing a participation in the original principal amount of One Million Five Hundred Thousand and 00/100 Dollars (\$1,500,000.00) (the "Participant Note") each dated August __, 2016 (the Retainage Note and the Participant Note being referred to collectively as the "Note") with interest thereon, as provided therein, and all late charges, loan fees, commitment fees, Prepayment Premiums (as described in the Note), and all extensions, renewals, modifications, amendments and replacements thereof;

(B) The payment of all other sums which may be advanced by or otherwise be due to LENDER under any provision of this Deed of Trust or under any other instrument or document referred to in clause (C) below, with interest thereon at the rate provided herein or therein;

(C) The performance of each and every covenant and agreement of BORROWER contained (1) herein, in the Note, or in any note evidencing a Future Advance (as hereinafter defined), and (2) in the obligations of BORROWER upon any and all pledge or other security agreements, loan agreements, disbursement agreements, supplemental agreements, any guaranty, financing statements (the foregoing shall include the commitment letter between BORROWER and LENDER executed in connection with the Loan), assignments (both present and collateral) and all instruments of indebtedness or security now or hereafter executed by BORROWER in connection with the Loan (the Note and all other documents relating to or securing the Loan being hereafter sometimes collectively referred to, together with this Deed of Trust, as the "**Loan Documents**"), and (3) in any and all pledges or other security agreements, loan agreements, disbursement agreements, supplemental agreements, any guaranty, financing statements, assignments (both present and collateral) affidavits and all instruments of indebtedness or security in connection with any indebtedness referred to in clauses (A), (B) or (D) of this section now or hereafter executed by BORROWER (or any of the parties constituting the BORROWER or any principals of such parties) or for the purpose of supplementing or amending this Deed of Trust or any instrument secured hereby (all of the foregoing in this clause (C)(3), as the same may be amended, modified or supplemented from time to time, being referred to hereinafter as "**Related Agreements**") and all costs and expenses, including reasonable attorneys' fees with respect to all such documents, including without limitation, in connection with all requests by the BORROWER for consent or approval or waiver under the Note, Loan Documents, or Related Agreements and the negotiation and drafting of any loan settlement or workout agreement, any litigation or other legal proceeding in any way related to the Note, the Loan Documents or Related Agreements; and

(D) The repayment of any other loans or advances, with interest thereon, hereafter made to BORROWER (or any successor in interest to BORROWER as the owner of the Property or any part thereof) by LENDER when the promissory note evidencing the loan or

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advance specifically states that said note is secured by this Deed of Trust, together with all extensions, renewals, modifications, amendments and replacements thereof (herein and in the Related Agreements, "Future Advance").

TO HAVE AND TO HOLD the Property to the use, benefit, and behoof of TRUSTEE and its successors and assigns, forever, in Fee Simple.

BORROWER warrants that BORROWER has good title to the Property, is lawfully seized and possessed of the Property and every part thereof, and has the right to convey the same; that the Property is unencumbered except as may be expressly provided in the Permitted Exceptions described in Exhibit B attached hereto and incorporated herein by this reference (the "Permitted Exceptions"); and, except for such Permitted Exceptions, that BORROWER will forever warrant and defend title to the Property unto TRUSTEE, his successors and assigns, against the claims of all persons whomsoever.

ARTICLE I **COVENANTS OF BORROWER**

To protect the security of this Deed of Trust, BORROWER covenants and agrees as follows:

1.01. Performance of Obligations Secured. BORROWER shall promptly pay when due the principal of and interest on the indebtedness evidenced by the Note, the principal of and interest on any Future Advance, any Prepayment Premium and late charges provided for in the Note or in any note evidencing a Future Advance, and shall further perform fully and in a timely manner all other obligations of BORROWER contained herein, in the Note, in any note evidencing a Future Advance, or in any of the Loan Documents or Related Agreements.

1.02. Insurance. For all times during the period there remains any indebtedness under the Note, or any and all other indebtedness (including, without limitation, Future Advances) secured by this Deed of Trust, BORROWER shall keep the Property insured against all risks and hazards as LENDER may require. Such insurance shall be in policy form, amount and coverage satisfactory to LENDER, including, but not limited to:

(A) Fire and extended coverage property damage insurance, including, but not limited to, all risk insurance, written on a special cause of loss form, in an amount equal to the full replacement cost of the Improvements, with an agreed value or no coinsurance, without deduction for depreciation, and no exclusions for acts of terrorism. The coverage must include windstorm/hail, and contain a waiver of subrogation clause in favor of the tenant(s) as stipulated in their respective lease agreements and a deductible amount acceptable to LENDER;

(B) General liability and excess liability insurance, in such form, amount and with self-retentions, satisfactory to LENDER, and naming LENDER c/o LENDER'S servicing agent, if any, as additional insured covering LENDER'S interest in the Property;

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(C) Business income or rent loss insurance in an amount at least equal to twelve (12) months' anticipated gross rental income or twelve (12) months' gross business earnings, whichever is applicable, without exclusion for acts of terrorism, and naming LENDER c/o LENDER'S servicing agent, if any, as lender's loss payee;

(D) Flood insurance if any part of the Property is now or is hereafter determined by the Secretary of Housing and Urban Development (HUD) or the Director of the Federal Emergency Management Agency (FEMA) to be in a "Special Flood Hazard Area," such insurance providing coverage at least equivalent to that provided under the National Flood Insurance Program (NFIP), in the Special Flood Hazard Area, provided that the aggregate amount of flood insurance must equal, at a minimum, the lesser of the insurable value of all buildings or the indebtedness evidenced by the Note; or, if only part of the Property is in a Special Flood Hazard Area, the insurable buildings exposed to flood hazards must be covered by flood insurance in an aggregate amount equal to a minimum of the lesser of the insurable value of the exposed building or that prorated portion of the unpaid indebtedness on the entire Property determined by the ratio of square foot area of the exposed buildings to the square footage of all buildings comprising the Property.

(E) "Dram shop" insurance if alcoholic beverages are sold on the Property;

(F) Equipment Breakdown insurance when risks covered thereby are present and LENDER requires such insurance; and

(G) Earthquake insurance if LENDER requires such insurance, with limits and deductible satisfactory to LENDER.

The insurance coverages described in Subsections (A), (C), (D), (F) and (G) above and any other insurance obtained by the BORROWER with respect to the Property, whether or not such insurance is specifically required by LENDER, shall name LENDER c/o LENDER'S loan servicer, if any, under a standard noncontributory mortgagee clause or otherwise directly insure LENDER'S interest in the Property. All policies of insurance required under this Section 1.02 shall be with a company or companies satisfactory to LENDER and authorized to do business in the state in which the Property is located. All policies of insurance shall provide that they will not be canceled or modified without fifteen (15) business days' prior written notice to LENDER. Certified copies of the above mentioned insurance policies satisfactory to LENDER shall be delivered to and held by LENDER. Copies of all renewal and replacement policies shall be delivered to LENDER at least thirty (30) days before the expiration of the expiring policies. If any renewal or replacement policy is not obtained as required herein, LENDER is authorized to obtain the same in BORROWER'S name, in which event BORROWER shall, on demand of LENDER, repay such premium or premiums to LENDER and such repayment shall be secured by the lien of this Deed of Trust. LENDER shall not by the fact of failing to obtain any insurance, incur any liability for or with respect to the amount of insurance carried, the form or legal sufficiency of insurance contracts, solvency of insurance companies, or payment or defense of lawsuits, and BORROWER hereby expressly assumes full responsibility therefor and all

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liability, if any, with respect thereto. If BORROWER fails to maintain the level of insurance required under this Deed of Trust, then BORROWER shall indemnify LENDER to the extent that a casualty occurs and insurance proceeds would have been available had such insurance been maintained.

1.03. Casualty Awards.

(A) In the event of loss under any policies referenced in Section 1.02, BORROWER shall give prompt written notice to the insurance carrier and to LENDER. In the event any such loss occurs, LENDER shall be entitled to receive and retain all insurance proceeds to be applied by LENDER, at LENDER'S option, either (i) upon any indebtedness secured hereby in such order as LENDER may determine (without payment of a Prepayment Premium as defined in Section 10.1 of the Note as to the amount of any such application to the principal balance of the Note, if at the time of such application there is no outstanding Event of Default or event, which with the notice or passage of time or both could become an Event of Default) or (ii) to payment for the replacing, repairing or restoring the improvements partially or totally destroyed to a condition and upon such terms of payment as may be satisfactory to LENDER.

(B) BORROWER hereby assigns to LENDER all monies recoverable under each such insurance policy and authorizes each insurance company to make payment for all such losses directly to LENDER instead of to LENDER and BORROWER jointly. In the event any insurance company fails to disburse insurance proceeds directly and solely to LENDER but disburses instead either to BORROWER alone or to BORROWER and LENDER jointly, BORROWER agrees promptly to transfer and endorse such proceeds to LENDER, and upon any failure of BORROWER to do so, LENDER may execute such transfers and endorsements for and in the name of BORROWER and BORROWER hereby irrevocably appoints LENDER as BORROWER'S agent and attorney-in-fact (which appointment is coupled with an interest) for such purposes. BORROWER shall cooperate with LENDER in obtaining for LENDER the benefits of any insurance or other proceeds lawfully or equitably payable to LENDER in connection with the transactions contemplated by the Loan Documents and the Related Agreements and the collection of any indebtedness or obligation of BORROWER to LENDER incurred thereunder. At LENDER'S option, LENDER shall be entitled and BORROWER hereby authorizes LENDER at BORROWER'S expense, to take all necessary and proper steps (including, without limitation, the engaging, at BORROWER'S expense, of appraisers to conduct independent appraisals on behalf of LENDER and the engaging, at BORROWER'S expense, of attorneys and other professionals and consultants) to obtain any insurance or other proceeds, and LENDER is hereby authorized and entitled to compromise or adjust any loss under any such insurance policy.

(C) Upon any foreclosure of this Deed of Trust or any sale of the Property in lieu thereof, LENDER shall become the owner of all proceeds and benefits from insurance policies on the Property, and BORROWER hereby irrevocably appoints LENDER as its attorney-in-fact, which appointment is coupled with an interest, to assign each such policy in such event.

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(D) Notwithstanding anything to the contrary contained in this Deed of Trust, so long as there is no default or event upon which the giving of notice or the passage of time or both would constitute an Event of Default under the Loan Documents, in the event of any insured damage to or destruction where the total amount of the insurance proceeds is less than One Hundred Fifty Thousand and 00/100 Dollars (\$150,000.00), LENDER agrees that said insurance proceeds may be utilized by BORROWER to complete necessary repairs or restorations to the Property or improvements; provided that any checks issued for such insurance proceeds shall be issued jointly to BORROWER and LENDER.

1.04. Escrow Fund for Casualty Proceeds.

(A) Notwithstanding anything to the contrary in Section 1.03(A) above, LENDER agrees to make available to BORROWER for restoration of the Property any net insurance proceeds received by LENDER under this Deed of Trust as a result of any partial casualty loss provided an uncured Event of Default does not then exist and if no condition then exists which will, with the passage of time, the giving of notice or both, constitute an Event of Default, and provided further, that (x) BORROWER demonstrates to LENDER that the Property can be restored to an architectural and economic unit of the same character and no less valuable than existed prior to the casualty, (y) such proceeds are sufficient to complete the rebuilding or restoration or, if insufficient, that BORROWER has funds which, together with the available proceeds, are sufficient to complete such rebuilding or restoration and (z) BORROWER satisfies such other reasonable conditions to the use of such proceeds to reimburse BORROWER as LENDER may impose thereon. If LENDER or its agent makes such proceeds available to reimburse BORROWER for the cost of the rebuilding or restoration of the Improvements on the Property, such proceeds shall be made available in the manner and under the conditions that the LENDER may require, including, without limitation, (i) that in the event such proceeds shall be insufficient to restore or rebuild the Improvements, BORROWER shall deposit promptly with LENDER or its agent funds which, together with such proceeds, shall be sufficient in LENDER'S judgment to restore and rebuild the Property; (ii) that the excess of such proceeds above the amount necessary to complete such restoration and to compensate BORROWER for all other losses shall be applied at LENDER'S option on account of the indebtedness or obligation hereby secured (in inverse order of maturity without payment of any prepayment premium); (iii) BORROWER shall have delivered to LENDER and LENDER shall have reviewed and approved in writing the plans and specifications for the restoration work and the same shall have been approved by all governmental authorities having jurisdiction; (iv) BORROWER shall have furnished to LENDER for LENDER'S approval a detailed budget and cost breakdown for said restoration work signed by BORROWER and describing the nature and type of expenses and amounts thereof estimated by BORROWER for said restoration work including, but not limited to, the cost of material and supplies, architect and designer fees, general contractor's fees, and the anticipated monthly disbursement schedule, and LENDER shall have given to BORROWER written approval of such budget and cost breakdown (if BORROWER determines that its actual expenses differ from its estimated budget, it will so advise LENDER promptly); (v) in LENDER'S reasonable judgment, such restoration work can

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be completed prior to the maturity of the Note; and (vi) BORROWER shall have furnished to LENDER evidence satisfactory to LENDER that all leases of the Property in effect immediately prior to such damage will remain in full force and effect subject only to abatement of rent during the repair period in accordance with the provisions of said leases or, if immediately prior to such casualty the Property was occupied by three or more tenants, none of whom occupied in excess of fifty percent of the leasable space at the Property, BORROWER shall have furnished to LENDER evidence satisfactory to LENDER that a sufficient number of such leases shall remain in full force and effect to generate a net income (as determined by Lender in Lender's sole and absolute discretion, but including in such net income any amounts that are payable to Borrower under any business interruption or rent loss insurance) sufficient to produce a debt-service-coverage on the Loan of not less than 2.0 times. In the event any of the conditions described above are not or cannot be satisfied, then such proceeds shall be disposed of as otherwise provided in this Section 1.04. Under no circumstances shall LENDER become obligated to take any action to restore the Property.

(B) All proceeds released or applied by the LENDER or its agent to the restoration of the Improvements pursuant to the provisions of this Section 1.04 shall be released and/or applied on the cost of restoration (including within the term "restoration" any repair, reconstruction or alteration) as such restoration progresses, in amounts which shall equal ninety percent (90%) of the amounts from time to time certified by an architect approved by LENDER to have been incurred in such restoration of any and all of said property (i.e., 90% of the total amount expended by the contractor for the project under a contract approved by LENDER and billed by the contractor to BORROWER) and performed by a contractor reasonably satisfactory to LENDER and who shall furnish such corporate surety bond, if any, as may be reasonably required by LENDER, in accordance with the plans and specifications therefore previously approved by LENDER and the remaining ten percent (10%) upon completion of such restoration and delivery to LENDER of evidence reasonably satisfactory to LENDER that no mechanics' lien exists with respect to the work of such restoration; that the restoration work has been completed in accordance with the plans and specifications for said work approved by LENDER; that all of the leases referred to in the preceding paragraph are in full force and effect, with all tenants in occupancy and paying full lease rental thereunder; and that all governmental approvals required for the completion of said restoration work have been obtained and the same are in form and substance reasonably satisfactory to LENDER.

(C) If LENDER makes insurance proceeds available to BORROWER pursuant to Section 1.04(A), then BORROWER must within a reasonable period of time undertake the following: (i) submit to LENDER and request LENDER'S approval of the plans and specifications for the repair, restoration or rebuilding of such loss or damage to the Property ("Plans") which approval will not be unreasonably withheld provided that the restoration work reflected in the Plans will result in the restoration of the Property to the condition in which it existed prior to the casualty; (ii) after receipt of LENDER'S approval of such Plans, obtain approval of such Plans from all governmental authorities whose approval is required; (iii) after such Plans are approved by LENDER and by all such governmental authorities, BORROWER must promptly commence such repair, restoration or rebuilding of the Property, and thereafter carry out diligently such repair, restoration or rebuilding of the Property; (iv) BORROWER shall

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at no time be delinquent in the payment to mechanics, maintenance or others of the costs incurred in connection with such work; and (v) BORROWER shall comply with all other conditions of Sections 1.04 (B) and (C) within a reasonable period of time after the occurrence of any such loss or damage. If BORROWER shall fail to comply with any of the requirements set forth in the preceding sentence, such failure shall constitute a Performance Default (as set forth in Section 2.01(C) hereof). During the existence of an Event of Default (as defined in Article II hereof) of any nature, then LENDER, in addition to all other rights herein set forth, at LENDER'S option, (i) may apply all insurance proceeds to the payment of any indebtedness hereby secured, and/or (ii) LENDER, or any lawfully appointed receiver of the Property, may at their respective options, perform or cause to be performed such repair, restoration or rebuilding, and may take such other steps as they deem advisable to carry out such repair, restoration or rebuilding, and may enter upon the Property for any of the foregoing purposes. BORROWER hereby waives, for itself and all others holding under it, any claim against LENDER and such receiver (other than a claim based upon the alleged gross negligence or intentional misconduct of LENDER or any such receiver) arising out of anything done by them or any of them pursuant to this Section 1.04. LENDER may in its discretion apply any insurance proceeds held by it to reimburse itself and/or such receiver for all amounts expended or incurred by it in connection with the performance of such work, including reasonable attorney's fees. In the event that the insurance proceeds held by LENDER are insufficient to cover such costs, then BORROWER shall be obligated to reimburse LENDER for such excess costs, and BORROWER'S obligation to pay such excess costs shall be secured by the lien of this Deed of Trust and if not paid within ten (10) days of demand, shall bear interest at the rate specified in Section 3.11.

1.05. Condemnation Awards.

(A) BORROWER shall promptly notify TRUSTEE and LENDER of any action or proceeding relating to any condemnation or other taking of the Property or any part thereof, and BORROWER shall appear in and prosecute any such action or proceeding unless otherwise directed or consented to by LENDER in writing. At LENDER'S option, LENDER shall be entitled, and BORROWER hereby authorizes LENDER at BORROWER'S expense, to take all necessary and proper steps (including, without limitation, the engaging, at BORROWER'S expense, of appraisers to conduct independent appraisals on behalf of TRUSTEE and LENDER and the engaging of attorneys and other professionals and consultants) to appear in, prosecute, compromise and discharge any such action or proceeding. As further security for the payment of the indebtedness and performance of the obligations, covenants and agreements secured hereby, BORROWER hereby assigns to LENDER all judgments, awards or damages or settlements hereafter made resulting from condemnation proceedings or in lieu of any taking of the Property or any part thereof under the power of eminent domain, or for any damage, whether caused by such taking or otherwise, to the Property, including the improvements thereon, or any part thereof, or of any streets appurtenant thereto, including any award for change of grade of streets. LENDER shall have the right either (i) to apply any such sums or any part thereof so received after payment of all of its expenses, including costs and reasonable attorneys' fees, to the indebtedness secured hereby (without payment of a Prepayment Premium as defined in Section 10.1 of the Note as to the amount of any such application to the principal balance of the Note, if at the time of such application there is no outstanding Event of

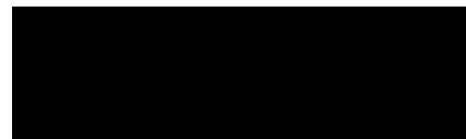
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Default or event, which with notice or passage of time or both could become an Event of Default) or (ii) apply all or any part of any amount received to the restoration or repair of the Property, in such manner as it elects.

(B) Notwithstanding anything to the contrary in Section 1.05(A) above, LENDER agrees to make available to BORROWER for restoration of the Property any net condemnation awards received by LENDER under this Deed of Trust as a result of any partial condemnation provided an uncured Event of Default does not then exist and if no condition then exists which will, with the passage of time, the giving of notice or both, constitute an Event of Default, and provided further, that (x) BORROWER demonstrates to LENDER that the Property can be restored to an architectural and economic unit of the same character and no less valuable than existed prior to the partial condemnation, (y) such award is sufficient to complete the rebuilding or restoration or, if insufficient, that BORROWER has funds which, together with the available proceeds, are sufficient to complete such rebuilding or restoration and (z) BORROWER satisfies such other reasonable conditions to the use of such award to reimburse BORROWER as LENDER may impose thereon. If LENDER or its agent makes such award available to reimburse BORROWER for the cost of the rebuilding or restoration of the Improvements on the Property, such award shall be made available in the manner and under the conditions that the LENDER may require, including, without limitation, (i) that in the event such award shall be insufficient to restore or rebuild the Improvements, BORROWER shall deposit promptly with LENDER or its agent funds which, together with such award, shall be sufficient in LENDER'S judgment to restore and rebuild the Property; (ii) that the excess of such award above the amount necessary to complete such restoration and to compensate BORROWER for all other losses shall be applied at LENDER'S option on account of the indebtedness or obligation hereby secured (in inverse order of maturity without payment of any prepayment premium); (iii) BORROWER shall have delivered to LENDER and LENDER shall have reviewed and approved in writing the plans and specifications for the restoration work and the same shall have been approved (such approval not to be unreasonably withheld provided the restoration work reflected in the plans will result in the restoration of the Property to the condition in which it existed prior to the condemnation) by all governmental authorities having jurisdiction; (iv) BORROWER shall have furnished to LENDER for LENDER'S approval a detailed budget and cost breakdown for said restoration work signed by BORROWER and describing the nature and type of expenses and amounts thereof estimated by BORROWER for said restoration work including, but not limited to, the cost of material and supplies, architect and designer fees, general contractor's fees, and the anticipated monthly disbursement schedule, and LENDER shall have given to BORROWER written approval of such budget and cost breakdown (if BORROWER determines that its actual expenses differ from its estimated budget, it will so advise LENDER promptly); (v) in LENDER'S reasonable judgment, such restoration work can be completed prior to the maturity of the Note; and (vi) BORROWER shall have furnished to LENDER evidence satisfactory to LENDER that all leases of the Property in effect immediately prior to such partial condemnation will remain in full force and effect subject only to abatement of rent during the repair period in accordance with the provisions of said leases or, if immediately prior to such partial condemnation the Property was occupied by three or more tenants, none of whom occupied in excess of fifty percent of the leasable space at the Property, BORROWER shall have furnished to LENDER evidence satisfactory to LENDER that a

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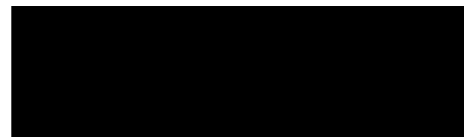
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sufficient number of such leases shall remain in full force and effect to generate a net income (as determined by Lender in Lender's sole and absolute discretion, but including in such net income any amounts that are payable to Borrower under any business interruption or rent loss insurance) sufficient to produce a debt-service-coverage on the Loan of not less than 2.0 times. In the event any of the conditions described above are not or cannot be satisfied, then such proceeds shall be disposed of as otherwise provided in this Section 1.05. Under no circumstances shall LENDER become obligated to take any action to restore the Property.

(C) All proceeds released or applied by the LENDER or its agent to the restoration of the Improvements pursuant to the provisions of this Section 1.05 shall be released and/or applied on the cost of restoration (including within the term "restoration" any repair, reconstruction or alteration) as such restoration progresses, in amounts which shall equal ninety percent (90%) of the amounts from time to time certified by an architect approved by LENDER to have been incurred in such restoration of any and all of said property (i.e., 90% of the total amount expended by the contractor for the project under a contract approved by LENDER and billed by the contractor to BORROWER) and performed by a contractor reasonably satisfactory to LENDER and who shall furnish such corporate surety bond, if any, as may be reasonably required by LENDER, in accordance with the plans and specifications therefore previously approved by LENDER and the remaining ten percent (10%) upon completion of such restoration and delivery to LENDER of evidence reasonably satisfactory to LENDER that no mechanics' lien exists with respect to the work of such restoration; that the restoration work has been completed in accordance with the plans and specifications for said work approved by LENDER; that all of the leases referred to in the preceding paragraph are in full force and effect, with all tenants in occupancy and paying full lease rental thereunder; and that all governmental approvals required for the completion of said restoration work have been obtained and the same are in form and substance reasonably satisfactory to LENDER.

(D) If LENDER makes condemnation awards available to BORROWER pursuant to this Section 1.05, then BORROWER must within a reasonable period of time undertake the following: (i) submit to LENDER and request LENDER'S approval of the plans and specifications for the restoration or rebuilding for the loss caused by the partial condemnation of the Property ("Plans"), such approval not to be unreasonably withheld provided the restoration work reflected in such Plans will result in the restoration of the Property to the condition in which it existed prior to the condemnation; (ii) after receipt of LENDER'S approval of such Plans, obtain approval of such Plans from all governmental authorities whose approval is required; (iii) after such Plans are approved by LENDER and by all such governmental authorities, BORROWER must promptly commence such restoration or rebuilding of the Property and thereafter carry out diligently such restoration or rebuilding of the Property; (iv) BORROWER shall at no time be delinquent in the payment to mechanics, materialmen or others of the costs incurred in connection with such work; and (v) BORROWER shall comply with all conditions of Sections 1.05 (B) and (C) within a reasonable period of time after the occurrence of any such partial condemnation. If BORROWER shall fail to comply with any of the requirements set forth in the preceding sentence, such failure shall constitute a Performance Default (as set forth in Section 2.01(C) hereof). During the existence of an Event of Default (as defined in Article II hereof) of any nature, then LENDER, in addition to all other rights herein

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set forth, at LENDER'S option, (i) may apply all condemnation awards to the payment of any indebtedness hereby secured, and/or (ii) LENDER, or any lawfully appointed receiver of the Property, may at their respective options, perform or cause to be performed such restoration or rebuilding, and may take such other steps as they deem advisable to carry out such restoration or rebuilding, and may enter upon the Property for any of the foregoing purposes. BORROWER hereby waives, for itself and all others holding under it, any claim against LENDER and such receiver (other than a claim based upon the alleged gross negligence or intentional misconduct of LENDER or any such receiver) arising out of anything done by them or any of them pursuant to this Section 1.05. LENDER may in its discretion apply any condemnation award held by it to reimburse itself and/or such receiver for all amounts expended or incurred by it in connection with the performance of such work, including reasonable attorney's fees. In the event that the amount of the condemnation award held by LENDER is insufficient to cover such costs, then BORROWER shall be obligated to reimburse LENDER for such excess costs, and BORROWER'S obligation to pay such excess costs shall be secured by the lien of this Deed of Trust and shall bear interest at the rate specified in Section 3.11.

(E) Notwithstanding anything to the contrary contained in this Deed of Trust, so long as there is no default or event upon which the giving of notice or the passage of time or both would constitute an Event of Default under the Loan Documents, in the event of any taking where the total amount of the condemnation award is less than One Hundred Fifty Thousand and 00/100 Dollars (\$150,000.00), LENDER agrees that said award may be utilized by BORROWER to complete necessary repairs or restorations to the Property or improvements; provided that any checks issued for such award shall be issued jointly to BORROWER and LENDER

1.06. Taxes, Liens and Other Items.

(A) BORROWER shall pay any and all taxes, bonds, assessments, fees, liens, charges, fines, impositions and any accrued interest or penalty thereon, and any and all other items which are attributable to or affect the Property by making payment when due directly to the payee thereof and promptly furnish copies of paid receipts for these to LENDER, unless such payments are to be made by LENDER as otherwise provided herein. BORROWER shall promptly discharge or bond any lien or encumbrance on the Property whether said lien or encumbrance has or may attain priority over this Deed of Trust or not. Except as otherwise expressly permitted hereunder, this Deed of Trust shall be the sole encumbrance on the Property and, if with the consent of LENDER it is not the sole encumbrance, then it shall be prior to any and all other liens or encumbrances on the Property. Provided that the priority of this Deed of Trust is not in any way affected, BORROWER may in good faith protest the payment of any tax or lien which it believes is unwarranted or excessive (the "Contested Sum") and may defer payment of such tax or lien pending conclusion of such contest if legally permitted to do so and provided LENDER'S security is not jeopardized in LENDER'S sole opinion. During such contest, BORROWER shall not be deemed in default hereunder if (i) prior to the delinquency of the Contested Sum, BORROWER deposits with LENDER or LENDER'S nominee cash or other security in form reasonably satisfactory to LENDER, adequate to cover the payment of such Contested Sum and any obligation, whether matured or contingent, of BORROWER or

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LENDER therefor, together with interest, costs and penalties thereon, and (ii) BORROWER promptly causes to be paid any amounts adjudged to be due, together with all costs, penalties and interest thereon, on or before such judgment becomes final and before any writ or order is issued under which the Property could be sold pursuant to such judgment. Notwithstanding the foregoing, BORROWER shall promptly upon the request of LENDER pay any such Contested Sum, regardless of such contest, if in the reasonable opinion of LENDER, the Property shall be in jeopardy or in danger of being forfeited or foreclosed.

(B) As further security for the payment of the Note and the payment of real estate taxes, regular or special assessments and insurance premiums, BORROWER shall be required to deposit, with each payment on the Note, an amount which shall, when multiplied by the number of loan payments due under the Note each year, be sufficient, in the estimation of LENDER (as determined each year) to pay all such charges not less than thirty (30) days prior to the date on which such items become due and payable. BORROWER shall furnish LENDER evidence to allow LENDER to estimate such amounts, including paid receipts, assessment notices and tax receipts. All funds so deposited (i) shall be held free of any liens or claims on the part of creditors of the BORROWER; and (ii) shall not be, or deemed to be, a trust fund; and such funds shall, until applied to the payment of the aforesaid items, as hereinafter provided, be held by LENDER without interest (except to the extent required under applicable law) and may be commingled with other funds of LENDER. All funds so deposited shall be applied to the payment of the aforesaid items only upon the satisfaction of the following conditions: (1) no Event of Default or event, which with notice or the passage of time or both could become an Event of Default, shall have occurred; (2) LENDER shall have sufficient funds to pay the full amounts of such items (which funds may include amounts paid solely for such purpose by BORROWER in addition to the escrowed funds); and (3) BORROWER shall have furnished LENDER with prior written notification that such items are due and with the bills and invoices therefor in sufficient time to pay the same before any penalty or interest attaches, and shall have deposited any additional funds as LENDER may determine as necessary to pay such items.

(C) If for any reason the funds on deposit with LENDER under this Section 1.06 shall not be sufficient to pay all charges specified herein within the time specified in this Section 1.06, then BORROWER shall, within ten (10) days after demand by LENDER, deposit sufficient sums so that LENDER may pay all such charges in full, together with any penalty and interest thereon. If the funds on deposit with LENDER shall from time to time exceed the amounts needed to pay all charges specified herein, then such excess shall be held by LENDER for further payments of such charges as specified in this Section 1.06.

(D) LENDER expressly disclaims any obligation to pay the aforesaid items unless and until BORROWER complies with all of the provisions set forth in Subsections 1.06(A) and (B); provided that it shall not constitute a default by BORROWER if BORROWER so complies but LENDER fails to pay any of the aforesaid items. Payments of all charges specified herein will, at the discretion of LENDER, be made as the same become due and payable even though subsequent owners of the Property may benefit therefrom. LENDER may, in refunding any part of the funds deposited hereunder as a result of the Note being paid in full, or for any other reason at the discretion of LENDER, pay the amount being refunded to whoever

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is represented to be the owner of the Property or any portion thereof at the time such refund is made. BORROWER hereby pledges any and all monies now or hereafter deposited pursuant to Subsection 1.06(B) as additional security for the Note, the Loan Documents and Related Agreements. If any Event of Default shall have occurred, or if the Note shall be accelerated as herein provided, all funds so deposited may, at LENDER'S option, be applied as determined solely by LENDER or to cure said Event of Default or as provided in this Section 1.06. In no event shall BORROWER claim any credit against the principal and interest due hereunder for any payment or deposit for any of the aforesaid items.

1.07. Acceleration Upon Sale or Encumbrance; Permitted Transfers.

(A) If BORROWER shall (A) sell or convey the Property or any part thereof, or any interest in the Property or in BORROWER; (B) be divested of its title to the Property or any interest therein; (C) further encumber the Property or the ownership interests in the BORROWER; (D) enter into any lease giving the tenant any option to purchase the Property or any part thereof; (E) encumber, grant a security interest in the ownership of interests in the BORROWER (other than limited partnership interests) or in the ownership interests in any partnership (other than limited partnership interests), corporation, limited liability company, trust or other entity directly or indirectly comprising the BORROWER; (F) transfer, permit the transfer of, or change or permit the change in the ownership interests in the BORROWER (other than limited partnership interests) or in the ownership interests in any partnership (other than limited partnership interests), corporation, limited liability company, trust or other entity directly or indirectly comprising the BORROWER, or (G) file any notices, or commence any procedures or actions which, if completed, would result in the Property being converted to a condominium or cooperative form of ownership, without the prior written consent of LENDER, then LENDER shall have the right, in its sole discretion, to declare the indebtedness secured by this Deed of Trust, irrespective of the maturity date specified in the Note, immediately due and payable. Except as expressly consented to in writing by LENDER, BORROWER shall not permit any additional encumbrances on the Property. Notwithstanding anything set forth herein, provided at all times during the term of the Loan, Chase Enterprises, L.P., a California limited partnership ("Chase Enterprises"), remains the managing member of BORROWER and retains control over the business and actions of BORROWER and the Property, and one or more of Rodney Chase, Sandra Chase, Michael Chase, Scott Chase and/or Mark Chase retains control of Chase Enterprises, and so long as there is no Event of Default or event upon which the giving of notice or passage of time or both would become an Event of Default, and so long as BORROWER continues to comply with the provisions of Section 1.14 and Section 1.16 hereof as to such transferees, (A) limited partnership interests in a limited partnership borrower, shares of stock of a corporate borrower, beneficial interests of a trust borrower, and member's interests in a limited liability company borrower, may be transferred, without the consent of LENDER, to: (i) limited partners, shareholders, beneficiaries and members, as the case may be, existing as of the date hereof; (ii) one or more of Rodney Chase, Sandra Chase, Michael Chase, Scott Chase and/or Mark Chase; and (iii) family members (or trusts, or other entities wholly owned and controlled by such family members, for the benefit of such family members) of such limited partners, shareholders, beneficiaries, members and Rodney Chase, as the case may be, for estate planning

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purposes; (B) any limited partnership interests in a member of BORROWER may be transferred without the consent of Lender; and (C) beneficial interests in BORROWER or any member or limited partner of BORROWER may be transferred without the consent of LENDER to (a) any of the parties listed in subsection (A) and (b) other third parties so long as the total cumulative amount of transfers to such other third parties, whether through one transfer or series of transfers, is not more than forty-nine percent (49%) of the beneficial interest in BORROWER or any member or limited partner of BORROWER during the term of the Loan; provided, however, that in all such cases LENDER receives written notice of such transfer within ten (10) days of BORROWER's knowledge of such transfer. BORROWER shall pay all administrative and actual out-of-pocket costs associated with any such transfers, including all attorney's fees LENDER may incur. Further, LENDER's prior consent and advance notice shall not be required for transfers of interests in BORROWER resulting from the death of partners, shareholders, beneficiaries or members of BORROWER or members of BORROWER, as applicable; provided, however, that (i) BORROWER shall provide written notice to LENDER no later than fifteen (15) days after such transfer; (ii) if such transfer results in a change in control in BORROWER or Chase Enterprises (other than to Rodney Chase, Sandra Chase, Michael Chase, Scott Chase and/or Mark Chase), then upon such transfer, (a) the management and control of BORROWER and Property must be acceptable to LENDER in its sole discretion, and (b) such transferee(s) shall fully satisfy all of LENDER's then-applicable eligibility, credit, management and other loan underwriting standards (including any standards with respect to previous relationships between LENDER and such transferee(s) (or person(s) controlling such transferee(s)) and the organization of the such transferee(s) (if applicable)); (iii) Borrower continues to comply with the provisions of Section 1.14 and Section 1.16 hereof as to such transferees; and (iv) none of the transferee(s) (if any of such are entities) shall have an organizational existence termination date that ends before the maturity date of the Loan. The failure to timely satisfy the foregoing conditions shall result in an Event of Default under the Loan Documents. As used herein "family member" shall mean and include only the spouse, issue (whether natural or adopted), sibling or parent of the member. Any transfer of membership interests made pursuant to this Section 1.07 shall be made only in such manner as to provide control of such membership interest by a competent legal entity or adult, and so as not to vest control of any partnership or membership interest in any minor or other legally incompetent person. As used herein, the term "control" shall mean the possession, directly or indirectly, of the power to direct or cause the direction of management or policies of the controlled entity, whether through the ownership of voting securities or other beneficial interests, by contract or otherwise.

Notwithstanding the above, so long as there is no Event of Default or event upon which the giving of notice of or passage of time or both would become an Event of Default, LENDER agrees to consent to one (1) transfer of one hundred percent (100%) of the ownership interest in the Property during the term of the Loan to a single purchaser who will assume the Loan provided LENDER receives sixty (60) days prior written notice of such transfer. However, as conditions to such consent: (a) LENDER must approve, in its sole discretion, the structure, the creditworthiness, financial strength, references, the real estate experience and management ability of the proposed purchaser; (b) LENDER must approve the financial terms of the proposed sale; and (c) LENDER shall receive a transfer fee in the amount of one percent (1%) of the then

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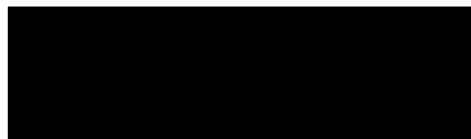
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outstanding principal balance of the Loan. BORROWER and the assumptor will be required to execute an Assumption Agreement satisfactory to LENDER in its sole discretion. In addition, BORROWER shall pay all administrative and actual out-of-pocket costs associated with such transfer including all attorney's fees LENDER may incur.

(B) Without limitation on the rights and remedies of LENDER arising under this Deed of Trust, in the event that BORROWER or any subsequent owner of the Property or any part thereof shall at any time sell, convey or transfer or attempt to sell, convey or transfer the Property or any part thereof, directly or indirectly, voluntarily or involuntarily, in violation of the provisions of Section 1.16(B) (concerning "ERISA") of this Deed of Trust, then LENDER shall, in addition to any other rights and remedies it may have at law or in equity or under this Deed of Trust, be entitled to a decree or order restraining and enjoining such sale, conveyance or transfer, and BORROWER or such subsequent owner shall not plead in defense thereof that there would be an adequate remedy at law (it being hereby expressly acknowledged and agreed that damages at law would be an inadequate remedy for breach or threatened breach of the provisions of Section 1.16(B)(iii) of this Deed of Trust).

(C) Secondary financing secured by the Property shall be permitted after August 10, 2019 if the following conditions are satisfied: (i) the combined principal amounts of this Loan (for purposes hereof, the calculation of principal amount shall be based upon the principal amount of the Loan outstanding at the time of closing on the secondary financing) and the secondary financing do not exceed sixty 60% of the value of the Property as determined by a current appraisal of the Property acceptable to LENDER prepared by a licensed appraiser approved by LENDER; (ii) the net operating income from the Property (as determined by LENDER in its sole discretion and which shall be calculated in accordance with generally accepted accounting principles consistently applied) is not less than 1.80 times the combined debt service of this Loan and the secondary financing (based upon a twenty-five (25) year amortization schedule); (iii) the proceeds of all secondary financing must be used for the Property; (iv) the secondary financing may not provide for an accrual of interest or additional principal and all payments on the secondary financing must be on a current pay basis; (v) if an Event of Default occurs under any of the Loan Documents securing the Loan, LENDER shall be paid all sums then due under its Loan Documents before the secondary lender receives any sums then due from BORROWER; (vi) the secondary lender must agree to give LENDER a copy of all notices of default given to BORROWER and agree not to accelerate or exercise any rights or remedies with respect to the Property or BORROWER without LENDER'S prior written consent; (vii) the secondary lender must enter into a subordination and intercreditor agreement satisfactory to LENDER; (viii) BORROWER shall pay all of LENDER'S costs incurred in connection with the subordination and intercreditor agreement; (ix) the lender providing the secondary financing is an institutional lender, such as a bank, insurance company or pension fund; (x) LENDER may reinstate its rights to require escrow deposits of real estate taxes and assessments and insurance premiums, if previously waived, and (xi) at the time of the making of the secondary financing, there exists no default under the Loan Documents and no condition which upon the giving of notice and passage of time would constitute an Event of Default under the Loan Documents.

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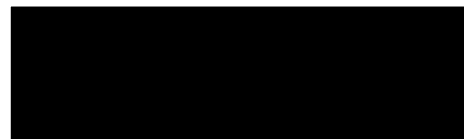


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(D) BORROWER represents, warrants and covenants (the items set forth below in this section being collectively the "Single Purpose Covenants") as of the date of hereof and until such time as the indebtedness secured hereby is paid in full, that BORROWER will not:

- (a) change or permit to be changed its organizational documents, if such change would adversely impact the covenants set forth in the Loan Documents or otherwise violate any prohibited transfer or due on sale provisions set forth in the Loan Documents;
- (b) fail to qualify to do business and remain in good standing under the laws of the state in which it was formed, or fail to observe all material corporate formalities;
- (c) engage in any line of business or other activity other than: (i) owning, operating and managing the Property, (ii) entering into and performing the obligations of BORROWER under the Loan Documents, and (iii) any and all, lawful activities incidental, necessary and appropriate thereto;
- (d) own any assets other than (i) the Property, and (ii) incidental personal property necessary for and used in connection with the ownership or operation of the Property;
- (e) transfer or otherwise dispose of a material portion of its assets, or engage in any transfer of assets outside the ordinary course of its business;
- (f) form, acquire, hold or own any subsidiary, or make any investment in any other entity, regardless of whether the entity is an affiliate;
- (g) commingle its assets with assets of any other person or entity;
- (h) incur debt, secured or unsecured, direct or contingent (including guaranteeing any obligation), other than the indebtedness evidenced by the Note or otherwise specifically permitted hereunder and other than debt incurred in the ordinary course of business to vendors and suppliers of services to the Property not secured by the Property, or any portion thereof;
- (i) fail to maintain its records, books of account, bank accounts, financial statements, accounting records and other entity documents separate and apart from those of any other person or entity or have its assets listed on the financial statement of any other entity; provided, however, that BORROWER's financial position, assets, liabilities, net worth and operating results may be included in the consolidated financial statements of an affiliate so long as BORROWER's assets are listed on BORROWER's own separate balance sheet and that any such consolidated financial statements contain a footnote indicating that

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BORROWER is a separate legal entity, that BORROWER's assets and credit are not available to satisfy the debts and other obligations of such affiliate, and that BORROWER maintains separate books and records;

- (j) maintain its assets in such a manner that it will be costly or difficult to segregate, ascertain or identify its individual assets from those of any other person or entity, regardless of whether such person or entity is related or an affiliate;
- (k) assume or guaranty or otherwise become obligated for the debts of any other person or entity, hold itself out to be responsible for the debts of any other person or entity, or otherwise pledge its assets for the benefit of any other person or entity (other than to Lender to secure the Note) or hold out its credit as being available to satisfy the obligations of any other person or entity;
- (l) make any loans or advances to any person or entity, regardless of whether such person or entity is related or an affiliate; or
- (m) fail either to hold itself out to the public as a legal entity separate and distinct from any other person (including identifying itself as a division or part of any other person), or conduct its business solely in its own name (including the failure to use separate stationery, invoices and checks bearing its own name) or fail to correct any known misunderstanding regarding its separate identity.

1.08. Preservation and Maintenance of Property. BORROWER shall hire competent and responsive property managers who shall be reasonably acceptable to LENDER. BORROWER shall keep, or cause to keep, the Property and every part thereof in good condition and repair, in accordance with sound property management practices and shall promptly and faithfully comply with and obey all laws, ordinances, rules, regulations, requirements and orders of every duly constituted governmental authority or agent having jurisdiction with respect to the Property. BORROWER shall not permit or commit any waste, impairment, or deterioration of the Property (excluding ordinary wear and tear), nor commit, suffer or permit any act upon or use of the Property in violation of law or applicable order of any governmental authority, whether now existing or hereafter enacted, or in violation of any covenants, conditions or restrictions affecting the Property or bring or keep any article in the Property or cause or permit any condition to exist thereon which would be prohibited by or invalidate the insurance coverage required to be maintained hereunder. BORROWER shall not make any structural modifications or improvements whatsoever to the Property which will diminish its utility, adversely affect its appearance or reduce its quality or value without the prior written consent of LENDER. BORROWER shall not remove or demolish the Improvements or any portion thereof without the prior written consent of LENDER. Subject to Sections 1.03 and 1.05, BORROWER shall promptly restore any portion of the Property which may be damaged or destroyed.

Unless required by applicable law or unless LENDER has otherwise first agreed in writing, BORROWER shall not make or allow any changes which will adversely affect the value

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of the Property to be made in the nature of the occupancy or use of the Property or any part thereof for which the Property or such part was intended at the time this Deed of Trust was delivered. BORROWER shall not initiate or acquiesce in any change which will adversely affect the value of the Property in any zoning or other land use classification now or hereafter in effect and affecting the Property or any part thereof without in each case obtaining LENDER'S prior written consent thereto.

1.09. Offset Certificates. BORROWER, within ten (10) days upon request in person or within fifteen (15) days upon request by mail, shall furnish a written statement duly acknowledged and notarized, of all amounts due on any indebtedness secured hereby or secured by any of the Loan Documents or Related Agreements, whether for principal or interest on the Note or otherwise, and stating whether any offsets or defenses exist against the indebtedness secured hereby and covering such other matters with respect to any such indebtedness as LENDER may reasonably require.

1.10. Protection of Security, Costs and Expenses. BORROWER and its property manager, if applicable, shall appear in and defend any action or proceeding purporting to affect the security of this Deed of Trust or any additional or other security for the obligations secured hereby, or the rights or powers of the TRUSTEE or LENDER hereunder. BORROWER shall pay all costs and expenses reasonably and actually incurred by LENDER OR TRUSTEE, including, without limitation, cost of evidence of title and reasonable attorneys' fees, in any such action or proceeding in which TRUSTEE or LENDER may appear, and in any suit brought by TRUSTEE or LENDER during the existence of an Event of Default to foreclose this Deed of Trust or to enforce or establish any other rights or remedies of TRUSTEE or LENDER hereunder or under any other security for the obligations secured hereby. If BORROWER fails to perform any of the covenants or agreements contained in this Deed of Trust, or if any action or proceeding is commenced which affects TRUSTEE or LENDER'S interest in the Property or any part thereof, including eminent domain, code enforcement, or proceedings of any nature whatsoever under any federal or state law, whether now existing or hereafter enacted or amended, relating to bankruptcy, insolvency, arrangement, reorganization or other form of debtor relief, or to a decedent, then LENDER may, but without obligation to do so and without notice to or demand upon BORROWER, perform such covenant or agreement and compromise any encumbrance, charge or lien which in the judgment of LENDER appears to be prior or superior hereto. BORROWER shall further pay all expenses of LENDER actually incurred, or contracted to be paid by LENDER or TRUSTEE (including reasonable attorneys' fees) incident to the protection or enforcement of the rights of TRUSTEE or LENDER hereunder, and enforcement or collection of payment of the Note or any Future Advance whether by judicial or nonjudicial proceedings, or in connection with any bankruptcy, insolvency, arrangement, reorganization or other debtor relief proceeding of BORROWER, or otherwise. Any amounts disbursed by LENDER pursuant to this Section 1.10 shall be additional indebtedness of BORROWER secured by this Deed of Trust and each of the Loan Documents and Related Agreements as of the date of disbursement and, if not paid within ten (10) days of demand, shall bear interest at the Default Rate set forth in the Note, from demand until paid. All such amounts shall be payable by BORROWER within ten (10) days of LENDER'S demand. Nothing

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contained in this section shall be construed to require TRUSTEE or LENDER to incur any expense, make any appearance, or take any other action.

1.11. BORROWER'S Covenants Respecting Collateral.

(A) BORROWER hereby authorizes LENDER to file any financing and continuation statements covering the Collateral from time to time and in such form as LENDER may require to perfect and continue the perfection of LENDER'S security interest with respect to such property, and BORROWER shall pay all reasonable costs and expenses, including reasonable attorneys' fees, of any record searches for financing statements LENDER may require.

(B) Without the prior written consent of LENDER, BORROWER shall not create or suffer to be created any other security interest in the Collateral, including replacements and additions thereto.

(C) Without the prior written consent of LENDER or except in the ordinary course of business or as specifically permitted hereunder, BORROWER shall not sell, transfer or encumber any of the Collateral, or remove any of the Collateral from the Property unless BORROWER shall promptly substitute and replace the property removed with similar property of at least equivalent value on which LENDER shall have a continuing security interest ranking at least equal in priority to LENDER'S security interest in the property removed.

(D) BORROWER shall (1) upon reasonable notice (unless an emergency or Event of Default exists) permit LENDER and its representatives to enter upon the Property to inspect the Collateral and BORROWER'S books and records relating to the Collateral and make extracts therefrom and to arrange for verification of the amount of Collateral, under procedures acceptable to LENDER, directly with BORROWER'S debtors or otherwise at BORROWER'S expense; (2) promptly notify LENDER of any attachment or other legal process levied against any of the Collateral and any information received by BORROWER relative to the Collateral, BORROWER'S debtors or other persons obligated in connection therewith, which may in any way affect the value of the Collateral or the rights and remedies of LENDER in respect thereto; (3) reimburse LENDER within ten (10) days of LENDER'S demand for any and all costs actually incurred, including, without limitation, reasonable attorneys' and accountants' fees, and other expenses incurred in collecting any sums payable by BORROWER under any obligation secured hereby, or in the checking, handling and collection of the Collateral and the preparation and enforcement of any agreement relating thereto; (4) notify LENDER of each location at which the Collateral is or will be kept, other than for temporary processing, storage or similar purposes, and of any removal thereof to a new location, including, without limitation, each office of BORROWER at which records relating to the Collateral are kept; (5) provide, maintain and deliver to LENDER certified copies of the policies of insurance and certificates of insurance insuring the Collateral against loss or damage by such risks and in such amounts, from and by such companies as LENDER may require and with loss payable to LENDER, and in the event LENDER takes possession of the Collateral, the insurance policy or policies and any unearned or

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returned premium thereon shall at the option of LENDER become the sole property of LENDER; and (6) do all acts necessary to maintain, preserve and protect all Collateral, keep all Collateral in good condition and repair and prevent any waste or unusual or unreasonable depreciation thereof.

(E) Until LENDER exercises its right to collect proceeds of the Collateral pursuant hereto, BORROWER will collect with diligence any and all proceeds of the Collateral. If an Event of Default exists, any proceeds received by BORROWER shall be held in trust for LENDER, and BORROWER shall keep all such collections separate and apart from all other funds and property so as to be capable of identification as the property of LENDER and shall deliver to LENDER such collections at such time as LENDER may request in the identical form received, properly endorsed or assigned when required to enable LENDER to complete collection thereof.

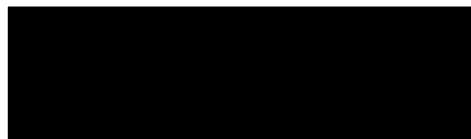
(F) LENDER shall have all the rights and remedies granted to a secured party under the Uniform Commercial Code of the state in which the Collateral is located, as well as all other rights and remedies available at law or in equity. During the continuance of any Event of Default, LENDER shall have the right to take possession of all or any part of the Collateral, to receive directly or through its agent(s) collections of proceeds of the Collateral (including notification of the persons obligated to make payments to BORROWER in respect of the Collateral), to release persons liable on the Collateral and compromise disputes in connection therewith, to exercise all rights, powers and remedies which BORROWER would have, but for the security agreement contained herein, to all of the Collateral and proceeds thereof, and to do all other acts and things and execute all documents in the name of BORROWER or otherwise, deemed by LENDER as necessary, proper and convenient in connection with the preservation, perfection or enforcement of its rights hereunder.

(G) During the existence of an Event of Default, BORROWER shall, at the request of LENDER, assemble and deliver the Collateral and books and records pertaining to the Property at a place designated by LENDER, and LENDER may, with reasonable notice to BORROWER (unless an emergency or Event of Default exists), enter onto the Property and take possession of the Collateral. It is agreed that public or private sales, for cash or on credit to a wholesaler or retailer or investor, or user of collateral of the types subject to the security agreement, or public auction, are all commercially reasonable since differences in the sales prices generally realized in the different kinds of sales are ordinarily offset by the differences in the costs and credit risks of such sales. The proceeds of any sale of the Collateral shall be applied first to the expenses of LENDER actually incurred in retaking, holding, preparing for sale, or selling the Collateral or similar matters, including reasonable attorneys' fees, and then, as LENDER shall solely determine.

1.12. Covenants Regarding Financial Statements.

(A) BORROWER shall keep accurate books and records in accordance with generally accepted accounting principles consistently applied (or other basis of accounting

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practices prescribed or permitted by LENDER), in which full, true and correct entries shall be promptly made as to all operations of the Property and shall permit all such books and records to be inspected and copied by LENDER, its designees or its representatives during customary business hours. BORROWER shall deliver or cause to be delivered to LENDER (i) within one hundred twenty (120) days of the end of each calendar year, financial statements (including a balance sheet and an income statement) of BORROWER and all guarantors of the Loan, and (ii) within one hundred twenty (120) days after the close of its financial year a statement of condition or balance sheet of BORROWER relating solely to the Property as of the end of such year and an annual operating statement showing in reasonable detail all income and expenses derived from or related to the operation of the Property, both certified as to accuracy by either an independent certified public accountant acceptable to LENDER (if requested by LENDER) or the senior financial officer or owner of the majority of the interests of the BORROWER; rent roll listing the total rentable area of the Property, all of the current tenants under the leases, the amount of space occupied by each tenant, the rentals payable by such tenants along with the date and amount of future rent increases, the beginning date of the lease and the expiration date of the lease, and for each tenant obligated to pay percentage rent, a statement of the amount of gross sales for such tenant at the Property for the previous fiscal year as disclosed to BORROWER by such tenant, certified as to their accuracy by a representative of BORROWER acceptable to LENDER, and in form and substance satisfactory to LENDER. In addition, BORROWER shall deliver or cause to be delivered to LENDER copies of all tax returns filed by BORROWER with the Internal Revenue Service within thirty (30) days after the filing of the same.

(B) In the event such statements are not in a form reasonably acceptable to LENDER and LENDER has provided BORROWER with written notice advising BORROWER that such statements are not in acceptable form and a period of fifteen (15) days in which to provide corrected statements to LENDER or BORROWER fails to furnish such statements and reports, then LENDER, consistent with the requirements of this Section 1.12, shall have the immediate and absolute right to audit the respective books and records of the Property and BORROWER at the expense of BORROWER.

1.13. Environmental Covenants.

(A) BORROWER represents and warrants and covenants and agrees that (i) BORROWER has not used and will not use and, to the best of BORROWER'S knowledge, except as disclosed in that certain Phase I Environmental Assessment dated July 8, 2016 and prepared by AE West Consultants, Inc. (the "**Environmental Report**"), no current tenant, subtenant, or other occupant of all or any part of the Property has used or is using Hazardous Material (as that term is hereinafter defined) on, from or affecting the Property in any manner that violates any Hazardous Material Laws (as that term is hereinafter defined) applicable to BORROWER or to the Property; (ii) to the best of BORROWER'S knowledge, except as disclosed by the Environmental Report, no Hazardous Materials have been disposed of or discovered on the Property during BORROWER'S ownership thereof nor have any Hazardous Materials migrated onto the Property during BORROWER'S ownership thereof, in either event in violation of any Hazardous Material Laws applicable to BORROWER or to the Property; (iii) BORROWER will not permit or suffer any such violation of any Hazardous Material Laws

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applicable to BORROWER or to the Property; and (iv) to the best of BORROWER'S knowledge and except as disclosed in the Environmental Report, no prior owner or prior tenant, subtenant or other occupant of all or any part of the Property has used or disposed of Hazardous Material on, from or affecting the Property in any manner that violates any Hazardous Material Laws applicable to the Property nor have any Hazardous Materials migrated on the Property prior to BORROWER'S ownership thereof.

For purposes of this Deed of Trust, "**Hazardous Materials**" means and includes asbestos or any substance containing asbestos, polychlorinated biphenyls, any explosives, radioactive materials, chemicals known or suspected to cause cancer or reproductive toxicity, pollutants, effluents, contaminants, emissions, infectious wastes, any petroleum or petroleum-derived waste or product or related materials and any items defined as hazardous, special or toxic materials, substances or waste under any Hazardous Material Law, or any material which shall be removed from the Property pursuant to any administrative order or enforcement proceeding or in order to place the Property in a condition that is suitable for ordinary use. "**Hazardous Material Laws**" collectively means and includes any present and future local, state, federal or international law or treaty applicable to the Property or to the BORROWER and relating to public health, safety or the environment including, without limitation, the Resource Conservation and Recovery Act, as amended ("**RCRA**"), 42 U.S.C. §6901 et seq., the Comprehensive Environmental Response, Compensation, and Liability Act ("**CERCLA**"), 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 ("**SARA**"), the Hazardous Materials Transportation Act, 49 U.S.C. §1801 et seq., the Clean Water Act, 33 U.S.C. §1251 et seq., the Clean Air Act, as amended, 42 U.S.C. §7401 et seq., the Toxic Substances Control Act, 15 U.S.C. §2601 et seq., the Safe Drinking Water Act, 42 U.S.C. §300f et seq., the Uranium Mill Tailings Radiation Control Act, 42 U.S.C. §7901 et seq., the Occupational Safety and Health Act, 29 U.S.C. §655 et seq., the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. §135 et seq., the National Environmental Policy Act, 42 U.S.C. §4321 et seq., the Noise Control Act, 42 U.S.C. §4901 et seq., and the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §11001 et seq., and the amendments, regulations, orders, decrees, permits, licenses or deed restrictions now or hereafter promulgated thereunder.

(B) BORROWER represents and warrants that to the best of its knowledge, except as disclosed by the Environmental Report, no generation, treatment, storage or disposal of any Hazardous Materials has occurred or is occurring on the Property in violation of any Hazardous Material Laws applicable to BORROWER or to the Property, and that BORROWER will not permit or suffer any such generation, treatment, storage or disposal of Hazardous Materials on the Property in violation of any Hazardous Material Laws applicable to BORROWER or the Property, or permit any lien under the laws of the state in which the Property is located to attach to the Property or any portion thereof or any interest therein as a result of any such Hazardous Materials activity. BORROWER represents and warrants that it has not received any notice from any governmental agency or any tenant of the Property with regard to such Hazardous Materials, and has received no notice that the environmental and ecological condition of the Property is in violation of any Hazardous Material Laws applicable to BORROWER or the Property.

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(C) BORROWER represents and warrants to the best of BORROWER'S knowledge, except as disclosed by the Environmental Report, (i) that the Property does not contain, and has not in the past contained, any asbestos containing material in friable form in violation of any Hazardous Material Laws applicable to BORROWER or to the Property, and (ii) that there is no current or potential airborne contamination of the Property by asbestos fiber, including any potential contamination that would be caused by maintenance or tenant finish activities in the improvements in violation of any Hazardous Material Laws applicable to BORROWER or to the Property.

(D) BORROWER represents and warrants that, to the best of its knowledge, except as otherwise disclosed to LENDER in writing: (i) the Property has not been damaged by water; (ii) there is not currently present upon the Property mold or any conditions that reasonably could be expected to give rise to mold or suggest the presence of mold in quantities and type which may pose a serious risk to human health or materially impair the value of the Property; (iii) the quality of the air in and about the Property is not, and has not been, the subject of any notice from a governmental agency, complaint, or legal proceeding; and (iv) BORROWER has not received any complaint, notice, letter, or other communication from occupants, tenants, guests, employees, licensees or any other person regarding odors, poor indoor quality, mold, or any activity, condition, event or omission that causes or facilitates the growth of mold.

(E) In the event that any investigation, site monitoring, containment, clean-up, removal, restoration or other remedial work of any kind or nature (hereinafter referred to as the "**Remedial Work**") is required under any Hazardous Material Laws applicable to BORROWER or to the Property, because of, or in connection with, the current or future presence, suspected presence, release or suspected release of a Hazardous Material in or about the air, soil, ground water, surface water or soil vapor at, on, about, under or within the Property (or any portion thereof), BORROWER shall within thirty (30) days after written demand for performance thereof from LENDER (or such shorter period of time as may be required by the applicable Hazardous Material Laws), commence and thereafter diligently prosecute to completion, all such Remedial Work. All Remedial Work shall be performed by contractors reasonably approved in advance by LENDER and under the supervision of a consulting engineer reasonably approved by LENDER. All costs and expenses of such Remedial Work shall be paid by BORROWER including, without limitation, engineer's fees and LENDER'S reasonable attorneys' fees and costs incurred in connection with monitoring or review of such Remedial Work. In the event BORROWER shall fail to timely prosecute to completion such Remedial Work, LENDER may, but shall not be required to, cause such Remedial Work to be performed and all costs and expenses thereof, or incurred in connection therewith, shall be immediately due and payable by BORROWER to LENDER and shall become part of the indebtedness.

(F) BORROWER shall provide LENDER with prompt written notice (a) upon BORROWER'S becoming aware of any release or threat of release of any Hazardous Materials upon, under or from the Property in violation of any Hazardous Material Laws applicable to BORROWER or to the Property, (b) upon BORROWER'S receipt of any notice from any federal, state, municipal or other governmental agency or authority in connection with any Hazardous Materials located upon or under or emanating from the Property; and (c) upon

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BORROWER'S obtaining knowledge of any incurrence of expense, for which BORROWER or the Property could be liable, by any governmental agency or authority in connection with the assessment, containment or removal of any Hazardous Materials located upon or under or emanating from the Property.

(G) Notwithstanding anything in this Section 1.13, this Section 1.13 shall not be construed to impose liability on the BORROWER for matters caused by the willful misconduct or gross negligence of LENDER or LENDER'S affiliates or for Hazardous Materials placed, released or disposed of on the Property through no fault of BORROWER or its principals or their respective agents, employees or contractors after the date of (x) the payment in full of the Note if LENDER does not acquire title in connection therewith, (y) the extinguishment of the lien of this Deed of Trust by foreclosure or other like action, or (z) the acceptance by LENDER of a deed in lieu of foreclosure. BORROWER shall bear the burden of proof with respect to establishing when Hazardous Materials were placed, released or disposed of on the Property.

1.14. Representations and Covenants Regarding Borrower.

(A) BORROWER represents and warrants that, (i) the BORROWER and, to the best of BORROWER's knowledge after due inquiry, each partner, shareholder, member, manager or beneficial owner of BORROWER (collectively for the purpose of this Section 1.14 referred to as the "**BORROWER**") is in compliance with Executive Order 13224, 66 Fed. Reg. 49079 (September 25, 2001) (the "**Order**") and the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act and related regulations, as may be amended or supplemented from time to time (the "**Patriot Act**"), (ii) BORROWER is not on the specially designated nationals and blocked persons list, maintained by the Office of Foreign Asset Control ("**OFAC**") or on any other list of terrorist or terrorist organizations that may be maintained pursuant to OFAC or any other anti-terrorism measures (collectively, the "**List**"), and (iii) the BORROWER is not a person that has been determined to be subject to prohibitions contained in the Order, and (iv) BORROWER is not owned or controlled by any persons on the List or has been determined to be subject to prohibitions contained in the Order.

(B) BORROWER covenants and agrees that (i) if the BORROWER obtains knowledge that BORROWER or any of its partners, shareholders, members, managers or beneficial owners become listed on the List or become indicted or arraigned in connection with money laundering activities it shall promptly notify LENDER, and (ii) notwithstanding any provisions herein to the contrary, BORROWER will not transfer or permit the transfer of any interest in BORROWER to any person who is on the List or to any entity that is owned or controlled by any person on the List.

1.15. Further Assurances. BORROWER shall execute and deliver (and pay the costs of preparation and recording thereof) to LENDER and to any subsequent holder of the Loan, from time to time, upon demand, any further instrument or instruments (provided that the same do not subject BORROWER to additional liability beyond that contemplated by the Loan Documents),

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including, but not limited to, deeds of trust, mortgages, deeds to secure debt, security agreements, financing statements, continuation statements, leases, assignments, and renewal and substitution notes, so as to reaffirm, to correct and to perfect the evidence of the obligations hereby secured and the lien, security interest and title of LENDER to all or any part of the Property intended to be hereby conveyed, whether now conveyed, later substituted for, or acquired subsequent to the date of this Deed of Trust and extensions or modifications thereof.

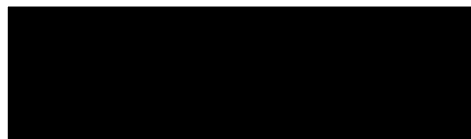
1.16. Compliance with Laws.

(A) BORROWER represents and warrants that to date it has complied in all material respects with all laws, ordinances, rulings, regulations, and orders of all governmental authorities affecting the Property (including but not limited to zoning, land use and environmental laws, ordinances, rulings, regulations and/or orders) and has obtained all necessary and proper permits and licenses for development, use and operation of the Property. BORROWER warrants (i) that the Property currently complies with the Americans with Disabilities Act of 1990 (the "ADA") and the Fair Housing Act of 1988 (the "FHA") to the extent applicable, and (ii) that BORROWER will maintain the Property and perform all alterations, modifications and additions to the Property in compliance with the ADA and the FHA, as the same may be amended from time to time. BORROWER further covenants and agrees that it will comply with or cause to be complied with all present and future laws, statutes, ordinances, rulings, regulations, orders and requirements of all federal, state, municipal, county, and other governmental agencies and authorities applicable to BORROWER or to the Property, as well as all covenants, conditions, and restrictions affecting same.

(B) BORROWER covenants, represents and warrants that (i) no assets of any employee benefit plan (as defined in Section 3(3) of the Employee Retirement Income Security Act of 1974 ("ERISA"), as now or hereafter amended) will be used in the satisfaction, exercise or performance by BORROWER of any of the obligations, rights or transactions specified or contemplated herein or in the Note or in any of the Loan Documents or Related Agreements; (ii) the Property does not now, and without the prior written consent of LENDER will not, constitute an asset of any such employee benefit plan; and (iii) notwithstanding any other provisions of this Deed of Trust, BORROWER will not sell, convey or transfer the Property, or any part thereof, to any person or entity which at the time of such transfer does not satisfy the representations set forth in clauses (i) and (ii) above regardless of whether any of the above described conditions arises by operation of law or otherwise.

(C) Contemporaneously with the execution and delivery of this Deed of Trust, BORROWER has delivered to LENDER a certificate that BORROWER is a United States person (as defined by Section 7701(a)(30) of the Internal Revenue Code of 1986, as amended) (the "Code") and that BORROWER is not a foreign person, foreign corporation, foreign partnership, foreign trust or foreign estate within the meaning of Section 1445(f)(3) of the Code. The sale, conveyance or transfer of the Property, or any part thereof, to any foreign person, foreign corporation, foreign partnership, foreign trust or foreign estate within the meaning of Section 1445(f) of the Code, without the prior written consent of LENDER, shall constitute an Event of Default hereunder, and BORROWER further covenants, represents and warrants that

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BORROWER shall notify LENDER within ten (10) days after any event or occurrence which would cause or result in the representations and certifications made to LENDER in such certificate to become untrue, invalid or incorrect.

1.17. Notice of Certain Events. BORROWER shall promptly notify LENDER if BORROWER learns of the occurrence of (i) any legal, judicial, or regulatory proceedings affecting BORROWER which, if adversely determined, would have a material adverse effect on the business or the financial condition of BORROWER; (ii) any dispute between BORROWER and any governmental or regulatory authority or any other person which, if adversely determined, might interfere with the normal business operations of BORROWER or otherwise have a material adverse effect on BORROWER, its business or properties; (iii) any labor dispute to which BORROWER may become a party, any strikes or walkouts affecting its operations, any demand for collective bargaining, and the expiration of any labor contract by which it may be bound; (iv) any material change in the management of BORROWER; (v) any material adverse changes, either individually or in the aggregate, in the assets, liabilities, financial condition, business, operations, affairs, or circumstances of BORROWER from those reflected in the BORROWER'S financial statements or from the facts warranted or represented in any of the Loan Documents or Related Agreements, or (vi) any material default by BORROWER under indebtedness owed by BORROWER to any party other than LENDER.

ARTICLE II

EVENTS OF DEFAULT

Each of the following shall constitute an event of default ("**Event of Default**") hereunder:

2.01. Monetary and Performance Defaults.

(A) Failure to make any payment of any installment of principal or interest due under the Note, or payment of any other sum due under the Note (other than the final payment and Prepayment Premium), under this Deed of Trust or under any of the other Loan Documents or Related Agreements to LENDER or any other party, including without limitation, payment of escrow deposits, if any, within fifteen (15) days from the date when such payment is due; or

(B) Failure to make the final payment or the Prepayment Premium due under the Note when such payment is due whether at maturity, by reason of acceleration, as part of a prepayment or otherwise (the defaults in (A) and (B) hereinafter "**Monetary Default**"); or

(C) Breach or default in the performance of any of the covenants or agreements of BORROWER contained herein or in any Related Agreement ("**Performance Default**"), if such Performance Default shall continue for thirty (30) days or more after written notice to BORROWER from LENDER specifying the nature of the Performance Default; provided, however, that if such Performance Default is of a nature that it cannot be cured within the thirty (30) day period, then BORROWER shall not be in default if it commences good faith

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efforts to cure the Performance Default within the thirty (30) day period, demonstrates continuous diligent efforts to cure the Performance Default in a manner satisfactory to LENDER and, within a reasonable period, not to exceed ninety (90) days after the date of the original written notice of the Performance Default, completes the cure of such Performance Default.

2.02. Bankruptcy, Insolvency, Dissolution.

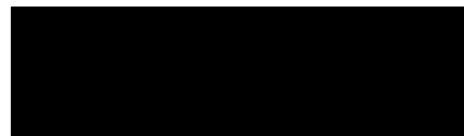
(A) Any court of competent jurisdiction shall sign an order (1) adjudicating BORROWER, or any person, partnership, corporation, limited liability company or trust holding an ownership interest in BORROWER or in any entity comprising BORROWER, or any guarantor (which term when used in this Deed of Trust shall mean guarantor of payment of the indebtedness) bankrupt or insolvent, (2) appointing a receiver, trustee or liquidator of the Property or of a substantial part of the property of BORROWER, or any person, partnership, corporation, limited liability company or trust holding an ownership interest in BORROWER, or in any entity comprising BORROWER, or any guarantor, or (3) approving a petition for, or effecting an arrangement in bankruptcy, or any other judicial modification or alteration of the rights of LENDER or of other creditors of BORROWER, or any person, partnership, corporation, limited liability company or trust holding an ownership interest in BORROWER, or in any entity comprising BORROWER or any guarantor; or

(B) BORROWER, any person, partnership, corporation, limited liability company or trust holding an ownership interest in BORROWER or in any entity comprising BORROWER, shall (1) apply for or consent to the appointment of a receiver, trustee or liquidator for it or for any of its property, (2) as debtor, file a voluntary petition in bankruptcy, or petition or answer seeking reorganization or an arrangement with creditors or to take advantage of any bankruptcy, reorganization, insolvency, readjustment of debt, dissolution or liquidation law or statute, or an answer admitting the material allegations of a petition filed against it and any proceeding under such law, (3) admit in writing an inability to pay its debts as they mature, or (4) make a general assignment for the benefit of creditors; or

(C) An involuntary petition in bankruptcy is filed against BORROWER or any person, partnership or corporation holding an ownership interest in BORROWER or in any partnership comprising BORROWER and the same is not vacated or stayed within ninety (90) days of the filing date.

(D) BORROWER (if a corporation or a limited liability company) commences the process of liquidation or dissolution or its charter expires or is revoked, or BORROWER (if a partnership or business association) commences the process of dissolution or partition, or BORROWER (if a trust) commences the process of termination or expires.

2.03. Misrepresentation. BORROWER, and in each case as applicable, any general partner, member, manager, trustee, beneficiary or other owner of BORROWER, any officer of the BORROWER, any guarantor of the indebtedness, or any party acting in or on behalf of BORROWER, makes or furnishes a representation, warranty, statement, certificate, schedule



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and/or report to LENDER in or pursuant to this Deed of Trust or any of the Loan Documents or Related Agreements which is false or misleading in any material respect as of the date made or furnished.

2.04. Process Against the Property. The levy of any execution, attachment, sequestration or other writ against the Property or any part thereof that is not dismissed, removed or bonded to the satisfaction of LENDER within ninety (90) days of the date of such filing or institution of such proceeding.

2.05. Foreclosure or Maturity of Other Liens. If the holder of any lien or security interest on the Property, other than LENDER (whether or not LENDER has consented to the existence of such lien or security interest and without hereby implying LENDER'S consent to the existence, placing, creating or permitting of any such lien or security interest) institutes or completes foreclosure or other proceedings for the enforcement of its remedies with respect to such lien or security interest, or accelerates maturity of such lien or security interest for any reason.

2.06. Prohibited Transfer. The Property, any interest in the Property, or any interest in BORROWER is encumbered, transferred, sold, assigned or conveyed, unless specifically permitted herein.

2.07. Abandonment. The abandonment of any part of the Property by BORROWER.

2.08. Violation Under Lease or Assignment. BORROWER'S failure to observe, comply or adhere to and/or perform any agreement of BORROWER in any lease or assignment thereof to LENDER relating to the Property.

2.09. Violation of Ground Lease. The violation by BORROWER of any covenants or agreements to be kept or performed by BORROWER under any ground lease affecting the Property.

2.10. Challenge to Validity of Loan Documents or Related Agreements. BORROWER'S challenge or contest of the validity or enforceability of the Note, this Deed of Trust, or any Loan Document or any Related Agreements, or the validity, priority or perfection of any security interest created hereunder or thereunder, in any action, suit or proceeding.

2.11. Conviction. The conviction of BORROWER, any guarantor or surety of the Loan or any principal of BORROWER under federal, state or local law of a felony involving financial fraud or misrepresentation.

ARTICLE III **REMEDIES**

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Upon the occurrence of any Event of Default, TRUSTEE or LENDER, as applicable, shall have the following rights and remedies set forth in Sections 3.01 through 3.11:

3.01. Acceleration. Notwithstanding the stated maturity date in the Note, LENDER may without notice or demand, declare the entire principal amount of the Note and/or any Future Advances then outstanding, accrued and unpaid interest thereon, the Prepayment Premium described in the Note, and all other sums or payments required under the Note and this Deed of Trust, to be due and payable immediately, and, at LENDER'S option, (i) to bring suit therefor, or (ii) to bring suit for any delinquent payment of or upon the indebtedness, or (iii) to take any steps and institute any and all other proceedings in law or in equity that LENDER deems necessary to enforce payment of the indebtedness and performance of other obligations secured hereunder and to protect the lien of this Deed of Trust.

3.02. Entry. Irrespective of whether LENDER exercises the option provided in Section 3.01 above, LENDER in person or by agent or by court-appointed receiver (and LENDER shall have the right to the immediate appointment of such a receiver without regard to the adequacy of the security and BORROWER hereby irrevocably consents to such appointment and waives notice of any application therefor) may, at its option, without any action on its part being required, without in any way waiving such Event of Default, with or without the appointment of a receiver, or an application therefor:

(A) take possession of, conduct tests of, manage or hire a manager to manage, lease and operate the Property or any part thereof, on such terms and for such period of time as LENDER may deem proper, with full power to make, from time to time, all alterations, renovations, repairs or replacements thereto as may seem proper to LENDER;

(B) with or without taking possession of the Property, collect and receive all rents and profits, notify tenants under the leases or any other parties in possession of the Property to pay rents and profits directly to LENDER, its agent or a court-appointed receiver and apply such rents and profits to the payment of:

(1) all costs and expenses incident to taking and retaining possession of the Property, management and operation of the Property, keeping the Property properly insured and all alterations, renovations, repairs and replacements to the Property;

(2) all taxes, charges, claims, assessments, and any other liens which may be prior in lien or payment to this Deed of Trust or the Note, and premiums for insurance for the Property, with interest on all such items; and

(3) the indebtedness secured hereby together with all costs and reasonable attorneys' fees, in such order or priority as to any of such items as LENDER in its sole discretion may determine, any statute, law, custom or use to the contrary notwithstanding;

(C) exclude BORROWER, its agents and servants, wholly from the Property;

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(D) have joint access with BORROWER to the books, papers and accounts of BORROWER relating to the Property, at the expense of BORROWER;

(E) commence, appear in and/or defend any action or proceedings purporting to affect the interests, rights, powers and/or duties of TRUSTEE or LENDER hereunder, whether brought by or against BORROWER, TRUSTEE or LENDER; and

(F) pay, purchase, contest or compromise any claim, debt, lien, charge or encumbrance which in the judgment of LENDER may affect or appear to affect the interest of LENDER or the rights, powers and/or duties of LENDER hereunder.

(G) The receipt by LENDER of any rents and profits pursuant to this Deed of Trust after the institution of foreclosure or other proceedings under the Deed of Trust shall not cure any such Event of Default or affect such proceedings or any sale pursuant thereto. After deducting the expenses and amounts set forth above in this Section 3.02 as well as just and reasonable compensation for all LENDER'S agents (including, without limitation, reasonable and attorneys' fees and management and rental commissions) engaged and employed in the operation of the Property, the moneys remaining, at the option of LENDER, may be applied to the indebtedness secured hereby. Whenever all amounts due on the Note and under this Deed of Trust shall have been paid and all Events of Default have been cured and any such cure has been accepted by LENDER, LENDER shall surrender possession to BORROWER. The same right of entry, however, shall exist if any subsequent Event of Default shall occur; provided, however, LENDER shall not be under any obligation to make any of the payments or do any of the acts referred to in this Section 3.02.

3.03. Judicial Action. TRUSTEE or LENDER, as applicable, may bring an action in any court of competent jurisdiction to foreclose this instrument or to enforce any of the covenants and agreements hereof. The Property may be foreclosed in parts or as an entirety.

3.04. Power of Sale. TRUSTEE may elect to cause the Property or any part thereof to be sold under the power of sale herein granted in any manner permitted by applicable law at one or more public sale or sales at the usual place for conducting sales at the courthouse of the county in which the Land or any part of the Land is situated, to the highest bidder for cash, in order to pay the indebtedness secured hereby, and all expenses of sale and of all proceedings in connection therewith, including Trustee's and reasonable attorneys' fees, after advertising the time, place and terms of each sale in accordance with the laws of the state in which the Property is located, all other notice, including judicial notice, being hereby waived by BORROWER. If the Land is situated in more than one county, then notices shall be given in both or all of such counties, and the Property may be sold in either county, and such notices shall designate the county where the Property will be sold. Upon the expiration of such time and the giving of such notice of sale, and without the necessity of any demand on BORROWER, TRUSTEE, at the time and place specified in the notice of sale, shall sell the Property or any part thereof. The foregoing notwithstanding, TRUSTEE or LENDER, as applicable, may sell, or cause to be sold, any tangible or intangible personal property or any part thereof, and which constitutes a part of

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the security hereunder, in the foregoing manner, or as may otherwise be provided by law. If the indebtedness secured hereby is now or hereafter further secured by any chattel mortgages, pledges, contracts of guaranty, assignments of lease or other security instruments, LENDER may at its option exhaust the remedies granted under any of said security instruments either concurrently or independently, and in such order as LENDER may determine. TRUSTEE or LENDER, as applicable, may, from time to time, postpone any sale hereunder by public announcement thereof at the time and place noticed therefor or by giving notice of the time and place of the postponed sale in the manner required by law. If the Property consists of several lots, parcels or items of property, TRUSTEE may designate the order in which such lots, parcels or items shall be offered for sale or sold. Any person, including BORROWER or LENDER, may purchase at any sale hereunder, and LENDER shall have the right to purchase at any sale hereunder by crediting upon the bid price the amount of all or any part of the indebtedness hereby secured plus interest, late charges, prepayment fees, trustee's fees and reasonable attorneys' fees, as herein provided. Should LENDER desire that more than one sale or other disposition of the Property be conducted, TRUSTEE or LENDER, as applicable, may, at its option, cause the same to be conducted simultaneously, or successively, on the same day, or at such different times and in such order as LENDER may deem to be in its best interests, and no such sale shall terminate or otherwise affect the security of this Deed of Trust on any part of the Property not sold until all indebtedness secured hereby has been fully paid. In the event of default of any purchaser, TRUSTEE shall have the right to resell the Property as set forth above. Upon any sale hereunder, TRUSTEE shall execute and deliver to the purchaser or purchasers a deed or deeds conveying the property so sold in fee simple, with or without any covenant or warranty whatever, express or implied, whereupon such purchaser or purchasers shall be let into immediate possession; and the recitals of facts in any such deed or deeds such as default, the giving of notice of default and notice of sale, and other facts affecting the regularity or validity of such sale or disposition, shall be conclusive proof of the truth of such facts and any such deed or deeds shall be conclusive against all persons as to such facts recited therein. BORROWER hereby constitutes and appoints TRUSTEE the agent and attorney-in-fact of BORROWER to make such recitals, sale and conveyance, and thereby to divest BORROWER of all right, title and equity that BORROWER may have in and to the Property and to vest the same in the purchaser or purchasers at such sale or sales. The conveyance to be made by TRUSTEE, or its assigns, (and in the event of a deed in lieu of foreclosure, then as to such conveyance) shall be effective to bar all right, title and interest, equity or redemption, including all statutory redemption, homestead, dower, courtesy, and all other exemptions of BORROWER, or its successors in interest, in and to the Property. The aforesaid power of sale and agency hereby granted are coupled with an interest and are irrevocable by death or otherwise and shall not be exhausted by one exercise thereof, but may be exercised until full payment of all sums secured hereby.

3.05. Rescission of Notice of Default. LENDER, from time to time before any such public sale or deed in lieu of foreclosure, may rescind any such notice of breach or default and of election to cause the Property to be sold. LENDER may evidence such rescission, among other methods, by executing and delivering to BORROWER a written notice of such rescission, which notice, when recorded, shall also constitute a cancellation of any prior declaration of default and demand for sale or such documents as may be required by the laws of the state in which the

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Property is located. The exercise by LENDER of such right of rescission shall not constitute a waiver of any breach or Event of Default then existing or subsequently occurring, or impair the right of LENDER to execute and deliver to BORROWER, as above provided, other declarations of default and demand for sale, and notices of breach or default, and of election to cause the property to be sold to satisfy the obligations hereof, nor otherwise affect any provision, agreement, covenant or condition of the Note and/or of this Deed of Trust and/or any of the Loan Documents and/or any of the Related Agreements or any of the rights, obligations or remedies of the parties hereunder or thereunder.

3.06. LENDER'S Remedies Respecting Collateral. LENDER may realize upon the Collateral, enforce and exercise all of the BORROWER'S rights, powers, privileges and remedies in respect of the Collateral, dispose of or otherwise deal with the Collateral in such order as LENDER may in its discretion determine, and exercise any and all other rights, powers, privileges and remedies afforded to a secured party under the laws of the state in which the Property is located as well as all other rights and remedies available at law or in equity.

3.07. Proceeds of Sales. The proceeds of any sale made under or by virtue of this Article III, together with all other sums which then may be held by LENDER under this Deed of Trust, whether under the provisions of this Article III or otherwise, shall be applied as follows:

(A) To the payment of the costs, fees and expenses of sale and of any judicial proceedings wherein the same may be made, including a reasonable trustee's fee and the cost of evidence of title in connection with the sale and to the payment of all expenses, liabilities and advances made or incurred by LENDER under this Deed of Trust, together with interest on all advances made by LENDER at the Default Rate (as herein defined), but limited to any maximum rate permitted by law to be charged or collected by LENDER;

(B) To the payment of any and all sums expended by LENDER under the terms hereof, not then repaid, with accrued interest at the Default Rate set forth in the Note, and all other sums (except advances of principal and interest thereon) required to be paid by BORROWER pursuant to any provisions of this Deed of Trust, or the Note, or any of the Loan Documents or Related Agreements, including, without limitation, all expenses, liabilities and advances made or incurred by LENDER under this Deed of Trust or in connection with the enforcement thereof, together with interest thereon as herein provided; and

(C) To the payment of the entire amount then due, owing or unpaid for principal and interest upon the Note, and any other obligation secured hereby, with interest on the unpaid principal at the rate set forth therein from the date of advancement thereof until the same is paid in full; and then

(D) The remainder, if any, to the person or persons, including the BORROWER, legally entitled thereto.

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3.08. Condemnation and Insurance Proceeds. All condemnation proceeds, insurance proceeds and any interest earned thereon shall be paid over either by the condemning authority, insurance company or escrow agent to LENDER and shall be applied in the sole and absolute discretion of LENDER and without regard to the adequacy of its security under this Deed of Trust (A) to the payment or prepayment of all or any portion of the Note including the Prepayment Premium described in the Note; (B) to the reimbursement of expenses incurred by LENDER in connection with the restoration of the Property; or (C) to the performance of any of the covenants contained in this Deed of Trust as LENDER may determine. Any prepayment of the Note or portion thereof pursuant to LENDER'S election under this section shall be subject to the Prepayment Premium described in the Note.

3.09. Setoff. LENDER may apply any balances in each and every account held by LENDER, including, but not limited to, the escrow account referred to in section 1.06, in satisfaction of the indebtedness secured hereby.

3.10. Other Remedies. TRUSTEE and LENDER, as applicable, shall, in addition to the remedies set forth in this Article III, and in Exhibit C attached hereto and incorporated herein by this reference ("**Applicable State Law Provisions**"), have all other remedies available to them at law or in equity.

3.11. Acceleration Interest. In addition to any default rate of interest which may be due under the Note, BORROWER shall pay interest on all sums (other than the sums due under the Note) due hereunder or under any other Loan Document at a rate (hereinafter referred to as the "**Default Rate**") equal to the lesser of (i) the Contract Rate of the Note plus four percent (4%) per annum compounded monthly, or (ii) the maximum rate permitted by law, from and after the first to occur of the following events: If LENDER elects to cause the acceleration of the indebtedness evidenced by the Note or any note evidencing a Future Advance; if a petition under Title 11, United States Code, shall be filed by or against BORROWER or if BORROWER shall seek or consent to the appointment of a receiver or trustee for itself or for any of the Property, file a petition seeking relief under the bankruptcy or other similar laws of the United States, any state or any jurisdiction, make a general assignment for the benefit of creditors, or be unable to pay its debts as they become due; if a court shall enter an order, judgment or decree appointing, with or without the consent of BORROWER, a receiver or trustee for it or for any of the Property or approving a petition filed against BORROWER which seeks relief under the bankruptcy or other similar laws of the United States, any state or any jurisdiction, and any such order, judgment or decree shall remain in force, undischarged or unstayed, sixty (60) days after it is entered; or if all sums due hereunder are not paid on the Maturity Date as set forth in the Note.

3.12. Waiver of Marshalling, Rights of Redemption, Homestead and Valuation.

(A) BORROWER, for itself and for all persons hereafter claiming through or under it or who may at any time hereafter become holders of liens junior to the lien of this Deed of Trust, hereby expressly waives and releases all rights to direct the order in which any of the Property shall be sold in the event of any sale or sales pursuant hereto and to have any of the

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Property and/or any other property now or hereafter constituting security for any of the indebtedness secured hereby marshaled upon any foreclosure of this Deed of Trust or of any other security for any of said indebtedness.

(B) To the fullest extent permitted by law, BORROWER, for itself and all who may at any time claim through or under it, hereby expressly waives, releases and renounces all rights of redemption from any foreclosure sale, all rights of homestead, exemption, monitoring reinstatements, forbearance, appraisal, valuation, stay and all rights under any other laws which may be enacted extending the time for or otherwise affecting enforcement or collection of the Note, the debt evidenced thereby, any debt evidenced by any of the Loan Documents or Related Agreements, or this Deed of Trust.

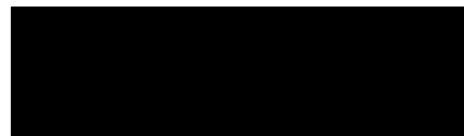
3.13. Remedies Cumulative. No remedy herein conferred is intended to be exclusive of any other remedy herein or by law provided, but each shall be cumulative and shall be in addition to every other remedy given hereunder or now or hereafter existing at law or in equity or by statute. No delay or omission to exercise any right or power accruing upon any Event of Default shall impair any right or power or shall be construed to be a waiver of any Event of Default or any acquiescence therein. Every power and remedy given by this Deed of Trust may be exercised separately, successively or concurrently from time to time as often as may be deemed expedient by LENDER. If there exists additional security for the performance of the obligations secured hereby, LENDER, at its sole option, and without limiting or affecting any of its rights or remedies hereunder, may exercise any of the rights and remedies to which it may be entitled hereunder either concurrently with whatever rights and remedies it may have in connection with such other security or in such order as it may determine. Any application of any amounts or any portion thereof held by LENDER at any time as additional security or otherwise, to any indebtedness secured hereby shall not extend or postpone the due dates of any payments due from BORROWER to LENDER hereunder or under the Note, or under any of the Loan Documents or Related Agreements, or change the amounts of any such payments or otherwise be construed to cure or waive any default or notice of default hereunder or invalidate any act done pursuant to any such default or notice.

ARTICLE IV **MISCELLANEOUS**

4.01. Severability. In the event any one or more of the provisions contained in the Deed of Trust shall for any reason be held to be invalid, illegal or unenforceable in any respect, such invalidity, illegality or unenforceability shall not affect any other provision of this Deed of Trust, but this Deed of Trust shall be construed as if such invalid, illegal or unenforceable provision had never been contained herein, but only to the extent that it is invalid, illegal or unenforceable.

4.02. Notices.

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(A) All notices expressly provided hereunder to be given by LENDER to BORROWER and all notices, demands and other communications of any kind or nature whatever which BORROWER may be required or may desire to give to or serve on TRUSTEE or LENDER shall be in writing and shall be (1) hand-delivered, effective upon receipt, (2) sent by United States Express Mail or by private overnight courier, effective upon receipt, or (3) served by registered or certified mail, return receipt requested to the appropriate address set forth below, or at such other place as the BORROWER, TRUSTEE or LENDER, as the case may be, may from time to time designate in writing by ten (10) days' prior written notice thereof. Any such notice or demand served by registered or certified mail, return receipt requested, shall be deposited in the United States mail, with postage thereon fully prepaid and addressed to the party so to be served at its address below stated or at such other address of which said party shall have theretofore notified in writing, as provided above, the party giving such notice. Service of any such notice or demand so made shall be deemed effective on the day of actual delivery as shown by the addressee's return receipt or the expiration of three (3) business days after the date of mailing, whichever is the earlier in time. Rejection or other refusal to accept or inability to deliver because of changed address of which no notice has been received shall also constitute receipt. Any notice required to be given by TRUSTEE or LENDER shall be equally effective if given by TRUSTEE'S or LENDER'S agent or loan servicer, if any.

(B) BORROWER hereby requests that any notice, demand, request or other communication (including any notice of an Event of Default and notice of sale as may be required by law) desired to be given or required pursuant to the terms hereof be addressed to BORROWER as follows:



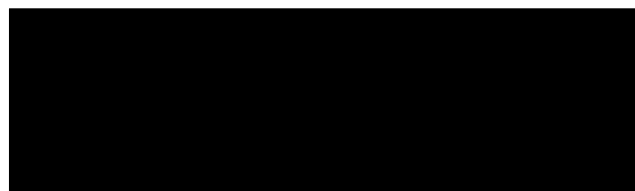
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With a copy to:

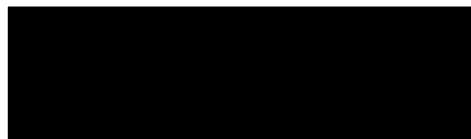


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All notices and other communications to LENDER shall be addressed as follows:



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All notices and other communications to TRUSTEE shall be addressed as follows:



4.03. BORROWER Not Released; Certain LENDER Acts.

(A) Extension of the time for payment or modification of the terms of payment of any sums secured by this Deed of Trust granted by LENDER to any successor in interest of BORROWER shall not operate to release, in any manner, the liability of BORROWER. LENDER shall not be required to commence proceedings against such successor or refuse to extend time for payment or otherwise modify the terms of payment of the sums secured by this Deed of Trust by reason of any demand made by BORROWER. Without affecting the liability of any person, including BORROWER, for the payment of any indebtedness secured hereby, or the legal operation and effect of this Deed of Trust on the remainder of the Property for the full amount of any such indebtedness and liability unpaid, LENDER is empowered as follows: LENDER may from time to time and without notice or consent (1) release any person liable for the payment of any of the indebtedness; (2) extend the time or otherwise alter the terms of payment of any of the indebtedness; (3) accept additional or personal property of any kind as security therefor, whether evidenced by deeds of trust, mortgages, security agreements or any other instruments of security; or (4) alter, substitute or release any property securing the indebtedness.

(B) LENDER may, at any time, and from time to time, (1) consent to the making of any map or plan of the Property or any part thereof, (2) join in granting any easement or creating any restriction thereon, (3) join in any subordination or other agreement affecting this Deed of Trust or the legal operation and effect or charge hereof, or (4) reconvey, without any warranty, all or part of the Property from the lien of this Deed of Trust.

4.04. Inspection. Upon reasonable prior notice and subject to the inspection rights of tenants under the leases, LENDER may at any reasonable time make or cause to be made entry upon and make inspections of BORROWER'S books and records, and inspections, reappraisals, surveys, construction and environmental testing of the Property or any part thereof in person or by agent, all at LENDER'S sole cost and expense; provided, however, if an Event of Default has occurred and is continuing under the Note, this Deed of Trust or any other Loan Document, such inspections, reappraisals, surveys, construction and environmental testing shall be at BORROWER'S sole cost and expense and, provided further, that BORROWER shall engage, at its sole cost and expense, a qualified environmental engineering or consulting firm acceptable to LENDER, to perform environmental testing of the Property at any time upon the request of LENDER if an Event of Default exists or if LENDER has a good faith belief that that Hazardous Materials exist at the Property in violation of law.

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4.05. Release or Reconveyance or Cancellation. Upon the payment in full of all sums secured by this Deed of Trust, LENDER shall cancel this Deed of Trust and shall surrender this Deed of Trust and all notes evidencing indebtedness secured by this Deed of Trust to BORROWER. The duly recorded cancellation shall constitute a reassignment of the leases by the LENDER to the BORROWER and BORROWER shall pay all costs of recordation, if any.

4.06. Statute of Limitations. BORROWER hereby expressly waives and releases to the fullest extent permitted by law, the pleading of any statute of limitations as a defense to any and all obligations secured by this Deed of Trust.

4.07. Interpretation. Wherever used in this Deed of Trust, unless the context otherwise indicates a contrary intent, or unless otherwise specifically provided herein, the word "BORROWER" shall mean and include both BORROWER and any subsequent owner or owners of the Property, the word "TRUSTEE" shall mean and include not only the original TRUSTEE hereunder but also any successor or assign, and the word "LENDER" shall mean and include not only the original LENDER hereunder but also any future owner and holder, including pledgees, of the Note or other obligations secured hereby. In this Deed of Trust whenever the context so requires, the masculine gender includes the feminine and/or neuter, and the neuter includes the feminine and/or masculine, and the singular number includes the plural. In this Deed of Trust, the use of the word "including" shall not be deemed to limit the generality of the term or clause to which it has reference, whether or not limiting language (such as "without limitation", or "but not limited to", or words of similar import) is used with reference thereto.

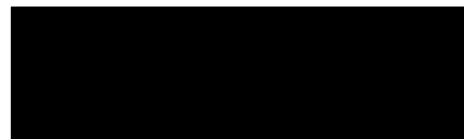
4.08. Captions. The captions and headings of the Articles and sections of this Deed of Trust are for convenience only and are not to be used to interpret, define or limit the provisions hereof.

4.09. Consent. The granting or withholding of consent by LENDER to any transaction as required by the terms hereof shall not be deemed a waiver of the right to require consent to future or successive transactions. BORROWER covenants and agrees to reimburse LENDER promptly on demand for all legal and other expenses incurred by LENDER or its loan servicer in connection with all requests by BORROWER for consent or approval under this Deed of Trust.

4.10. Delegation to Subagents. Wherever a power of attorney is conferred upon TRUSTEE or LENDER hereunder, it is understood and agreed that such power is conferred with full power of substitution, and TRUSTEE or LENDER may elect in their sole discretion to exercise such power themselves or to delegate such power, or any part thereof, to one or more subagents.

4.11. Successors and Assigns. All of the grants, obligation, covenants, agreements, terms, provisions and conditions herein shall run with the land and shall apply to, bind and inure to the benefit of, the successors and assigns of BORROWER (but this shall not permit any assignment prohibited hereby) and TRUSTEE and shall apply to bind and inure to the benefit of the endorsees, transferees, successors and assigns of LENDER. In the event BORROWER is

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composed of more than one party, the obligations, covenants, agreements, and warranties contained herein as well as the obligations arising therefrom are and shall be joint and several as to each such party.

4.12. Governing Law; Jurisdiction and Venue. **THIS DEED OF TRUST IS INTENDED TO BE GOVERNED BY AND CONSTRUED UNDER THE LAWS OF THE STATE IN WHICH THE PROPERTY IS LOCATED WITHOUT GIVING EFFECT TO THE CONFLICT OF LAWS PRINCIPLES THEREOF. IN ANY LITIGATION IN CONNECTION WITH OR TO ENFORCE THIS DEED OF TRUST OR ANY OF THE OTHER LOAN DOCUMENTS OR RELATED AGREEMENTS, THE BORROWER HEREBY IRREVOCABLY CONSENTS AND CONFERS PERSONAL JURISDICTION ON THE STATE COURTS OF THE COUNTY IN WHICH THE PROPERTY IS LOCATED, OR ON THE UNITED STATES DISTRICT COURT OR THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT IN WHICH THE PROPERTY IS LOCATED. BORROWER EXPRESSLY WAIVES ANY OBJECTIONS AS TO VENUE IN ANY SUCH COURTS AND AGREES THAT SERVICE OF PROCESS MAY BE MADE ON THE BORROWER BY MAILING A COPY OF THE SUMMONS AND COMPLAINT BY REGISTERED OR CERTIFIED MAIL, RETURN RECEIPT REQUESTED, TO THE BORROWER'S ADDRESS. NOTHING CONTAINED HEREIN SHALL, HOWEVER, PREVENT TRUSTEE OR LENDER FROM BRINGING ANY ACTION OR EXERCISING ANY RIGHTS WITHIN ANY OTHER STATE OR JURISDICTION OR FROM OBTAINING PERSONAL JURISDICTION BY ANY OTHER MEANS AVAILABLE BY APPLICABLE LAW.**

4.13. Waiver of Jury Trial. TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, THE BORROWER HEREBY IRREVOCABLY AND UNCONDITIONALLY WAIVES ALL RIGHT TO TRIAL BY JURY IN ANY ACTION, SUIT, OR PROCEEDING THAT RELATES TO OR ARISES OUT OF THE NOTE, THIS DEED OF TRUST OR UNDER ANY OF THE OTHER LOAN DOCUMENTS OR RELATED AGREEMENTS OR THE ACTS OR FAILURE TO ACT OF OR BY TRUSTEE OR LENDER IN THE ENFORCEMENT OF ANY OF THE TERMS OR PROVISIONS OF THE NOTE, THIS DEED OF TRUST, OR ANY OF THE OTHER LOAN DOCUMENTS.

4.14 Judicial Reference. TO THE EXTENT A PREDISPUTE WAIVER OF THE RIGHT TO TRIAL BY JURY IS NOT ENFORCEABLE UNDER APPLICABLE LAW, ANY AND ALL DISPUTES, CONTROVERSIES OR CLAIMS ARISING OUT OF OR RELATING TO THIS DEED OF TRUST AND OTHER LOAN DOCUMENTS OR TRANSACTIONS CONTEMPLATED THEREBY, INCLUDING, WITHOUT LIMITATION, THE MAKING, PERFORMANCE, OR INTERPRETATION OF THIS DEED OF TRUST OR OTHER LOAN DOCUMENTS, SHALL BE HEARD BY A REFEREE AND RESOLVED BY JUDICIAL REFERENCE PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE §638. THE REFEREE SHALL BE AN ATTORNEY LICENSED TO PRACTICE LAW IN THE STATE OF CALIFORNIA AND EXPERIENCED AND QUALIFIED IN REAL ESTATE MATTERS OF THE TYPE CONTEMPLATED BY THIS DEED OF TRUST AND OTHER LOAN

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DOCUMENTS OR A RETIRED CALIFORNIA SUPERIOR OR APPELLATE COURT JUDGE. THE PARTIES SHALL NOT SEEK TO APPOINT A REFEREE THAT MAY BE DISQUALIFIED PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE §641 or §641.2 WITHOUT THE PRIOR WRITTEN CONSENT OF ALL PARTIES. IF THE PARTIES ARE UNABLE TO AGREE UPON A REFEREE WITHIN TEN (10) CALENDAR DAYS AFTER ONE PARTY SERVES A WRITTEN NOTICE OF INTENT FOR JUDICIAL REFERENCE ON THE OTHER PARTY OR PARTIES, THEN THE REFEREE WILL BE AN ATTORNEY LICENSED TO PRACTICE LAW IN THE STATE OF CALIFORNIA AND EXPERIENCED AND QUALIFIED IN REAL ESTATE MATTERS OF THE TYPE CONTEMPLATED BY THIS DEED OF TRUST AND OTHER LOAN DOCUMENTS OR A RETIRED CALIFORNIA SUPERIOR OR APPELLATE COURT JUDGE SELECTED BY THE COURT IN ACCORDANCE WITH CALIFORNIA CODE OF CIVIL PROCEDURE §640(b). ANY DECISION OF THE REFEREE SHALL BE ENTERED AS A JUDGMENT IN THE COURT IN ACCORDANCE WITH CALIFORNIA CODE OF CIVIL PROCEDURE §§644 and 645.

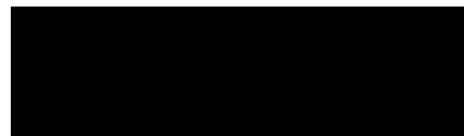
4.15 Changes in Taxation. If, after the date of this Deed of Trust, any law is passed by the state in which the Property is located or by any other governing entity, imposing upon LENDER any tax against the Property, or changing in any way the laws for the taxation of mortgages or deeds of trust, debts secured by mortgages or deeds of trust so that an additional or substitute tax is imposed on LENDER or the holder of the Note, BORROWER shall reimburse LENDER for the amount of such taxes within ten (10) days after receipt of written notice from LENDER. Provided, however, that such requirement of payment shall be ineffective if BORROWER is permitted by law to pay the whole of such tax in addition to all other payments required hereunder, without any penalty or charge thereby accruing to LENDER and if BORROWER in fact pays such tax prior to the date upon which payment is required by such notice.

4.16 Maximum Interest Rate.

(A) It is the intention of BORROWER and LENDER to conform strictly to the usury laws now or hereafter in force in the state or commonwealth in which the Property is located, and any interest payable under the Note, this Deed of Trust, or any other Loan Documents or Related Agreements shall be subject to reduction to an amount not to exceed the maximum non-usurious amount for commercial loans allowed under the usury laws of the state or commonwealth in which the Property is located as now or hereafter construed by the courts having jurisdiction over such matters. In the event such interest (whether designated as interest, service charges, points, or otherwise) does exceed the maximum legal rate, it shall be (i) cancelled automatically to the extent that such interest exceeds the maximum legal rate; (ii) if already paid, at the option of the LENDER, either be rebated to BORROWER or credited on the principal amount of the Note; or (iii) if the Note has been prepaid in full, then such excess shall be rebated to BORROWER.

(B) It is further agreed, without limitation of the foregoing, that all calculations of the rate of interest (whether designed as interest, service charges, points, or

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otherwise) contracted for, charged, or received under the Note, or under any instrument evidencing or securing the loan evidenced hereby, that are made for the purpose of determining whether such rate exceeds the maximum legal rate, shall be made, to the extent permitted by applicable law, by amortizing, prorating, allocating, and spreading throughout the full stated term of the Note (and any extensions of the term hereof that may be hereafter granted) all such interest at any time contracted for, charged, or received from the BORROWER or otherwise by the LENDER so that the rate of interest on account of the indebtedness evidenced by the Note, as so calculated, is uniform throughout the term hereof. If the BORROWER is exempt or hereafter becomes exempt from applicable usury statutes or for any other reason the rate of interest to be charged on the Note is not limited by law, none of the provisions of this paragraph shall be construed so as to limit or reduce the interest or other consideration payable under the Note, under this Deed of Trust, or under other Loan Documents or Related Agreements. The terms and provisions of this paragraph shall control and supersede every other provision of all agreements between the parties hereto.

4.17 Payment on Account. Acceptance by LENDER of any payment in an amount less than the amount then due on the indebtedness evidenced by the Note or due hereunder or under any other Loan Document shall, following the expiration of applicable notice and cure periods, be deemed an acceptance on account only, and the failure to pay the entire amount then due under the Note, hereunder, and under any other Loan Document shall be and continue to be an Event of Default. Until the entire amount due under all Loan Documents and all Related Agreements has been paid in full, LENDER shall be entitled to exercise all rights and remedies conferred upon it in this instrument upon the occurrence of an Event of Default.

4.18 Assignment of Instrument. LENDER shall have the right in its sole discretion at any time during the term of this Deed of Trust to sell, assign, syndicate or otherwise transfer and/or dispose of all or any portion of its interest in the Loan, the Note or the Loan Documents or Related Agreements, and any or all servicing rights with respect thereto, or grant participations therein, or issue mortgage pass-through certificates or other securities evidencing a beneficial interest in a rated or unrated public offering or private placement, and BORROWER hereby permits LENDER to submit to LENDER'S purchaser, transferee, assignee, servicer, participant, investor or any rating agency, and any organization maintaining databases on the underwriting and performance of commercial mortgage loans, the financial data and all other information being furnished by BORROWER to LENDER under the terms of this Deed of Trust, the Note or any of the Loan Documents or Related Agreements. BORROWER agrees to cooperate and cause any guarantor to cooperate with LENDER in connection with any transfer made or any securities created pursuant to this Section, including, without limitation, the delivery of an estoppel certificate and such other documents as may be reasonably requested by LENDER and the execution of amendments to the Note, the Deed of Trust, the Loan Documents, Related Agreements and BORROWER'S organizational documents as reasonably requested by LENDER; provided, however, that BORROWER shall not be required to modify or amend any provision if such modification or amendment would (a) change the interest rate, the stated maturity or the amortization of principal as set forth in the Note; or (b) modify or amend any other material economic term of the Loan; or (c) subject BORROWER or any guarantor to additional liability beyond that contemplated by the Loan Documents.

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4.19 Subrogation. To the extent that proceeds of the indebtedness secured hereby are used to pay any outstanding lien, charge or encumbrance affecting the Property, such proceeds having been advanced by LENDER, LENDER shall be subrogated to all rights, interest and liens owned or held by any owner or holder of such outstanding liens, charges and encumbrances, irrespective of whether such liens, charges or encumbrances are released of record; provided, however, that the terms and provisions hereof shall govern the rights and remedies of LENDER and shall supersede the terms, provisions, rights, and remedies under the lien or liens to which LENDER is subrogated hereunder.

4.20 No Waiver. Any failure by TRUSTEE or LENDER to insist upon the strict performance by BORROWER of any of the terms and provisions hereof shall not be deemed to be a waiver of any of the terms and provisions hereof, and TRUSTEE or LENDER, notwithstanding any such failure, shall have the right thereafter to insist upon the strict performance by BORROWER of any and all of the terms and provisions hereof to be performed by BORROWER.

4.21 Deed of Trust Extension. The lien hereof shall remain in full force and effect during any postponement or extension of the time of payment of the indebtedness secured hereby, or of any part thereof, and any number of extensions or modifications hereof, or any additional notes taken by LENDER, shall not affect the lien hereof or the liability of BORROWER or of any subsequent obligor to pay the principal indebtedness unless and until such lien or liability be expressly released in writing by LENDER.

4.22 Indemnification. BORROWER shall indemnify and hold TRUSTEE and LENDER harmless from and against all obligations, liabilities, losses, costs, expenses, fines, penalties or damages (including reasonable attorneys' fees) which TRUSTEE and LENDER may incur by reason of this Deed of Trust or with regard to the Property prior to the foreclosure of or acceptance of a deed-in-lieu of foreclosure under this Deed of Trust, whether or not such obligations, liabilities, losses, costs, expenses, fines, penalties or damages are discovered before or after foreclosure or an acceptance of a deed-in-lieu of foreclosure under this Security Instrument. BORROWER shall defend TRUSTEE and LENDER against any claim or litigation involving TRUSTEE or LENDER for the same, and should TRUSTEE or LENDER incur such obligation, liability, loss, cost, expense, fine, penalty or damage, then BORROWER shall reimburse TRUSTEE or LENDER, as applicable, upon demand. Any amount owed LENDER, or any amount paid, or contracted to be paid, by LENDER pursuant to this Section 4.22, under this provision shall, if not paid within ten (10) days of demand, bear interest at the Default Rate set forth herein and shall be secured hereby. Notwithstanding the foregoing, BORROWER shall not indemnify TRUSTEE or LENDER (i) for the consequences of any gross negligence or willful misconduct of TRUSTEE or LENDER, or (ii) as to any income or franchise taxes imposed upon LENDER under the jurisdiction wherein LENDER holds the Note.

4.23 Time of Essence. Time is of the essence of the obligations of BORROWER in this Deed of Trust and each and every term, covenant and condition made herein by or applicable to BORROWER.

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4.24 Reproduction of Documents. This Deed of Trust and all Loan Documents and Related Agreements, specifically excluding the Note but including, without limitation, consents, waivers and modifications which may hereafter be executed, financial and operating statements, certificates and other information previously or hereafter furnished to LENDER, may be reproduced by LENDER by any photographic, photostatic, microfilm, micro-card, miniature photographic or other similar process, and LENDER may destroy any original document ("Master") so reproduced. BORROWER agrees and stipulates that any such reproduction is an original and shall be admissible in evidence as the Master in any judicial or administrative proceeding (whether or not the Master is in existence and whether or not such reproduction was made or preserved by LENDER in the regular course of business).

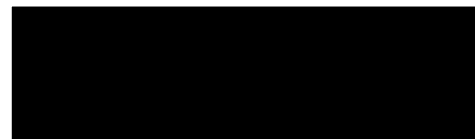
4.25 Separate Absolute Assignment of Rents and Profits and Collateral Assignment of Leases. The indebtedness secured hereby is additionally secured by, inter alia, an Absolute Assignment of Rents and Profits and Collateral Assignment of Leases of even date herewith executed by BORROWER herein, as Assignor, to LENDER, as Assignee.

4.26 Discontinuance of Proceedings. In case TRUSTEE or LENDER, as applicable, shall have proceeded to enforce any right, power or remedy under this Deed of Trust by foreclosure, entry or otherwise or in the event TRUSTEE commences advertising of the intended exercise of the sale under power provided hereunder, and such proceeding or advertisement shall have been withdrawn, discontinued or abandoned for any reason, or shall have been determined adversely to TRUSTEE or LENDER, then in every such case (i) BORROWER, TRUSTEE and LENDER shall be restored to their former positions and rights, (ii) all rights, powers and remedies of TRUSTEE or LENDER shall continue as if no such proceeding had been taken, (iii) each and every default declared or occurring prior or subsequent to such withdrawal, discontinuance or abandonment shall and shall be deemed to be a continuing default and (iv) neither this Deed of Trust, nor the Note, nor the indebtedness secured hereby, nor any other instrument concerned therewith, shall be or shall be deemed to have been reinstated or otherwise BORROWER hereby expressly waives the benefit of any statute or rule of law now provided, or which may hereafter be provided, which would produce a result contrary to or in conflict with the above.

4.27 Substitution of Trustee. LENDER shall have the irrevocable right to remove at any time and from time to time without limit the TRUSTEE herein named without notice or cause and to appoint a successor by an instrument in writing, duly acknowledged, in such form as to entitle such written instrument to be recorded in the state in which the Property is located; and, in the event of the death or resignation of the TRUSTEE herein named. LENDER shall have the right to appoint a successor by written instrument, and any TRUSTEE so appointed shall be vested with the title to the Property, and shall possess all the powers, duties and obligations herein conferred on the TRUSTEE in the same manner and to the same extent as though the successor trustee were named herein as TRUSTEE.

4.28 Entire Agreement; Modifications. This Deed of Trust together with any exhibits, appendices, addenda, and schedules hereto, encompasses the final and entire agreement of the parties hereto and supersedes any and all prior agreements, promises, negotiations,

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representations, understanding, or inducements whether express or implied, oral or written, relating to the subject matter hereof. This Deed of Trust may not be amended or modified orally, but only by an agreement in writing signed by the party against whom enforcement of any amendment or modification is sought. The provisions of this Deed of Trust shall extend and be applicable to all renewals, amendments, extensions, consolidations, and modifications of the other Loan Documents and Related Agreements, and any and all references herein to the Loan Documents and Related Agreements shall be deemed to include any such renewals, amendments, extensions, consolidations or modifications thereof.

4.29 Fee for Services Rendered. LENDER reserves the right to assess BORROWER (and the latter agrees to pay) LENDER'S out-of-pocket expenses for services rendered by LENDER and/or reasonable attorneys' fees in connection with the Loan or the Property including but not limited to modification of any documents, matters undertaken by LENDER at the request of BORROWER, collection efforts regarding mortgage payments, exercising assignments of rents or leases, and foreclosure proceedings under the Deed of Trust or in pursuit of any remedies under the Note or under any Loan Document. Said sums shall, on notice to BORROWER, become immediately due and payable to LENDER. If BORROWER fails to make payment of fees pursuant to this Section, then such fees shall be added to the outstanding principal balance and shall bear interest at the Default Rate.

4.30 Exhibit. Exhibit(s) A, B and C are attached hereto and incorporated herein by reference.

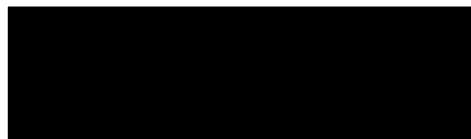
4.31 Participation. The \$3,100,000.00 Loan secured by this Deed of Trust is represented by the Retainage Note and the Participant Note. The relationship between Lincoln and the Participant is governed by a separate participation agreement or agreements. Pursuant to such agreement(s), Lincoln has the authority to exercise all rights of the Lender under the Deed of Trust, all rights of the Holder under the Note and all rights of the Lender under the Loan Documents and Related Agreements. Lincoln shall be conclusively deemed to have the authority to take all actions undertaken by Lincoln with respect to the foregoing instruments, and Borrower shall have no duty, obligation or right to inquire as to the authority of Lincoln to act in such capacity.

ARTICLE V

SECURITY AGREEMENT

5.01. Security Interest. BORROWER hereby grants to LENDER a security interest in all equipment and fixtures and in the Personal Property (as defined in this Section 5.01) wherever located and more fully described in the granting clauses of this Deed of Trust, including without limitation any and all property of similar type or kind hereafter wherever located, and together with (i) any and all sums at any time on deposit for the benefit of LENDER or held by LENDER (whether deposited by or on behalf of BORROWER or anyone else) pursuant to any of the provisions of this Deed of Trust, (ii) BORROWER'S right, title and interest in and to any and all Personal Property leases of any type now or hereafter in effect covering any of such described or

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referenced Personal Property, if and to the extent such Personal Property leases are permitted by LENDER, (iii) BORROWER'S right, title and interest, as lessor, landlord or owner, in and to any and all leases or other occupancy agreements or concession or license agreements or arrangements pertaining to any portion of the Property if and to the extent such leases or other agreements or arrangements are permitted by LENDER, (iv) all proceeds from the sale or other disposition of any Personal Property or interests in which BORROWER has granted a security interest in favor of LENDER and receivables arising out of the operation of the Property all for the purpose of securing all obligations of BORROWER secured hereby and (v) all other now owned or hereafter acquired personal property (tangible and intangible) arising from or relating to the Property including, but not limited to all Inventory, Equipment, Accounts, General Intangibles, Fixtures, Documents, Instruments, Investment Property, Letter of Credit Rights, Money, Chattel Paper, As-Extracted Collateral, Deposit Accounts and Supporting Obligations (all as defined in the UCC) arising from or relating to the Property (as used in this Article V, collectively referred to as the "**Personal Property**"). With respect to BORROWER'S interest in Personal Property hereinabove described, this Deed of Trust shall constitute a security agreement between BORROWER and LENDER, and, cumulative of all other rights of LENDER hereunder, LENDER shall have all of the rights conferred upon secured parties by the UCC. BORROWER agrees to execute one or more financing statements covering such Personal Property, in the manner and form required by law and to the satisfaction of LENDER. BORROWER agrees to pay LENDER'S reasonable charge, to the maximum amount permitted by law, for any statement by LENDER regarding the obligations secured by this Deed of Trust requested by BORROWER or on behalf of BORROWER. On demand, BORROWER will promptly pay all costs and expenses of filing financing statements, continuation statements, partial releases and termination statements deemed necessary or appropriate by LENDER to establish and maintain the validity and priority of the security interest of LENDER or any modification thereof, and all costs and expenses of any searches reasonably required by LENDER. LENDER may exercise any or all of the remedies of a secured party available to it under the UCC with respect to such Personal Property, and it is expressly agreed that if, upon Event of Default, LENDER should proceed to dispose of the collateral in accordance with the provisions of the UCC, ten (10) days' notice by LENDER to BORROWER shall be deemed to be reasonable notice under any provision of the UCC requiring such notice; provided, however, that LENDER may, at its option, dispose of the collateral in accordance with LENDER'S rights and remedies in respect of the real property pursuant to the provisions of this Deed of Trust, in lieu of proceeding under the UCC.

5.02. Fixtures, Filings, Representation. Certain of the Personal Property described in the granting clauses are or are to become fixtures on the Land described in Exhibit A. With respect to BORROWER'S interest in fixtures hereinabove described, this Deed of Trust shall constitute a security agreement and financing statement between BORROWER and LENDER, and shall be effective as a financing statement filed as a fixture filing under the UCC from the date of its filing in the real estate records in the County in which the Property is located. This security agreement and financing statement covers the above described fixtures and cumulative of all other rights of LENDER hereunder, LENDER shall have all of the rights conferred on secured parties by the UCC with respect to such fixtures. On demand, BORROWER will promptly execute and pay all costs and expenses of filing financing statements, continuation statements, partial releases and termination statements deemed necessary or appropriate by

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LENDER to establish and maintain the validity and priority of the security interest of LENDER, or any modification thereof, and all costs and expenses of any searches reasonably required by LENDER. During the existence of an Event of Default, LENDER may exercise any or all of the remedies of a secured party available to it under the UCC with respect to such fixtures, and it is expressly agreed that if upon Event of Default LENDER should proceed to dispose of the collateral in accordance with the provisions of the UCC, ten (10) days' notice by LENDER to BORROWER shall be deemed to be reasonable notice under any provision of the UCC requiring such notice; provided, however, that LENDER may at its option dispose of the collateral in accordance with LENDER'S rights and remedies in respect of the real property pursuant to the provisions of this Deed of Trust, in lieu of proceeding under the UCC. Information concerning the security interest created by this Deed of Trust may be obtained from LENDER, as Secured Party, at the address set forth in this Deed of Trust. The address of BORROWER, as Debtor, is the address set forth on in this Deed of Trust.

5.03. Warranties, Representations and Covenants. BORROWER hereby warrants, represents and covenants as follows:

(A) Except for the security interest granted hereby, BORROWER is, and as to portions of the Personal Property to be acquired after the date hereof will be, the sole owner of the Personal Property, free from any adverse lien, security interest, encumbrance or adverse claims thereon of any kind whatsoever. BORROWER will notify LENDER of, and will defend the Personal Property against, all claims and demands of all persons at any time claiming the same or any interest therein.

(B) Except as otherwise specifically permitted hereunder, BORROWER will not lease, sell, convey or in any manner transfer the Personal Property without the prior written consent of LENDER.

(C) The Personal Property is not used or bought for BORROWER'S personal, family or household purposes.

(D) The Personal Property will be kept on or at the Property and BORROWER will not remove the Personal Property from the Property without the prior written consent of LENDER, except that so long as BORROWER is not in default hereunder, BORROWER shall be permitted to dispose of such portions or items of Personal Property which are consumed or worn out in ordinary usage, all of which shall be promptly replaced by BORROWER with property of like kind and quality and at least equal in value to that replaced and in such manner so that said new Personal Property shall be subject to the security interest created hereby and so that the security interest of LENDER shall be first in priority, it being expressly understood that all replacements of the Personal Property and any additions to the Personal Property shall be and become immediately subject to the security interest of this Deed of Trust and be covered hereby.

(E) BORROWER authorizes LENDER to file financing and continuation statements, amendments and supplements thereto relating to the equipment, fixtures and Personal

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Property and BORROWER will pay the cost of filing of same in all public offices wherever filing is deemed by LENDER to be necessary or desirable to perfect the security interest created by this Deed of Trust. To the extent LENDER has recorded any financing statement with respect to the Loan that may predate the execution of this authorization, BORROWER hereby ratifies such filing.

(F) BORROWER will do all acts and things as LENDER may require or as may be necessary or appropriate to establish and maintain a first perfected security interest in the Personal Property, subject to no liens, encumbrances or security interests of others.

(G) All covenants and obligations of BORROWER contained in this Deed of Trust shall be deemed to apply to the Personal Property whether or not expressly referred to herein.

(H) This Deed of Trust constitutes a Security Agreement and also constitutes a financing statement for all purposes under the UCC.

[SIGNATURES COMMENCE ON FOLLOWING PAGE]



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IN WITNESS WHEREOF, the undersigned has executed this Deed of Trust as of the day and year first hereinabove written.

BORROWER:

LA CANADA ASSOCIATES, LLC,
a Delaware limited liability company

By:



Name: Michael A. Chase
Title: Vice President

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

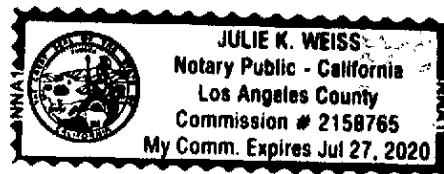
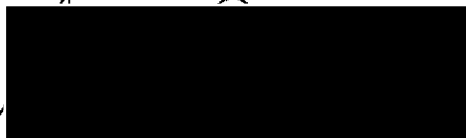
STATE OF CALIFORNIA)
COUNTY OF Los Angeles) ss.

On August 16, 2016, before me, Julie K. Weiss, a Notary Public, personally appeared Michael A. Chase, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the within instrument in his authorized capacity and that by his signature on the within instrument, the person or entity upon behalf of which he acted executed the within instrument.

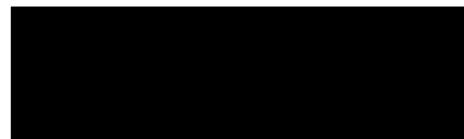
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



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EXHIBIT A

Description of Land

THE LAND REFERRED TO HEREIN BELOW IS SITUATED LA CANADA FLINTRIDGE, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

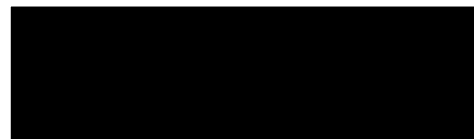
A PORTION OF LOTS 1 AND 2 IN RANCHO LOT 24 OF BEACH'S ADDITION TO CRESCENTA CANADA, IN THE CITY OF LA CANADA FLINTRIDGE, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 7 PAGE 25 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, AND A PORTION OF THAT CERTAIN UNNAMED ROAD, SHOWN ON SAID MAP, LYING BETWEEN LOTS 1 AND 2, VACATED BY ORDER OF THE BOARD OF SUPERVISORS OF SAID COUNTY, A COPY OF WHICH ORDER WAS RECORDED IN BOOK 257 PAGE 94 OF MISCELLANEOUS RECORDS OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE SOUTHERLY PROLONGATION OF THE WESTERLY LINE OF SAID LOT 1, SAID POINT BEING ALSO ON THE NORTHERLY LINE OF FOOTHILL BOULEVARD, 100 FEET WIDE, AS DESCRIBED IN DEED TO THE STATE OF CALIFORNIA, RECORDED IN BOOK 11942 PAGE 327, OFFICIAL RECORDS OF SAID COUNTY; THENCE NORTH 14° 40' 47" EAST 200.00 FEET TO A POINT, SAID POINT BEING 50.00 FEET EASTERLY, MEASURED AT RIGHT ANGLES FROM SAID SOUTHERLY PROLONGATION OF THE WESTERLY LINE OF SAID LOT 1; THENCE NORTH 0° 12' 08" EAST ALONG A LINE PARALLEL TO SAID SOUTHERLY PROLONGATION OF SAID LOT 1, A DISTANCE OF 250.76 FEET; THENCE SOUTH 89° 39' 00" WEST 50.00 FEET, MORE OR LESS, TO SAID SOUTHERLY PROLONGATION OF THE WESTERLY LINE OF SAID LOT 1; THENCE SOUTH 0° 12' 08" WEST ALONG SAID SOUTHERLY PROLONGATION OF THE WESTERLY LINE OF SAID LOT 1, A DISTANCE OF 443.92 FEET TO THE POINT OF BEGINNING.

PARCEL 2:

THOSE PORTIONS OF LOTS 1 AND 2 IN RANCHO LOT 24 OF BEACH'S ADDITION TO CRESCENTA CANADA, AS PER MAP RECORDED IN BOOK 7 PAGE 25 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY AND OF THE UNNAMED ROAD ADJOINING SAID LOTS VACATED BY ORDER OF THE BOARD SUPERVISORS OF SAID COUNTY, DESCRIBED AS A WHOLE AS FOLLOWS:

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BEGINNING AT THE INTERSECTION OF THE NORTHEASTERLY LINE OF FOOTHILL BOULEVARD AS DESCRIBED IN THE DEED TO STATE OF CALIFORNIA RECORDED ON JANUARY 12, 1933 AS INSTRUMENT NO. 551 IN BOOK 11942 PAGE 327 OF OFFICIAL RECORDS OF SAID COUNTY WITH A LINE THAT IS PARALLEL WITH AND DISTANT WESTERLY 300 FEET AT RIGHT ANGLES FROM THE SOUTHERLY PROLONGATION OF THE WESTERLY LINE OF LOT 1 OF LYANS PARK TRACT, AS PER MAP RECORDED IN

BOOK 144 PAGES 15 AND 16 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER; THENCE ALONG SAID PARALLEL LINE NORTH 0° 12' 08" EAST 341.61 FEET, MORE OR LESS, TO THE NORTHERLY LINE OF THE LAND DESCRIBED IN ITEM 1 OF THE DEED TO BEAR INVESTMENT COMPANY RECORDED ON FEBRUARY 5, 1953 AS INSTRUMENT NO. 3073 IN BOOK 40904 PAGE 94 OF SAID OFFICIAL RECORDS; THENCE ALONG SAID NORTHERLY LINE NORTH 83° 38' 59" EAST 41.28 FEET, MORE OR LESS, TO AN ANGLE POINT AND THENCE STILL ALONG SAID NORTHERLY LINE NORTH 89° 39' 00" EAST 259.00 FEET TO SAID SOUTHERLY PROLONGATION; THENCE ALONG SAID PROLONGATION SOUTH 0° 12' 08" WEST 443.92 FEET, MORE OR LESS, TO SAID NORTHERLY LINE OF FOOTHILL BOULEVARD; THENCE ALONG SAID BOULEVARD NORTH 74° 59' 45" WEST 71.05 FEET, MORE OR LESS, TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHEASTERLY HAVING A RADIUS OF 1950 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE AND SAID BOULEVARD 243.91 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

EXCEPT THEREFROM THAT PORTION OF SAID LAND IS CONVEYED TO THE STATE OF CALIFORNIA BY DEED RECORDED APRIL 14, 1955 IN BOOK 47490 PAGE 319, OFFICIAL RECORDS.

APN: 5870-001-013, 5870-001-014

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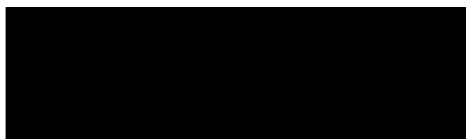
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EXHIBIT B

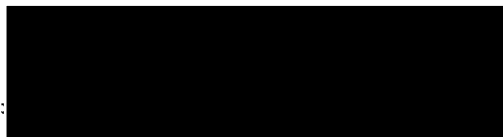
Permitted Exceptions

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Policy No.:



SCHEDULE B

EXCEPTIONS FROM COVERAGE

Except as provided in Schedule B - Part II, this policy does not insure against loss or damage, and the Company will not pay costs, attorneys' fees, or expenses that arise by reason of:

PART I

A. Property taxes, which are a lien not yet due and payable, including any assessments collected with taxes to be levied for the fiscal year 2016-2017.

B. An assessment by the improvement district shown below, none due and payable:

Assessment
(or Bond) No:
Series:
District:
For:
Bond issued:



Said assessment is collected with the county/city property taxes.

C. The lien of supplemental or escaped assessments of property taxes, if any, made pursuant to the provisions of Chapter 3.5 (commencing with Section 75) or Part 2, Chapter 3, Articles 3 and 4, respectively, of the Revenue and Taxation Code of the State of California as a result of the transfer of title to the vestee named in Schedule A or as a result of changes in ownership or new construction occurring prior to Date of Policy. None yet due and payable or ascertainable as of date of Policy.

1. Water rights, claims or title to water, whether or not disclosed by the public records.

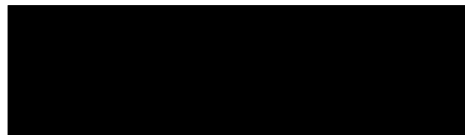
2. The privilege and right to extend and maintain drainage structures and excavations and embankment slopes beyond the limits of the Foothill Boulevard, as granted to the State of California by deed

Recorded: in Book 11942 Page 327, Official Records.

Reference is hereby made to said document for full particulars.

3. Easement(s) for the purpose(s) shown below and rights incidental thereto as set forth in a document:

Purpose:
Recording Date:
Recording No:
Affects:



cribed in said document

Affects: Parcel 2 and as shown on the survey prepared by JRN Civil Engineers dated July 14, 2016, last revised July 21, 2016, File No.: 15773.

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SCHEDULE B – Part I
(Continued)

4. Covenants, conditions and restrictions but omitting any covenants or restrictions, if any, including but not limited to those based upon race, color, religion, sex, sexual orientation, familial status, marital status, disability, handicap, national origin, citizenship, immigration status, primary language, ancestry, source of income, gender, gender identity, gender expression, medical condition or genetic information, as set forth in applicable state or federal laws, except to the extent that said covenant or restriction is permitted by applicable law, as set forth in the document

Recording Date:
Recording No:

Said covenants, conditions and restrictions provide that a violation thereof shall not defeat the lien of any mortgage or deed of trust made in good faith and for value.

5. Easement(s) for the purpose(s) shown below and rights incidental thereto as set forth in a document:

Purpose: public utilities
Recording Date: March 8, 1955
Recording No: in Book 47126 Page 289, Official Records
Affects:

6. Easement(s) for the purpose(s) shown below and rights incidental thereto as set forth in a document:

Granted to: State of California
Purpose: public highway and drainage structure
Recording Date: April 14, 1955
Recording No:
Affects:

Affects:

7. Easement(s) for the purpose(s) shown below and rights incidental thereto as set forth in a document:

Purpose: public utilities
Recording Date: July 9, 1964
Recording No: 6021 in Book D2642 Page 250, Official Records
Affects:

Affects:

8. Intentionally deleted.

9. Intentionally deleted.

10. Intentionally deleted.

Policy No.: [REDACTED]

SCHEDULE B – Part I
(Continued)

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11. Matters contained in that certain document

Entitled: Certificate of Conversion
Recording Date: January 16, 2007
Recording No: 2007-81230, Official Records

Reference is hereby made to said document for full particulars.

12. Any right, interest or claim that may exist, arise or be asserted against the Title under or pursuant to the Perishable Agricultural Commodities Act of 1930, as amended, 7 USC 499a et seq., the Packers and Stockyard Act of 1921, as amended, 7 USC 181 et seq., or any similar state laws.

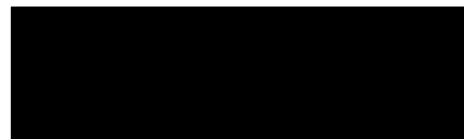
13. Any rights, interests, or claims which may exist or arise by reason of the following matters disclosed by survey,

Job No.: [REDACTED]
Dated: [REDACTED]
Prepared by: [REDACTED]
Matters shown: [REDACTED]

A. The building lies over 15' side setback line and 15' rear setback line.

14. Rights of tenants in possession as tenants only under the unrecorded leases listed on attached exhibit "A."

End of Schedule B – Part I



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EXHIBIT C

STATE LAW PROVISIONS

I. California State Law Provisions, Waivers and Agreements.

(a) For purposes of the Civil Code of California ("California Law"), BORROWER herein shall be the "Trustor" and LENDER herein shall be "Beneficiary". Beneficiary, Trustee and Trustor shall have all rights, benefits and remedies conferred or contemplated by California Law. Notwithstanding the foregoing, Beneficiary may, at its option in its sole discretion, elect to foreclose this Deed of Trust judicially as authorized by California Law.

(b) If LENDER invokes the power of sale, LENDER shall execute or cause Trustee to execute a written notice of the occurrence of an event of default and of LENDER'S election to cause the Property to be sold and shall cause such notice to be recorded in each county in which the Property or some part thereof is located. LENDER or Trustee shall mail copies of such notice in the manner prescribed by applicable law. After the lapse of such time as may be required by a applicable law, Trustee, without demand on BORROWER, shall sell the Property at public auction to the highest bidder at the time and place and under the terms designated in the notice of sale in one or more parcels and in such order as Trustee may determine. Trustee may postpone sale of all or any parcel of the Property by public announcement at the time and place of any previously scheduled sale. LENDER or LENDER'S designee may purchase the Property at any sale.

Trustee shall deliver to the purchaser Trustee's deed conveying the Property so sold without any covenant or warranty, expressed or implied. The recitals in the Trustee's deed shall be prima facie evidence of the truth of the statements made therein. Trustee shall apply the proceeds of the sale in the following order: (a) to all reasonable costs and expenses of the sale, including, but not limited to, reasonable Trustee's and attorneys' fees and costs of title evidence; (b) to all sums secured by this Deed of Trust; and (c) the excess, if any, to the person or persons legally entitled thereto.

(c) Upon payment of all sums secured by this Deed of Trust, LENDER shall request Trustee to reconvey the Property and shall surrender this Deed of Trust and all notes evidencing indebtedness secured by this Deed of Trust to Trustee. Trustee shall reconvey the Property without warranty and to the person or persons legally entitled thereto. Such person or persons shall pay all costs of recordation, if any.

(d) LENDER, at LENDER'S option, may, from time to time, appoint a successor trustee to any Trustee appointed hereunder by an instrument executed and acknowledged by LENDER and recorded in the office of the Recorder of the county where the Property is located. The instrument shall contain the name of the original LENDER, Trustee and BORROWER, the book and page where this Instrument is recorded and the name and address of the successor trustee. The successor trustee shall, without conveyance of the Property, succeed to all the title, powers and duties conferred upon the Trustee herein and by applicable law. The procedure for substitution of trustee shall govern to the exclusion of all other provisions for substitution.

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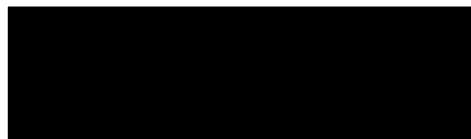
(e) BORROWER requests that copies of the notice of default and notice of sale be sent to BORROWER'S address, which is the Property Address. LENDER requests that copies of notices of foreclosure from the holder of any lien which has priority over this Deed of Trust be sent to LENDER'S address, as set forth on page one of this Deed of Trust, as provided by Section 2924(b) of the Civil Code of California.

(f) LENDER may collect a fee not to exceed \$50.00 for furnishing the statement of obligation as provided by Section 2943 of the Civil Code of California.

(g) Without limiting any of the remedies provided in the Loan Documents, Trustor acknowledges and agrees that the Environmental Indemnity Agreement between BORROWER and LENDER is an environmental provision (as defined in Section 736(f)(2) of the California Code of Civil Procedure) made by the BORROWER relating to the real property security (the "Environmental Provisions"), and that BORROWER'S failure to comply with the Environmental Provisions is a breach of contract such that LENDER shall have the remedies provided under Section 736 of the California Code of Civil Procedure ("Section 736") for the recovery of damages and for the enforcement of the Environmental Provisions. Pursuant to Section 736, LENDER'S action for recovery of damages or enforcement of the Environmental Provisions shall not constitute an action within the meaning of Section 726(a) of the California Code of Civil Procedure or constitute a money judgment for a deficiency or a deficiency judgment within the meaning of Sections 580a, 580b, 580d, or 726(b) of the California Code of Civil Procedure. Other than the remedy provided under Section 736, all remedies provided for by the Loan Documents are separate and distinct causes of action that are not abrogated, modified, limited or otherwise affected by the remedies provided under Section 736(a) of the California Code of Civil Procedure.

(h) In accordance with California Code of Civil Procedure Section 726.5, LENDER may waive its lien against the Property or any portion thereof, together with fixtures or personal property thereon, to the extent such property is found to be environmentally impaired, and may exercise any and all rights and remedies of an unsecured creditor against BORROWER and all of BORROWER'S assets and property for the recovery of any deficiency, including without limitation, seeking an attachment order under California Code of Civil Procedure Section 483.010. No such waiver shall be final or binding on Beneficiary unless and until a final money judgment is obtained against BORROWER. As between LENDER and BORROWER, for purposes of California Code of Civil Procedure Section 726.5, BORROWER shall have the burden of proving that the release or threatened release was not knowingly or negligently caused or contributed to, or knowingly or willfully permitted or acquiesced to by BORROWER or any related party (or any affiliate or agent of BORROWER or any related party) and that BORROWER made written disclosure thereof to LENDER or that LENDER otherwise obtained actual knowledge thereof prior to the making of the loan evidenced by the Note. For purposes of California Code of Civil Procedure Section 726.5, the acts, knowledge and notice of each "726.5 Party" shall be attributed to and be deemed to have been performed by the party or parties then obligated on and liable for payment of the Note. As used herein, "726.5 Party" shall mean BORROWER, any successor owner to BORROWER of all or any portion of the Property, any related party of BORROWER or any such successor and any affiliate or agent of BORROWER,

The Lincoln National Life Insurance Company
Lincoln Life & Annuity Company of New York
Deed of Trust
Ross Plaza
La Canada, CA



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any such successor or any such related party. Without limiting the foregoing provisions, BORROWER acknowledges that the Property is included in the property covered by the Environmental Indemnity referred to herein and is subject to all of the terms, conditions, and representations therein.

(i) In accordance with California Civil Code Section 2955.5, a lender must disclose to a borrower that no lender shall require a borrower, as a condition of obtaining or maintaining a loan secured by real property, to obtain hazard insurance coverage on the real property in an amount exceeding the replacement value of the improvements on the real property.

(j) BY EXECUTING THIS DEED OF TRUST, BORROWER HEREBY ACKNOWLEDGES THAT UNDER THIS DEED OF TRUST AND THE LOAN DOCUMENTS, LENDER IS REQUIRING BORROWER TO OBTAIN FIRE AND EXTENDED PROPERTY DAMAGE INSURANCE ONLY IN AN AMOUNT "EQUAL TO THE FULL REPLACEMENT VALUE OF THE IMPROVEMENTS."

(k) BORROWER hereby authorizes LENDER at any time and from time to time to file any initial financing statements, amendments thereto and continuation statements with or without signature of BORROWER as authorized by applicable law, as applicable to the Collateral. For purposes of such filings, BORROWER agrees to furnish any information requested by LENDER promptly upon request by LENDER. BORROWER also ratifies its authorization for LENDER to have filed any like initial financing statements, amendments thereto or continuation statements if filed prior to the date of this Deed of Trust. BORROWER hereby irrevocably constitutes and appoints LENDER and any officer or agent of LENDER, with full power of substitution, as its true and lawful attorneys-in- fact with full irrevocable power and authority in the place and stead of BORROWER or in BORROWER'S own name to execute in BORROWER'S name any such documents and to otherwise carry out the purposes of this Section, to the extent that BORROWER'S authorization above is not sufficient. To the extent permitted by law, BORROWER hereby ratifies and affirms all acts said attorneys-in fact shall lawfully do, have done in the past or cause to be done in the future by virtue hereof. This power of attorney is a power coupled with an interest and shall be irrevocable.

(l) BORROWER hereby specifically, unconditionally and irrevocably waives all rights of a property owner granted under California Code of Civil Procedure Section 1265.225(a), which provides for allocation of condemnation proceeds between a property owner and a lienholder, and any other law or successor statute of similar import.

The statutes referred to in this Exhibit C shall include any further statutes amending, supplementing or supplanting same.

The Lincoln National Life Insurance Company
Lincoln Life & Annuity Company of New York
Deed of Trust
Ross Plaza
La Canada, CA

From: Bob Ford [REDACTED]
Sent: Monday, August 1, 2022 10:22 AM
To: housingelement@lcf.ca.gov
Subject: Property owner of parcels 95 & 96

Categories: La Canada-Housing Emails

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hi

I own the two lots at the N/E corner of Foothill and El Camino. I'm interested in changing the zoning to mixed use or multi-family. What I'd like to know is if it's mixed use do you have the option to develop the property as multi-family?

My phone # is [REDACTED]

Thanks, Bob Ford

Sent from my iPhone

From: info@lcf.ca.gov
Sent: Monday, August 1, 2022 11:36 AM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Name

Susan Gauthier

Email

[REDACTED]

Message

I am absolutely against this project!

From: info@lcf.ca.gov
Sent: Monday, August 1, 2022 2:02 PM
To: housingelement@lcf.ca.gov
Subject: New submission from Housing Element Public Comment

Name

David Stassel

Email[\[REDACTED\]](#)**Message**

In support of the principle that political decisions are best when made as near to the voters as practical, please consider showing courage and fight the Sacramento tyranny manifested in social engineering through imposition of dense housing. The city can efficaciously make it's own zoning decisions; it needs no input from the state level.. Other cities have combined to seek to overturn Sacramento's tyranny in court. Please join in the resistance.

I oppose 25-30-unit per acre housing..

From: Keith Eich <keich@lcf.ca.gov>
Sent: Monday, August 1, 2022 3:56 PM
To: Housing Element Email
Subject: Fw: Michael Baker Report and Base Density
Attachments: 20220801154609482.pdf

Categories: La Canada-Housing Emails

From: GARRET WEYAND [REDACTED]
Sent: Monday, August 1, 2022 3:51 PM

[REDACTED]

Subject: Michael Baker Report and Base Density

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Attached please find my public comments relating to the Housing Element

Thank You

Garret Weyand

Dear Mayor Eich and honorable members of the City Council, Chairman Oh and members of the Planning Commission.

My name is Garret Weyand. I am a resident of La Canada. I am writing in regards to the draft Housing Element, Sites Inventory and the analysis by Michael Baker and Associates.

Michael Baker was hired as a sub consultant of CityPlace Planning. This was done so the City could provide a realistic residential density that would possibly convince a property owner to discontinue their current use and build a new housing project. This analysis could then be pointed too and used as a realistic density in the City's Housing Element and receive Approval from HCD.

The property chosen for the comparison appears to be 1021 Foothill which is in the 6th housing element as site 30 (Draft Site inventory 9-21 and 3-22-22).

This property was purchased on October 2021 for 3,495 million by a pediatric doctor. The property is composed of a 5648 lot and a 3512 ft.² building and a non-adjacent parking lot of 7989 ft.² The property has since been re-purposed into a pediatric clinic (and yet is still in the site inventory).

The staff report alludes that this property, if allowed to build at a density of 26 units per acre, would generate the same returns as redeveloping the site into a housing project.

There are several glaring problems with the financial analysis offered by Michael Baker, including the following:

- 1) The operating expenses are listed at 13% or \$78,000. If you take a look at what is proposed the property taxes alone would be approximately \$111,000. Normally operating expenses would be estimated at between 30 to 35% of Gross Income.
 - a. I have attached page 123 of the Office of the Comptroller of Currency's Commercial Real Estate Lending Handbook March

2022 that states "**Operating expenses would usually range from 35 to 45 percent of revenue.** Older properties, those with more amenities, and properties where the landlord provides heat, water, or electricity as part of the rent (usually because of lack of separate metering) represent the upper end of the range)".

- b. I have also attached a financial analysis produced by Economic & Planning Systems Inc (EPS) for the City of South Pasadena. In their analysis they use a base expense of \$12,000 per unit. As a percentage of gross income this is 32%. Michael Baker uses \$6000 per unit. I have already completed proformas on all the properties listed in the latest site inventory using Michael Bakers exact numbers only adjusting the operating expense to 30%. Not one property would be even close to being financially viable.
- 2) The Developer's profit is listed at 12%. This basically means that the builder bought the property on Jan 1, received approval from the City, had plans approved, built the project, and then rented the project out and stabilized the building and then completed a sale of the property by Dec 31 of that year. If you are realistic this process would probably take in La Canada 4 to 5 years. This would produce an IRR of around 2-3 % at best. . There are also no carrying costs in the proforma offered.
 - 3) The rents shown are very high. I have personally not seen any rents in the surrounding area that come close to comparing to what Michael Baker is using. South Pasadena's EPS report used 3,900 based on comparable rents in South Pasadena. Michael Baker provides no comparables to justify the rents used.
 - 4) Finally, the residual land cost shown is at \$ 95 per foot for a ½ acre site and \$60 for an acre Site. There have been no comparable in the last six years that would support this price. In fact, the average land cost of 18 commercial properties that have sold in the last six years is actually \$243 per foot.

In conclusion, I would hope that the city staff would instruct Michael Baker and CityPlace Planning to revise their numbers and come back to the city with a

realistic zoning density. I would also request that the full Michael Baker report be released to the public since it is now being used in solicitation letters to property owners in the city. After the city was told by HCD that a zoning of 20-30 would not work, why would the city come back at a zoning of 26 units. The city has shown by real world experience that since the 5th element was approved not one project at a density of 20 to 30 units has been approved years. In fact, there has been no new housing in the City of La Canada for over 20 years. The city has paid CityPlace Planning and Michael Baker a considerable amount of money and we are no further along than we were 2 years ago.

It is time for the city to have a realistic density in our town that would at least give an Owner a choice whether to keep the existing use or build a mixed-use project. At the end of the day a realistic zoning might get a couple owners to build badly needed housing but in reality, Foothill Blvd will remain the same as it has been for the last 20 years.

Sincerely,

Garret Weyand

- **Economic factors:** affordability of entry-level single-family housing versus renting, strength of local economy, local employment conditions including current levels and trends, trends in the value of single-family housing, current levels and trends for local rents, and vacancy.
- **Location factors:** local quality of life; proximity to shopping, recreation, and employment; school system; and availability of land for future residential development.
- **Local and state laws:** rent control and or stabilization programs, co-op/condominium conversion rules, low income housing programs.

Property-specific considerations include

- occupancy history.
- collection losses.
- rents as compared with competitive properties.
- management quality.
- ingress and egress.
- quality of construction, age, and condition of improvements.
- parking availability and convenience.
- amenities as compared with competitive properties.
- availability of individual unit metering for utilities.

Lack of proper maintenance can pose a significant risk to the viability of multifamily properties. Undercapitalized borrowers may neglect needed maintenance when cash flows are inadequate, and that can result in increased turnover and vacancies. Deferred maintenance can significantly affect loan losses and expenses in the event of foreclosure. An inspection of the property should determine how many of the vacant units are rentable in their current condition; cash-strapped borrowers sometimes “cannibalize” vacant units of appliances, heating units, and other items when replacements are needed. It is important that banks monitor property maintenance and improvements to verify they are timely and appropriate. Banks should assess whether cash flow is adequate to provide for necessary replacements and upgrades over time.

Historical operating expenses should be carefully analyzed. Operating expenses would usually range from 35 to 45 percent of revenue. Older properties, those with more amenities, and properties where the landlord provides heat, water, or electricity as part of the rent (usually because of lack of separate metering) represent the upper end of the range.

A multifamily property is typically underwritten with management fees of 5 percent of revenues. Replacement reserves for multifamily properties are underwritten on an annual per-unit basis and vary based on the age and condition of the property.

Hospitality

The hospitality industry is highly sensitive to trends in leisure and business spending. Hospitality properties have historically experienced considerable volatility in income and value. Hotel operations can be complex and may have a sizable non-real estate component.

Table 7 Feasibility Analysis of IHO Ordinance for Prototype Rental Developments

	For Rent Property	
	4-5 Stories	
	Woodframe Multifamily Building with Garage Parking	
Input Assumptions		
Development Program Assumptions		
Acreage	0.55	0.57
Density/Acre	55	70
Base Unit Count	30	40
Very-Low Income (VLI) Units	3	4
Low-Income (LI) Units	3	4
Total Required Affordable Units	6	8
Gross Unit Size [1]	1,176	1,176
Net Unit Size	1,000	1,000
Number of Bedrooms	2	2
Parking Spaces/Unit [2]	1.00	1.00
Cost Assumptions		
Land/Acre [3]	\$4,750,000	\$4,750,000
Land Value (rounded)	\$2,591,000	\$2,714,000
Land/Unit	\$86,367	\$67,850
Direct Costs		
Construction Costs/SF	\$350	\$350
Direct Construction Costs/Unit (rounded) [4]	\$411,800	\$411,800
Basement Garage Parking Construction Cost/Unit	\$35,000 /space	\$35,000
Subtotal, Direct Costs/Unit	\$446,800	\$446,800
Indirect Costs/Unit (rounded) [5]	18% of direct costs	\$80,400
Total Cost/Unit (rounded)	\$613,567	\$595,050
Project Value		
Revenue per Year per VLI Unit [6]	\$13,332	\$13,332
Revenue per Year per LI Unit [6]	\$22,992	\$22,992
Affordable Revenue per Year	\$108,972	\$145,296
MR Revenue per Year [7]	\$3,900 /mo per unit \$1,123,200	\$1,497,600
Operating Costs [8]	\$12,000 /year per unit (\$360,000)	(\$480,000)
Total NOI	\$872,172	\$1,162,896
Total Project Cost	\$18,407,000	\$23,802,000
Yield on Cost [11]	4.7%	4.9%

[1] Gross Unit Size includes common areas for 4-story Wood Frame Building (assumed efficiency ratio of 85%).

[2] Parking assumption is consistent with the City's density bonus requirements for projects including affordable housing units.

[3] Land value assumption based on data from CoStar and local developers for projects of similar density.

[4] Costs based on EPS estimate and latest Construction Cost Index data for the Los Angeles area from Rider Levett Bucknall.

[5] Includes estimated costs for architecture and engineering; entitlement and fees; project management; appraisal and market study; marketing, commissions, and general administration; financing and charges; insurance; developer fee and contingency.

[6] See affordable rents assumptions on Table 4.

[7] Based on CoStar data for similar 2BR apartments located in South Pasadena.

[8] Reflective of newly-constructed properties in communities proximate to South Pasadena, as reported by CoStar. Inclusive of management, maintenance, common utility, and property tax costs.

[9] Yield on cost is calculated as NOI divided by total development costs, and is a typical return metric used for rental real estate projects.

Sources: Los Angeles County; California HCD; CoStar; CBRE; Rider Levett Bucknall; and Economic & Planning Systems

Market-Rate Housing Revenue Assumptions

EPS used the following assumptions for determining the value of market-rate housing units:

- *Market Rate Sale Prices* - For the 1,650-square-foot townhome prototype, the estimated sale value is \$860 per square foot, or \$1,419,000 per unit. For the 1,200-square-foot condominium prototype, the estimated sale value is \$800 per square foot, or \$960,000 per unit. These values are based on EPS' review of data on home sales in South Pasadena.
- *Market-Rate Rents* - The rent for newly constructed, market-rate two-bedroom units is assumed to be \$3,900, based on EPS research and input from local developers about recent underwriting assumptions.
- *Operating Costs (for Rental Units)* - The analysis assumes that multifamily rental apartment operators incur annual operating costs of \$12,000 per unit. This amount is inclusive of the cost of management, maintenance, common utilities (those not paid by tenants), as well as property tax and insurance. The operating cost estimate is based on data collected by CoStar on operating expenses and taxes for newly-constructed residential projects built in communities proximate to South Pasadena.

Development Cost Assumptions

EPS used the following assumptions for determining the development costs associated with the prototype projects:

- *Land Costs* - EPS estimated a land acquisition cost of \$3.3M per acre for Prototype 1 (for-sale townhomes) and \$4.75M per acre for Prototypes 2, 3, and 4 (for-sale condominium and multifamily rental apartment product types). These costs are based on data from recent land transactions in South Pasadena. The difference in land cost assumptions reflects the relatively lower value of land on which local zoning rules allow fewer units per acre to be developed.
- *Direct Costs* - EPS estimated per square foot direct costs (including material and labor) of \$300 for Prototype 1 (for-sale townhomes) and \$350 for Prototypes 2, 3, and 4 (for-sale condominium and multifamily rental apartment product types). These costs were based on interviews with housing developers both within South Pasadena and the larger Los Angeles region, as well as data from Rider Levett Bucknall's (RLB) Construction Cost Indicator for the Los Angeles region.
- *Indirect Costs* - Indirect or "soft" costs include architecture, entitlement, fees, marketing, financing, and related costs. EPS assumed indirect costs would be equal to 18 percent of direct costs for all prototypes. This assumption was based on examples of project financial pro formas provided by area developers.

As stated earlier, these assumptions are representative of a typical or average project; the actual costs for a given project will vary by location and project design characteristics.

From: Renee Weihe <[REDACTED]>
Sent: Monday, August 8, 2022 9:10 AM
To: housingelement@lcf.ca.gov
Subject: FW: Today's Mail re: Facility 7428
Attachments: Scanned_from_a_Lexmark_Multifunction_Product07-25-2022-133544.pdf

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Good morning. We are in receipt of the attached notice. Please be advised that Albertson's is no longer in possession of this property. Please remove us from the mailing list for this property. Questions, let me know. Thank you!

Renee

Renee Weihe
Senior Paralegal
ALBERTSONS COMPANIES, INC.
[REDACTED]

Working remotely -- e-mail is the most efficient way to reach me.

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2021-2029 (6th Cycle) Housing Element; La Canada Flintridge

Alex Khatchaturian [REDACTED]

Thu 3/10/2022 9:27 AM

To: Henry Oh <[REDACTED]>

Cc: j [REDACTED]
[REDACTED]
[REDACTED]

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Members of the La Canada Flintridge Planning Commission:

My family owns two commercial properties that are included in the Sites Inventory revised as of March 2, 2022. Neither the City nor its consultants engaged with us prior to making the decision to include these properties as having potential to be turned over into lower-income housing units during the 2021-2029 housing cycle. I am writing to request that these properties be eliminated from the Sites Inventory and to share my overall assessment of the City's hastily drafted Housing Element.

The property identified as Site #100 and #101 with a combined 22 lower-income dwelling units is the former site of Pier 1 Imports located at 2200 Foothill Boulevard. This property is currently vacant, but we have listed the commercial space for lease and have interest for an automobile service (express car wash) use. City staff, including the Director of Community Development and City Manager, were well aware of our intentions before the addition of this property to the Sites Inventory, yet this site, at the last minute, was identified as having the potential to be turned over into residential units. At a density range of 20-30 du/ac, corresponding to 27 lower-income units, we have no financial incentive to redevelop the property. The best and highest use of our land would be to keep it nonresidential and lease it at fair market rent. Unless the City revises up the density factor and allows for the construction of substantially more units, there is no interest on our part to build affordable housing units at this site.

The property identified as Site #26 with 18 lower-income dwelling units is the parking structure serving the multi-tenant shopping center located at 707-711 Foothill Boulevard (NW corner of Oakwood & Foothill). We have long term lease agreements with our tenants, including a new 10 year lease executed with Handel's Homemade Ice Cream, which would preclude the construction of residential units at this site during the 2021-2029 housing cycle.


All three sites, #26, #100 and #101 totaling 40 lower-income dwelling units should be eliminated from the Sites Inventory. Neither property has the potential for being redeveloped into residential units (given the low density range) during the 2021-2029 housing cycle.

I urge the Planning Commission to direct City staff to seek nonresidential sites where ownership is amenable to redevelopment. Prior to designating a site as having potential for being redeveloped into residential units, the City should contact the property owner and gauge their interest. If they find that the property owner has no interest in redevelopment, or if it is obvious that the parcel does not have the potential to be utilized for the construction of residential units, then that property should not be included in the Sites Inventory.

After surveying the Sites Inventory I believe a significant (i.e. pivotal in terms of meeting the RHNA requirements) number of the identified parcels will not turn over to residential units during the 2021-2029 housing cycle. One glaring example is Site #104, the parking lot for Verdugo Hills Hospital. The City identified this site with the potential for creating 80 lower-income dwelling units. This is an absurd proposition. The City has no reason to believe that the hospital will convert its parking spaces into residential units during the next eight years, yet they included the site in order to meet the RHNA requirement. Instead of increasing the density factor at locations where there is definite interest to develop residential units, the City has intentionally identified an expansive list of properties that will not turn over because land values are high, rendering a redevelopment project that yields a low number of allowable housing units uneconomical. Moreover, the City is aware that many of the identified parcels do not have the potential to be redeveloped into residential units because of existing agreements (private party lease, reciprocal parking, contract with the City, etc.) that will preclude redevelopment and/or existing site conditions (not connected to sewer, steep current slope, etc.) that categorically rule out the construction of affordable housing units. The City hopes state authorities will accept its Housing Element without scrutiny and they will achieve compliance with state requirements without actually having any new affordable housing units get built.

The Housing Element Sites Inventory was not completed within the spirit of the state's public policy goal, which is to maximize the production and availability of housing affordable to families at all income levels. Rather the City seems to have deliberately included sites where they know with certainty that housing will not get built. The City should not be engaging in deception, but instead should make a sincere effort to promote the development of housing in accordance with state laws and public policy objectives.

Thank you,
Alex Khatchaturian



Fw: Comment on Draft MND for Housing & Safety Elements

Susan Koleda <skoleda@lcf.ca.gov>

Wed 3/9/2022 4:40 PM

To: Planning Commission Distribution List <planningcommission@lcf.ca.gov>

Please see the comments below by Mr. Haxton.

Since meetings are once again in-person, this comment will not be acknowledged during the meeting or within the minutes and will not be posted on the City's website. This comment is not viewed as a "public comment" but will be made part of the administrative record for the project.

Please let me know if you have any questions.

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: David Haxton <dhaxton@lcf.ca.gov>

Sent: Tuesday, March 8, 2022 2:24 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

Cc: Mark Alexander <malexander@lcf.ca.gov>

Subject: Re: Comment on Dra. MND for Housing & Safety Elements

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I thought the purpose of the public comment period was to collect public comments and then share them, along with your responses, with those making the MND decision. Here, I made a comment, and you aren't sharing it, and your response below is only to me. I'm not disagreeing with what you wrote below, I just think my comment and this response should have been part of the staff report.

On Tuesday, March 8, 2022, 01:15:46 PM PST, Susan Koleda <skoleda@lcf.ca.gov> wrote:

Mr. Haxton,

The Planning Commission will be making a recommendation on the Mitigated Negative Declaration as it relates to the Safety Element only. Given the changes that are still occurring to the Housing Element, additional environmental review will be required for the new sites before the Housing Element can be adopted.

Regarding SB 9, per state law, both the adoption of any ordinance implementing SB 9, as well as SB 9 urban lot splits and urban dwellings are exempt from the California Environmental Quality Act. Additionally, SB 9 lots will not be included within the 6th Cycle Housing Element as there is no history of approved SB 9 units within the City since the law allowing such units only came into effect January 1, 2022. If SB 9 units are constructed within the 2021-2029 6th cycle, they will be reported to the Department of Housing and Community Development by income

category during the Annual Report that is required by state law. Any history of approval of SB 9 units will serve the City during the preparation of the 7th cycle housing element.

Susan

--

Susan Koleda, AICP
Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: David Haxton <[REDACTED]>
Sent: Friday, March 4, 2022 8:39 PM
To: Susan Koleda <skoleda@lcf.ca.gov>
Cc: Mark Alexander <malexander@lcf.ca.gov>
Subject: Fw: Comment on Draft MND for Housing & Safety Elements

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I sent the below comment on the Safety Element's draft MND, yet my comment isn't addressed in next week's staff report to the planning commission in which you are asking the commission to approve the MND. The resolution you are recommending the commission adopt says in section 3.3 that the commission has reviewed comments received regarding the draft MND, but that is not true since my comment has not been shared with the commission.

----- Forwarded Message -----
From: David Haxton <[REDACTED]>
To: Susan Koleda <skoleda@lcf.ca.gov>
Sent: Tuesday, November 9, 2021, 04:41:54 PM PST
Subject: Comment on Draft MND for Housing & Safety Elements

The draft Mitigated Negative Declaration, along with the draft Housing and Safety elements, fail to address the effect of SB 9 on the city's housing and safety over the next eight years. SB 9 gives single-family properties the right to add an 800 square foot house, in addition to their existing right to add an 800 square foot accessory dwelling unit. You shouldn't be ignoring the environmental effects of SB 9.

Together La Canada Supports the March 10 Staff Report on the Housing Element

Together La Canada [REDACTED]

Tue 3/8/2022 2:29 PM

To: [REDACTED]

Cc: [REDACTED]

 1 attachments (63 KB)

TLC Housing Element Comment Letter 03082022.pdf;

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Please find attached our letter of support for the new staff report to be heard at the March 10, 2022 meeting of the Planning Commission.. Please also include this in the administrative record. We hope both the Planning Commission and City Council adopt it as is.

Sincerely,

Together La Canada Board of Directors



Together La Canada
"Partners for Responsible Development"
P.O. Box 1446
La Canada Flintridge, CA. 91012-5446

March 9, 2022

Honorable Council Members
Honorable Planning Commissioners
City of La Canada Flintridge
One Civic Center Drive
La Canada Flintridge, CA. 91011

Re: Public Comment on the Housing Element Agenda Item on March 10, 2022, Planning Commission Meeting

Dear Honorable Councilmembers and Planning Commissioners:

We thank you for the opportunity to provide comments to the Housing Element Planning Commission Staff Report for the March 10, 2022, Planning Commission Agenda.

Together La Canada (TLC) was created to bring La Canada Flintridge residents and business owners together who support responsible real estate development in the city. TLC is happy to be a productive problem solver along with others in the community.

We understand from Susan Koleda that the original draft contains an error and that the Arco Station and Thursday Club parcels are recommended to be zoned 12-15 units per acre. With this correction, we are glad to support the March 10 Staff Report because it recognizes the unique character of the city and the fact that we have one main commercial artery. It recognizes many opportunities to increase density in appropriate places to meet our State Regional Housing Need Assessment goals, while at the same time is more sensitive to future higher density development adjacent to residential areas.

We appreciate the hard work and thoughtfulness of the City Councilmembers who pulled all the various interests in the City together to create a well-designed Housing Element and hope both the Planning Commission and City Council approve it.

Sincerely,

Together La Canada Board Members

3.10.22 PC Public Comment - Revised Housing Element Sites Inventory

Alexandra Hack <[REDACTED]>

Thu 3/10/2022 3:47 PM

To: [REDACTED]

Cc: [REDACTED]

📎 5 attachments (1,005 KB)

3.10.22 LCF Revised HE Sites Inventory_pc_comments.xlsx; DPW_response letter_VHH_03_09_2022.pdf; Sewer Map_VHH_03_09_2022.pdf; 2022-3-3 - Californians Letter to LCF.pdf; 2022-3-9 - LCF City Attorney response letter.pdf;

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Honorable Chair Oh, Vice Chair McConnell and Planning Commissioners of the City of La Canada Flintridge,

With regards to this evening's agenda, please see the comments enclosed concerning the revised Sites Inventory list as part of the Housing Element. Supplementary materials include sewer map and correspondence from the City of Glendale Dept of Public Works regarding infrastructure sewer capacity for the Verdugo Hills Hospital parking lot.

For your reference, I've also enclosed a recent letter from Californians for Homeownership to the City of La Canada Flintridge as well as the City's initial response.

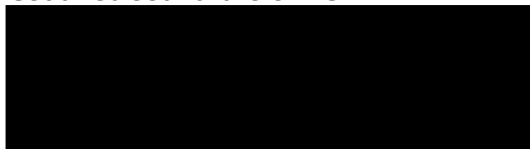
Attachments include:

- 1) Sites Inventory list comments (excel file)
- 2) Sewer Map (VHH)
- 3) City of Glendale Dept of Public Works letter
- 4) Californians for Homeownership letter to LCF
- 5) LCF City Attorney response

Best,
Alex

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Alexandra Hack
Cedar Street Partners LLC



Site #	APN	Address	General Plan	Zone/ District	General Plan	Zone/ District	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (Assumes rounding up)	NET Unit Potential (Assumes rounding up)	Income Category	5th Cycle	Existing Use	Land to Improvement Value: LV > IV	Year Built	Public Comments
95	5808-008-020	N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
96	5808-008-021	EAST OF NE CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-1	High Density Residential	R-3	0.26	T	20-30	24	7	7	Lower	No	Vacant	Yes	N/A	
92	5810-014-002	2242 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.12	R	20-30	24	3	3	Above Moderate	No	Commercial-Restaurant	Yes	1957	
93	5810-014-003	2238 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.09	R	20-30	24	3	3	Above Moderate	No	Parking lot	Yes	1978	
94	5810-014-004	2236 FOOTHILL BLVD	Commercial /Office	CPD	Mixed Use	MU	0.08	R	20-30	24	2	2	Above Moderate	No	Commercial-Restaurant	Yes	1958	
100	5810-014-018	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.25	BB	20-30	24	6	6	Lower	No	Parking lot for vacant commercial building (see APN 5810-014-0190)	Yes	1990	Former Pier 1. Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial uses and will not redevelop into housing within the next planning period
101	5810-014-019	2200 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.63	BB	20-30	24	16	16	Lower	No	Vacant commercial building (Formerly Pier 1)		1990	Owner has submitted public comment confirming his plans to maintain the property for ongoing commercial use going forward and does not have plans to redevelop into housing within the next planning period
102	5810-014-020	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.32	CC	20-30	24	8	8	Lower	No	Parking lot for commercial center (see APN 5810-014-021)	Yes (\$722,237-\$15,036)	1960	
103	5810-014-021	2196 FOOTHILL BLVD	Commercial /Office	CPD	Commercial /Office	MU	0.38	CC	20-30	24	10	10	Lower	No	Commercial center	No (\$951,547-\$1,113,450)	1960	
C99	5810-015-015	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.27	AA	20-30	24	7	7	Lower	Yes	JOANN Fabric & Crafts Store	Yes	1958	
B98	5810-015-016	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.56	AA	20-30	24	14	14	Lower	Yes	JOANN Fabric & Crafts Store	Yes	1958	
75	5810-023-001	1830 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1.67	N/A	20-30	24	41	41	Lower	No	The Church of Jesus Christ of Latter Day Saints	No	1951	City of La Canada just signed a joint use agreement for field use. Expires in 2026. Will not be eligible for the 6th Cycle due to lease
35	5812-023-001	1039 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	U	20-30	20	2		Moderate	Yes	Commercial-Store	Yes	1949	
37	5812-023-003	1037 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.08	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1956	
38	5812-023-004	1033 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	V	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1948	
39	5812-023-005	1029 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.112	V	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1949	
30	5812-023-006	1021 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	20-30	20	3	3	Moderate	Yes	Commercial-Store/office	Yes	1939	Purchased by corporate user in Dec 2021 for \$3.95MM.

31	5812-023-007	1017 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.13	E	15-25	20	2	2	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
34	5812-023-010	1001 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.19	E	15-25	20	3	3	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020. Should be removed
40	5812-023-018	1057 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.065	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
41	5812-023-019	1055 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
42	5812-023-020	1053 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
43	5812-023-022	1047 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.057	F	20-30	20	2	2	Moderate	Yes	Commercial-Store	Yes	1949	
45	5812-023-024	1043 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.115	U	20-30	20	3	3	Moderate	Yes	Commercial-Office	Yes	1959	
46	5812-023-032	1051 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
47	5812-023-033	1049 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	F	20-30	20	2	2	Moderate	Yes	Commercial-Office	Yes	1996	
32	5812-023-034	MID-BLOCK BETWEEN CHEVY CHASE DR & ANGELES CREST HWY, NORTH SIDE FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
33	5812-023-035	MID-BLOCK BETWEEN CHEVY CHASE DR & ANGELES CREST HWY, NORTH SIDE FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.058	E	15-25	20	1	1	Moderate	Yes	Union 76 gas station	Yes	None listed	Union 76 Gas Station and Mini Mart. Newly remodeled. Just signed long term lease in June 2020.
104	5813-005-074	1716 VERDUGO BLVD	Institutional	PS	Commercial /Office	MU	3.32	N/A	20-30	24	80	80	Lower	No	Parking lot for USC Verdugo Hospital	Yes	1972	Not connected to sewer/inadequate infrastructure to support lower income housing. See enclosed sewer map and email from City of Glendale Dept of Public Works. Cities of Glendale and LCF do not have any agreements for additional capacity in place, so Glendale DPW would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils. Additionally, a parking easement agreement between all owners for parking use has been recorded on title.
78	5813-006-022	1700 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (PS)	0.87	N/A	20-30	24	21	21	Lower	No	Lutheran Church of the Foothills	No	1950	
79	5813-015-055	1200 FOOTHILL BLVD	Institutional	PS	Institutional	RI-OZ (P/SP)	1	N/A	20-30	24	24	24	Lower	No	La Canada Congregational Church	No	1924	
48	5814-002-002	1040 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Restaurant	Yes	1951	
49	5814-002-003	1038 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Office	Yes	1946	
50	5814-002-018	1044 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Store	Yes	1949	
51	5814-008-024	954 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.563	H	12-15	12	7	7	Moderate	Yes	Commercial-Store	Yes	1946	

52	5814-005-026	1004 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.405	H	12-15	12	5	5	Moderate	Yes	Commercial-Store	Yes	1966	Hill St Café. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
54	5814-008-028	CHEVY CHASE DR SOUTH OF FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.434	H	12-15	12	6	6	Moderate	Yes	Parking lot	Yes	1961	Hill St Café Parking lot. Upgrade plans approved in 2016 and renovation work completed in 2018. No plans to turn over to housing within next 8 year period
55	5814-009-013	928 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.137	I	12-15	12	2	2	Moderate	Yes	Commercial-Store/office	Yes	1957	
56	5814-009-025	942 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.296	I	12-15	12	4	4	Moderate	Yes	Commercial-Fast food	Yes	1977	Verizon just signed lease in 2021.
110	5814-0180-029	4467 COMMONWEALTH AVE	DVSP	DVSP-Institutional	DVSP	RI-OZ-DVSP (DVSP-I)	0.69	EE	12-15	12	5*	5*	Moderate	No	Parking lot for St. George Episcopal Church	Yes	1956	
111	5814-018-017	N/A (DIRECTLY WEST OF 820 FOOTHILL BLVD)	DVSP	DVSP-Institutional	DVSP	DV-MU-S	0.13	EE	12-15	12	2	2	Moderate	No	Parking lot for commercial property to the west	Yes	N/A	
112	5814-018-018	820 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.13	EE	12-15	12	2	2	Moderate	No	Stepping Stones Academy	Yes	1956	
113	5814-018-019	814 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.09	EE	12-15	12	1	1	Moderate	No	Jiu-Jitsu	No	1953	
77	5814-018-030	800 FOOTHILL BLVD	DVSP	DVSP-Institutional	DVSP	RI-OZ-DVSP (DVSP-I)	0.38	EE	12-15	12	5	5	Moderate	No	St. George Episcopal	No	1962	
27	5814-020-001	720 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.248	D	12-15	12	3	3	Moderate	Yes	Commercial-Restaurant	Yes	1948	
28	5814-020-014	712 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.292	D	12-15	12	4	4	Above Moderate	Yes	Commercial-Store	Yes	1960	
29	5814-020-028	700 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-S	0.42	D	12-15	12	5	5	Moderate	Yes	Commercial-Restaurant	Yes	1999	Owner-user operates Panda Express and has no plans to discontinue use over next planning period
76	5814-027-019	4435 WOODLEIGH LN	DVSP	DVSP-Institutional	DVSP-Institutional	RI-OZ-DVSP (DVSP-I)	0.98	BB	12-15	12	12	12	Moderate	No	La Cañada Presbyterian Church—Parking lot	Yes	N/A	
97	5814-028-009	600 FOOTHILL BLVD	DVSP-Instit.	Institutional	DVSP	DV-MU-S	1.28	N/A	12-15	12	16	16	Above moderate	No	Former Christian Science Church (owned by a private party)	Yes	1949	
1	5815-013-012	845 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.131	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Professional	Yes	1953	
2	5815-013-014	823 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	
3	5815-013-016	831 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.112	N/A	20-30	20	3	3	Above Moderate	Yes	Commercial-Store	Yes	1949	
5	5815-013-019	822 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.138	A	20-30	20	3	3	Above Moderate	Yes	SFR	Yes	1947	Homes well maintained. Not conducive to developed
6	5815-013-020	816 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	4	Above Moderate	Yes	SFR	Yes	1951	Homes well maintained. Not conducive to developed
7	5815-013-024	4527 COMMONWEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
8	5815-013-025	804 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.193	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1925	Homes well maintained. Not conducive to developed
12	5815-013-027	811 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.172	B	12-15	12	2	1	Moderate	Yes	SFR	Yes	1957	Two different densities for MU1 North? (i.e. site #11 is same zone MU1/DV-MU-N @ 20-30 du/acre)
13	5815-013-028	817 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.287	B	12-15	12	3	2	Moderate	Yes	SFR	Yes	1940	SFR sold for 1,665,000 in 2021.
14	5815-013-032	818 HOUSEMAN ST	DVSP	MU1	DVSP	DV-MU-N	0.181	B	12-15	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed

15	5815-013-033	814 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.181	B	up to 15	12	2	1	Moderate	Yes	SFR	Yes	1958	Homes well maintained. Not conducive to developed
16	5815-013-034	806 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1950	Homes well maintained. Not conducive to developed
17	5815-013-035	804 HOUSEMAN ST	DVSP	Residential	DVSP	Residential	0.25	B	up to 15	12	3	2	Moderate	Yes	SFR	Yes	1953	Homes well maintained. Not conducive to developed
9	5815-013-057	4519 COMMONWEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.152	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
10	5815-013-058	4521 COMMONWEALTH AVE	DVSP	MU1	DVSP	DV-MU-N	0.161	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1963	Homes well maintained. Not conducive to developed
11	5815-013-061	814 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.17	A	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1950	Two different densities for MU1 North? (i.e. site #12 is same zone MU1/DV-MU-N @ 12-15 du/acre)
18	5815-014-004	726 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.184	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	Homes well maintained. Not conducive to developed
19	5815-014-005	729 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.71	C	20-30	20	15	15	Lower	Yes	Commercial-Restaurant	Yes	1961	
21	5815-014-009	743 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.105	C	20-30	20	2	2	Above Moderate	Yes	Commercial-Auto service	Yes	1959	
22	5815-014-010	739 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Office	Yes	1950	
23	5815-014-011	737 FOOTHILL BLVD	DVSP	MU1	DVSP	DV-MU-N	0.053	C	20-30	20	1	1	Above Moderate	Yes	Commercial-Store	Yes	1950	
24	5815-014-027	722 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.274	C	20-30	20	6	5	Above Moderate	Yes	SFR	Yes	1958	
25	5815-014-028	720 LA PORTE DR	DVSP	MU1	DVSP	DV-MU-N	0.174	C	20-30	20	4	3	Above Moderate	Yes	SFR	Yes	1955	
26	5815-014-043	NW OF NW CORNER OF FOOTHILL BLV & OAKWOOD AVE	DVSP	MU1	DVSP	DV-MU-N	0.873	C	20-30	20	18	18	Lower	Yes	Parking lot (for 707 Foothill Blvd.)	Yes	N/A	
60	5815-021-010	4532 RINETTI LN	DVSP	MU2	DVSP	DV-MU-N	0.187	K	20-30	20	4	4	Moderate	Yes	Commercial-Office	Yes	1949	
61	5815-021-011	4526 RINETTI LN	DVSP	MU2	DVSP	DV-MU-N	0.186	K	20-30	20	4	4	Moderate	Yes	Commercial-Medical/dental	Yes	1950	
72	5815-021-033	555 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-N	0.94		20-30	20	19	19	Lower	Yes	Commercial-Bank	Yes	1973	Representative from Wells Fargo branch in La Canada expects ongoing operations in the next 8 years. In fact, they are considering expanding the branch. It should be noted that the Wells Fargo branch on Foothill in La Crescenta has been closed permanently and is up for sale
59	5815-021-038	4603 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.97	K	20-30	20	20	20	Lower	Yes	Institutional-Private school	Yes	1948	
67	5815-022-002	4522 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.267	M	20-30	20	6	6	Moderate	Yes	Commercial-Medical/dental	Yes	1948	Medical Office.
68	5815-022-003	4526 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.27	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
69	5815-022-004	4532 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.256	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	School
70	5815-022-019	4536 INDIANOLA WAY	DVSP	MU2	DVSP	DV-MU-N	0.28	M	20-30	20	6	5	Moderate	Yes	SFR	Yes	1948	Post Office Government owned. Not eligible for development
64	5820-001-002	514 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.441	L	12-15	12	6	6	Moderate	Yes	Commercial-Store	Yes	1991	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over
65	5820-001-003	502 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.657	L	12-15	12	8	8	Moderate	Yes	Commercial-Store	Yes	1961	Owner Purchased in 2006 \$3.5M. Tenants Subway, T-Mobile, Round Table. Owner just re-skinned building. Will not turn over

57	5820-001-008	548 FOOTHILL BLVD	DVSP	MU2			0.464	J	15-25	20	9	9	Moderate	Yes	Arco Gas Station	Yes	1971	Arco Gas Station. Signed renewed franchise agreement in Q1 2022. Owner/Operator is currently looking to expand hydrogen fueling stations (two installed in 2019).
58	5820-001-014	4440 WOODLEIGH LN	DVSP	MU2	---	---	1.32	J	15-25	20	26	26	Moderate	Yes	Commercial-Club (Thursday Club)	Yes	1926	Thursday Club. This non-profit service organization has been in existence at this site since 1912 They will not sell the property.
108	5820-009-014	440 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.23	N/A	12-15	12	3	3	Moderate	No	Commercial	Yes	1986	Previously Club Champion studio purchased Nov 2020 for \$2.85MM by owner-user. Repurposed to physical therapist clinic.
107	5820-009-016	456 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.23	DD	12-15	12	3	3	Moderate	No	Commercial	Yes	1955	
105	5820-009-017	458 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.47	DD	12-15	12	6	6	Moderate	No	Commercial	Yes	1959	
109	5820-009-019	420 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU-S	0.45	N/A	12-15	12	6	6	Moderate	No	Commercial (tire store)	Yes	1976	Owner-user. Just Tires does not plan to vacate or change use during next 8 year period
106	5820-009-021	N/A (directly south of 458 FOOTHILL BLVD)	DVSP	R-1	DVSP	DV-MU-S	0.19	DD	12-15	12	3	3	Moderate	No	Parking lot for 5820-009-017 (behind building)	Yes	N/A	
74	5823-001-016	104 BERKSHIRE PL	Institutional	PS	Institutional	RI-OZ (PSP)	0.55	N/A	20-30	24	14	14	Lower	No	United Methodist Church	No	1977	
80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	20-30	24	10	9	Lower	Yes	Parking lot	Yes	N/A	Owned by same entity as Ross property. No intention of converting to housing in next 8 year period.
81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	20-30	24	65	65	Lower	Yes	Commercial-Shopping center (Ross Dress-for- Less)	Yes	1955	Currently a Ross Dress for Less. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	20-30	24	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship Center)	Yes	1955	Currently a FedEx with ongoing operations. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	20-30	24	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)	No	1955	Long Term Tenant. No turn over in Over 10 years. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	20-30	24	4	4	Lower	Yes	Commercial-Shopping center (Avanti Jewelry)	Yes	1955	Purchased in 2019. Long term tenant. Very thin lot . Would need an adjacent owner to develop. Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	20-30	24	13	13	Lower	Yes	Commercial-Shopping center (Restaurant)	No	1955	Reciprocal Easement Agreement recorded on parking lot for separate owners of shopping center parcels.
87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)	No	1966	
88	5870-010-044	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	20-30	24	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)	Yes	1966	

89	5870-010-045	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	20-30	24	18	18	Lower	Yes	Commercial-Shopping center	Yes	1966	
86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	20-30	24	8	8	Lower	Yes	Commercial-Shopping center	No	1966	
90	5870-011-056	2383 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.18	Q	20-30	24	29	29	Lower	Yes	Commercial-Shopping center	Yes	1977	
91	5870-011-057	2355 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.48	Q	20-30	24	36	36	Lower	Yes	Commercial-Auto service (Car wash)	Yes	1967	



Alexandra Hack <ahack@cedarstreetpartners.com>

Fwd: 1812 Verdugo Blvd: 03/09/2022

GARRET WEYAND

Wed, Mar 9, 2022 at 4:34 PM

Reply-To: [REDACTED]

To: [REDACTED]

-----Original Message-----

From: A'Hearn, William <[REDACTED]>

To: Johnson, Pamela <[REDACTED]>

Cc: Patino, Adrian <[REDACTED]>

Sent: Wed, Mar 9, 2022 4:28 pm

Subject: RE: 1812 Verdugo Blvd: 03/09/2022

Sir,

Because the Cities of Glendale and LCF do not have any agreements in place, we would not allow any property in LCF to connect to the City's sanitary sewer system. Any agreement would require approval by both City's Councils.

Take care and be safe,

Bill A'Hearn, LSIT, GIS Analyst • City of Glendale • Department of Public Works

633 E. Broadway Room 205 • Glendale, CA 91206 • (818) 247-8818



"The good cartographer is both a scientist and an artist. He must have a thorough knowledge of his subject and model, the Earth.... He must have the ability to generalize intelligently and to make a right selection of the features to show. These are represented by means of lines or colors; and the effective use of lines or colors requires more than knowledge of the subject - it requires artistic judgment."

Erwin Josephus Raisz (1893-1968)

[Quoted text hidden]



Alexandra Hack <ahack@cedarstreetpartners.com>

Fwd: 1812 Verdugo Blvd: 03/09/2022

GARRET WEYAND [REDACTED]

Wed, Mar 9, 2022 at 4:34 PM

Reply-To: GARRET W [REDACTED]

To: "[REDACTED]"

[REDACTED]

Original Message

From: A'Hearn, William [REDACTED]

To: Johnson, Pamela [REDACTED]

Cc: Patino, Adrian <[REDACTED]>

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Bill A'Hearn, LSIT, GIS Analyst • City of Glendale • Department of Public Works

633 E. Broadway Room 205 • Glendale, CA 91206 • (818) 937-8243 • wahearn@glendaleca.gov



"The good cartographer is both a scientist and an artist. He must have a thorough knowledge of his subject and model, the Earth.... He must have the ability to generalize intelligently and to make a right selection of the features to show. These are represented by means of lines or colors; and the effective use of lines or colors requires more than knowledge of the subject - it requires artistic judgment."

Erwin Josephus Raisz (1893-1968)

[Quoted text hidden]



March 3, 2022

Susan Koleda
City of La Cañada Flintridge
Email: skoleda@lcf.ca.gov

RE: La Cañada Flintridge's failure to timely adopt a Sixth Cycle Housing Element.

Dear Ms. Koleda:

Californians for Homeownership is a 501(c)(3) non-profit organization that uses impact litigation to address California's housing crisis. We are monitoring local compliance with the law governing housing elements. Our understanding is that the City has not adopted a sixth cycle housing element, which it was required to do by October 15, 2021.¹ It also missed the second compliance deadline of February 12, 2022, subjecting it to additional penalties.² We are currently preparing for litigation against cities that have not timely adopted housing elements, like yours.

In light of the City's failure to timely adopt its housing element, our organization could immediately sue the City under Code of Civil Procedure Section 1085 to compel it to adopt a compliant housing element.³ As a result of this litigation, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend all non-residential permitting,⁵ or could judicially approve housing development projects within the City.⁶ And the court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ Housing element litigation is given priority in the court system,⁸ and a successful plaintiff can obtain attorneys' fees under Code of Civil Procedure Section 1021.5. Indeed, in a recent case involving the City of Huntington Beach's housing element, a court awarded another non-profit organization over \$3.5 million in fees.⁹

The purpose of this letter is to offer the City a pathway to avoid immediate litigation by our organization. Enclosed is an Acknowledgment that sets forth some of the penalties to which the City is currently subject in light of the City's failure to adopt a housing element. If the City signs and returns the Acknowledgment, we will not initiate litigation against the City at this time.

¹ Gov. Code § 65588(e)(3).

² Gov. Code §§ 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C).

³ Gov. Code §§ 65587, 65751.

⁴ Gov. Code § 65754.

⁵ Gov. Code § 65755(a)(1).

⁶ Gov. Code § 65755(a)(4).

⁷ Gov. Code § 65757.

⁸ Gov. Code § 65752.

⁹ <https://www.communitylegalsocal.org/kennedy-commission-awarded-3-5-million-in-attorneys-fees-for-advocacy-in-huntington-beach-low-income-housing-case/>



March 3, 2022
Page 2

We ask that you return the Acknowledgement by March 11, 2022. If you decline to do so, understand that we may initiate litigation against the City, using the City's refusal to acknowledge these basic requirements of state housing law to demonstrate the existence of a dispute necessitating judicial intervention. As part of the litigation, we would likely seek a judicial declaration that the City is subject to the same penalties described in the Acknowledgment, among other remedies. We have dedicated in-house resources sufficient to maintain at least 10 simultaneous housing element lawsuits as part of our commitment to enforcing this important aspect of state housing law.

We look forward to receiving the signed Acknowledgment. If you would like to discuss any of this with me, please do not hesitate to give me a call at ([REDACTED])

Sincerely,



Matthew Gelfand

cc: Adrian R. Guerra, Esq., City Attorney (by email to aguerra@awattorneys.com)

ACKNOWLEDGMENT

The City of La Cañada Flintridge hereby acknowledges that it has not timely adopted a sixth cycle revised housing element of its general plan within the deadline set forth in Government Code Section 65588, and that its housing element is therefore not in substantial compliance with Article 10.6 of the Government Code. As a result, the City is subject to the following:

1. Pursuant to Government Code Sections 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C), the City will be required to complete any rezoning required under housing element law in connection with the City's sixth cycle housing element by October 15, 2022.
2. The City is currently prohibited from rejecting housing development projects based on subdivisions (d)(1) and (d)(5) of the Housing Accountability Act (HAA), Government Code Section 65589.5. The City acknowledges that this means that, unless another exception within subdivision (d) applies, the City is prohibited from using its general plan and zoning standards to reject a proposal that meets the affordability requirements described in subdivision (h)(3) of the HAA.

The public, including without limitation any applicant to develop any project involving residential units, may rely on this Acknowledgment as the City's binding commitment to comply with the provisions of state law described above.

DATED: _____, 2022

CITY OF LA CAÑADA FLINTRIDGE

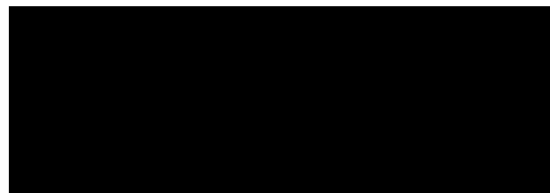
By: _____
[Signature]

[Name]

Its: _____
[Title]



ALESHIRE &
WYNDER^{LLP}
ATTORNEYS AT LAW



March 9, 2022

Californians for Homeownership



Attention: Matthew Gelfand, Esq.

Re: La Cañada Flintridge's Housing Element

Dear Mr. Gelfand:

My firm serves as the City Attorneys' Office for the City of La Cañada Flintridge (the "City"). We are in receipt of your letter dated March 3, 2022 concerning the City's housing element.

By way of background, a draft housing element was released by the City for public review and comment on September 22, 2021. In October 2021, the City submitted its draft housing element to the Department of Housing and Community Development ("HCD") for review and comment. The City received comments on its draft housing element from HCD on December 3, 2021. Since that time, the City has diligently been working towards full compliance with HCD's comments including through public meetings that continue to be held before both the Planning Commission and the City Council to fully address HCD's comments on this important matter for the City.

We anticipate being able to provide a more detailed response to your above-referenced letter in two weeks that includes the outcome of the above public meetings. Without waiving the City's rights, we will provide a detailed response to your letter by March 25, 2022 that includes the outcome of the above public meetings. Meanwhile, the City is continuing its ongoing work towards complying with the comments HCD provided to the City's housing element.

Should you have any questions, please let me know.

Sincerely,

ALESHIRE & WYNDER, LLP

Anthony R. Taylor

cc: Adrian Guerra, City Attorney

From: Nancy Antonoplis [REDACTED]
Sent: Thursday, July 28, 2022 3:08 PM
To: Housing Element Email <housingelement@lcf.ca.gov>
Subject: Re: Public Comment on 6th Cycle Housing Element 2nd dra. of Sites Inventory:

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear City Council,

La Canada is a gem of a town and the people have worked hard over the years to maintain its character and small town feel.

Please keep the existing zoning of 12-15 units/acre for properties on the south side of Foothill Blvd in the Downtown Village Specific plan (DVSP).

The narrow north/south residential streets south of Foothill Blvd. can't handle the traffic, congestion, and parked vehicles that will result from higher density projects. (See attached pictures). The walkability of our narrow north/south streets (without sidewalks) will be severely compromised. Higher density projects in the DVSP should be located on the north side of Foothill in the island area away from R-1 residential properties.

Sincerely,

Nancy Antonoplis



4/8/22



4/23/22



4/23/22



5/5/22



5/8/22



6/30/22



7/26/22

Emily Stadnicki

From: Keith Eich
Sent: Sunday, July 24, 2022 8:09 AM
To: Housing Element Email
Subject: Fwd: In opposition to SECOND DRAFT Proposed to LCF Residents by City Council

From: Anita Hossepian <[REDACTED]>
Sent: Sunday, July 24, 2022 8:07:54 AM
To: Keith Eich <[REDACTED]>
Subject: In opposition to SECOND DRAFT Proposed to LCF Residents by City Council

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear City Council members,

I have once again attempted to summarize my reasons for my opposition below:

The reason the State's Housing plan will NOT work in our city of LCF is :

- 1) LCF is rated as a Very High Fire Hazard Severity Zone by the State of California. High density buildings would increase the danger and reduce access for emergency vehicles during fires.
- 2) Many areas in LCF have only ONE STREET for entering or exiting. In addition, some of these streets are single car wide access and in windy hillside conditions.
- 3) About half the homes in LCF are on septic tanks therefore, the States' estimate of increasing LCF housing by 612 units needs to be adjusted down since increased density for additional units can not be accommodated in these septic areas.
- 4) LCF has ONE MAIN STREET: Foothill Blvd. Increasing density on this street will cause infrastructure issues (electricity, water, etc.) as well as emergency response problems (fire, ambulance)
- 5) We have already had many prior issues with So Cal Edison in LCF in the past few years (relating to the Utilities ability to provide reliable service). The UTILITIES will have difficulty supplying high density buildings in LCF.
- 6) LCF can do all that our infrastructure will allow. We can NOT do something that we know will cause bigger problems for our city in the future which we would not be able to redo or correct.

If we must comply with the State's plans regardless of the above issues, we should discuss:

- A) **East LCF:** Only appropriate area is the "Island" surrounded by the freeway and North of Foothill Bl. that would not impact residential homes.
- B) **West LCF:** More options both North and South of Foothill Blvd.
- C) **Property owners** plans for the future: LCF does not need to get the approval or future plans of commercial/property owners in order to rezone areas.
- F) Low-income renters need units near **job hubs and transit systems** for access to employment. This does not make LCF a good choice.
- E) Due to the **high cost of property/land in LCF**, it is very unlikely that a developer would build low-income housing in LCF no matter how the city rezones it.
- D) Planning staff needs to explain to commercial property owners that this rezoning does not force them to redevelop their property into high density multi-units housing. Also, the **value of their property** may go up with **rezoning** since future potential buyers of their property would have more options for developing the property.

G) The only solution to the State's mandate for LCF is **ADUs** since the land it is built on is in essence free for the homeowner. Pre-build ADUs can cost about \$300,000 allowing it to be profitable for the homeowner to rent it out as low-income housing and cover the cost of the mortgage.

H) The planning staff needs to have **educational sessions** informing residents that the State allows ADUs now which were not allowed in LCF in the past. This would increase the number of requests to build ADUs. Once this is done, our numbers for ADUs would increase significantly. We should not be basing our ADU estimates on an average of the past 3 years. We should look at the most recent months when ADUs in LCF and throughout the state have grown **exponentially** and base our estimates on these months. If we do that, we can satisfy the State's requirements for low-income and 612 units with only one out of each 10 homes in LCF.

I) A better option for the State would be to provide their funding for low-income developments to developers who convert **abandoned malls, underutilized office buildings and commercial sites** which are closer to available **transit**.

J) LCF staff needs to negotiate with the State about the **unique needs** of our city. **Having only ADUs would prevent any rezoning**. Are they taking the easy way out and not trying to get what this city deserves?

K) If the staff cannot do this, then maybe we should look at joining the other 48 Californian cities that are suing the State for this **unconstitutional mandate**.

L) I am not sure that staying under the radar by rezoning as the State desires (in order to divert the State's attention to other cities who refuse to follow the mandate) will be the right answer since if it allows even one developer to build a massive multi-unit complex, it may negatively impact this city forever.

M) Relying on DESIGN STANDARDS (Design Review Committee) to prevent a developer from building what he has been zoned for will not work. A developer can claim that you are rescinding on your zoning agreements to stop them from developing at a higher density that they were promised.

We oppose the SECOND Draft and request that you remain resolute in demanding that the State accept what our City's infrastructure can tolerate and not ask us to do the impossible and create problems in the future.

Thank you,

--

Anita Hossepian

Ms. Emily Stadnicki, Principal Planner

Dated: July 28, 2022

Acting Director for Community Development

Honorable Members of the City Council

Members of the Planning Commission

City of La Canada Flintridge

One Civic Center Dr., La Canada Flintridge, CA-91011

Sub: Sites Inventory (second Draft)- Public Review; July 20-29, 2022

Ref: Site address: 2242, 2238 & 2236 Foothill Blvd. (site #92, 93 & 93 on the list of 2nd draft) Proposed

Project in Plan Check for a Commercial, Retail, Offices and a Restaurant, approved with
Planning entitlements for the above uses.

Respected Sir's/Madam

I am writing this letter/email in response to the request and a feedback from the community and Property Owners whose sites are enlisted in the Draft Inventory List as indicated above.

I am the owner of the 3-lots as mentioned above. It shows that these lots are proposed to be Re-designated/changed to "Mixed Use" Zone. It is also indicating that the Base Density Range of 25-30 units per acre for Residential Development.

I welcome this "Mixed Use" designation, but I am not in Agreement with the Base Density of 25-30 units per acre on my 3 lots.

I have, at number of occasions and at various meeting with the Planning Department and the Honorable members of the City Council/Commissions have expressed my desire to assist the City in achieving and providing few Residential Units. My project which is in the Final stages of Plan Check and permitting process can only provide 6-units, only at the second floor. I want to keep my Commercial uses on the 1st floor and can only accommodate 6 units. This will be the True Mixed Project in the city.

I discussed my project with the Planning Department, and have indicated to them that "Only 6 Residential Units are possible" under the current approved project. The project complies with all the Building Code requirements and will be ready to build in mid next year.

One of the constraints for providing 6 Residential Units is the "Height and Number of Stories Limitations" and both these limitations under the current and proposed zones limit the number of units that can be built for a Mixed Use Development. I may be able to provide additional units if my site is allowed an additional height of 8 feet and add one more story to the existing approved project. It is my request the City's Community Development Department and the Consultants should look into this viable option.

In absence of this approach as mentioned earlier, I will have to regretfully mention that my current project and my lots will not be able to provide much needed and required Multi Family Housing.

I can only provide 6 units at the second floor and another alternative way to accommodate this option is to Designate my site/properties to a base Density of 20-30 units per acre. In this way my project which is ready to get the permits can adapt to 6 units.

My project which will be ready to start construction in next 12 months will set an example, and it will also provide the city a much needed credit to promote the Housing Development.

I believe that some serious considerations need to be given to my proposed options. In absence of the choices mentioned earlier, I may not be able to provide a Mixed Use or a Multi Family Development.

I would like to express my sincere gratitude to the Honorable City Council and the Director of Community Development in listening to me and hopefully accommodating my project to move forward with Residential Units at 2nd Floor.



Arun K Jain

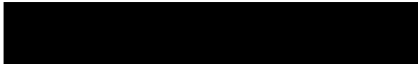
Owner

La Canada Enterprises LLC

From: info@lcf.ca.gov <info@lcf.ca.gov>
Sent: Sunday, July 24, 2022 1:16 PM
To: Housing Element Email <housingelement@lcf.ca.gov>
Subject: New submission from Housing Element Public Comment

Name

Gorik Hossepien

Email**Message**

Dear LaCanada City Council Members,

I was very surprised and disappointed in viewing the recommendations of the Housing Element Committee. After the City Council heard the community feedback against the 600 Foothill Bl project and voted unanimously (4 to zero) against approving the density, we are back to square one!! The Council made a very wise decision to exclude all commercial properties South of Foothill (for high density MU-3 zoning) since they would impact the residential properties behind the developments. There are already issues associated with congestion from Arco gas station, lack of parking, and street size on Woodleigh, Oakwood. Having this 600 Foothill property listed with a minimum of 32 and a maximum of 39 (and a density bonus of 20% for seniors or low income) will add up to 47 units !!!!! This is what the City Council rejected when it was brought up last time. What has changed now?

The intersections of Angeles Crest Highway and Chevy Chase with Foothill Blvd and the Community Center are also very congested areas and higher residential densities will only cause more traffic and parking issues. St Georges Church and LC Presbyterian Church are also on the South side of Foothill and would have the same issues as the 600 Foothill property. We oppose all of these.

We propose that you increase the density of commercial sites close to the freeways and away from residential housing (such as Hillside Schools and The Methodist Church) as well as the West Side of Foothill near Ocean View Blvd. The island area on the North side of Foothill (south of the freeway) could be increased in density since it would not impact residential housing. The area near USC VHH and the Theater complex can also support higher density developments. We request that these be considered carefully.

The city can also make a very good case for increasing the number of ADUs and second units (such as the one at 601 Durwood Drive, LCF, CA.). By relaxing the LCF City's design standards and showing the HCD that our 2022 ADU numbers have more than doubled in just half a year, we can make a case for not averaging the prior 2 years but using the numbers from this year to calculate the future demand for ADUs. Since Building Permits for ADUs issued in the last few years have gone up for LCF (5 in 2018, 2 in 2019, 13 in 2020, 10 in 2021 and an amazing 24 in half of the year in 2022) and due to the fact that the law just changed at the beginning of 2022, this is an increase that will most likely go up even more in future years. !!! Annualized for 2022, this would mean 48 units which is a 480% increase since the last year !!!! Why are we not focusing more on ADUs to fulfill the State's requirements ?

We are firmly and resolutely opposed to this. As elected representatives of the city, I believe you have heard a resounding opposition to the 600 Foothill project from the community and the former Mayors since we submitted over 350 signed oppositions regarding this in the first month the issue came up.

Gorik Hossepien



From: Kenneth Ho [REDACTED]
Sent: Saturday, July 23, 2022 9:41 AM
To: Housing Element Email <housingelement@lcf.ca.gov>
Cc: Vicki Ho [REDACTED]
Subject: 400 Foothill Blvd.

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Susan,

Thank you for the letter regarding mixed use zoning for La Canada Flintridge. As an owner of commercial property, I am interested in the zoning change (overlay) to allow us to develop residential and commercial use for our commercial property. However, I do not think this development will ever happen because of two things:

1. The corner of Foothill and Georgian is a very busy corner. There is heavy traffic on school days due to Flintridge Prep, LCHS, St. Francis, and St. Bede schools in close proximity.
2. Neighbors do not want higher density residential.

If this change means that the southwest corner of Woodleigh and Foothill will be developed as mixed use, then we are against this proposal. Traffic is already heavy because of the Arco station. Cars wait in line and block the street. There is no traffic signal at the intersection, and neighbors do not want higher density residential, or even additional residences as this would add more traffic congestion and more people to our small town.

Thank you again for the opportunity to share our opinion.

Kenneth and Victoria Ho

2021 Housing Element Update

Anthony Dedousis [REDACTED]

Thu 10/29/2020 12:49 PM

To: Michael Davitt <mdavitt@lcf.ca.gov>; Mark Alexander <malexander@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Mayor Davitt, Mr. Alexander, and Ms. Koleda,

My name is Anthony Dedousis, and I'm director of policy and research at [Abundant Housing LA](#). We're a pro-housing education and advocacy group focused on helping to solve Southern California's housing crisis.

I'm reaching out to [share a letter](#) offering guidance for La Cañada Flintridge's upcoming 2021 housing element update. It contains a detailed summary of key legal requirements and recommended best practices for housing element updates, and highlights four critical components of the site inventory analysis portion of the housing element. We strongly recommend that you and your team follow these standards as you begin the housing element update process.

Additionally, we'd like to [share a memo](#) with additional detail on recommended best practices and legal requirements for the site inventory analysis, as well as a [one-page "checklist" summary version](#). These reflect guidance from the state Department of Housing and Community Development (HCD), legal scholars, and planners.

We would be glad to engage with your office and with the Planning Department throughout the housing element update process. We look forward to a productive and collaborative working relationship with the City of La Cañada Flintridge on this critical effort.

Thank you,

Anthony

--

Anthony Dedousis

Director, Policy and Research

Abundant Housing LA
[REDACTED]



October 29, 2020

Mayor Michael Davitt
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Dear Mayor Davitt,

We are writing on behalf of **Abundant Housing LA** regarding La Cañada Flintridge's upcoming 6th Cycle housing element update. Abundant Housing LA is a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. We support efforts to reform zoning codes and expand housing production, which are needed to reduce rents, improve access to jobs and transit, strengthen the local economy and job market, and combat segregation. We have a large and growing membership base throughout Los Angeles County, including La Cañada Flintridge.

California has a statewide housing shortage of nearly 3.5 million homes, and [has the highest poverty rate in the nation](#) after accounting for housing costs. Households at all levels of income face a historically high rent burden. Exclusionary zoning and longstanding constraints on denser housing have led to an undersupply of medium and high density housing near jobs and transit. This contributes to high rents and displacement of households.

Over the past few years, new state laws (e.g. AB 686 (2018), SB 166 (2017), AB 1397 (2017), SB 828 (2018), SB 35 (2017), etc.) have strengthened the Regional Housing Needs Assessment (RHNA), which sets a housing growth target for individual jurisdictions and requires jurisdictions to update their housing elements in order to achieve these targets.

These changes to state law have led to historically high jurisdiction-level housing growth targets in the upcoming 6th Cycle Housing Element Planning Cycle, and have empowered the state Department of Housing and Community Development (HCD) to enforce appropriately high standards for housing element updates. We are encouraged that La Cañada Flintridge was given a target of **612 new homes, of which 386 must be affordable to lower-income households.**

As jurisdictions start the housing element update process, AHLA seeks to provide guidance on how jurisdictions should fulfill both the letter and the spirit of housing element law. Unfortunately, some jurisdictions are already seeking to skirt their obligation to sufficiently plan to meet their housing needs. AHLA will scrutinize jurisdictions' housing elements, submit comments to HCD as needed, and collaborate closely with nonprofits that bring legal action against jurisdictions that fail to comply with state housing laws.



Of course, AHLA recognizes that the COVID-19 pandemic and resulting economic devastation have made it more difficult for jurisdictions to meet ambitious RHNA targets. But the pandemic has made it even more critical than ever for jurisdictions to solve the region's housing crisis and encourage economic recovery. We seek to collaborate with you and your team on policy efforts to achieve the RHNA goals.

To that end, we have published a memo, [Requirements and Best Practices for Housing Element Updates: The Site Inventory](#), explaining the key legal requirements, as well as HCD and AHLA's recommended best practices, for housing element updates. Additionally, [this checklist provides a summary of our core policy recommendations](#). We respectfully encourage you to incorporate the concepts detailed in these documents into La Cañada Flintridge's housing element update.

As your team begins to develop La Cañada Flintridge's housing element update, we would like to draw particular attention to four critical components of the site inventory analysis:

1. Incorporating an estimate of the **likelihood of development** and the **net new units if developed** of inventory sites
2. Using an HCD-recommended "safe harbor" methodology for **forecasting future ADU production**
3. Prioritizing high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to **affirmatively further fair housing**
4. Including the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to **avoid violating the No Net Loss requirement**

Component #1: Housing elements should estimate and report both the **likelihood of development** and the **net new units if developed** of inventory sites.

Just because jurisdictions zone for more housing doesn't mean that the housing will actually be built. The economic cycle, uncertainty of market conditions, the current usage of nonvacant sites, and land use regulations all influence the extent to which rezoned parcels are built to their maximum theoretical capacity.

A parcel's maximum theoretical capacity is not the same as its realistic capacity. To draw a parallel to college admissions, when UCLA wants 2,000 students in its incoming class, they admit 4,000 students. Similarly, to achieve housing production targets, jurisdictions must increase zoned capacity well above the target number of new homes.

An accurate assessment of site capacity is necessary in order for the housing element to achieve sufficient housing production. The site capacity estimate should account for the following **two factors**:

- What is the likelihood that the site will be developed during the planning period?
- If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

These are the **likelihood of development**¹ and **net new units if developed**² factors, as required by HCD guidelines. The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

(likelihood of development) x (net new units if developed) = realistic capacity.

In past planning cycles, the likelihood of development factor was not expressly considered; housing elements frequently assumed that most or all site inventory locations would be redeveloped to their maximum theoretical capacity. Since this generally did not happen, jurisdictions consistently fell short of their RHNA targets as a result. This is the case for La Cañada Flintridge, which is not on a path to achieving its 5th cycle RHNA targets for very low, low, and moderate income housing. Through 2019, it has permitted 0 homes that are affordable at these income levels, out of a total RHNA target of 68 homes.

5th Cycle RHNA Targets vs. Actual Housing Production (2014-19)

Income Bucket	RHNA Target	Homes Permitted
VLI	30	0
LI	18	0
MI	20	0
AMI	44	61
Total	112	61

According to La Cañada Flintridge's 5th cycle housing element, the city had theoretical capacity for roughly 399 more housing units.³ Through 2019, La Cañada Flintridge permitted 61 housing units⁴, which equates to 81 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues in 2020 and 2021). This implies that in La Cañada Flintridge, excess zoned capacity has a **20% likelihood of being developed** (81 actual units divided by 399 theoretical units).

La Cañada Flintridge's 6th cycle housing element should incorporate this likelihood of development estimate into its site inventory analysis. This would be consistent with HCD

¹ [HCD Site Inventory Guidebook, pg. 20](#)

² [HCD Site Inventory Guidebook, pg. 21](#)

³ [La Cañada Flintridge 5th Cycle Housing Element](#)

⁴ [HCD Annual Progress Report dataset, 2020](#)

guidelines,⁵ while also ensuring that enough zoned capacity is available to encourage 612 housing units to be built by the end of the 6th cycle. Assuming that zoned capacity has a 20% likelihood of being developed in the next 8 years, **the housing element must allow for 3,060 units of zoned capacity in order to achieve 612 actual housing units.** If Planning believes that a higher likelihood of development (and thus a smaller zoned capacity increase) is justified for certain parcels in the site inventory, persuasive data to support this assumption must be provided.⁶

Component #2: Housing element updates should use an HCD-recommended “safe harbor” methodology for forecasting future ADU production.

Local jurisdictions frequently use overly optimistic estimates of future ADU production to avoid necessary housing reform and rezoning. ADU development estimates must reflect actual on-the-ground conditions to ensure that they are realistic. Overly aggressive ADU production estimates set jurisdictions up for failure in providing the required housing for residents.

To that end, HCD has established two safe harbors for forecasting ADU production during the 6th Cycle⁷. One option (“Option #1”) is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available (“Option #2”), assumes ADU production at five times the local rate of production prior to 2018. Jurisdictions are also permitted to include programs that aggressively promote and incentivize ADU construction.

Where no other data is available, jurisdictions may assume an average increase of five times the previous planning period construction trends prior to 2018. Jurisdictions may also use regional ADU production trends, and include programs that aggressively promote and incentivize ADU construction. Jurisdictions should clearly and explicitly state their methodology and data sources for future ADU development forecasts.

According to HCD, La Cañada Flintridge issued permits for 0 ADUs in 2017, 5 ADUs in 2018, and 1 ADU in 2019. Under HCD’s “Option #1”, La Cañada Flintridge could take the average of the 2018 and 2019 ADU production trends, and forecast that 3 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 24 ADUs.**

Under HCD’s “Option #2”, La Cañada Flintridge could multiply the 2017 ADU production trend by five, and forecast that 0 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 0 ADUs.** Abundant Housing LA does not recommend this methodology, since based on the ADU permit totals in 2018 and 2019, it is extremely unlikely that no ADUs would be permitted between 2021 and 2029.

⁵ [HCD Site Inventory Guidebook, pg. 20](#)

⁶ [HCD Site Inventory Guidebook, pg. 20-21](#)

⁷ [HCD Site Inventory Guidebook, pg. 31](#)

Another, more aggressive, option would take the average of the 2018 and 2019 ADU production trends, and multiply that average by five. This methodology would forecast that 15 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 120 ADUs**. Abundant Housing LA does not recommend this methodology, since it is not an HCD-defined safe harbor forecasting option.

La Cañada Flintridge should use HCD's Option 1 safe harbor when projecting annual ADU production. If it believes that higher ADU production forecasts are warranted, it must provide well-grounded estimates, based on the pace of ADU production in neighboring jurisdictions, and must explain programs or policy efforts that could lead to higher ADU production.

Finally, per HCD, the housing element “should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.”⁸ La Cañada Flintridge's housing element should commit to mid-cycle rezoning if ADU production is lower than forecasted, and its midpoint review should be linked with immediate and automatic programs to increase housing production in the second half of the RHNA cycle. AHLA's recommended approach is to incorporate by-right density bonuses on inventory sites, which would automatically take effect mid-cycle if the ADU target is not met. The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall.

Component #3: Housing elements must prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to affirmatively further fair housing.

AB 686 (2018) requires housing element updates to “affirmatively further fair housing”, which is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

In our region, housing policy and land use regulations were once used to exclude members of minority groups. [Redlining and restrictive covenants, which restricted where Black Americans could live, were once commonplace in La Cañada Flintridge and throughout Los Angeles County](#). Thankfully, La Cañada Flintridge is more welcoming today, but exclusion continues on the basis of income: the median home sale price in La Cañada Flintridge was \$1,735,000 in 2018⁹, and 54% of the city's renters are “rent-burdened” (i.e. they spend more than 30% of their income on rent)¹⁰. High housing costs place a disproportionate burden on lower-income communities of color, and have the effect of excluding them from the city altogether.

⁸ [HCD Site Inventory Guidebook, pg. 31](#)

⁹ [SCAG Pre-Certified Local Housing Data, La Cañada Flintridge](#)

¹⁰ American Community Survey, 2014-18

Jurisdictions must address this issue by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements. HCD's Site Inventory Guidebook offers recommendations for **how** jurisdictions should accomplish this. HCD is **likely to require jurisdictions to distribute lower-income housing opportunities throughout the jurisdiction**, and recommends that jurisdictions first identify development potential for lower-income housing in high-opportunity neighborhoods¹¹.

Given that single-family, exclusionary zoning predominates in many of La Cañada Flintridge's high- and highest-opportunity census tracts ([as defined in the TCAC/HCD Opportunity Map](#)), rezoning is required in order to accommodate the RHNA targets for lower-income households. Additionally, focusing rezoning in single-family zoned areas will expand housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.

In order to fairly distribute housing opportunities citywide, La Cañada Flintridge should develop a quantitative methodology for scoring neighborhoods, based on factors like housing costs, median income, access to transit, access to jobs, access to schools, and environmental quality. Neighborhoods that score higher on these dimensions should be allocated higher housing growth targets, and rezoning should be based on these neighborhood-level housing growth targets.

Finally, La Cañada Flintridge should identify funding sources, public resources, and density bonus programs to maximize the likelihood that housing projects with below market-rate units are actually built. Local measures like a [real estate transfer tax](#) and [congestion pricing](#) could help generate new funding to support affordable housing production and preservation.

Component #4: Housing elements should include the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to avoid violating the No Net Loss requirement.

SB 166 (2017) requires adequate sites to be maintained **at all times** throughout the planning period to accommodate the remaining RHNA target by each income category.¹² This means that if a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.¹³

¹¹ [HCD Site Inventory Guidebook, pg. 3](#)

¹² HCD [No Net Loss Law Memo](#), pg. 1

¹³ [HCD Site Inventory Guidebook, pg. 22](#)



If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action.

To ensure that adequate housing capacity at all income levels exists in the housing element through the 6th Cycle, HCD recommends that “the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income RHNA.”¹⁴ **La Cañada Flintridge should “overshoot” on total site capacity for each income level, in order to ensure that the City’s RHNA target is achieved at all income levels.**

The City of La Cañada Flintridge has an obligation to sufficiently plan to meet current and future residents’ housing needs. The housing element update affords La Cañada Flintridge, and the broader Southern California region, the chance to take bold action on lowering housing costs, reducing car dependency, strengthening the local economy, and guaranteeing access to opportunity for Californians of all racial and ethnic backgrounds. We urge you and your colleagues to fully embrace this opportunity to transform La Cañada Flintridge for the better.

Finally, it is worth noting that state law imposes penalties on jurisdictions that fail to adopt a compliant 6th cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units¹⁵. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

We would be glad to engage with your office and with the Planning Department throughout the housing element update process. We look forward to a productive and collaborative working relationship with the City of La Cañada Flintridge on this critical effort. Thank you for your consideration.

Sincerely,

Leonora Camner
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Abundant Housing LA

Anthony Dedousis
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Abundant Housing LA

¹⁴ [HCD Site Inventory Guidebook, pg. 22](#)

¹⁵ [California Government Code 65589.5\(d\)\(5\)](#)

Requirements and Best Practices for Housing Element Updates: The Site Inventory

Abundant Housing LA

August 18, 2020

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Background

California has a statewide housing shortage of nearly 3.5 million homes, and households at all levels of income face a historically high rent burden throughout the state. Exclusionary zoning and longstanding constraints on denser housing production have led to an undersupply of medium and high density housing near jobs and transit, contributing to high rents and displacement of households across Southern California.

Over the past few years, new state laws (e.g. AB 686 (2018), SB 166 (2017), AB 1397 (2017), SB 828 (2018), SB 35 (2017), etc.) have strengthened the Regional Housing Needs Assessment (RHNA), a state-mandated process that sets a housing growth target for individual jurisdictions, and requires jurisdictions to update their housing elements in order to achieve the RHNA targets. These changes have led to historically high jurisdiction-level housing growth targets in the upcoming 6th Cycle Housing Element Planning Cycle, and have empowered the state Department of Housing and Community Development (HCD) to enforce appropriately high standards for housing element updates. As a result, the 6th Housing Element Planning Cycle has the potential to be transformative for our region and to relieve its housing crisis.

As jurisdictions start the housing element update process, Abundant Housing LA (AHLA) seeks to provide guidance on how jurisdictions should fulfill both the letter and the spirit of housing element law. Unfortunately, some jurisdictions are already seeking to skirt their obligation to sufficiently plan to meet their housing needs. AHLA will scrutinize jurisdictions' housing elements, submit comments to HCD as needed, and collaborate closely with nonprofits that bring legal action against jurisdictions that fail to comply with state housing laws.

To that end, we've prepared this report to explain both the key legal requirements and our recommended best practices for the housing element updates. These guidelines will inform how AHLA will review, assess, and comment on housing element updates. We believe that jurisdictions that follow these guidelines will succeed in designing housing element updates that expand the availability of housing at all income levels, reduce longstanding patterns of racial segregation and lack of equal access to high-resource areas, and promote climate-friendly living patterns that increase transit usage and reduce carbon emissions from transportation.

This report is focused on the **site inventory assessment** portion of the housing element update. HCD has provided detailed guidance on requirements and best practices for the site inventory assessment in its [Site Inventory Guidebook](#), and this report identifies the most impactful elements of housing element law and the Guidebook to help jurisdictions simplify their housing element process and implement policies that encourage significant housing production.

Housing element law also requires an analysis of constraints on housing development and a program to mitigate or remove these constraints. This is a substantial topic that merits its own Requirements and Best Practices analysis, and we will address it in a future report. Finally, while this report addresses the legal requirement to affirmatively further fair housing in the site

inventory assessment, it is worth noting that HCD will soon release a technical assistance memo offering more specifics on how to address AFFH requirements in the housing element.

Part 1 - General Principles for Site Inventory Assessment

See [HCD's Site Inventory Guidebook, June 2020](#) for citations and examples

The site inventory and assessment of capacity is the heart of the housing element. But the numerous, sometimes convoluted, requirements and factors for assessing capacity make it easy to lose sight of the [big picture](#). This report presents AHFA's view of the big picture, and explains what we'll be looking for when we review, comment on, and litigate housing elements.

The big picture is this: housing element law aims to bring about the production of the total RHNA target and, where feasible, the subsidiary targets in each income bin.¹ A further goal is to enable the development of relatively low-cost housing types in high-opportunity neighborhoods (Gov't Code 65583(c)(10)), which helps to address jurisdictions' requirement to affirmatively further fair housing (see Part 3). Ambiguities in the law should be worked out with these central objectives in view.

An accurate assessment of site capacity is necessary in order for the housing element to achieve the above central objectives. The site capacity estimate should account for the following **two factors**:

- What is the likelihood that the site will be developed during the planning period?
- If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

We call these the **likelihood of development** (pg. 20, Guidebook) and **net new units if developed** (pg. 21, Guidebook) factors. The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

(likelihood of development) x (net new units if developed) = realistic capacity.²

In past planning cycles, the likelihood of development factor was not expressly considered, and jurisdictions consistently fell short of their targets. Not accounting for the likelihood factor in a housing plan is like failing to account for the probability of enrollment in a college admissions plan. When UCLA wants a first-year class of 6,000 students, it admits 14,000 high school seniors, knowing that many who are offered admission will decline.

Similarly, not every owner of a suitably zoned site will accept the "offer" to develop it during the planning period. In fact, the median city is on track to develop [only 25% of the nominal site capacity](#) of its 5th cycle housing element.

¹ [Elmendorf et al. "Making It Work: Legal Foundations for Administrative Reform of California's Housing Framework"](#)

² The example calculation of realistic capacity on pg. 21-22 of the Guidebook is instructive here.

Recent amendments to the housing element law, including AB 1397 and SB 6, position HCD to require discounting of the **net new units if development** factor by the likelihood of development factor. The Guidebook directs attention to the likelihood of development factor on pg. 20-22 and pg. 25.

Part 2 - Capacity Assessment for Vacant Sites: Minimum Zoned Density Method

[See HCD's Site Inventory Guidebook](#), pg. 19 for citations and examples

The housing element law provides jurisdictions with a “safe harbor” for counting vacant, residentially zoned sites at their **minimum** zoned density. Although it’s not clear that this provision excuses jurisdictions from accounting for the site’s likelihood of development, the Guidebook interprets the safe harbor in this way. AHLA will accept this interpretation.

Principal requirements for legal compliance

A housing element that uses the minimum zoned density safe harbor must ensure that “overlay zones, zoning allowing nonresidential uses, or other factors potentially impacting the minimum density” will not preclude development of the site at that density (pg. 19). The only way to provide this guarantee is to declare in the housing element a “fundamental, mandatory, and clear” policy of allowing inventory sites to be developed at the density ascribed to them in the housing element. The housing element is a component of the general plan, and under background principles of state law, any “fundamental, mandatory and clear” policy of the plan supersedes contrary municipal ordinances and regulations, and is judicially enforceable.

Recommended best practices

We counsel against use of the “minimum zoned density” safe harbor, as it may be highly unrealistic. It both ignores the possibility that the site won’t be developed at all during the planning period, and the possibility that the site will be developed at a density exceeding the minimum. That said, if a jurisdiction does use the “minimum zoned density” safe harbor, the housing element should certainly declare a “fundamental, mandatory and clear” policy of allowing development at the stipulated minimum density.

Part 3 - Capacity Assessment for Vacant and Nonvacant Sites: Factors Method

[See HCD's Site Inventory Guidebook](#), pg. 19-26 for citations and examples

For vacant sites, the alternative to relying on the “minimum zoned density” safe harbor is to assess capacity using what the Guidebook calls the “factors” or “Step 2” method (pg. 19). The statute lists a number of overlapping factors to be considered, such as “realistic capacity,” “current or planned availability and accessibility of sufficient water, sewer, and dry utilities,” “typical densities of existing or approved residential developments,” and “land use controls and site improvement requirements.” (Gov’t Code 65583.2(c)(2); Guidebook pg. 19).

The statute is confusing because the various factors are all subsumed by the concept of **realistic capacity** (i.e. **likelihood of development** multiplied by **net new units if developed**), which is itself listed as one of the factors (pg. 20)). For example, if a site doesn't have current or planned access to utilities, the site is very unlikely to be developed during the planning period, and hence has little realistic capacity.

Another section of the statute lists additional factors to be weighed in assessing the capacity of nonvacant sites. These include “the extent to which existing uses may constitute an impediment to additional residential development, ... past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts ..., development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development.” (Gov't Code 65583.2(g), Guidebook pg. 24-26). All of these factors bear in one way or another on the two central questions identified in Part 1: **What is the site's likelihood of development during the planning period, and how many net new units will be built if it is developed?** Jurisdictions should estimate site inventory capacity in a way that directly addresses these two questions.

Principal requirements for legal compliance

The factors listed in Gov't Code 65583.2(c) and (g) should not be treated as a mechanical checklist, such that a housing element “complies” if it discusses every factor, and “fails to comply” if it doesn't. Rather, the housing element's analysis of vacant site capacity (using the factor method) and of nonvacant site capacity, should focus on whether the jurisdiction reasonably assessed both the **likelihood of development** and the **net new units if developed** of the sites in the inventory.³

Every housing element should **report the proportion of sites from the previous housing element's inventory that were developed** during the previous planning period. This proportion need not be used as a proxy for current inventory sites' likelihood of development, but it provides a starting point, especially “[i]f no information about the rate of development of similar parcels is available.” (Guidebook, pg. 21) A jurisdiction may find that current inventory parcels have a higher likelihood of development, possibly owing to new “market conditions” or “regulatory or other incentives” that the jurisdiction had enacted to facilitate the sites' development (Gov't Code 65583.2(g)). But if the housing element assumes a likelihood of development for a given site that is higher than the likelihood implied by past performance, the assumption requires justification (“The methodology analysis must describe how each of these adjustments was generated” (pg. 21)).

Again, jurisdictions must estimate and report both the **likelihood of development** and the **net new units if developed** of inventory sites. This requirement doesn't impose a single methodology for **how** jurisdictions should estimate these two factors. Rather, this requirement

³ During economic recessions, the rate of housing development usually falls. A housing element's assessment of development likelihood may properly focus on normal years, not recession or pandemic years.

improves accountability (e.g. makes it easier to compare capacity assessment methodologies across jurisdictions) while leaving jurisdictions flexibility to estimate the two factors in any reasonable manner.

For this reason, AHLA will scrutinize housing elements to ensure that jurisdictions provide both a “likelihood of development” and a “net new units if developed” number for every parcel in the inventory (excluding vacant sites counted at their minimum zoned density), as well as a reasonable justification for likelihood of development estimates that exceed the rate of development from the previous housing element’s inventory.

If the analysis of inventory sites’ capacity reveals a shortfall (relative to the RHNA) under current zoning, the housing element must include rezoning programs to make additional capacity available (Gov’t Code 65583(c)(1)). These rezoning programs should be described with enough specificity for site owners to determine how much they will be allowed to build. The Housing Accountability Act (HAA) disallows jurisdictions from denying or reducing the density of projects (with at least a 20% affordable set-aside) if the project is “consistent with the density specified in the housing element, even though it is inconsistent with ... the jurisdiction’s zoning ordinance.” (Gov’t Code 65589.5(d)). The HAA thus presupposes that housing elements will include site-specific plans for accommodating the RHNA, even if the plan necessitates greater density than the zoning code currently allows.

Recommended best practices

To ensure that inventory sites can actually be built to the intended density, AHLA recommends that jurisdictions declare a “fundamental, mandatory, and clear” policy of allowing development of the number of units anticipated in the housing element. The policy should also declare an average unit size that will be allowed on the site. These declarations would entitle developers to an exception from local ordinances and regulations that physically preclude development of inventory sites to the scale and density anticipated in the housing element. The declaration may provide for exceptions if development would have an adverse health or safety impact within the meaning of the Housing Accountability Act. (Gov’t Code 65589.5(j)).

Because development trends and market conditions are subject to change, AHLA recommends that housing elements provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated. The mid-cycle adjustment could take the form of:

- An automatic density bonus on inventory sites
- An option for developers to elect ministerial permitting of projects on inventory sites
- A procedure for developers to obtain waivers of fee, exaction, or parking and design requirements that make it economically infeasible to develop inventory sites to the density the housing element anticipated

Part 4 - Site Selection and the Duty to Affirmatively Further Fair Housing

See HCD's [Site Inventory Guidebook](#), pg. 9, and HCD's [AB 686 Summary of Requirements in Housing Element Law, April 2020](#) for citations and examples

High-income neighborhoods with good access to jobs, transit, schools, and parks tend to have very high housing costs. Racially motivated zoning [created many of these neighborhoods](#), and today's single-family zoning reinforces historical patterns of racial and income segregation, disproportionately harming Black and Latino communities.

AB 686 requires jurisdictions to analyze fair housing issues and to affirmatively further fair housing (AFFH) through their housing element. It's no longer permissible to allow relatively affordable housing to be built only in areas of socioeconomic disadvantage.

Below, we summarize AHLA's understanding of the AFFH requirements in relation to housing elements, specifically the site inventory and associated rezoning programs. HCD intends to release a technical assistance memo about AFFH requirements (Guidebook, pg. 9), and we will update our guidance after that memo is released.

Principal requirements for legal compliance

The new AFFH duty encompasses **analytic, programmatic, and procedural** requirements. Housing elements must analyze "available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk." (Gov't Code 65583(c)(10)). The analysis must dig into causes as well as patterns (Gov't Code 65583(c)(10)(iii)).

AHLA will monitor housing elements to ensure that the fair housing analysis **acknowledges any publicly available data or reports about the history of overt racial or ethnic discrimination in the jurisdiction's housing and land development market**. This includes racial covenants, racially discriminatory lending, and the adoption of exclusionary zoning in response to actual or feared demographic change.

With respect to the site inventory and rezoning programs, a housing element must not concentrate opportunities for affordable housing development in areas of segregation or high poverty. Rather, "sites must be identified throughout the community in a manner that affirmatively furthers fair housing." (Guidebook, pg. 9). Additionally, the site inventory must not only include an analysis of site capacity to accommodate the RHNA target for each income level, "but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity" (pg. 6, AB 686 Summary).

The [TCAC/HCD Opportunity Area Maps](#), which characterize existing socioeconomic patterns at the census tract level, can be used to gauge compliance with this requirement. **AHLA will oppose housing elements that fail to accommodate at least a pro-rata portion of the lower-income RHNA in high-opportunity census tracts** (e.g. if 30% of a jurisdiction's land area is located in high-opportunity tracts, then at least 30% of the lower-income RHNA should be allocated to such tracts.)

Regarding procedure, the jurisdiction "shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." (Gov't Code 65583(c)(7)). Housing elements should not cater to the predominantly [wealthy, white, and homeownership populations that customarily dominate land-use policy forums](#).

Recommended best practices

Analysis: AHLA recommends that jurisdictions set up a public web portal to elicit studies and other information about the history of overt racial, ethnic, and socioeconomic discrimination in their community. This portal should go online at least one year prior to the target date for completing the draft housing element.

Programs: Particularly in communities with a history of discrimination and substantial racial or socioeconomic segregation, housing elements should go beyond the minimal duty not to further concentrate lower-income housing in disadvantaged areas. As the Guidebook explains (p. 9), jurisdictions should try to accommodate as much of the lower-income RHNA as possible on sites with:

- Proximity to transit
- Access to high performing schools and jobs
- Access to amenities, such as parks and services
- Access to health care facilities and grocery stores
- No need for environmental mitigation

A housing element must affirmatively "[a]ssist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households" (Gov't Code 65583(c)(2)). The AFFH program should use available public resources, including real estate transfer taxes, publicly owned land, and the potential for "super" density bonuses (in excess of those under state law) for projects with below-market-rate units. **Simply rezoning parcels to the density that state law deems suitable for affordable housing isn't enough.**

Procedure: To overcome bias in patterns of public participation, jurisdictions should sample a random cross-section of the community (e.g., from voter or jury rolls), and elicit the respondents' preferences and priorities regarding zoning and residential development. If response rates vary with demographic or geographic characteristics of respondents, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community.

Additionally, when the jurisdiction takes public comment on its draft housing element, it should require commentators to provide their name and address. Comments from people whose name or address cannot be verified should be disregarded. Names should be matched to property tax records (to determine whether the commentator is a homeowner), and addresses should be matched to census tracts (to determine whether the commentator lives in a high-opportunity or low-opportunity neighborhood). If the pattern of participation proves to be demographically skewed, the jurisdiction should give less weight to the comments.

Part 5 - Findings Required if the Housing Element Assigns >50% of the Lower-Income RHNA Target to Nonvacant Sites

[See HCD's Site Inventory Guidebook](#), pg. 26-28 for citations and examples

If a housing element assigns more than 50% of the lower-income RHNA to nonvacant sites, the jurisdiction must make findings supported by “substantial evidence” that the sites’ existing uses are “likely to be discontinued during the planning period.” (Gov’t Code 65583.2(g)(2)).

This “findings requirement” should be approached with practical considerations in view. In communities where most sites have already been developed, there are real advantages to assigning the lower-income RHNA target to nonvacant sites. This tends to advance fair housing goals, as vacant sites in already-developed jurisdictions are likely to be concentrated in poor communities. Moreover, by spreading the RHNA target over a large number of sites, a jurisdiction hedges against the risk of unanticipated development barriers on any given site. Much as the prudent investor diversifies her portfolio of assets (rather than trying to pick a few “winning” stocks), the prudent jurisdiction plans to accommodate its RHNA target on a large and diverse portfolio of sites.

However, the Guidebook implies (pg. 26-28) that if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites, the jurisdiction must make findings about the discontinuation of existing uses **for each individual site**. This becomes increasingly impractical as the number of sites grows. As such, it could discourage jurisdictions from pursuing prudent, diversified strategies for site capacity and fair housing compliance.

Principal requirements for legal compliance

It’s not yet clear what courts will deem sufficient to satisfy the “findings requirement”. To encourage diversification, AHLA endorses [Monkkonen et al.’s proposal](#) to interpret “likely to be discontinued” to mean “more likely to be discontinued than the development probability claimed for the site.” Since redevelopment **by definition** requires discontinuation of the current use, the findings requirement should be deemed satisfied if:

- The housing element discounts inventory sites’ “net new units if developed” by the likelihood of development, using factors supported by substantial evidence, and

- The aggregate realistic capacity of the housing element's lower-income inventory sites equals or exceeds the RHNA target.

In a recent [webinar](#), HCD presenters interpreted "likely to be discontinued" to mean "a greater than 50% chance of being discontinued." Though different from Monkkonen et al.'s approach, this interpretation is also reasonable. However, it may unnecessarily hinder the distribution of the lower-income RHNA to nonvacant sites, particularly if site-specific discontinuation-of-use findings are required.

Recommended best practices

To the extent that jurisdictions adopt the "greater than 50%" interpretation, AHLA encourages jurisdictions to use statistical methods to justify the requisite findings, at least for housing elements that rely on large numbers of nonvacant sites.

For example, a jurisdiction or its Council of Governments could survey a random sample of owners of nonvacant sites, asking whether they intend to discontinue their current use during the next eight years. If 40% of the site owners answer affirmatively, the jurisdiction could assume that 40% of its nonvacant inventory sites satisfy the "existing uses are likely to be discontinued" condition. The housing element's nonvacant site capacity (for lower-income housing) would be deemed sufficient if the jurisdiction's lower-income RHNA could realistically be accommodated on 40% of such sites, chosen at random from the inventory. This is a way for jurisdictions to comply with the statutory findings requirement while employing a large, diversified portfolio of inventory sites.

Part 6 - Forecasts of ADU Development and Credits for Anticipated Production

[See HCD's Site Inventory Guidebook](#), pg. 30-32 for citations and examples

Local jurisdictions frequently use overly optimistic estimates of ADU capacity and future production to avoid necessary housing reform and rezoning. ADU development estimates must reflect actual on-the-ground conditions to ensure that they are realistic. This will maximize the likelihood that ADUs will be built to the level forecasted in the housing element update.

Principal requirements for legal compliance

Housing element law and the Guidebook allow jurisdictions to count anticipated ADU production on non-inventory sites toward the jurisdiction's RHNA target. The analysis of ADU capacity must be "based on the number of accessory dwelling units developed in the prior housing element planning period," and "other relevant factors." (Gov't Code 65583.1).

Fundamentally, the assessment of ADU capacity is no different from the assessment of capacity for any other type of housing. The ultimate question is: **what is the realistic housing production yield that can be anticipated during the planning period?** The answer depends

on the number of sites, the sites' likelihood of development, and the number of units likely to be built on each site in the event of development.

To that end, the Guidebook establishes two safe harbors for forecasting ADU production during the 6th Cycle (pg. 31). One option is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available, assumes ADU production at five times the local rate of production prior to 2018. Jurisdictions are also permitted to use trends from regional production of ADUs, and include programs that aggressively promote and incentivize ADU and JADU construction.

The housing element “should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.” (pg. 31). “Depending on the finding of that review, amendments to the housing element may be necessary, including rezoning pursuant to Government Code 65583.2 (h) and (i).” (pg. 31). This provides a fail-safe in the event that ADU development falls short of forecasted production by the midpoint of the planning cycle.

Recommended best practices

Jurisdictions should clearly explain their methodology and data sources for forecasting ADU development. The data and models should be shared publicly online.

A housing element's provision for mid-cycle adjustment should be feasible to implement at the midpoint of the cycle. Rezoning is generally a multiyear process, often involving extensive CEQA review and litigation. Rezoning initiated at the midpoint may result in little (if any) new zoned capacity during the planning period.

AHLA therefore recommends that jurisdictions proactively plan for the possibility of an ADU shortfall by either:

- Providing in the housing element for by-right density bonuses on inventory sites, which would become automatically available mid-cycle if the ADU target is not met, or
- Completing a fallback rezoning during the first half of the cycle, which would take effect at mid-cycle if the ADU target is not met.

Given the choice between these two approaches, we recommend the first one. It is more transparent and predictable, and it also avoids wasting resources on a rezoning program that may never be adopted.

The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall. For example, if the parcels designated for the bonus have realistic capacity under current zoning of 5,000 units (in the aggregate), and the ADU production shortfall during the first half of the cycle was 1,000 units, the “make up” density bonus would entitle developers to 20% (1,000 / 5,000) more density on each inventory site than the zoning

otherwise allows. To ensure that use of the bonus is economically feasible, no below-market-rate requirements should attach to it.

Part 7 - No Net Loss

See HCD's [Site Inventory Guidebook](#), pg. 22, and HCD's [No Net Loss Law Memo, November 2019](#) for citations and examples

California's No Net Loss law requires jurisdictions to maintain adequate site capacity throughout the planning period. Gov't Code 65863. SB 166 (2017) amended this law to require maintenance of site capacity **by income category**, not just in the aggregate.

Principal requirements for legal compliance

If a jurisdiction downzones a site inventory parcel, or approves a project with fewer units at the targeted affordability level than the housing element planned to accommodate on the site, then the jurisdiction must ensure that it has enough remaining inventory capacity to accommodate the remaining unmet RHNA target at that affordability level (Guidebook, pg. 22). If additional sites with adequate zoned capacity don't exist, the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA within 180 days. A failure to rezone within this window may result in decertification of the housing element and legal action.

Recommended best practices

Six months is a small window of time for rezoning, and likely sets the stage for a messy, rushed process that results in suboptimal housing policy and litigation risk. To avoid this situation, jurisdictions should take proactive steps when creating their housing element to ensure adequate site capacity throughout the planning period. AHLA endorses HCD's recommendation that jurisdictions "create a **buffer in the housing element inventory of at least 15-30%** more capacity than required, especially for capacity to accommodate the lower income RHNA." (Guidebook, pg. 22).

Part 8 - What If the RHNA Target is Not Realistic?

Having realistically assessed site capacity and potential ADU production, and having developed a housing element that meets AFFH and No Net Loss Law requirements, a jurisdiction may still conclude that the RHNA target itself is unachievable or unrealistic. What then?

We must distinguish two senses in which the RHNA target may be unrealistic. First, it could be practically impossible for the jurisdiction to achieve its targets by income bin without "expend[ing] local revenues for the construction of housing, housing subsidies, or land acquisition." (Gov't Code 65589.9(a)). Second, it could be practically impossible for the jurisdiction to provide sufficient capacity to achieve the aggregate target, without regard to affordability levels, owing to a lack of demand for housing, high-value existing uses, or construction costs that are high for reasons beyond the jurisdiction's control.

In the first scenario, the jurisdiction's problem is more apparent than real. This is because the law allows sites to be counted toward the lower-income target if they are zoned to allow certain densities (30 units per acre in metropolitan counties), regardless of whether market-rate units are more likely than subsidized units to be constructed on the sites (Gov't Code 65583.2(c); Guidebook, pg. 13). To achieve minimum legal compliance, the jurisdiction just needs to zone at the stipulated density and include a capacity buffer for ongoing compliance with No Net Loss law. The same goes for moderate-income housing. Statutory densities deemed adequate for lower-income housing are adequate for moderate-income housing too. (Of course, AHLA expects jurisdictions to both zone for **and** fund subsidized affordable housing. Local funding sources and other incentives, like density bonus programs, can ensure that lower-income housing is actually built; see pg. 8 of this memo.)

In the second scenario, where weak demand or unavoidably high construction costs make it impractical to provide sufficient site capacity, the jurisdiction may be able to achieve compliance by assigning its RHNA target to vacant sites and using HCD's safe harbor for counting vacant sites at their minimum zoned density, regardless of likelihood of development (Guidebook, pg. 19). Alternatively (and preferably) the jurisdiction could comply by committing through its housing element to aggressive rezoning and constraint removal programs, with the goal of creating as much realistic capacity as is feasible.

Concurrently, the jurisdiction would set "quantified objectives" for housing production in each income bin, commensurate with its rezoning and constraint removal programs. These quantified objectives may be smaller than the RHNA targets. (See Gov't Code 65583(b)(2): "[i]f total housing needs ... exceed available resources and the community's ability to satisfy this need ..., the quantified objectives need not be identical to the total housing needs"). However, a jurisdiction should never set quantified objectives below its RHNA targets without exhausting all practicable options for increasing housing production during the planning period. AHLA will carefully monitor jurisdictions' use of the quantified objectives proviso.

Requirements and Best Practices for Housing Element Updates: Checklist

Abundant Housing LA

Site Capacity Assessment

- ☐ Does the housing element estimate and report both the **likelihood of development** and the **net new units if developed** of inventory sites, both vacant and nonvacant?
- ☐ Does the housing element **report the proportion of sites from the previous housing element's inventory that were developed** during the previous planning period?
 - ☐ If not, were HCD-recommended methodologies and data sources used in order to conduct a thorough “factors” analysis of sites’ realistic development capacity?
- ☐ Does the housing element declare a “fundamental, mandatory, and clear” policy of allowing inventory sites to be developed at the density ascribed to them in the housing element?
- ☐ If the housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, were statistical methods (e.g. surveying a random sample of owners of nonvacant sites) used to determine that the sites’ existing uses are likely to be discontinued during the planning period?
- ☐ Was a buffer **of at least 15-30%** extra capacity included in the housing element site inventory, especially for capacity to accommodate the lower-income RHNA target?

Affirmatively Furthering Fair Housing

- ☐ Does the housing element include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market?
- ☐ Does the housing element prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities?
- ☐ Does the housing element identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built?
- ☐ Did the jurisdiction solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction’s socioeconomic makeup?

Forecasts of ADU Development

- ☐ Did the housing element use an HCD-recommended safe harbor methodology for forecasting future ADU production?
- ☐ Does the housing element provide for mid-cycle adjustments if a) inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if b) ADU production falls short of projections?
 - ☐ Do mid-cycle adjustments automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and is it large enough to make up for an ADU shortfall?

Fw: Public Comments February 8, 2022 Special City Council Meeting

Public Comment Email [REDACTED]

Tue 2/8/2022 4:02 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: Mark Alexander [REDACTED]
[REDACTED]

Good afternoon,

Below is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: Nancy Antonopolis <[REDACTED]>

Sent: Tuesday, February 8, 2022 3:35 PM

To: Public Comment Email <ccpubliccomment@lcf.ca.gov>

Subject: Public Comments February 8, 2022 Special City Council Meeting

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear City Council Members,

I thought the citizens voices were heard after the high density, 3-story, 600 Foothill project was soundly rejected by the City Council on November 16, 2021. As Mayor Walker cogently said that night, "If [zoning] changes are needed, we need to make changes but we need to go through the process, taking into consideration what is good for our city as a whole and not just for one project." Citizens against the project expressed major concerns about size, traffic issues on our one thoroughfare through the city, public safety, lack of parking, and problems with ingress and egress on a narrow, already taxed north-south street. Many citizens attended the three Zoom Planning Commissions meetings, wrote public comment letters and spoke against the project and how it would put an end to the City's Downtown Village charm and feel. While this was all occurring it appears the Housing Element was put on the backburner and now City Staff must rush to get it all done before 10/15/22. Within the DVSP, they propose repackaging 600 Foothill's rejected MU-3 zoning as the Housing Element's modified MU-2 zone with 3 stories. This is precisely what was rejected in November and we don't need to go down that road again. Instead, City Staff should hold public workshops and Town Hall meetings with citizens and developers (besides the two with pipeline projects) to get their input and ideas on what's best for our city. Now is the time for creativity, not the recycling of rejected ideas.

Sincerely,
Nancy Antonopolis

2021 Housing Element

Briggs D'Eliscu <[REDACTED]>

Wed 11/4/2020 10:43 AM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hi Susan,

This is Briggs from City Ventures; an eco-friendly homebuilding company. Chris gave me your email.

I was wondering when the City of La Canada's new Housing Element will be available in 2021. Did you hire a consultant to make it? And are you the best person to contact regarding future updates?

Briggs D'Eliscu

City Ventures



Housing Element Update

Tim Ramm [REDACTED]

Thu 2/11/2021 2:46 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Ms. Koleda,

It looks like you have started your 6th Cycle Housing Element update. I'd like to be included on any list of interested parties and follow the process if there is a way to participate. Please let me know. Thanks!

Regards,

Tim Ramm

Province Group, LLC / Newport Equities, LLC



Fw: Public Comment February 8, 2022 Special City Council Meeting

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Mon 2/7/2022 5:12 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: [REDACTED]

Good afternoon,

Below is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: Nancy Antonopolis [REDACTED]

Sent: Monday, February 7, 2022 7:29 AM

To: Public Comment Email <ccpubliccomment@lcf.ca.gov>

Subject: Public Comment February 8, 2022 Special City Council Meeting

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

February 6, 2022

Public Comment regarding the 6th Cycle Update to the City's Housing Element

Dear City Council Members,

Are citizens being left in the dark on La Canada's Housing Element? Why has there been so little public outreach done by City Staff to alert citizens about the Special City Council Meeting on February 8? Only a small print Notice of Public Meeting was posted on the second to the last page of the Outlook Valley Sun on January 27 but most people don't read these notices. The meeting date is not posted on either the Upcoming Events section listed on the Home page of the City website or the Housing Element section on the City's website. Instead it is posted at the Public Hearing and Legal Notice section of the website that most people would have no idea to look there. The Housing Element section of the City's website has not been updated since the Draft Housing Element was posted September 22, 2021. Here is an excerpt from the woefully out of date Housing Element section of the City's website:

How can you get involved?

The City will be holding two public workshops to provide information on the Housing Element update and receive public comments. The public workshops will be hosted by the La Cañada Flintridge Planning Commission and will be held virtually. After the Draft Housing Element is prepared, two public hearings for adoption will be held—the first will be held by the Planning Commission and the second will be held by the City Council. The dates have not been determined yet, so please check back here for the dates and for links to join the meetings virtually.

What is the schedule to complete the Housing Element? As required by State law, the Housing Element must be adopted by the La Cañada Flintridge City Council and submitted to the State no later than October 15, 2021.

Contrast this with our neighboring cities such as San Marino, Sierra Madre, South Pasadena and Glendora. All of these cities have far more transparent Housing Element websites that are continually updated with links to important documents, such as comment letters from the California Housing and Community Development (HCD), and also dates of future meetings. These cities do a great job of informing their residents, which in turn leads to a more engaged and informed community discussion of the Housing Element. La Canada instead buries its HCD letter inside a 353-page City Council agenda package posted just days before an important City Council meeting.

The Outlook Valley Sun staff wrote good front page articles to inform citizens about the June 10, 2021 Housing Element Workshop just prior to the workshop and after the workshop. Those were the last articles in the Outlook Valley Sun on the Housing Element, even though the City released the Draft Housing Element September 22, 2021. Other local papers, such as the San Marino Tribune and the South Pasadena Review, have continuously covered the Housing Element in depth for their communities. I'm not sure why the Outlook Valley Sun hasn't covered this important issue. It would have been nice if the City could have collaborated with the Outlook Valley Sun for a small front page Housing Element Meeting announcement. It's great that the City can check the box that there is another Housing Element meeting on February 8, 2022, but what is the point if citizens have no idea the meeting is happening and therefore can't participate and comment on important long term decisions about our city's future.

Sincerely,
Nancy Antonoplis

Fw: Housing Element

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Mon 2/7/2022 5:16 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: [REDACTED]

Good afternoon,

Below is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: David Haxton [REDACTED]

Sent: Monday, February 7, 2022 4:42 PM

To: Public Comment Email <ccpubliccomment@lcf.ca.gov>

Subject: Housing Element

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

[Housing Element]

It is embarrassing that the city hasn't prepared a substantially compliant Housing Element despite having more than a year to do so. However, the good news is that the state has identified the draft Housing Element's numerous problems, many of them the same types of issues that infected the city's previous Housing Element, which resulted in no affordable housing being built. The other good news is that the city now has a compressed schedule of only eight months to rezone and change its development standards, rather than the three years it would otherwise have had. Time is now of the essence.

As the city moves forward, I urge the city to do a better job of seeking public input. The notice published a year ago said there would be two workshops, followed by hearings on the draft Housing Element before the planning commission and city council. The promised planning commission hearing never happened, and tonight's city council hearing is taking place only four days before the Housing Element deadline for submitting to the state, so there has been virtually no opportunity for the public to comment on the draft Housing Element.

I'd have two suggestions for council to discuss tonight and give direction to staff. First, the city should adopt an inclusionary housing ordinance, which requires that a certain minimum percentage of a project's housing must be affordable. Second, the city should provide density bonuses that are greater than the minimum density bonuses required by state law. Without one or both of these measures, no affordable housing will ever be built in the city due to its expensive land and small parcels.

I'd also ask that the city not engage in fictions when it comes to affordable housing. For example, the state allows the city to consider 68% of its accessory dwelling units to be for low and very low incomes. But from what I've seen in watching the planning commission, most of the ADUs being built in the city are actually pool houses or will be used only for house guests, not as rentals. For the city to count every ADU as rental housing, and to consider two-thirds of those ADUs as renting to those with low or very low incomes, is pure fiction.

I look forward to the upcoming hearings at which changes will be made to zoning and development standards to accommodate affordable housing in the city.

Fw: February 8, 2022 City Council Hearing on the Housing Element Draft

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Mon 2/7/2022 5:15 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: [REDACTED]

Good afternoon,

Attached is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: Scott Van Dellen [REDACTED]

Sent: Monday, February 7, 2022 1:52 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: February 8, 2022 City Council Hearing on the Housing Element Draft

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Mayor Walker and Council Member of the City of La Canada Flintridge:

Attached please find my comments regarding both the discussion of the Housing Element Draft at the February 8, 2022 Council hearing as well as comments on how the implementation of SB 9 can meet most if not all of the RHNA goals. The Housing Element Draft could be revised to address how 2nd units and lot splits can meet the goals of the Housing Element.

In researching RHNA goals, I found that Sierra Madre has 1/2 the population of La Canada Flintridge but only 1/3 the RHNA goals. I am sure the SCAG formula for our share of the regional goal is complicated, but I wonder if it considers the considerable land area in the City, particularly zoned as Institutional and Commercial, used for private schools - day care through high school. I would think that LCF would have a harder time than Sierra Madre to reach our goal since so much of the developable land is already occupied by educational facilities. You might make a case to SCAG or the State that our goal is relatively too high.

Thanks again for the opportunity to comment on this very important topic. - Scott Van Dellen

--

Scott Van Dellen

[REDACTED]

Scott Van Dellen
La Canada Flintridge, CA. 91011

February 8, 2022

Honorable Council Members
City of La Canada Flintridge
One Civic Center Drive
La Canada Flintridge, CA. 91011

Re: My Public Comment on the Housing Element Draft and SB 9 ordinance

Dear Honorable Councilmembers:

I am a member of Together La Canada. Last week, we submitted a comprehensive letter commenting on the Draft Housing Element and tying the content of the Housing Element and meeting the accompanying Regional Housing Needs Assessment (RHNA) goals to the recent enactment of the Urban Dwellings and Urban Lot Splits emergency ordinance.

It is my belief that the recent State law requiring cities to approve second units and lot splits in R-1, single family zones will go a long way toward meeting our RHNA goals. There is no need to increase the height and density, and lower the parking requirements for residential, multifamily, institutional, and mixed-use zones in order to create low, moderate, and above moderate-income housing. Doing so is unpopular, will lead to more congestion on our main artery, Foothill Blvd. and will NOT create more lower and moderate-income affordable housing.

The Draft Housing Element discusses e-commerce and telecommuting as recent trends affecting housing patterns but draws the wrong conclusion.

Those trends do not logically lead one to conclude that higher, denser housing with less parking is the answer. People prefer less dense housing, a yard, and more affordable housing. Expansion of e-commerce and telecommuting made it possible for more people to move to less dense, more affordable areas. SB 9 provides the answer for meeting those trends and allowing our young families and elderly parents to remain in a high-cost community like ours.

The current proposed ordinance as-is, could easily meet about 75%, if not all of the RHNA goal of 612 units. Three reasons why.

1. It is the only way to affordably create new housing.

- Second units and lot splits are more affordable, and particularly important in a high-cost area like La Canada Flintridge, because there is no additional land cost and added expense of multi-story construction and underground parking.
- Based on current county income data, families in the low-income category could afford a rent of up to \$1,800 per month. A moderate-income family could afford a rent of up to \$2,700 per month.
- For homeownership, a low-income family could afford a home price of up to \$348,000 and a moderate-income family up to \$523,000.
- A current homeowner could build a new 1,000 square foot, 2-bedroom, 2 bath home for \$300,000: easily affordable to a low-income family. That unit could rent for \$1,800 per month, meaning a return on investment to the homeowner of 7.2% per year, before taxes and insurance. Try getting that at the bank.
- A 1,500 square foot home would cost \$450,000, easily affordable to a moderate-income household. A rent at \$2,700 per month would mean the same return on investment.

2. Second units, in the form of the more restrictive rules for Accessory Dwelling Units, are already gaining in popularity.

- The Community Development Department's data in the Housing Element showed an increasing demand for ADU units in La Canada Flintridge; from 4 units built in 2018, 2 in 2019, 13 in 2020 and 17 permitted through August 31, 2021.
- 68% of the ADUs forecast by the Draft Housing Element are expected to be affordable to very low- and low-income households.
- Sadly, the Housing Element only forecasts 15 ADU units annually through the next 8 years. That is certainly too conservative. What might happen if the city embraced ADUs, second units and lot splits even more? Here is what that could mean.

3. The Housing Element could be revised to double the contribution of 2nd units and lot splits over the 8 years.

- The Housing Element forecasts that in 2021 there would be 30 permit requests for ADU units. Now that second unit requirements have been reduced by SB 9 and added the ability to split a lot to create a second home, it seems very plausible that the 30 units could easily double to 60 units per year. That would create 480 units over the 8 planning years.
- Taking the Housing Element formula, 113 of these units would be affordable to very low-income households, 214 to low-income households, and the remaining 153 to moderate- and above-income households.

- There is local support for this plan. Sierra Madre's adopted Housing Element plans for 98 of its 204-unit RHNA allocation to ADUs.

Finally, there are other benefits of encouraging 2nd units and lot splits:

1. **Best housing for families and seniors.** Adding 2nd units, being largely first floor units, will also better meet senior and disabled housing needs. It also better accommodates families with children who need yard space and a neighborhood to play in.
2. **Increased population diversity.** Spreading out new housing construction throughout the city will increase racial and ethnic diversity (and not segregate it in a high-rise development) and more fairly distribute on-street parking, traffic, and congestion issues.
3. **More children for our local schools.** Adding 60 new affordable homes per year could lead to approximately 120 new students every year to reinvigorate our declining public-school enrollment.
4. **Business directed toward our local contractors and builders.** The City and Chamber of Commerce are proud to support the small business owners in the City. Large, more complex developments bring in outside developers, architects, lawyers, contractors, and subcontractors. Single unit homes and lot splits will mean more work for our local builders and contractors.

The TLC letter also discussed several specific recommendations to the Urban Dwelling and Urban Lot ordinance. I have to disclose that it was a laundry list, and not all of them are universally supported by all of our members.

Some of those recommendations included:

1. Reducing the objective design standards (exterior wall offsets, unit has to match style and materials of the main house, etc.) and allowing modular units
2. Increasing the maximum size from 800 square feet to 1,200 to 1,400 square feet
3. Allow 2-story second units, particularly over an existing garage
4. Allow flag lots

Each of these have their own advantages and disadvantages and some neighbors will object to one or more of them next door. They should be discussed widely and some or all of them could be adopted into the final ordinance. They aren't even necessary to contribute 60 units per year to the RHNA goal.

Since the City will need to discuss all the extra measures it is taking in the Housing Element to support its contribution to the provision of new housing to all income levels of the public, it can be very pro-active in several other areas:

1. Create a public awareness campaign, and hold several workshops for homeowners, builders, and contractors with ADU modular experts and ADU-experienced local builders.
2. Provide expedited processing and free or discounted architectural services.
3. Create approved templates for lot splits and second units based on a few common lot and home configurations.
4. Partner with modular ADU builders by approving each design/model once and allow homeowners to buy and install with minimal city oversight.
5. Partner with online rental services to match homeowners with second units with prospective tenants in the surrounding areas.

The creative use of SB 9 is the best, most affordable way to create housing for all income level people and families. Our children and parents would not have to move away from our great community to find affordable housing. Just as importantly, it would maintain the relaxed, semi-rural nature of our city, and best support our families, seniors, schools, local builders, contractors, and workers.

We would expect that the Council, Chamber of Commerce, Unified School District, and community at large would be fully supportive of this effort.

Furthermore, our Downtown Village area is worth maintaining and not being eviscerated by calls for high density. Again, Sierra Madre might be a model. Their 2007 Voter's Empowerment Ordinance (Measure V) was adopted to ensure the preservation of the small-town character of the downtown district by limiting development height and density to two stories, 30 feet in height and 13 residential units per acre.

The City should not be shy in promoting this plan with HCD. If providing more housing, and particularly more affordable housing, is the purpose of the Housing Element and the RHNA goals, let them try to prove you wrong.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Van Dellen', with a large, stylized loop at the end.

Scott Van Dellen

Fw: Comment on the Housing Element draft

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Tue 2/8/2022 5:34 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: [REDACTED]

Good afternoon,

Below is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: [REDACTED]**Sent:** Tuesday, February 8, 2022 5:33 PM**To:** Public Comment Email <ccpubliccomment@lcf.ca.gov>**Subject:** Comment on the Housing Element draft

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City Council,

I believe that the draft of the Housing Element should describe, in the overview, the major elements in our city, that affect, and limit, residential development, of all types, including low-income housing. If we do not provide this essential background, the state will not be able to effectively evaluate our Housing Element proposal. The geography and topography of our city, varies substantially from our neighbors in Pasadena, La Crescenta, Sierra Madre, South Pasadena, and South Pasadena. LCF must provide the context for our Housing Element draft. LCF is not solely a series of numbers.

1. The 210 freeway bisects our entire city. How much does the federal government and Cal Trans control? Development is limited near the freeway. How much acreage does the 210 freeway and adjacent land include? Is this acreage excluded from the acreage considered for LCF's Housing Element?
2. Descanso Gardens lies in our city limits. We cannot build residential units in Descanso Gardens. How many acres of Descanso Gardens are in our city limits?
3. Much of our city border is adjacent to the Angeles National Forest. The topography is hilly, with canyons. There is no roadway access to most areas, in our city, that border the Angeles National Forest. How many acres does this area include?
4. Cherry Canyon Park, Memorial Park are in the LCF city limits. How much acreage there?
5. There are other areas with hilly topography, which makes residential building not practical, or not feasible. Canyons, for example, are spread though LCF.
6. Our trail system is spread throughout the city. How much acreage is included?

6. Current measures of residential density, in LCF, possibly understates the actual density, if the acreage from items 1-6, which are unavailable for development are included.

To summarize items 1-6, how much acreage, in LCF city limits, is not available for residential (or commercial) building?

6. A small portion of the 2 freeway, on our western boundary, limits residential development.

The Housing Element draft, from Sept. 2021, heavily includes land, currently occupied by business entities and medical/professional offices, along Foothill Blvd, for potential low housing. Three gas stations (Arco, Chevron, the former 7-11 at Angeles Crest/Foothill). Will these sites need remediation before building can occur?

Are we telling businesses that they must vacate, and relocate, their businesses?

It seems that the most of the sites identified in the Draft lie substantially along Foothill Blvd. Many in the DVSP. LCF has had very little residential housing on Foothill Blvd. in its history. There are apartments behind JoAnn Fabrics, a few on Salisbury, across from the former City Hall building, and a few behind the Dilbeck building at Foothill/Chevy Chase.

And the 600 Foothill property shows 47 potential sites, although this was not approved by City Council. I believe that at 20 density units/per acre, the potential should be $20 \times 1.29 = 25.8$. If a bonus is warranted, the number would increase by 20%. $25.8 \times 20\% = 5.16$. The projected 47 should be lowered, in the Housing Element draft.

So, how to identify feasible spots for the Housing Element?

Is the vacant Pier 1 building included in the Housing Element as a potential site?

More ADUs should be allowed, and included in the Housing Element. I know many are concerned about housing for aging parents, and also for young adults starting jobs, right after college.

Will we need to look at residential areas along Verdugo, and Alta Canada, south of Foothill?

Expanding apartments, or allowing taller buildings, behind JoAnn Fabrics?

Big Lots?

The residential area north of Big Lots?

The area north of Foothill where the former Valley Sun's offices were located (down from the Allen Lund building, north of the shopping area where Penelope's Café is located)?

Thank you.

Mary Blencowe

Fw: I sat on the phone listening to the Zoom mtg on the phone while simultaneously watching it on muted TV. When I hear through the phone, to touch *9 I did so expecting I would be called up when it ws my turn. This ever occurred. Zoom mtgs do not s...

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Tue 2/8/2022 8:30 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: [REDACTED]

We are forwarding the e-mail below as an FYI. This email will be treated as an informational e-mail only and will not be included in the minutes of the meeting nor posted on the City's website.

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From: Public Comment Email <ccpubliccomment@lcf.ca.gov>

Sent: Tuesday, February 8, 2022 8:21 PM

To: Mark Alexander [REDACTED]

Cc: [REDACTED]

Subject: Fw: I sat on the phone listening to the Zoom mtg on the phone while simultaneously watching it on muted TV. When I hear through the phone, to touch *9 I did so expecting I would be called up when it ws my turn. This ever occurred. Zoom mtgs do not s...

This person was not called when she dialed *9.

From: Lauren Oakes [REDACTED]

Sent: Tuesday, February 8, 2022 8:19 PM

To: Public Comment Email <ccpubliccomment@lcf.ca.gov>

Subject: I sat on the phone listening to the Zoom mtg on the phone while simultaneously watching it on muted TV. When I hear through the phone, to touch *9 I did so expecting I would be called up when it ws my turn. This ever occurred. Zoom mtgs do not serve...

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My comment would have been that this 3 story, ov er 20 units per acre and reduced parking below our already inadequate parking requirements, will doom the City to streets clogged with both traffic and parked cars. The elimination of comercial in the MU2 zone will destory any hope of a walkable tdowntown. Once you build 3 story inadequately parked ovr 20 units of ONLY housing, the only walkers will be those looking and LOOKING for their street parked cars.

This HRNA requirement can be met with ADUs and MU2 sones all along the entire Foothill corridor. To rush into densities that our single main street, our dubious sewer capacity, our extreme fire danger, our position atop earthquake faults as laid out and explained by Cal tech's Dr Lucy Jones, all these suggest this is a recipe for disaster. We need to have a lot of real workshops, in person mtgs, and REAL citizen

involvement in order to avoid this bad result. Once you zone it, they will build. Once they build it, the city is changed forever. Lauren Oakes

Fw: Comments on 6th Housing Element

Public Comment Email <ccpubliccomment@lcf.ca.gov>

Tue 2/8/2022 2:55 PM

To: City Council Distribution List <citycouncil@lcf.ca.gov>

Cc: Mark Alexander [REDACTED]
[REDACTED]

Good afternoon,

Below is a public comment submitted via e-mail for the February 8, 2022, Special City Council meeting.

Please do not reply to all.

Thank you

From: GARRET WEYAND [REDACTED]

Sent: Tuesday, February 8, 2022 2:52 PM

To: [REDACTED]
[REDACTED]

Comment Email <ccpubliccomment@lcf.ca.gov>

Cc: [REDACTED]

Subject: Comments on 6th Housing Element

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Mayor Walker and Council Members of the City of La Canada Flintridge:

I would like to make a few comments on the 6th Housing Element and site inventory list.

The City of La Canada has produced no Multi-Family projects in either the 4th or 5th cycle (16 Years). Over 75% of the sites included in the 6th Cycle inventory list were recycled from the prior 4th and 5th cycles. The City can expect the same outcome under current Zoning Code as they have had the last 16 years. I have listed a few sites below that should be eliminated or revised in the La Canada's Housing Elements site list:

1. Site #73 - Site owned by Caltrans under freeway right-of-way. In a phone conversation with Caltrans, they stated that residential housing would not be permitted on this site due to the right-of-way and long-term ground lease. A movie theater, Starbucks, El Pollo Loco and other restaurants currently exist on the site. The City stipulates that 96 units of LOWER income housing will be provided here. This should be removed from the Site inventory list.
2. Site #87 – Mistake on acreage. The property lot size is incorrectly stated here. The site is 0.73 acres (not 3.14 acres). The development yield should be 17 units not 75 units. This

was also carried over from the 5th Element Sites Inventory.

3. Site #62 – 4537 Indianola Way: New office building under construction. No residential component. Should be removed.
4. Site #58 - This is owned by the Thursday Club, a non-profit service organization that has been in existence at this site since 1912. There is no interest to sell or develop the property.
5. Site #52 & Site #54 - This is a restaurant (Hill Street Cafe) that just completed a renovation in 2019-20.
6. Site #57 - Owner operates an ARCO gas station and recently added a hydrogen fuel station. Long term contracts make it infeasible to have residential on this small site. No plans to sell or develop.
7. All three pipeline projects should be removed. One project was recently denied by City Council and the other 2 pipeline projects do not have active applications currently.

This is just a small example of sites that are not feasible for housing development.

Additionally, lower income housing in the Downtown Village Specific Plan is only provided for in the religious institution overlay zone. Low income housing should be evenly spread throughout the whole city.

The City's ADU count is overly optimistic. HCD has stated in their letter that a more realistic count should be 7 units per year. HCD has indicated that they are still working on guidelines for how to implement any SB 9 housing. But if it were allowed the city would need to show a track record of lot splits to be able estimate units for the RHNA. I also believe that the city prohibits flag lots. The main area that SB 9 would work is South of Foothill Blvd where the lots are large enough to be able to split. If this is allowed, how will the city deal with adding more housing in an area without sewers?

It is time for the City of La Canada Flintridge to adopt policies and zoning that will facilitate new housing projects in the City.

Sincerely,

Garret Weyand

April 3, 2022

To the LCF City Council & Planning Commission members,

I am the owner and operator of the ARCO gas station, as well as in conjunction with my wife, the owner of the property located at 550 Foothill Boulevard in the City of LCF. Recently we became aware of the Housing Element Project that is being implemented by the City's Planning Commission. Surprisingly we found out that our property is on the Site Inventory for the Housing Element. What this means is unknown to us. Does this mean rezoning, eminent domain, the City purchasing of the property? Whatever the case may be, we are stating our objection of the evaluation and conclusion that put our property on the Site Inventory. Our business and our investment in the property is our current and future livelihood. We invested in commercial property and do not want it devalued by rezoning it to residential property. After listening to the last City Council and Planning Commission meeting there were many points that were not considered that need to be considered about the evaluation of our property, therefore, I will present these considerations now.

There were two points that were made during the evaluation of all the gas stations in the city that put our site on the inventory list. The first was complaints about traffic on Woodleigh Lane due to the prosperity of our business and the second was that our building is old. Both of these points are addressable which I will state in a moment but first let me state a business analysis. When we individually compare the production of our gas station to the production of each of the other gas stations in LCF, the production of our station far exceeds the production of each of the other stations. This results in our station generating more tax revenue for the city than any of the other gas stations. Furthermore, low gas prices and good customer service also bring patrons in from the surrounding cities bringing in more tax revenue for the city as they patronize our station as well as other businesses in the City of LCF. Having a productive business is not a bad thing and I believe if our station was no longer in business most of the current tax revenue that we generate for the city would be lost to other cities due to the fact that the majority of ARCO customers exclusively shop at ARCO gas stations. Now addressing the two points mentioned in the evaluation of our property. I agree there are brief moments of traffic congestion on Woodleigh Lane but it is far from constant. It happens periodically throughout the busy times of the day and it's not a major issue. In 2021 I was in discussion with A & S Engineering Inc. to upgrade our site. Our plans were to demo the existing building, replace the existing canopy and extend the new canopy southward to accommodate 4 more new gasoline dispensers (8 total), and to construct a new store in the southeast portion of the property. This would help vehicle traffic to flow better and reduce congestion and also satisfy the aged building evaluation. But I had to take a step back and reevaluate if the project would be worth the investment after I heard that our Federal and State governments were pushing the replacement of gasoline vehicles with electric vehicles (EV's). At this time, I am still planning to upgrade our site. I am in the process of researching high output EV chargers with the thought of adding only 2 more gasoline dispensers and possibly using the rest of the space for EV chargers, but now these thoughts are on hold since our discovery of the Housing Element. Keep in mind that we are willing to adapt as the vehicle environment changes which brings me to my next point to consider.

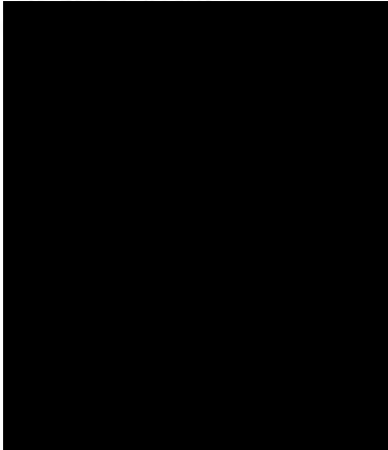
We are the only gas station in LCF that has begun to adapt to the changing vehicle environment by the addition of the hydrogen fueling station. During the last meeting it was suggested that the hydrogen station could be moved to another site. There are two things that combat that idea. First, our site was ideal because we had the space to accommodate the hydrogen station and our site was the most stable as far as property ownership. We own the property so this made the hydrogen company feel more secure in signing a lease with us. I believe that either most or all of the other gas stations in LCF have some type of property lease and no direct property ownership. Second, we have a 20-year lease signed between us and the hydrogen company that started in 2015. This brings me to my next point to consider.

As I just stated there is a lease with the hydrogen company in conjunction with our property. There would have to be financial restitution and compensation if the hydrogen lease is broken by moving the station to a different site before the lease time is fulfilled. Also, we have a gasoline contract with ARCO. It needs to be made clear that our gasoline contract with ARCO is a 15-year signed contract. It is not a 3-year lease as was stated at the last meeting. This contract was signed in May 2021 and basically began at the start of the year 2022. It would be quite costly to buy out this contract.

Here are some other points to consider. As fossil fuel is phased out, ARCO is not going to pack up and leave the industry. They have confirmed that they will adapt with the changing vehicle environment. They are already producing and distributing renewable biodiesel fuel along with researching the hydrogen fuel industry for future production and distribution. Also, they will soon be implementing an EV charger program for ARCO owners that are interested in installing high output EV chargers at their sites. In my opinion phasing out gas station sites may not be in the City's best interest. As EV's replace gasoline vehicles the demand for charging and hydrogen fueling will increase. All plug-in EV's will not be able to charge at the owner's residents or place of work, therefore, many of the plug-in EV's and all of the hydrogen EV's will need an infrastructure to accommodate this demand. What sites would be better to meet this need than the existing gasoline stations, slowly transforming them from gasoline dispensing to EV hydrogen dispensing and EV charging stations.

If any documentation is needed to confirm contracts, leases, and business dealings let us know.
Thank you for your time,

David & Nancy Jensen
La Canada ARCO



Housing Element update concerns

Amy Pringle <[REDACTED]>

Mon 4/4/2022 5:42 PM

To: [REDACTED]

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

To: Members of La Canada City Council and Planning Commission

From: The Rev. Amy Pringle, Rector, St. George's Episcopal Church

April 4, 2022

Hello, City leaders,

I'm writing to express my concerns about the latest proposals of the Planning Commission to revise the Housing Element's sites inventory list (Item 6 on the agenda of the March 10 meeting, which I was unable to attend); and more importantly, to share some concerns about the methods and patterns of City Planning in general.

Specifically, I'm dismayed to notice that ever since State Bill 1851 was passed, partially addressing the state's housing crisis by making it easier for churches to convert unused property to affordable housing, the City of La Canada seems to be moving in the opposite direction. The latest round of proposed LCF policies in fact makes it more difficult for churches to do so, by *reducing* (rather than increasing, as the Bill allows) the allowed number of dwelling units per acre, for our property and other churches in town, which are almost all on the south side of Foothill Blvd. Should we or any other church ever want to redevelop our properties and replace our aging buildings, a limit of 12-15 dwelling units per acre would make building housing, the form of development most in keeping with our mission as a church – and the one most needed by the City – financially unfeasible.

More generally, because our campus is part of the DVSP, I and many of our lay leaders have been paying close attention to the work of the Planning Commission and Council these last few years. And I've become increasingly concerned, not so much as a property owner, but as a religious and moral leader within this community. Giving you as individuals the benefit of the doubt as well-intentioned, hard-working public servants, it seems nonetheless that we're collectively backing into unwritten policies which are fast approaching injustice. Here's what I mean:

- 'Planning' is being done reactively rather than proactively, with a stated goal of responding to proposed developments on a case-by-case basis, rather than coming up with a visionary plan for the future of the City, and inviting/encouraging proposals which fit that plan and its guidelines. (The DVSP was such an effort, granted; but most agree that it's proving to be unworkable, and needs substantial revision.)
- Because of this reactive process, undue power is being given to the loudest, most anxious voices of objection, speaking out about what we *shouldn't* do – which is basically 'anything different from what we're doing now.' Acceding to the status-quo lobby effectively puts real estate 'red-lining' exclusions in place in our City, enabling racism and classism to thrive here. And maintaining the status quo is really quite different from planning for the City's future, which I believe is the best work of leadership.
- The latest round of proposed planning for RHNA units takes the NIMBY mindset to a whole new level, shunting identified sites to literally the furthest square inches of the City's outskirts. ('Let's put them under the freeway,' REALLY? That didn't sound bad to anyone?) These proposals would add new fuel to the ancient Flintridge-vs-La-Canada bias, by imposing arbitrarily different policies for the north and south sides of Foothill Blvd. Maybe this round of proposals is a necessary step on the way to proving that affordable housing will, in fact, need to be developed in the body of the City, after exploring sites on the outskirts *first*; but if this list of sites is meant to be the final plan, then I must say, I believe it's morally wrong, and I'd be deeply saddened to see this City allow such cliché snobbery to stand.

- Most disheartening of all is that the income and rent levels which would count as 'affordable' housing in this area would still be far beyond the reach of any unsavory characters. Instead it would allow teachers in our award-winning schools, medical and office workers and JPL folks and other degreed professionals to live where they work, actually reducing traffic congestion, and increasing consumer dollars spent in the City. How, exactly, is that bad?

As I'm sure you know, there's a worldwide movement now in architecture and urban planning, which seeks to overhaul cities and towns, not only to repurpose the empty and unrentable brick-and-mortar retail buildings, but to be more 'generative' (a current buzz word of the movement) of citizens' overall health and happiness, and to anticipate the new needs which the Age of Disruption will bring and is already bringing.

As a City and a society, due mostly to technological advances, and some to the pandemic, we're experiencing attitudinal sea changes in how we all understand our work lives, and the work-home balance of our time and energies. As a (formerly?) mostly-bedroom community, La Canada-Flintridge finds itself with a real opportunity to make over the City, not only to have a few more 'bedrooms' in it, but to be an inspiring, life-giving environment in which people can live, work, learn, shop and play, on a far more breathable human scale than the outmoded and soul-sucking commute from suburb to city and back again has ever allowed.

Rather than wait for the next random proposal to come along, and then being worn down by the voices which most loudly oppose it, my hope is that the City's leaders might see the current housing challenges as an opportunity to do some further proactive thinking and dreaming about the City's hoped-for future; a future which would accommodate the vastly changed and changing needs of life in the 21st century. Create a beautiful plan for that future, set guidelines for it, and invite proposals for the developments you'd like to see. Then, graciously invite new neighbors, many of whom are already friends, to share in the good life this City provides.

St. George's for one would *love* to be a partner in creating such a community.

Thanks for listening,

The Rev. Amy Pringle

[Redacted signature block]



Together La Canada

April 5, 2022

Honorable Council Members
Honorable Planning Commissioners
City of La Canada Flintridge
One Civic Center Drive
La Canada Flintridge, CA. 91011

Dear Honorable Councilmembers and Planning Commissioners:

We thank you for the opportunity to provide comments on the latest Staff Report for this joint meeting on the proposed Housing Element.

Together La Canada (TLC) was created to bring La Canada Flintridge residents and business owners together who support responsible real estate development in the City. TLC is happy to be a productive problem solver along with others in the community.

We are in support of the new Staff Report for this meeting because it recognizes the unique character of the city and the fact that we have one main commercial artery, adjacent to residential neighborhoods. It recognizes many opportunities to increase density in appropriate places to meet our State Regional Housing Need Assessment goals, while at the same time is more sensitive to future higher density development adjacent to residential areas.

We are disappointed that some Planning Commissioners have questioned the wise direction by Councilmembers to maintain a 12-15 unit per acre, two story limit on the south side of Foothill in the Downtown Village Specific Plan area. This draft Housing Element is not perfect. More RHNA units could have been assigned to ADUs and the units to come from the proposed ordinance to implement the SB 9 2nd unit/lot split requirements. Others, mainly developers, want to see more areas with higher densities. Maybe we are forgetting that this new Housing Element includes a commitment to a DRAMATIC increase in property zoned for higher density housing. There will certainly be construction, congestion, traffic, and other harmful impacts when this new housing is built that the City will need to adapt to and ameliorate.

We appreciate the hard work and thoughtfulness of the City Councilmembers who pulled all the various interests in the City together to create a well-designed Housing Element and hope both the Planning Commission and City Council approve it tonight as is.

Sincerely,

Together La Canada Board Members

ADUs and 2nd units

Scott Van Dellen [REDACTED]

Tue 4/5/2022 11:26 AM

To: [REDACTED]

Cc: [REDACTED]

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Hi, Susan. Perhaps the City could collaborate with the City of Los Angeles' ADU/standard plan program mentioned in this article to encourage 2nd units in the City. I bet we could meet the 612 units goal in the eight year planning period on 2nd units and lot splits alone. Best- Scott

He challenged himself to build an ADU for under \$100,000. What's his secret?

Architect professor Alexis Navarro designed and built an accessory dwelling unit that is affordable and attractive. The result is inspiring.

Read in Los Angeles Times: <https://apple.news/AYe9wQyi5QGC5E7tUeC4H-g>

Shared from [Apple News](#)

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Scott Van Dellen

Thanks for last night's meeting

Amy Pringle [REDACTED]

Wed 4/6/2022 12:23 PM



[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Good morning, and Good on you!

I want to say again how pleased I was last night, when I came to the joint City Council/Planning Commission meeting, to see that you're all really trying to address the challenge of affordable housing in La Canada-Flintridge, and debating workable solutions, rather than begrudgingly seeking the barest minimum compliance to, or trying to dodge, state requirements.

I addressed my concerns to you ahead of the meeting via private email, rather than in public comments, for two reasons. First, I extend to you the same courtesy I ask of my own board members, which is: Sycophants don't help me be a better leader, so please speak every word of the truths you think I need to hear; and also please do that in private, while in public, you're Team Amy all the way. Second, I wanted to see for myself that you're making legitimate efforts here. It's not your fault that you don't know the answers to the housing crisis, and it's not my place to kick a guy who's trying their best.

Here are my waking thoughts, which I'll share and then, honest, I'll stop emailing you. I need to get my head back into preparing for Holy Week for my congregation!

The Missing Middle

My favorite apartment of all time was on Oxley Street in South Pasadena. From there I could walk to Garfield Park for my tai chi class; I could walk to Ralphs and Rite Aid; and best of all I could walk to the Rialto Theater, which was still showing films back then. I think of that apartment every time I read the vision for the DVSP of 'a walkable village atmosphere.'

I lived there just after landing my first full-time career job in a church, which paid a whopping \$32,000 a year. After a decade of waiting tables and tending bar in college and grad school, that seemed like a fortune. But of course it wasn't enough to be a homeowner or even a home-leaser in South Pas, so I found that apartment, which was the only top unit of a four-plex. The four-plex lived comfortably and aesthetically between two classic Arts and Crafts South Pas homes, whose property values were undiminished and whose occupants were undisturbed by my existence there.

South Pasadena is full of those hidden gem apartments, as are Sierra Madre, Altadena, Alhambra, and some neighborhoods of Pasadena and Glendale. Duplexes, four- and six- and eight-plexes, bungalow havens, cottage courts – these standalone or near-standalone places are where people of more moderate incomes want to live, NOT in concrete towers with no soul.

It seems to me that these 'missing middle' or medium-density housing options are what's most needed in La Canada – and also the housing solution which will be most palatable to current homeowners, since they don't disturb the ethos or character of the city. I'm not sure how cities enable these dwellings to be built, perhaps by allowing multiple units to be built on former R1 lots, when those homes age out and are ready to be replaced – maybe they become the owner's new income property, while they move elsewhere. (My Oxley Street landlord lived in a beautiful, palatial home in Monterey Hills.) And for what it's worth, I think a three-story building, designed with soul and character, can be such a place too.

The Spirit of the Law

Affordable housing laws intend one thing only: That everyone, no matter what level their income, deserves a safe, clean and affordable place to live. One approach to addressing the spirit of these laws is to identify who 'everyone' is, *in La Canada-Flintridge*. Our 'everyone' isn't the same as the 'everyone' living in downtown L.A. – so for whom, exactly, is it your mandate to ensure the possibility of a safe, clean, and affordable place to live? It seems to me that you can hold your head up with the state, and sleep at night with your conscience, if you just tend to people of all income levels whose days are already, or potentially will be, spent within this City's borders.

People who need housing in La Canada-Flintridge

- ✓ The very wealthy
- ✓ Those who planned their retirements just right
- ✓ The people whose parents or grandparents bought houses here back when it was affordable
- ø Single income households
- ø Newly divorced spouses who want to stay near their kids
- ø Newly divorced spouses who want to keep their kids in our schools
- ø Grandparents who want to live near their grandchildren
- ø Widows and widowers
- ø Seniors on a fixed income
- ø Downsizing empty-nesters
- ø People who've chosen helping professions over high incomes
- ø First responders
- ø Creatives – artists, musicians, writers – who make money but don't understand it
- ø Teachers and administrators in our award-winning schools
- ø Visiting scientists at JPL
- ø People in the entertainment industry, whose income is feast-or-famine
- ø Degreed professionals who work in town but make second-tier salaries
- ø Store and restaurant managers
- ø Yoga teachers, fitness trainers, life coaches
- ø Therapists and marriage counselors
- ø Real estate agents

- ø Staff members of churches, preschools, gyms, and the YMCA
- ø Staff members of medical and law and financial offices
- ø Workers in hair and nail salons
- ø Childcare workers
- ø Dog groomers
- ø Maintenance staff
- ø Bus drivers
- ø Bank tellers
- ø Restaurant staff
- ø Hospital staff
- ø Auto mechanics
- ø Retail clerks

These are the people in front of you, to whom you owe the possibility of living in our City. They are not drug dealers or criminals or people so mentally ill that they'll end up screaming on our sidewalks. They're good and decent people, who just want to live where they work, and be able to take a walk on a safe, tree-lined street. And they don't want to live in concrete monstrosities which no one wants to see built, but on a simple human scale and in a good and beautiful space.

I'm not sure what incentives are needed by developers to build these smaller-scale dwellings, which of course make less monthly income than the concrete monstrosities do; but finding that out would be a good place to put your energies. And I know that the gradual building of these over time won't get you to your 612 number anytime soon; but your job isn't to *get* them built, right? All *you* have to do is get the policies in place which *enable* them to be built. That's a possible thing; you can do that, sooner rather than later.

And if institutional dwelling-spaces do in fact qualify as affordable housing, you can add to the list:

- o Battered women's shelters
- o Young adults aging out of foster care
- o Sober Living homes
- o Long-term medical rehab
- o First-stop housing and acclimation for immigrants and refugees
- o Evacuation and transitional housing for those displaced by disasters

These would increase your RHNA numbers without requiring new builds, or adding higher building density, since these programs are people living in one bedroom each in a formerly-single-family home. (They make for very quiet neighbors, since they don't want to draw attention to themselves!) Inviting these types of programs would be a quick and easy win with the state, and buy you good will on the slower pace of other housing provisions. I'm happy to help, if you need or want suggestions for specific organizations; I can definitely hook you up with the Episcopal Church's local organizers, and I'm sure other denominations have them too.

OK, back to Holy Week for me; and roll-up-your sleeves time for you. Thanks again for listening.

The Rev. Amy Pringle

A couple of thoughts on Housing

Rody Stephenson

Wed 7/6/2022 7:19 AM

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

As you know, my main interest and passion is with climate. But I stayed last night to hear the presentation and discussion by the staff, public, and the CC members.

I am extremely impressed by the competence and hard work of the staff and CC members who remained.

I do have two come-away thoughts:

1. I can't believe that the City responded based on a phone call from HCD. I think whoever received that call should have immediately asked them to *"put it in writing."*
 - a. Hopefully someone took detailed notes of that call. And I think those notes should be posted on the website.
2. I urge you to stick to the original October 15th schedule, even if the State bill gets approved that gives another year. It is better to get this behind this, and let the City move on to other business.

Rody

R. Rhoads (Rody) Stephenson

Re: Saint George/Housing Element Plan

John Powers <[REDACTED]>

Fri 9/2/2022 4:54 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Susan,

Thank you for the response. My wife and I will be at the Sept 12 meeting and will share our view. The 4463 Commonwealth property shares a property line with my house as well as our neighbors at 4457 and 4459 so you can understand our concern about the potential for a 3 story multi-unit building right next to our house. The 4463 property currently provides a buffer to the commercial buildings on Foothill. Given that the total number of units on the list is well over the 612 target it makes no sense to include two single family residences (Commonwealth and Briggs) on the list. The impact on the neighbors needs to be considered as well as the property owner. I will share this view with the city council via email as well in addition to sharing our view at the Sept 12 meeting.

Regards

John

On Fri, Sep 2, 2022 at 3:02 PM Susan Koleda <skoleda@lcf.ca.gov> wrote:
good afternoon John,

Thank you for your email.

The residence you are speaking about is located on the same parcel as 800 Foothill Boulevard (shown below), which is the address utilized by the LA County Assessor, which is where the City pulls parcel record information from.



While I can see your concern, at this point in time the second version of the draft Housing Element has been reviewed by the Planning Commission and they have recommended the City Council adopt the Housing Element. The second version is also being posted on the City's website later today prior to the September 12, 2022 City Council meeting and there is insufficient time for any additional changes to be made prior to its posting. The maps that accompany the Sites Inventory list did show the entire parcel, including the piece that extends to Commonwealth and contains the residence.

The inclusion of existing single-family residences was discouraged by the Housing Element subcommittee, unless the property owner wished to be included on the inventory. There are a couple of parcels where this was the case, including the St George's parcel and one on Briggs Avenue.

I would recommend that you attend the special City Council meeting to be held at 6pm on September 12. The City Council can provide direction to staff whether to include the additional parcel address on the sites inventory to provide clarification.

Please let me know if you have any questions.

Susan

--

Susan Koleda, AICP

Director of Community Development
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Phone: (818) 790-8881

skoleda@lcf.ca.gov

From: John Powers [REDACTED]
Sent: Thursday, September 1, 2022 2:48 PM
To: Susan Koleda <skoleda@lcf.ca.gov>
Subject: Saint George/Housing Element Plan

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Susan,

First off, I'd like to thank you and your team for all of your efforts on the housing element project which is a ton of work with the needs of many stakeholders to balance.

My name is John Powers (La Canada resident for 17 years) and I reside at [REDACTED] [REDACTED] which is located next to the 4463 Commonwealth Ave single family residence owned by St. George Church (see photo below). We have read the correspondence between St George and the City and are alarmed by the proposed densities for a multi-unit property at the St George site. The former density was 15 to 20 units per acre, was recently increased to 25 to 30 units per acre and St George recently proposed a staggering figure of at least 40 units and ideally 50 units. As can be expected, there will be significant opposition to this level of density on an already busy intersection which would create tremendous parking and traffic issues and would harm the character of the neighborhood and city.

In looking through the housing element materials on the website we were very surprised to see the single-family residence at 4463 was included in the housing element plan in the first place. It required some digging to determine that the 4463 residence is actually part of the 800 Foothill parcel map. Since one of the sensitive components of the housing element plan is the tear down of single-family residences (such as is proposed for 4463 Commonwealth), it would provide additional transparency to the community if the Site Inventory document included an additional disclosure about 4463. Perhaps the language under Existing Uses could be modified as follows: "St. George Episcopal including the single-family residence at 4463 Commonwealth". We are hopeful that this important update can be made for the benefit of the community.

As mentioned above the tearing down of existing single-family homes is a sensitive topic and especially given the comments made by Rick Gunter in the Aug 25 Outlook which state *"We are not redoing any single-family homes into something else Gunter said at a City Council meeting August 2"*. The inclusion of 4463 Commonwealth in the housing element plan doesn't make sense and the City should remove 4463 from the housing element plan.

We are hopeful that the city can deliver the required housing element document to the state and then follow it up with common sense development which balances the needs of the community and maintains the character of our city. We look forward to sharing our perspective at the Sept 12 City Council meeting.

If you have any questions I can be reached at [REDACTED]

Regards

John Powers

[REDACTED]

4463 Commonwealth Single Family Residence Included In Housing Element Plan



Fwd: Housing Element 2nd Draft Responses

Mark Alexander <malexander@lcf.ca.gov>

Sat 9/3/2022 6:22 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

FYI

MARK R. ALEXANDER | CITY MANAGER | CITY OF LA CAÑADA FLINTRIDGE

One Civic Center Drive | La Cañada Flintridge, CA 91011

MAlexander@lcf.ca.gov

T: 818-790-8880

F: 818-790-7536

From: Keith Eich <keich@lcf.ca.gov>

Sent: Saturday, September 3, 2022 5:13:56 PM

To: Mark Alexander <malexander@lcf.ca.gov>; Adrian Guerra <aguerra@awattorneys.com>

Subject: Fwd: Housing Element 2nd Draft Responses

FYI

From: Anita Hossepian [REDACTED]

Sent: Saturday, September 3, 2022 5:09:50 PM

To: Kim Bowman <kbowman@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Keith Eich <keich@lcf.ca.gov>; City Council Distribution List <citycouncil@lcf.ca.gov>

Subject: Housing Element 2nd Draft Responses

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

To: City Mayor and Council Members:

I would like to point out a few things about the Public Comments to the Housing Element since the staff stated that they had received mostly positive comments to the 2nd draft.

In terms of numbers for and against rezoning to a higher density in the DVSP, there were 23 commercial developers (minus 6 repeating letters from the same developers) bringing it to a total of **17** developers in support. In contrast, there were 35 residents (minus 7 letters from the same residents) who opposed high density in the DVSP area bringing it to a total of **28** plus the 170 who signed the petition bringing it to a FINAL total of almost **200**. When you compare 200, all of whom are residents of La Canada, telling the Planning Committee that they are opposed to the second draft, to the 17 commercial developers, almost all of whom are NOT residents of La Canada, you see this dispersity between the will of the residents that you represent versus the developers that have no stake in our

community. It is obvious that the 2nd draft missed the mark and we must take action.

Three other things should be noted: 1) the City contacted and sent out 2 letters to each developer informing them of the second draft and requesting their reply whereas most residents were not informed in this way and very few of us were on the lookout for the posting on the city website which gave us only 9 and a half days' notice. 2) The developers who replied supported up-zoning only for their own property/location and not the whole 2nd draft. 3) Only one of the developers is a La Canada resident whereas ALL of us who are voicing our opposition are residents. You should also note that we were able to get 170 signatures in only 9 and a half days' time whereas the city had much more time to contact the 17 supporters.

We have sent numerous letters and made several public comments to both the Planning Commission as well as the City Council. But, unfortunately, it does not seem to make a difference since we do not get any response to our objections to the housing element plans!!! We are not a bunch of NIMBYs that are against all development. We just want appropriate development. Development that is in the right area and the right density. We have **only one main street**, FOOTHILL BLVD, in our city. Putting a high density building in the **center** of this main artery would cause irreparable damage in terms of **infrastructure** such as traffic congestion (especially since it is right next to the highly congested ARCO gas station), problems with **evacuations** for fires, floods, earthquakes and other **emergencies**. There are sites on the West and East side of Foothill which would not have such irreparable damage. All it takes is one highly dense development and the city will be scarred forever and have many more problems than we could imagine now. Please hear us and make the right decision so we do not have to take further actions to stop this development.

Thank you,

--

Anita Hossepian

[REDACTED]

[REDACTED]

Letter to City Council for the September 12th Special Session on the Housing Element adoption

Scott Van Dellen <[REDACTED]>

Mon 9/5/2022 10:14 AM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

 1 attachments (199 KB)

Van Dellen Ltr to Council 09122022.pdf;

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hello, all. I will be unable to attend the Council meeting on September 12th so am submitting written comments for your information. I hope you will consider my idea for an amendment to the Plan and then adopt the Housing Element. A lot of work went into this plan, and in such short time. Congratulations go out to many of you and others. This will make it a better Plan and one many of us can support. Thanks - Scott

--

Scott Van Dellen

[REDACTED]
[REDACTED]

Scott Van Dellen

September 12, 2022

City Councilmembers
City of La Canada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

Dear Mayor Eich, Mayor Pro Tem Gunter, and Councilmembers Walker, Davitt, and Bowman,

I am writing to comment on the recently released Housing Element Draft for the Sixth Cycle Housing Element. The staff and subcommittee have created a very comprehensive document, which has added even more eligible sites, fairly distributed throughout the City. The City has also added a program to grandfather in some existing ADUs and proposed programs to encourage their development. These are all very positive additions to the Housing Element.

However, as documented more fully below, there are five totally unnecessary high density/three story, 1.5 FAR, MU-25 sites, that are not religious overlay properties, that do virtually nothing to assist the city's housing element needs, are extremely detrimental to the health, safety, and well-being of the city, are opposed by virtually everyone in the community and in direct conflict with the sentiments expressed at many meetings and direction from the City Council issued in April. These five sites can be returned to the MU-12 density, as shown in the April 5th Draft, while still leaving a very generous RHNA unit count, well above any state requirements. With these changes, I am very happy to support the new Housing Element and support the addition of new housing for all income levels in the City through zone changes and the promotion of ADUs, 2nd units and lot splits.

Therefore, the Housing Element should be approved with an amendment that returns the 600 Foothill, 1010 Foothill, 820 Foothill, W of 820 Foothill and 824 Foothill properties to the MU-12 zoning. Returning the 5 properties to the 12-15 du/ac zone, results in a reduction of 12 units for 600 Foothill, 3 for 1010 Foothill, 2 each for 820 Foothill & W of 820 Foothill, and 1 for 814 Foothill, for a new net total of 768 units. We still would have a surplus of 66% in total RHNA units, and in the very important Very Low-Income category, the surplus is 62% and for Low Income, 87%.

This is a simple amendment that changes two charts (attached) and adjusts the unit count for the two properties on the site selection. A 20-minute exercise that provides ample time to submit the final Housing Element to HCD two days from now.

Many comments from Councilmembers and the public made it clear why the south side of Foothill is qualitatively different from the north side in the Downtown Village Specific Plan area. The

proximity of Foothill high density development on the south side will result in significant increases of traffic, parking issues and infrastructure problems in the adjacent residential neighborhoods that are fed by narrow residential streets with no other adjacent commercial streets that weren't developed for the kind of density envisioned by an MU-25 zone for 600 Foothill. The current corner it shares with the ARCO station is a very visible example. The City Council in November denied it.

So, why is the 600 Foothill project at the highest density zone proposed back again? Let's go through the sequence of events leading up to today.

1. On November 16, 2021, the Council members on a 4-0 vote UPHeld the appeal by Together La Canada of the Planning Commission approval of the 600 Foothill project. They not only expressed dismay at the way the new proposed MU-3 zoning designation, solely for this property, came about **but expressed a desire for the south side of Foothill to be treated to a lower density than the north side** at both at that meeting and subsequent Council meetings.
 - a. At the November 16, 2021, Council meeting, Councilmember Mike Davitt said the design should fit the area and must meet the current plan. Councilmember Rick Gunter said he could not support the zone change and suggested a senior housing project with MU-2 and at 20 units per acre. Then-Mayor Terry Walker suggested MU-1 or MU-2 senior housing. (Note: current MU-1 and MU-2 are 15 dwelling units per acre, two stories and 24-foot height maximum.) Mayor Walker also said she wished the developers would keep an open mind and make changes to bring the project into compliance with current zoning. Then-Mayor Pro-Tem Keith Eich said the City should find ways to produce better solutions for senior housing, not just a project like 600 Foothill.
 - b. At the February 8, 2022, meeting Mayor Walker said we need to look at the north and south sides of Foothill separately. At the same meeting Councilmember Gunter said we should look closely at which properties on Foothill should be MU-1 and MU-2. Councilmember Davitt said that it's valid that the north and south of Foothill are extremely different. He would like to see that altered so that it matches more consistently with smaller density amounts on the south as opposed to larger on the north side. He thought two stories on the south especially is fine and on the other side if it went a little higher that would be fine as well. Mayor Pro-Tem Eich said he's not a fan at all of changing to three stories or changing height requirements. He also said he thought David Haxton and Steve Del Guerico were right and the north and south side of Foothill are very different, so he'd really like to see us look at that when we update the DVSP.
2. The April 5, 2022, Housing Element Draft was then released. The site selection provided a 12-15 dwelling unit per acre zone for all non-religious properties south of Foothill in the DVSP. This included 600 Foothill.
3. The April 5th, 2022, Council meeting was then held to review and approve the new Housing Element Draft.
 - a. Based on a week earlier urgent call with Community Development Staff, the City consultant and HCD staff, (of which the community was promised, but never received, a full transcript of the meeting), the City staff basically pulled the Housing Element from consideration

because they were very worried that the Plan hadn't created realistic sites and densities to meet the RHNA requirements.

- b. The decision was made to hire a consultant to determine the financially feasible density required and to form a subcommittee (which became Councilmembers Keith Eich and Rick Gunter and Commissioners Henry Oh and Jeffrey McConnell) to look again at the site selection and engage property owners directly on advisability and desirability for inclusion.
 - c. Among the comments by Councilmembers, Councilmember Gunter stated that 3 stories all along Foothill Blvd. was a non-starter for our residents.
4. The Michael Baker study results were unveiled at the July 5, 2022, Council meeting which concluded that the minimum density needed to produce lower income housing financially feasibly is 26 dwelling units per acre.
 5. The Subcommittee then used that criteria to propose two zones: MU-12 (12-15 dwelling units per acre) and MU-25 (25-30 dwelling unit per acre) and began to apply them to various sites throughout the City.
 - a. This site selection resulted in 775 RHNA eligible units, more than the 612 units required and even more than needed for the 20% buffer.
 - b. **But then, something strange happened.** The subcommittee proposed a NEW criteria for the south side of Foothill in the DVSP defining that only non-religious owned properties that directly **ABUT** a single-family residential home, not residential neighborhood, would be designated MU-12. That allowed them to add back the 600 Foothill property by adding four other small property with marginal benefit to the RHNA numbers.
 6. Subsequent feedback from many property owners resulted in the removal of many single-family residential properties and the addition of more commercial properties in the current Housing Element draft.
 7. Over 20 people commented at the August 25, 2022, Planning Commission meeting to restore the MU-12 designation for 600 Foothill. The Planning Commission ignored those comments and approved the new draft as-is, by the same 5-0 vote it approved the original 600 Foothill proposal in November 2021.

Everyone needs to know that allowing a 25-30 dwelling unit per acre density for 600 Foothill could result in **46 or 47 total units** (30 du/ac x 1.28 acres x 20% density bonus = 46.08, or rounding up, 47). That means three stories, 35-foot height and 1.5 Floor Area Ratio. That's almost the same size project that was VOTED DOWN by the Council last November.

So, with this brief history, many of us in the community are more than a little frustrated.

I'm trying to figure out why this keeps happening:

1. We know the 600 Foothill sponsors have been lobbying the HCD staff with highly critical comments about the City of La Canada Flintridge planning process and the site selections.
2. We know the 600 Foothill sponsors leaned very heavily on LCF Community Development staff with threatening letters.

3. We know that the Subcommittee changed the criteria from the April 5, 2022, Housing Element Draft for south of Foothill properties in the DVSP, which benefited only 5 properties, but mainly 600 Foothill.
4. I suspect the 600 Foothill sponsors are unhappy with either the 12-15- or 25-30-unit designations since they have repeatedly criticized the Michael Baker study and testified that much greater density is required for their property.

In summary, the Plan should be approved with this simple proposed amendment for these reasons:

1. The Council and the community have told the City staff that they don't want high density at the 600 Foothill site.
2. The announcement at the April 5th, 2022, meeting resulted in a new financial study and the formation of a subcommittee, which led to the creation of a more robust list of well supported RHNA sites that resulted in **EVEN MORE** sites totaling 788 units (or, 768 by returning 600 Foothill and the other 4 small properties to MU-12).
3. The 600 Foothill property at 25-30 units per acre is NOT needed to meet the RHNA requirement.
4. The 600 Foothill property does NOTHING to meet the very low-, low- and moderate-income categories.
5. This amendment is simple to implement. I have attached the two charts that need to be changed for Sites 53, 97, 111, 112, and 113 on the 2021-2029 Site Inventory Chart, Table C-1.

I hope the Council will remain faithful to its promises to the community and vote tonight to approve the Housing Element Plan with the amendment I have proposed above. It shows that you have listened to the community. I am more than happy to write to HCD, and get many more, to support the amended Housing Element and vouch for the considerable study, community participation and sincere intentions that went into it.

Sincerely yours,



Scott Van Dellen

Table HE 48 - Adequacy of Sites to Accommodate the 2021-2029 RHNA by Zone

Proposed Zoning District	Lower Income	Moderate Income	Above Moderate Income	Total
R-3 (Multifamily Residential)	68	0	0	68
Mixed Use	252	0	8	260
DVSP MU-12	0	84	4	88
DVSP MU-25	43	59	37	139
DVSP RI-OZ	18	52	0	70
R-OZ	143	0	0	143
Total	524	195	49	768

Table HE 49 - Complete Summary of 6th Cycle RHNA

Income	RHNA	Issued	Pending/ Pipeline	Sites Inventory	ADUs	Total	Surplus	% Surplus
Very Low	252	8	11	362	28	409	157	62%
Low	135	16	21	162	53	252	117	87%
Moderate	139	1	1	195	3	200	61	44%
Above Moderate	86	10	58	49	36	153	67	78%
Total	612	35	91	768	120	1014	402	66%

RHNA number charts

Scott Van Dellen <[REDACTED]>

Mon 9/5/2022 9:49 AM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Jeffrey McConnell
[REDACTED] Henry Oh <[REDACTED]>; Susan Koleda <skoleda@lcf.ca.gov>

 1 attachments (24 KB)

RHNA adjusting MU-12 on S Side Foothill.xlsx;

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Hi, all. I am submitting a letter to the City Council to amend the 09/02/2022 Draft Housing Element to restore the south side of Foothill (non-religious owned) to the similar MU-12 density provided in the April 5th Housing Element draft. I have created the attached excel workbook that shows the changes to the RHNA numbers for tables HE-48 and HE-49. The white tabs are the current charts, the blue tabs are where you make the changes and the yellow tabs are the final chart.

I hope this is helpful in your deliberations. - Scott

--

Scott Van Dellen

[REDACTED]
[REDACTED]

Table HE 48 - Adequacy of Sites to Accommodate the 2021-2029 RHNA by Zone

Proposed Zoning District	Lower Income	Moderate Income	Above Moderate Income	Total
R-3 (Multifamily Residential)	68	0	0	68
Mixed Use	252	0	8	260
DVSP MU-12 ¹	0	73	4	77
DVSP MU-25 ^{1, 2}	62	59	49	170
DVSP RI-OZ	18	52	0	70
R-OZ	143	0	0	143
Total	543	184	61	788

Table HE 48 - Adequacy of Sites to Accommodate the 2021-2029 RHNA by Zone

Proposed Zoning District	Lower Income	Moderate Income	Above Moderate Income	Total
R-3 (Multifamily Residential)				0
Mixed Use				0
DVSP MU-12 ¹		11		11
DVSP MU-25 ^{1, 2}	-19		-12	-31
DVSP RI-OZ				0
R-OZ				0
Total	-19	11	-12	-20

¹- 1010 Foothill, 820 Foothill, 824 Foothill & parking W of 820 Foothill rezoned to 12-15 units resulting in 8 fewer units, 19 fewer lower income units but 11 more moderate income units. (all non-religious overlay in DVSP)

²- 600 Foothill rezoned to 12-15 units resulting in 12 fewer above moderate income units

Table HE 48 - Adequacy of Sites to Accommodate the 2021-2029 RHNA by Zone

Proposed Zoning District	Lower Income	Moderate Income	Above Moderate Income	Total
R-3 (Multifamily Residential)	68	0	0	68
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DVSP MU-12	0	84	4	88
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DVSP RI-OZ	18	52	0	70
R-OZ	143	0	0	143
Total	524	195	49	768

Table HE 49 - Complete Summary of 6th Cycle RHNA

Income	RHNA	Issued	Pending/ Pipeline	Sites Inventory	ADUs	Total	Surplus	% Surplus
Very Low	252	8	11	362	28	409	157	62%
Low	135	16	21	181	53	271	136	101%
Moderate	139	1	1	184	3	189	50	36%
Above Moderate	86	10	58	61	36	165	79	92%
Total	612	35	91	788	120	1034	422	69%

Table HE 49 - Complete Summary of 6th Cycle RHNA

Income	RHNA	Issued	Pending/ Pipeline	Sites Inventory	ADUs	Total	Surplus	% Surplus
Very Low								
Low ¹				-19				
Moderate ¹				11				
Above Moderate ²				-12				
Total				-20				

¹ - 1010 Foothill, 820 Foothill, 824 Foothill & parking W of 820 Foothill rezoned to 12-15 units resulting in 8 fewer units, 19 fewer lower income units but 11 more moderate income units. (all non-religious overlay in DVSP)

² - 600 Foothill rezoned to 12-15 units resulting in 12 fewer above moderate income units

Table HE 49 - Complete Summary of 6th Cycle RHNA

Income	RHNA	Issued	Pending/ Pipeline	Sites Inventory	ADUs	Total	Surplus	% Surplus
Very Low	252	8	11	362	28	409	157	62%
Low	135	16	21	162	53	252	117	87%
Moderate	139	1	1	195	3	200	61	44%
Above Moderate	86	10	58	49	36	153	67	78%
Total	612	35	91	768	120	1014	402	66%

Fw: Letter to City Council

Keith Eich

Wed 9/7/2022 10:12 AM

To: **Housing Element Email** <housingelement@lcf.ca.gov>

Cc: Mark Alexander <malexander@lcf.ca.gov>

FYI

From: Kristene Hossepian <[REDACTED]>**Sent:** Wednesday, September 7, 2022 9:16 AM**To:** City Council Distribution List <citycouncil@lcf.ca.gov>; Keith Eich <keich@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>**Subject:** Letter to City Council

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Mayor and City Council Members,

I am disappointed in the 2nd draft proposal and how the staff and planning committee has addressed the Housing Element for the past year. The City Council made the correct decision in limiting development on the South side of Foothill Blvd to 12 to 15 units. Unfortunately, the staff surprised the City Council at last month's meeting by changing the focus and recommending the hiring of yet another consulting firm and revisiting the Housing Element with a subcommittee (which included Planning Commissioner Jeff McConnell) to do a 2nd draft.

Relisting the 600 Foothill high density development in the 2nd draft will add up to 47 units which is just 2 units less than what the City Council previously rejected with a unanimous vote. This (with the other 4 proposed sites South of Foothill Blvd) is the same "Spot Zoning" which will set a precedent and should be avoided.

The residents have proposed (with numerous letters and public presentations) to up-zone the areas near USC's VHH, the West and East ends of Foothill Blvd. in order to avoid high density development in the center of town which is already congested (due to the ARCO station and narrow streets with no sidewalks.)

The City can also increase the number of ADUs counted for the State's requirements since the laws for ADUs changed just this year. We should attempt and fight to request a larger number and make a stronger case in support of this due to our increase in ADUs in 2022 to 24 in just the first half of the year.

We can resubmit a legal and compliant Housing Element to the State without including the 600 Foothill development and will still satisfy all our RHNA numbers.

Our city has limitations due to being a HIGH FIRE RISK ZONE, septic tank area, narrow streets with single car access, lack of transportation in the center of town, etc. This is all our city's INFRASTRUCTURE can

handle and tolerate. We cannot develop higher density due to our city's limitations.

If we allow the 600 Foothill development to be up-zoned, there is no going back with design restrictions later on. The State is onto this tactic and will watch cities for this maneuver. How will we deal with the increased traffic, fire dangers, emergency services, delivery trucks, as well as lack of sufficient parking causing congestion and gridlock on the side streets, etc. if we allow this to pass?

Trying to stay under the radar with the State is NOT the right answer. We should do what is right for our city and what our city's infrastructure can best support. We can submit a housing plan that both makes sense for our city and meets the State's requirements. We do not need to include and up-zone the 600 Foothill Blvd development to do this.

We will not stop making attempts and taking further actions to prevent Jon Curtis' development from ruining this city for the future. Please do the right thing for our city by listening and voting with what the residents have requested.

Best,

Kristene Hossepian, Psy.D.

[REDACTED]

Fw: Housing Element Plan/St George/Your Quote in the Outlook

Keith Eich

Wed 9/7/2022 8:27 AM

To: **Housing Element Email** <housingelement@lcf.ca.gov>; Emily Stadnicki <estadnicki@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

Cc: Richard Gunter <rgunter@lcf.ca.gov>; Jeffrey McConnell <jeffsmcconnell@gmail.com>; Henry Oh <henryoh@sbcglobal.net>; Mark Alexander <malexander@lcf.ca.gov>

 1 attachments (1 MB)

St. George Flyer 9.6.22.pdf;

See the email below.

I didn't think we included the single-family home on Commonwealth even though ownership was with the church. I don't see 4463 on the Site Inventory documents that I have reviewed. Is it just being included somewhere else and not obvious or is it not being included in the current draft?

Some clarity would be good.

Thank you.

p.s. Rick, I assume you will respond to Mr. Powers. But I want to make sure I understand this too - since I'm sure it'll come up on 9/12.

From: John Powers [REDACTED]

Sent: Wednesday, September 7, 2022 7:43 AM

To: Richard Gunter <rgunter@lcf.ca.gov>

Cc: Keith Eich <keich@lcf.ca.gov>

Subject: Housing Element Plan/St George/Your Quote in the Outlook

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Rick,

I'd like to thank you and your colleagues for your efforts on the housing element project which is a difficult task with the needs of many stakeholders to balance.

My name is John Powers (La Canada resident for 17 years) and my family and I reside at [REDACTED] which is located next to the 4463 Commonwealth Ave single family residence (see photo below) owned by St. George Church and has been rented to local families for years. Last week I read with much concern about the proposed densities at the St George site. The former density was 12 to 15 units per acre and was recently proposed by the Planning Commission at 25 to 30 units per acre (and could be as high as 50 per acre with low-income density bonuses). Separately, we learned through review of public documents that St. George recently

proposed to city officials a staggering figure of 50 units per acre and is in active discussions with real estate developers. There will be significant opposition to this level of density on an already busy intersection which would create tremendous parking and traffic issues and would harm the character of the neighborhood and city.

Neighbors of St. George are particularly concerned about the tear down of the existing single-family residence at 4463 Commonwealth. It is encouraging to read that you share this view from your quote in the August 25 article in the Outlook ***"We are not redoing any single-family homes into something else Gunter said at a City Council meeting August 2"***. However, in looking through the housing element materials on the city website it was surprising to see that the single-family residence at 4463 was included in the housing element plan (part of the 800 Foothill parcel). Tearing down the 4463 single family residence and using the land to build a multi-unit apartment building complex is a key component of the St. George development plan.

With the City housing element inventory list currently 57% above the 612-unit state requirement it begs the question why any single-family residence is included in the housing element plan in the first place. We have read that the property owners consented to their inclusion but there has been zero communication to or regard for the nearby residents or community. The prospect of a three-story apartment complex towering over the nearby homes on Commonwealth and Beulah is extremely troubling.

There is a clear path for the city to modify the current housing element plan with more responsible densities and meet the state mandates. Achieving this goal can be attained by the following actions:

- 1) Reduce densities in the housing element plan in the high traffic Foothill corridor to a more responsible level which would include the St George and the 600 Foothill locations
- 2) Remove all single-family residences from the housing element plan (there are only a few)

The neighbors of St George have launched an outreach program to bring attention to this important issue which includes meeting with your colleagues, placing a full-page ad in this week's Outlook, and a flyer campaign (see attached). I look forward to sharing my perspective at the Sept 12 City Council meeting.

Regards

John Powers

4463 Commonwealth Ave

One of only a few single family residences currently included in Housing Element Plan. The house would be torn down and replaced with an apartment complex as part of the St George plan

City Council should remove all single family residences from the Housing Element due to negative impact on neighborhoods and immaterial impact of single family residences on the housing element plan (only a few included)

100 Apartments at St. George?

It could happen!!!



Montecedro Senior Apartments, Altadena

St. George Episcopal Church has officially encouraged the LCF City Council to rezone their 2.1 acre properties to allow for as many as 50 apartment units per acre. That could result in a staggering **100 APARTMENTS** in one of the most congested areas of our city. On **July 5, 2022**, St. George Reverend Amy Pringle wrote the following to City Officials.

I was delighted to meet with Keith Eich and Mayor Walker for a chat on May 25th ... to discuss the property of St. George's Episcopal Church. I reached out to our Diocesan Real Estate Task Force, and also to Episcopal Communities and Services, (developers of Montecedro and Twelve Oaks senior communities). Their advice is that a housing project...is only financially feasible if our property is zoned at a high enough density...

50 dwelling units per acre would be ideal...

Rev. Amy Pringle, Rector, St. George's Episcopal Church

LCF officials confirmed that 50 units per acre are possible if the City Council on September 12th approves the City's proposed LCF Housing Element and the units are low income. ***In comparison, the huge 600 Foothill developer project across from the ARCO gas station was 47 units. Come to the City Council meeting at 6 p.m., September 12th at City Hall, 1 Civic Center Drive.*** Ask why the proposed LCF housing plan contains 57% more units than the state requires. Encourage the City Council to only approve a ***lower apartment density for the St. George properties as well as 600 Foothill*** which will still allow the City to meet state requirements.

Email City Council members, Mayor Keith Eich, keich@lcf.ca.gov; members Richard Gunter III, rgunter@lcf.ca.gov; Michael Davitt, mdavitt@lcf.ca.gov; Kim Bowman, kbowman@lcf.ca.gov; and Terry Walker, twalker@lcf.ca.gov.

Be wary of anyone who says *"this doesn't mean that anything will be built...this is a long process...we would never do that... or no plans have been submitted."* Truth is that over time:

AS THEY ZONE IT, THEY WILL BUILD IT!

Questions? Send email to [REDACTED]

Linda Van Winkle Deacon
[REDACTED]

September 8, 2022

City Council Members
City of La Canada Flintridge
One Civic Center Drive
La Canada Flintridge, CA 91011

Re: Draft Housing Element and Site Selection Inventory

Dear Mayor Eich, Mayor Pro Tem Gunter, and Council Members Walker, Davitt and Bowman:

I am writing to express my concern with certain portions of the site selection draft. Although I recognize that a lot of time and thought has gone into it, the new draft contains issues that will damage the city forever, and that are completely unnecessary for a comprehensive, legally acceptable housing element.

Currently, the Downtown Village Specific Plan (DVSP) provides for a "village" type atmosphere in the core area of the city. This plan was created amidst great controversy, and has been followed carefully ever since. The goal has been to avoid the kind of high density, high congestion areas that have become so apparent in portions of Pasadena and Glendale. While the demands of the housing element have created challenges to this goal, it is not necessary to plot 35 foot, 30 unit per acre sites (which will increase even more when density bonuses are applied) on the south side of Foothill Blvd., within the DVSP, in order to achieve the required housing element numbers. Yet that is what the current draft of the site inventory has done. 600 Foothill Blvd., 1010 Foothill Blvd., 820 Foothill Blvd. W of 820 Foothill Blvd. and 824 Foothill Blvd. have been documented as being singularly inappropriate for this type of construction. These sites have been included as 35-foot, 30 unit/acre sites, despite: a) virtually universal objection to these south side of Foothill sites; b) a complete failure to solve or even address the objections; and c) the fact that none of these sites, at this height and density, is necessary to meet the required numbers. At a two story, 12-15 units/acre designation for these sites, the site inventory would still significantly exceed the state requirements. There is no need for these sites to stay high density.

The excuses for including these sites as high density sites are false.

1. Excuse Number One: "There is no time to consider any changes to the draft housing element."

This is patently false. If the City Council approved an amendment to lower the density of these properties, only two charts and the site selection list would need to be amended. It will take less than 20 minutes to make the amendments necessary to change these five parcels from the MU-25 density, to the MU-12 density. Nothing else needs to be changed. No great investigation is necessary. The problem can be remedied with virtually no effort.

2. Excuse Number Two: "The state is requiring us to do this."

This is patently false. The number of housing sites required by the state is 612. The draft housing element provides for a substantially greater number. Even if the five parcels are slated for the MU-12 designation, the number of units substantially exceeds the state requirements.

3. Excuse Number Three: "We are struggling to meet our "very low" and "low-income" housing numbers."

This is patently false. These sites do not purport to significantly add to either the low- or very-low income units. In fact, the 600 Foothill site is designated completely "above moderate income". Dropping the density, as suggested, still leaves a significant excess for the very low- and low-income categories. The inclusion of these sites damages the DVSP and provides NO benefit for the city in the housing areas with which it is struggling. It is truly a self-inflicted wound without justification or excuse.

4. Excuse Number Four: "We will adjust the sites to better fit with the neighborhood during the zoning and design standards process".

This is patently false. The housing element becomes part of the general plan. It is not legal to pass zoning that is inconsistent with the general plan. It is not credible that the Planning Commission, which lacked the courage to properly designate these parcels when a simple ministerial act would have sufficed, will suddenly develop the courage to amend the housing element during the zoning process. The time to protect the city is now.

5. Excuse Number Five: "There is already a 35-foot height designation in the DVSP"

This is patently false. There is not. The whole purpose of the DVSP is to keep the profile low in the "village" area. To pretend that this is not a wholesale change to the area is simply to lie to the citizens.

6. Excuse Number Six: "We need to provide numbers vastly in excess of what is required because one or more of these parcels might 'fall out' as a designated housing site, and then we would have to look at everything again."

This is patently false. It overlooks some very obvious facts. Preliminarily, no one can see the future and there is no certainty that any particular site will "fall out".

Additionally, the current trend for La Canada is a very big increase in accessory dwelling units (ADU). We are told that there have been 24 permits for ADUs granted as of June of this year. Although, the housing element only gives La Canada credit for 15 ADUs a year, the excuse for that is that we have to average 2020 and 2021 into 2022 (and we cannot project any additional units for 2022) which drastically lowers our numbers. However, by the time any of the housing element sites have "dropped out", the 2022 year will have been completed and the city will be into, at least, 2023. A "new look" at the ADU situation at that time will likely more than make up for any loss from the "dropped out site". At a minimum, such a result is as likely as any other. Therefore a sure and certain devastation to the DVSP in order to accommodate a future possibility that may not occur, and that may be solved by events already taking place, is foolhardy. Since the new housing element specifically references efforts to increase ADUs in the city, it is far more likely than not that such ADU increases will occur.

This excuse also ignores that fact that changing these parcels back to a more modest 12-15 units per acre still leaves the city with a vast excess of proposed housing sites, even without an increase in ADUs.

7. Excuse Number 7. "The DVSP is outdated since it was put in place before cell phones were invented."

This is a patently false. Preliminarily, it is irrelevant to the proper development of the designated parcels whether people communicate by cell phone, rotary dial, or carrier pigeon. Additionally, there is absolutely no public outcry to destroy the DVSP. Indeed, people who speak on the issue routinely state their support for the village atmosphere of the city. Before destroying the DVSP, considerably more factual evidence than the invention of the cell phone should be developed.

8. Excuse Number 8: "We have to do this in order to get the state approval".

There is simply no evidence that this is true. The previous plan that was scheduled to be approved in April was compliant and legal in all respects. This plan, even without these five sites at high density, is even more generous. In April, when the citizens were sandbagged with staff announcement that the proposed and published site selection draft was being pulled, we were unaware of what could possibly have caused such disruption to what had seemed a very well ordered process. After receiving information from the state pursuant to a Freedom of Information Act request, it is clear that the original draft was sabotaged by former Council Member Curtis' investment group for the 600 Foothill development. Nearly all of the letters to the state were demonstrably sent by 600 Foothill. (Other letters may be tied to 600 Foothill as well. The roster of investors is not known, and probably will not be unless and until some type of litigation results in this disclosure.)

Foolishly, the citizens of La Canada had not expected a sitting City Council member to undermine a City Council recommendation. However, the citizens will not be fooled a second time. While it is undoubtedly true that, should 600 Foothill be removed from the MU-25

designation, former Council Member Curtis will again wage an attack at the state level, the citizens are now aware of the sabotage, and are prepared to defend the city's plan, if it is amended by the re-designation of these five parcels, at the state level. Exposing the self-interested nature of the negative commentary, and documenting the well taken concerns to making these sites very high density, is not something that we knew we needed to do. However, it is not a lesson that has been or will be forgotten.

Putting all these ridiculous excuses aside, the most devastating problem with including these parcels as 3 story 30-unit/acre sites is that it completely ignores the facts, complaints, and arguments expressed by hundreds of citizens and the City Council. These documented concerns about the south side of Foothill, and particularly about the 600 Foothill parcel, (high traffic, especially with the ARCO gas station that is always filled with overflow vehicles, very narrow streets, parking problems that already frequently make the streets impassable for 2-way traffic, proximity of residential neighborhoods that lack sidewalks, lack of appropriate access, destruction of the mountain views, violation of the village atmosphere in the DVSP area, and many others) have never been addressed by either staff or the Planning Commission. Indeed, they have been totally ignored. It is as if the citizens simply do not exist. The only concern seems to be to provide an opening for a development by former Council Member Curtis.

The problems with these south of Foothill sites are real, and they are not solvable with a development plan of this density and height. There is no significant support for inclusion of these south of Foothill properties as high density, except from the 600 Foothill investors. Childishly and rudely turning your back on citizens addressing the Commission, as Commissioner McConnell did on August 25, or pointedly hiring the sheriff to intimidate the citizens at the meeting, as staff and the Commission did on August 25, do not count as solving citizens' concerns. 600 Foothill would never have been considered if it were not for the desire to please Mr. Curtis. That is not a legitimate basis for governing this city. Mr. Curtis' investment opportunities should not triumph over the health and welfare of the city. This is your chance to stand up for transparent governance, and fairness for the La Canada citizens. Please do not fail.

Sincerely,

A solid black rectangular box used to redact the signature of Linda Van Winkle Deacon.

Linda Van Winkle Deacon

Housing element

Drglenn@[REDACTED]

Thu 9/8/2022 5:39 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Greetings. I could not figure out how to submit a written comment for 9/12 meeting so am writing to you.

There was a good reason that the city Council denied the 600 foothill application even after the planning commission pushed it forward. Same reasons how to be a parent for this new proposal and I hope the city Council will once again deny approval. Yes I know that we are under the gun to comply with state requirements and feel that there must be another way that does not impact our community as viciously. Thank you for your consideration.

Glenn Fischel

La Canada

Sent from me

ADUs in Housing Element

David Haxton <[REDACTED]>

Thu 9/8/2022 5:11 PM

To: Susan Koleda <skoleda@lcf.ca.gov>; Emily Stadnicki <estadnicki@lcf.ca.gov>

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The below sentence is from Appendix D of the draft Housing Element:

"In all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities."

How is the city encouraging this? I am unaware of anything the city is presently doing to encourage ADU occupancy by the above groups. The draft Housing Element does say that fees for legalizing unpermitted ADUs are reduced by 30% if occupied by the above groups, but that is for unpermitted ADUs, not new ADUs.

As to the 30% fee reduction for legalizing unpermitted ADUs, the draft Housing Elements is written as though this fee reduction currently exists. Is that true, or is it a planned future fee reduction?

Development at St. George's

Patty Wynne-Hughes <[REDACTED]>

Fri 9/9/2022 12:07 PM

To: Housing Element Email <housingelement@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear City of LCF,

I only now just realized that Saint George Church is promoting the sale/use of their property for the LCF low income housing requirement. Well, of course they are! Their financial gain would be our local citizens' loss!

Giant concern: Commonwealth Avenue is already overly used and cannot handle any potential increase in traffic! We are a narrow street that can barely handle traffic going in both directions as it is! On garbage days (Tues. and Wed.) cars must pull over to allow autos to pass from the opposite direction. People zoom up the avenue to Milmda to avoid Foothill and access Angeles Crest Highway and the freeway entrances. With two large banks already existing on the Foothill corners, as well as the proximity of the Gelsons and TJ Maxx shopping mall, this is a potential nightmare that must be considered. It's dangerous and ill-conceived.

I have lived one block north of Foothill on the corner of Commonwealth since 1993 and have seen the drastic increase in traffic over the years. Please don't let this housing development happen at the St. George location. It's a bad idea with consequences that could negatively change our lives and city forever.

Respectfully,

Patty Wynne-Hughes



September 12, 2022

VIA EMAIL

City Council
City of La Cañada Flintridge
One Civic Center Dr.
La Cañada Flintridge, CA 91011
Email: citycouncil@lcf.ca.gov

RE: Insufficiency of the City's Sixth Cycle Housing Element
September 12, 2022 City Council Meeting, Agenda Item 5.

To the City Council:

Californians for Homeownership is a 501(c)(3) non-profit organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with the law governing housing elements.

As you know, housing element law places strict requirements on the sites inventory that the City must include with its Sixth Cycle housing element. We have reviewed the materials provided with your agenda packet. Based on this review, we have determined that the inventory is legally inadequate, and that the City will not be able to meet its obligation to support the inventory with evidentiary findings as the law requires. Our concerns echo those raised in the review letter sent to you by HCD, dated December 3, 2021.

These inadequacies expose the City to the risk of litigation by the state, our organization, or another organization dedicated to addressing the housing crisis through impact litigation. We urge you to continue this item so that staff can return with a compliant housing element.

State Law Governing the Use of Nonvacant Sites to Satisfy Housing Element Obligations

Under Government Code Section 65583.2(g)(1), for each nonvacant site, a city must "specify the additional development potential . . . within the planning period," and it must explain how the developmental potential for each site was measured. The methodology must consider the extent to which the existing use may impede development.

Additionally, if a city intends to rely on nonvacant sites to make up more than fifty percent of its lower income housing need, it is also subject to Government Code Section 65583.2(g)(2).



This provision requires the city to make an affirmative factual showing that the existing use is not an impediment to development. More specifically, the city must present “findings based on substantial evidence that the use is likely to be discontinued during the planning period.” Without these findings, the existing use is “presumed to impede additional residential development.”

Inadequacy of the City's Draft Housing Element

The sites inventory in the City's draft Housing Element does not meet these requirements. The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period. What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. It is not enough to state that a higher-intensity use *can* develop on a site or that a site is *attractive* for development. Instead, it must be shown that the actual existing use is *likely* to be discontinued.

Indeed, in places, the City's draft openly disregards conclusive evidence that a site will be maintained in its current use. For example, the owners of the property at 2200 Foothill Blvd has written to the City to say that they intend to continue to use the property as a commercial property throughout the planning period and to demand that the City remove the property from the inventory. We understand that this property owner is in the process of leasing or has recently leased the property, foreclosing redevelopment. Yet the City has insisted on keeping the property on its inventory. This conduct demonstrates a profound disregard for the basic goal of this process: to identify sites that are actually available for redevelopment.

Accordingly, as it stands, the existing uses of the non-vacant sites listed in the City's inventory would be presumed to impede additional residential development, making those sites inappropriate for inclusion.

Sincerely,



Matthew Gelfand

cc: City of La Cañada Flintridge
Mark Alexander, City Manager (by email to malexander@lcf.ca.gov)
Adrian Guerra, Esq., City Attorney (by email to aguerra@awattorneys.com)

California Department of Housing and Community Development
John Buettner (by email to john.buettner@hcd.ca.gov)

Petition to Keep the building code for 600 Foothill Property

有关保留600 Foothill地块现有的建筑规则的请愿

Petition summary and background 背景描述	<p>Petition to keep the current building code for 600 Foothill Property 有關要求保留600 Foothill地塊現有建築規範的請願</p> <p>We, the undersigned eligible residents of the City La Canada Flintridge, CA91011, petition the City Council of La Canada Flintridge to follow the current building code for 600 Foothill Property. It is currently zoned 12-15 units/acre with 24 foot height (2 story), while the City staff and Planning Commission are recommending the zoning on that property be changed to 25-30 units per acre with 35 foot height (3 story)</p> <p>我們，以下簽署人是La Canada Flintridge CA91011城市的合法居民，我們在此向市議會請願要求保留並執行600 Foothill 地塊的建築規範。該地塊現有的建築規範是12-15戶/英畝，限制高度24英尺（2層），而現在市規劃委員會建議將該地塊的建築規範增加到25-30戶/英畝，限制高度提高到35英尺（3層）</p>
Action petitioned for	<p>We, the undersigned, are concerned residences who urge our leaders to act now to keep the current building code for 600 Foothill Property</p> <p>我們，以下簽署人為本市合法居民，提請市議會保留並執行現有的建築規範。</p>

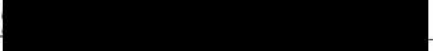
Printed Name 姓名	Signature 簽名	Address 地址	Comment 備註	Date 日期
Sherry Huang				9/7/2022
Fang Zhou				9/7/2022
Jiaqi Ma				9/7/2022
Chuan Qiu				9/7/2022
Gao zhen yu				9/7/2022

[illegible]

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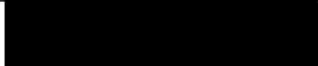

Printed Name 姓名	Signature 簽名	Address 地址	Comment 備註	Date 日期
Iu Choi Chan				9/12/22
Amy (Xia) Chen			It.	9/12/22
Daniel Li				9/12/2022
Nina Li				9/12/2022
GEORGE DIETRICH			NOT TO SPOIL LA CANADA	

Jinsu Wang			9/7/2022
Linlin Wu			
Xianglin Li			9/7/2022
Gang's Ye			9/7/2022
Mei Cao			9/7/2022
MARTORIE Hung			9/7/2022
Liqun Xie			9/8/2022
Maoliang			09/08/22
Allen Wang			09/08/22
Jay Hou			09/08/22
Ding Chang			09/08/22
Huoben Qiao			09/08/22
Jiemer Li			09/08/22
Joanna Zhao			09/08/22
Angel Qian			09/08/22
Yanwen Liang			09/08/22
Zhaoyang Pan			09/08/22
Wangjie Zhang			09/08/22
Liang Wei			9/10/22
Qirui Huang			09/10/2022
Shaoye Chen			9/11/2022
Aixia Wu			9/11/2022
Yong Li			9/11/2022

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Printed Name 姓名	Signature 簽名	Address 地址	Comment 備註	Date 日期
PENG JIANG				9/9/22
Yujin Lee				9/9/22

[illegible]

Linda Klibanow

I joined St. George's Episcopal Church in La Canada about 1986-1987, several years before Amy Pringle became rector. I attended for approximately 25 yrs, serving two terms on the vestry, teaching Sunday School, being a lay reader, volunteering in the Dragon Thrift Shop and decorating its windows, my daughter went to St. George preschool and my daughter and I for several years participated in the Red Shirt (Lakota) project. I even represented the parish in a time of need as its pro bono legal counsel.

I stopped by St. George's this past Sunday (9/11) after reading the September 8, 2022 Outlook article regarding Rev. Pringle's allegedly surreptitious pursuit of zoning changes to allow development of a very large and population-dense apartment complex on St. George property.

My understanding always has been that St. George's founders intended their property (including the land Rev. Pringle is proposing be turned into high density housing) to support the mission of St. George's parish members. I believe it would constitute a breach of duty owed to such early parishioners, many of whose ashes have been trustingly interred in the Memorial Garden on the St. George's campus, to build a large apartment building, rather than to protect hallowed space for fond remembrance.

When I stopped by St. George's yesterday and spoke with some old friends who have remained, it came to my attention that there may not be a properly functioning vestry—and decisions such as seeking rezoning to convert any of the St. George property to commercial ends would be within the purview of a properly constituted and functioning vestry.

I found in the on-line materials (700+) pages a letter dated July 5, 2022 from Rev. Pringle to the Council, the mayor and the planning commission, dated July 5, 2022, in which she alludes to consideration of closing the preschool which has always been a preeminent part of St. George's ministry. From what I can see in my La Canada neighborhood there are many families with babies and young children.

St. George's property should be withdrawn from any consideration by the City for any purpose until time is allowed for careful examination of whether the parish is being governed per episcopal law.

Fwd: St. George's

Richard Gunter <rgunter@lcf.ca.gov>

Wed 9/14/2022 1:42 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

 2 attachments (35 KB)

Hearing comments Sept 2022.docx; Planning Update Sept 2022.docx;

Richard B. Gunter III | City Councilmember | City of La Cañada Flintridge
One Civic Center Drive | La Cañada Flintridge | CA 91011
rgunter@lcf.ca.gov | +1 (310) 728-0819

From: Amy Pringle [REDACTED] >

Sent: Sunday, September 11, 2022 2:13:18 PM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>

Cc: Jeffrey McConnell [REDACTED] >

Subject: St. George's

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear LCF City Council,

I'm writing to give you a heads up about my planned remarks for tomorrow night's meeting, (attached), since they kinda throw the ball back into your court, and I don't want you to be taken by surprise. I may tweak my words some more, but the gist will stay the same.

Also attached is a copy of an in-house document which I circulated to church folks, then ended up adapting for the LCF FB page, in response to a post about our property. It catches you up to exactly where our thinking has been, and how it's now changed.

See you tomorrow, for ALL the fun!

Amy Pringle
Rector, St. George's Episcopal Church
[REDACTED]

Mayor, Council Members, citizens:

I'm here to speak as three people tonight: As the rector of St. George's Episcopal Church and Preschool, as a priest, and as a person.

- 1) On behalf of St. George's, let me say first, and clearly: Assign whatever housing density you'd like to our property. We really don't care. Ever since hearing from our diocesan real estate advisors the high number of units we'd have to build in order to make a senior housing project financially feasible, we've been cold on the idea, because we have zero interest in building any monstrosities on our land. Honestly, I wasn't even going to attend this meeting tonight, until the whole kerfuffle in the Outlook this week.

So zone us however you'd like. We have a church and preschool thriving at the center of our campus; we have a Memorial Garden for which we have obligations in perpetuity, also at the center of our campus; and you can zone our outlying properties however you'd like. If it's helpful to you, to get your Housing Element accepted by the state, feel free to assign us a high density; if it's more helpful to you, to address the concerns of the community, give us a low one. Either way, it's a non-issue for St. George's.

- 2) As a *priest*, let me add that once the Housing Element does get accepted by the state, it's my hope that this Planning Commission and Council will take a hard look at housing equity in this city. We don't intend to build it at St. George's, but housing should nonetheless be built, which would allow people who work here to live here.
- 3) And finally, as a *person*, who's mildly interested in trends in city planning, my own belief is that the best way for additional housing to be built here is 'missing middle' housing – beautiful duplexes and fourplexes scattered throughout town, where the teachers in our schools, employees of JPL, shop owners and managers and other professionals can live. I know that such a small level of density doesn't help with the present Housing Element; but I believe that longer-term, and morally, it would absolutely count as justice in this community.

So zone St. George's property however you want; we don't care.

Do what you have to do, to get the Housing Element passed by the state.

And then, please, take an actual look at housing equity, for all the wonderful people who spend their days working here, and should be able to live here.

Thank you.

I'm the Reverend Amy Pringle, Rector of St. George's Episcopal Church and Headmaster of St. George's Preschool. Much has been said about our institution, in this community's discussion about housing; and most of it has been said without ever asking to hear our side of the story. So I'm here to tell it to you.

1. St. George's has been engaged in a long-range planning process for several years, trying to discern the best uses of our property. *No decisions have yet been made.*
2. For those who don't know, our 2-acre campus consists of a church, a preschool, four preschool playgrounds, a Memorial Garden, two parking lots, four commercial lease properties along Foothill Blvd., and a house on Commonwealth – which used to be the rectory, where the priest would live, and now is a residential lease, with an office leased behind the detached garage.
3. Our congregation, like many others, has been shrinking; and we don't yet know how our preschool will be affected by the state and national governments' push for universal free preschool in the near future. Many of our buildings are near or past the mark of a hundred years old, and a couple are at a decision point between significant renovation or rebuilding altogether.
4. Therefore our planning process has included both short-term scenarios, for those buildings in most need of attention, and a larger-picture look at redeveloping the whole campus over time. *No decisions have yet been made.*
5. Among the options we discussed in the earliest parts of our planning were:
 - a. Converting the commercial part of campus to a holistic health care center, inviting tenant practitioners of acupuncture, herbal remedies, and other eastern wellness methodologies, as well as offering classes in yoga, tai chi and qigong
 - b. Dedicating part of the campus to being a coffee-/teahouse/Three-Pines-style bistro/village pub, to fit into the DVSP's dream of a walkable downtown ethos
 - c. Developing part of the campus into a 'massage village' with various international methods offered in our several commercial buildings
 - d. Dedicating some of our buildings to a We-Work-style communal space, and a good number of private office spaces, for the many self-employed professionals and retiree consultants in town

No decisions were made among these options.

6. Also early on in our process, we interviewed all the community leaders of La Canada with whom we have relationships. The one and only common thread, among their answers to the question of what businesses are needed in town, was senior housing. So we looked into it.
7. Knowing that a proposed assisted living project had already been rejected by the community, we investigated the possibility of 'still-ready-for-prime-time' senior living – empty nesters, widows and widowers, and downsizing retirees who are able and independent, but no longer want or need a massive home, and all its landscaping, to take care of.
8. We saw the possibility of, and were briefly excited about, a brand-new niche in the senior living market: downsized dwellings which were still spacious, and surrounded by plenty of green space, with just enough accessibility built in to accommodate the knee scooters and temporary wheelchairs of people recovering from back and knee surgery. Residents could have very light assistance available – a job we could give to college kids, we thought, or even to help kids aging out of the foster system – who could provide help getting things down off high shelves, setting

up Christmas trees, tearing down Amazon boxes, calling an Uber, and providing perpetual IT assistance to keep the phones and TV remotes working.

9. We consulted our diocesan real estate advisors, in particular Episcopal Communities and Services, who own the senior living facilities of Montecedro in Altadena, Twelve Oaks in Glendale, and The Atherton in Alhambra. We thought that our location near the geographic center of those three assisted living facilities might act as a feeder community, where people could live independently here, as long as possible, and then make a smooth transition to assistance in one of those three facilities, when and if they needed it.
10. However, we were told by both our diocesan Real Estate Task Force and ECS that to make any housing project financially feasible, a large number of units would be required. This set us back, because from the start we'd all been in agreement that we'd never build what we called 'penitentiary-style' housing on our land. We realized that in order to take this idea any further, we'd have to invest a lot of money consulting multiple architects, to see if our idea of large, gracious, airy units with lots of green space was even possible. And we didn't want to undertake that kind of significant expense, just to find out whether or not an idea would work.
11. So we stalled there – **we're still stalled there** – not quite knowing what to do next. *No decisions have yet been made.*
12. In the meantime, we were sent a letter by the City, asking if we'd agree to our property being listed on the Sites Inventory of their new Housing Element, and if we'd also say that we're amenable to the idea of developing affordable housing on our land. 'Sure,' we said, 'we'll be a pal, and do that for you. What the heck, we'll even include what our real estate advisors told us, about the high density level required for a housing development to be feasible. That way you can meet your 612 RHNA number with a fewer number of larger lots, instead of having to talk homeowners and small businesses into putting *their* properties on the list.' Then we patted ourselves on the head, for being such caring and cooperative community partners with the City, helping them out in their hour of need. And we went back to being stalled at a back-to-the-drawing-board place in our own long-range planning, *further away from a decision than ever.*
13. The next thing we knew, there were letters to the editor in the Outlook, talking about St. George's push for a "mega-apartment complex." There was a front-page story about the housing element, with a large picture of *our* church linked to its headline. And there was a full-page ad paid for by some anonymous source, full of loathing, and clearly aiming to destroy both our church and our preschool for even thinking about the word 'housing.'

St. George's reserves the right to talk amongst ourselves, and explore every possible future for our campus, without it becoming a cause for mass hysteria in town. The exploration phase of our long-range planning is our business, and ours alone; and we have a right to put any idea we want to on the table for discussion. We've been attacked for a proposal we never made, and *wouldn't* make, and *had already ruled out* making. We had *ruled it out*, because we're *not* professional real estate developers, we're a *church*; and our decision-makers are residents of this town, who want all the same things for it that our concerned neighbors want. And we're *Episcopalians*, for God's sake; it's not in our nature to do anything gauche!

So, Yes: St. George's is trying to figure out our best options for the future. We get to talk about that, and we deserve to do it in peace. *No decisions have yet been made.*

Thank you.

Housing Element

Rody Stephenson <[REDACTED]>

Mon 9/12/2022 2:13 PM

To: Keith Eich <keich@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

Cc: Mark Alexander <malexander@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

I will not be able to attend tonight's CC meeting.

Suggestions:

1. Please pass final housing element tonight.
2. Send to State. Tell them it is final.
3. Do not accept ANY comments from the State by phone. Only in writing. USPS.
Signed by high official.
4. Do not plan to spend any time on the Housing element for 6 years.

Rody

R. Rhoads (Rody) Stephenson

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Fwd: Please oppose changing zoning in LA Canada

Anna Tom <[REDACTED]>

Mon 9/12/2022 11:24 AM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Anna 😊

2 [REDACTED]

Begin forwarded message:

From: Anna Tom <[REDACTED]>

Date: September 12, 2022 at 11:21:23 AM PDT

To: keich@lcf.ca.gov, mdavitt@lcf.ca.gov, kbowman@lcf.ca.gov, kbowman@lcf.ca.gov, twalker@lcf.ca.gov

Subject: Please oppose changing zoning in LA Canada

I am a 23 year La Canada resident and I am expressing my opposition on changing the zoning in La Canada to high density apartments. Please preserve our beautiful neighborhood.

Anna Tom

[REDACTED]

[REDACTED]

2 [REDACTED]

Proposal of high density apartments in La Canada

Boon <[REDACTED]>

Mon 9/12/2022 11:29 AM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Susan Koleda,

We are longtime residents of La Canada and love the laid back atmosphere of this city.
The city's proposal of high density apartments would bring in traffic congestion and crime into our neighborhood.

Therefore, we say **NO for high density apartents**. Please reconsider.

Thank you.

Sincerely,
Ken Ueda

(No subject)

Stella W [REDACTED] >

Mon 9/12/2022 2:01 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Ms. Koleda,

We strongly object to the City's proposal to rezone LCF to build more than 900 apartments including low income housing in our community for many reasons. Just to name a few:

- Major traffic jams
- Increased crimes
- Huge impact to our schools
- Adversely affect property values
- Strain on our electricity and water
- Override current city restrictions like parking, building set-backs, etc.

We are unable to attend the meeting tonight, I hope our voices are heard via email.

Sincerely,
Stella Wong
Derek Wong

Opposition to the City's Proposal to rezone LCF for building apartments

Tate LLC [REDACTED] >

Mon 9/12/2022 2:03 PM

To: Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear Ms. Koldeda,

We strongly object to the City's proposal to rezone LCF to build more than 900 apartments including low income housing in our community for many reasons. Just to name a few:

- Major traffic jams
- Increased crimes
- Huge impact to our schools
- Adversely affect property values
- Strain on our electricity and water
- Override current city restrictions like parking, building set-backs, etc.

We are unable to attend the meeting tonight, I hope our voices are heard via email.

Sincerely,
Andy Wong

City Zoning Plan

grace wong <[REDACTED]>

Mon 9/12/2022 3:27 PM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

Dear City Council members and Director of Planning,

This email is to let you know that our families (our immediate family owns three homes in La Canada), friends, and neighbors are firmly against zoning the city for high-density apartments. Currently, the traffic in our town on Foothill and Angeles Crest Hwy is already very heavy. The plan for the new high-density apartments will completely change our living environment once it passes.

We chose to move to La Canada and have lived here for decades, and now our children have also moved back to La Canada to raise their families because of the quality of living in La Canada.

There are many cities in Los Angeles County that are not safe to live in. I firmly request the City Council not to open the door to making La Canada a dangerous community for the residents.

Thank you for your serious and kind consideration in this matter.

Sincerely,
Grace Wong

1.5 FAR Too High for Lower Density

David Haxton [REDACTED]

Tue 9/13/2022 9:17 AM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>; Emily Stadnicki <estadnicki@lcf.ca.gov>; Mark Alexander <malexander@lcf.ca.gov>

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At last night's meeting I commented that the housing element should not include any floor area ratios as FAR is a development standard. Director Koleda later stated that the state requires housing elements to include not just density, but also FAR.

The draft housing element states that in the mixed use zones, projects that are entirely commercial will have a FAR of 0.5, and projects with a residential component will have a FAR of 1.5, thereby incentivizing the inclusion of housing (pp. 95 & 97).

(In the current housing element, the highest FAR is 1.3, in the non-DVSP mixed use zone, which is primarily Big Lots and Ross. The rejected project at 600 Foothill had a FAR of 1.37.)

While a FAR of 1.5 is appropriate for the higher 25-30 du/ac density, the lower 12-15 du/ac density should have a FAR no larger than 1.0.

Leaving the FAR at 1.5 for lower density properties would result in oversized projects being built with a token amount of housing to qualify the project for the 1.5 FAR. For example, 600 Foothill, with its 56,000 sf / 1.29 acres, would be able to develop 84,000 sf by including 16 apartments. In a hotel, at 500 sf per room, that's 152 hotel rooms with 16 apartments.

Also recognize that the housing element's FAR puts constraints on the development standards the city can impose. A FAR of 1.5 essentially requires the city to allow three-story projects, while a FAR of 1.0 allows projects to be limited to two stories.

I plan to make a comment about the above during non-agenda public comment at next week's city council meeting, with the hope that council will then give direction to staff to prepare an alternate version of the housing element for the Oct. 4 meeting that specifies a 1.0 FAR for the lower density zones. While council can't take action on a non-agenda item, it is allowed to give direction, such as when council directs staff to look into an issue a resident commented on.

La Canada NEEDS affordable Senior Housing

Pamela woncik [REDACTED] >

Fri 9/16/2022 1:11 PM

To: Keith Eich <keich@lcf.ca.gov>; Richard Gunter <rgunter@lcf.ca.gov>; Michael Davitt <mdavitt@lcf.ca.gov>; Terry Walker <twalker@lcf.ca.gov>; Kim Bowman <kbowman@lcf.ca.gov>; Susan Koleda <skoleda@lcf.ca.gov>

Cc [REDACTED]

[EXTERNAL EMAIL] This email originated outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe

We need Senior Housing, especially with Assisted Living & Memory Care options, that's affordable and SAFE right here in La Canada. I sincerely sympathize with residents who don't want the added traffic/parking a multi-unit housing development might produce and I'm *completely* with them on that. But we **CAN** be mindful of that AND still make it work. Young families need an opportunity to move into this city and enjoy the life we "old folks" have enjoyed. Every city needs to bring in new blood, energy and joy to keep it going. What will happen to our schools/town if all we Boomers stay put in our single family homes, paying our low property taxes, and exempt from the school parcel tax?

Many of us would benefit from [and need] *affordable* Senior Housing with Assisted Living & Memory Care options. But as we get older even just the thought of moving to a new city is very stressful; so we hunker down and stay put at home far longer than we should. I've moved around a lot in my lifetime and I NEVER thought I'd stay put in one place/one house this long. But here I am 25yrs later still in La Canada and I really don't want to move away. I'm a widow and a senior. I love my home and so far I'm still able to keep up with most of the work myself. But I'm starting to think the community/societal need to free up my single family home so a young family can get into La Canada schools is more important than my love of pruning my fruit trees. Also, I took care of my father who had a rare genetic form of Muscular Dystrophy and after that I for over a decade took care of my mother who had advanced Alzheimer's. The experience taught me *a lot* about how truly difficult it is to age in this society and I also learned what seniors need. It would have helped so much if there were an affordable facility right here in town to help me take care of my lovely and deserving mother.

I watched the Special City Council Meeting 09/12/2022 online and it really upset me. Dozens of people attended but the majority were present under false pretenses because of misleading messages and/or advertising in the local Outlook Newspaper. And the City Council appears to have "fallen for it" to some degree when they changed the density for the few parcels on the south side of Foothill Blvd that are large enough to build an adequate and much needed senior housing facility.

I can understand the logic you applied when reducing the density, the south side really is different from the north side in that area, but I ask you: instead of changing the density to ease neighbors' concerns, is it possible to leave the density very high but designate these parcels exclusively for Senior Housing only?? The neighbors fear poor or homeless people will move into La Canada and bring crime. Many others had more valid concerns about increased parking/traffic. But both aren't really an issue if the structures are for Senior Housing only. Seniors, especially those needing Assisted Living don't [or barely] drive so parking/traffic isn't a big issue except the builder MUST accommodate parking for staff and some transient visitors. And while some seniors might dream of the days we had the energy to be great Cat Burglars, I doubt any of us would be very successful at crime now LOL. Also affordable senior housing typically consists of smaller units more like bachelor or 1br size – so a higher density would be logical & maybe more economical to build? Typically these facilities have vans to bring residents en masse to events/outings or to doctor visits. And for the many residents still physically active having the

ability to walk to places **close by** (stores, restaurants, post office, church, etc) is **imperative** and also important for their good health. So someplace like 600 Foothill is just about the only location adequate for senior housing in this city.

I have no skin in the game at 600 Foothill; I don't know the builders or the neighbors. But I am a senior who knows I may sooner rather than later need to move into senior housing. I don't like the most recent 600 Foothill design and I don't blame the city for rejecting it. We don't need office space coupled with hotel rooms coupled with [high end?] apartments for seniors – seems weird. What we need is some place nice & safe but also affordable for most of us who want to stay in La Canada but shouldn't stay in our single family homes any longer. Having a facility like Pasadena Highlands right here in La Canada would be great! (maybe fewer levels, but even the many levels, if **done right** could work, it seems like 4529 Angeles Crest Hwy has worked in LCF). Go tour Pasadena Highlands and other senior housing for ideas and their expert advice. <https://www.caring.com/senior-living/california/pasadena/pasadena-highlands-91104>

If we are committed to becoming an “age friendly” city then please don't make a decent senior housing facility impossible to build or afford in LCF.

Regards,
Pamela Woncik

████████████████████

La Cañada Flintridge City Council
One Civic Center Drive
La Cañada Flintridge, California 91011

CC: Department of Housing and Community Development
Division of Housing Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Re: City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Dear Honorable Members of City Council of the City of La Cañada Flintridge,

I am the director of a preschool at 4603 Indianola Way. (APN 5815-021-036) located in the City of La Cañada Flintridge. The site, improvements and premises are owned and occupied by Parents and Childrens Nursery School, a California Non Profit Public Benefit Corporation. The school owns the property outright and has no intention of discontinuing the current use whatsoever for the foreseeable future, especially and including the next eight year planning period. Additionally, my property is owned and operated as, and by, a registered nonprofit corporation. As such, the school would forgo it's tax-exempt status on property taxes if the school were to redevelop it's property into multifamily residential use.

Although the City wishes to include my site within the Sites Inventory of the City of La Cañada Flintridge's 6th Cycle Housing Element, The school has a long and successful history and there is no intention of discontinuing the current use of this property during the next eight-year planning period. As such, we do not intend to redevelop my property, or any portion thereof, into housing within the next eight (8) year planning period.

In acknowledgement of the facts presented above, I hereby request that the City **remove** my property from consideration of the Sites Inventory of the 6th Cycle Housing Element.

Sincerely,

Marji Golden

Director
4603 Indianola Way, La Cañada Flintridge CA 91011

October 4, 2022

Via Email -- citycouncil@lcf.ca.gov

City Council of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, California 91011
Attn: Honorable Mayor Eich and City Council

Re: City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory – Panda Express

Dear Honorable Mayor Eich and Members of City Council:

Panda Express is located at 700 Foothill Blvd, La Cañada Flintridge CA 91011 (APN 5814-020-028). Panda Express is an established and successful restaurant that is generating significant tax revenues for the City.


The City has wrongfully included our property within the Sites Inventory of the City of La Cañada Flintridge's 6th Cycle Housing Element. It was done without asking us and we have NO intention of discontinuing the current use of this property during the next eight-year housing planning period. We operate a very successful restaurant at this location, and it would make no economic or business sense to turn the location into housing. We are *surprised* that the property would even be proposed for inclusion in the Site Inventory. To allow the property to remain in the Sites Inventory is to misrepresent to the State that the site could be redeveloped with housing, which it can and will not.

For the avoidance of doubt and to be clear:

- (1) we do **not** intend to redevelop our property, or any portion thereof, into housing within the next eight (8) year housing element planning period; and
- (2) we hereby request that the City **remove** our property from consideration of the Sites Inventory of the 6th Cycle Housing Element.

We thank you for complying with our request.

Sincerely,


David Landsberg
All States Realty Company, Inc.
DbA Panda Express

cc: Department of Housing and Community Development
Division of Housing Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
Attn: Mr. John Buettner – john.buettner.hcd.ca.gov

Susan Koleda – Director of Planning -- skoleda@lcf.ca.gov
Mark Alexander – City Manager -- malexander@lcf.ca.gov

GTR Realty LLC
2243 Foothill Blvd
La Cañada Flintridge, CA 91020

To: La Cañada Flintridge City Council
One Civic Center Drive
La Cañada Flintridge, California 91011

Re: City of La Cañada Flintridge 6th Cycle Housing Element and Sites Inventory

Dear Honorable Mayor Eich and Members of City Council of the City of La Cañada Flintridge,

I am the owner of 2243-2265 Foothill Blvd. (APN 5870- 010-043,044,045,046) located in the City of La Cañada Flintridge. The site, improvements and premises are leased to Big Lots under a 20-year lease with two (2) 10-year extension options.

Although the City wishes to include my site within the Sites Inventory of the City of La Cañada Flintridge's 6th Cycle Housing Element, I have no intention of discontinuing the current use of this property during the next eight-year planning period. It would be impractical and financially infeasible to redevelop my property for housing, given the long-term lease to Big Lots. As such, I do not intend to redevelop my property, or any portion thereof, into any residential or mixed use within the next eight (8) year planning period while the existing Big Lots lease is still in effect.

I hereby request that the City remove my property from consideration of the Sites Inventory of the 6th Cycle Housing Element in acknowledgement of the facts presented above.

Sincerely,



Lisa Hsu
Manager, GTR Realty LLC
2243 Foothill Blvd., La Cañada Flintridge, CA 91011

Appendix B: Review of Past Accomplishments

B.1 Overview

Government Code Section 65588(a) requires each jurisdiction to review its housing element as frequently as appropriate to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and
- The progress of the city, county or city and county in implementation of the housing element.

This section documents the City's achievements under the 2013-2021 (5th Cycle) Housing Element with respect to the actions and objectives contained therein. This section describes the relative success of the City's efforts to implement the 5th Cycle programs, and contains recommendations for program retention, revision, deletion or addition to address current and projected needs and state requirements for the 2021-2029 planning period.

Table B-1 summarizes the City's progress regarding the 5th Cycle RHNA for new construction, rehabilitation, and conservation/preservation. Table B-2 provides a review of the Program accomplishments for the 5th Cycle Housing Element.

Table B-1: Objectives and Accomplishments

Income Category	RHNA Objective	New Construction		Rehabilitation		Conservation/Preservation	
		Objective	Accomplishment	Objective	Accomplishment	Objective	Accomplishment
Extremely Low	49	49	0	8	4	0	0
Very Low	43	43	0	16	0	0	0
Low	57	57	0	24	9	0	0
Moderate	62	62	0	16	2	0	0
Above Moderate	132	132	91	0	0	0	0
Total	343	343	91	64	15	0	0

B.2 Effectiveness in Addressing Special Needs

As a small city with limited financial resources and high property values, the City sought creative methods during the 5th Cycle to address the housing needs to special needs populations in a manner that provided the most effective and efficient use of its limited funding options. This included participating in the San Gabriel Valley Regional Housing Trust and the San Gabriel Valley Council of Governments Homeless Prevention/Diversion Program. The City's participation in these programs is summarized below. Other activities that are not funding-related include preparing a draft ordinance to facilitate senior housing, which is currently in the public review process as part of the comprehensive Zoning Code update. The City is currently proposing to amend the existing Reasonable Accommodation ordinance for persons requesting modification to development standards to accommodate their disabilities to make the process easier and less expensive as part of the comprehensive Zoning Code update.

San Gabriel Valley Regional Housing Trust

The City participates in the Los Angeles Urban County Permanent Local Housing Allocation (PLHA), which allocates funding through State Property Transfer Fees to increase affordable housing stock in California. In order to make the most effective and efficient use of funding received through the program, the City contributes the bulk of the money it receives from the PLHA to the San Gabriel Valley Regional Housing Trust (SGVRHT). The SGVRHT funds affordable housing projects in the region that the City benefits from, but might not otherwise be able to accomplish on its own. The City approved approximately \$57,000 in funding from the PHLA in FY 20-21 and 21-22, the bulk of which (approximately \$55,000) is allocated to the SGVRHT fund.

SGVCOG Homeless Prevention/Diversion Program Grant Funding

In 2020, the City was allocated \$15,000 to implement a homeless prevention and diversion program from the San Gabriel Valley Council of Governments Homeless Prevention/Diversion Program grant funding. Given the low homeless count in La Cañada Flintridge, the City determined that it would be most appropriate to partner with a neighboring jurisdiction in the use of the funds. The City of Arcadia has an active homeless prevention program and is working with Union Station Homeless Services in Pasadena to implement homeless outreach. The City entered into a Memorandum of Understanding (MOU) with the City of Arcadia to allocate its share of funding to Arcadia and to support their ongoing efforts to combat the growing homelessness issues in the San Gabriel Valley.

Table B-2: Review of Past Program Accomplishments

Goal and Associated Programs		Accomplishments
Providing New Housing Opportunities		
Program 1: Adequate Residential Sites	<p>Remove the Planned Development (PD) permit requirement for High Density (30 units per acre) properties identified for rezoning. Regularly monitor the effectiveness of incentives in encouraging redevelopment and identify alternatives as necessary.</p> <p>Ensure development standards for areas with high density zoning are adequate to allow the achievement of the maximum density permitted. Adopt design guidelines to implement new mixed use and high density residential zoning. Maintain an inventory of residential and mixed use sites for interested developers; update the inventory annually. Assist in lot consolidation by providing a list of appropriate and available sites to interested developers. Monitor the sites inventory annually to ensure the City has adequate capacity for its RHNA.</p>	<p>On February 10, 2014, the City amended the Zoning Code to rezone 4.4 acres of existing lower density residential and nonresidential land to high density residential land. The City also removed the PD permit requirement for high density residential in 2014. As described previously, the City initiated a comprehensive update to the Zoning Code during the 5th Cycle, which includes reviewing and modifying development standards to allow achievement of maximum density permitted, including adoption of objective design standards and revisions to parking, setbacks, and other development standards—this program is ongoing. The City regularly monitors the sites inventory to ensure it has adequate capacity for its RHNA</p> <p>Continued Appropriateness: This Program continues to be appropriate. See Program 3 of the 6th Cycle Housing Element.</p>
Program 2: Downtown Village Specific Plan	<p>Provide information on sites within the DVSP area and development incentives available through the City's density bonus ordinance in support of affordable housing and on available financial assistance through the City, county, and state. Amend the DVSP designation to allow multi-family housing for all household types, not</p>	<p>Ongoing.</p> <p>Continued Appropriateness: This Program continues to be appropriate. See Program 4 of the 6th Cycle Housing Element for program to amend the DVSP to increase the density of the MU-2 district, modify development standards, and add objective design guidelines</p>

Goal and Associated Programs		Accomplishments
	just senior multi-family housing. Consider amending the DVSP to increase the multi-family residential density from 15 units per acre to 30 units per acre, consistent with citywide regulations.	
Program 3: Lot Consolidation	Allow administrative processing of lot consolidation requests. Provide assistance with site identification and entitlement processing. Offer fee deferrals for affordable housing projects. Work with property owners to facilitate lot consolidation and identify redevelopment potential.	Ongoing, no requests during the 5 th Cycle. Continued Appropriateness: This Program continues to be appropriate. See Program 7 of the 6 th Cycle Housing Element.
Program 4: Second Units/Accessory Living Quarters	Continue to support the development of second units as a source of affordable housing for lower and extremely low income persons, with the goal of developing two second units per year. Monitor annually to ensure adherence to codes and to assess rental rates.	The City is proactive in ensuring its Zoning Code remains consistent with state law. Zoning Code was updated in 2020 to comply with recent legislation. Continued Appropriateness: This Program continues to be appropriate. See Program 8 of the 6 th Cycle Housing Element.
Conserving and Maintaining Existing Housing		
Program 5: Code Enforcement (Community Preservation)	Continue to enforce the City's Property Maintenance Ordinance to preserve existing units, maintain property values, and support a high quality of life for residents. Provide information to income-qualified property owners on available rehabilitation assistance.	Ongoing. Continued Appropriateness: This Program continues to be appropriate. See Program 9 of the 6 th Cycle Housing Element.
Program 6: Residential Rehabilitation Program	Continue to advertise availability of the Residential Rehabilitation Program through brochures at the public counter and posting on the City's website. Target advertising to the lower and extremely low income households, including seniors and persons with disabilities (including persons with developmental disabilities). Provide CDBG funds to achieve approximately three grants per year.	On-going. City typically funds 2 residential rehab projects per year with CDBG funds. Continued Appropriateness: This Program continues to be appropriate. See Program 10 of the 6 th Cycle Housing Element.
Program 7: Sewer Connection Grant Program	Provide grants for approximately four to six lower and moderate-income households annually. Continue to advertise the availability of this program through brochures at the public counter, posting on the City's website, and other appropriate venues.	On-going - dependent upon funding. 2 connections completed in 2020 Continued Appropriateness: This Program continues to be appropriate. See Program 11 of the 6 th Cycle Housing Element.
Program 7: Condominium Conversion Ordinance	Continue to enforce condominium conversion regulations to help conserve existing rental housing and provide tenant protections.	On-going. No action in 5 th Cycle Housing Element. Continued Appropriateness: This Program continues to be appropriate. See Program 12 of the 6 th Cycle Housing Element—City is updating the Condominium Conversion ordinance as part of the comprehensive Zoning Code update.
Program 8: Multi-Family Housing Acquisition and Rehabilitation	Identify apartments and duplexes in the community in need of substantial rehabilitation and contact property and housing corporations regarding opportunities for acquisition and rehabilitation. Target assistance to units occupied by lower income households.	On-going. No action in 5 th Cycle. Continued Appropriateness: This Program continues to be appropriate. See Program 13 of the 6 th Cycle Housing Element

Goal and Associated Programs		Accomplishments
Facilitating Housing for Lower- and Moderate-Income and Special Needs Households		
Program 9: Density Bonus	Revise the Zoning Code to address density bonus provisions consistent with state density bonus law. Promote the use of density bonus incentives to developers and provide technical assistance to developers in utilizing density bonus for maximized feasibility and to meet local housing needs.	Completed in 2014; density bonus ordinance under review in 2021 to remain consistent with state law; reviewed by the Planning Commission; pending City Council review. Continued Appropriateness: This Program continues to be appropriate. See Program 14 of the 6 th Cycle Housing Element
Program 10: Special Needs Housing	Amend the Zoning Code and continue to monitor its effectiveness in facilitating a range of housing options in the City. Address impediments as appropriate and to the extent legally feasible.	Ordinances for special needs housing adopted in 2014. City participates in SGVRHT and San Gabriel Valley Council of Governments Homeless Prevention/Diversion Program. Continued Appropriateness: This Program continues to be appropriate. See Program 15 of the 6 th Cycle Housing Element.
Program 11: Senior and Workforce Housing	Continue to inform the development community of opportunity sites, development incentives, and financial assistance for development of workforce and senior housing. Prioritize funding assistance to affordable housing projects that include units affordable to extremely low income households. Support funding applications for county, state, and other financial resources for projects that further the community's housing goals. Work with qualified housing developers to pursue affordable housing in the community.	Ongoing. City participates in SGVRHT and San Gabriel Valley Council of Governments Homeless Prevention/Diversion Program. Continued Appropriateness: This Program continues to be appropriate. See Program 16 of the 6 th Cycle Housing Element.
Program 12: Mortgage Credit Certificate	Advertise the program in the City newsletter and website and provide brochures at the public counter to interested homebuyers. Work with local realtors to make them aware of the program.	On-going Continued Appropriateness: This Program continues to be appropriate. See Program 17 of the 6 th Cycle Housing Element.
Program 13: Home Ownership Program	Advertise the program in the City newsletter and website and provide brochures at the public counter to interested homebuyers. Work with local realtors to make them aware of the program.	On-going Continued Appropriateness: This Program continues to be appropriate. See Program 18 of the 6 th Cycle Housing Element.
Program 14: Housing Choice Voucher Program	Continue to participate in the Housing Choice Voucher Program. Encourage property owners, particularly owners of ALQs, to accept the vouchers. Promote program to extremely low-income households.	On-going Continued Appropriateness: This Program continues to be appropriate. See Program 19 of the 6 th Cycle Housing Element.
Ensuring Environmental Sensitivity		
Program 15: Hillside Development Standards	Continue to enforce hillside development standards to protect and preserve the environment of the City's hillside areas and protect residents from unreasonable risk of landslide, wildfire, and other slope-related hazards.	On-going. 29 Hillside Development Permits submitted in 2020. The Hillside ordinance is being updated as part of the comprehensive update of the Zoning Code. Continued Appropriateness: This Program is not continued in the 6 th Cycle Housing Element.
Program 16: Green Task Force	Continue to post and expand resources for energy and water conservation on City website. Continue to implement the Construction and Demolition Debris Management program and Calsense by the Public Works Department. Continue to implement recommendations of the Green Task Force as funding permits.	Ongoing. City adopted a Climate Action Plan (CAP) in 2016. Green Task Force remains an ongoing committee and the City continues to implement associated programs. City updated its website and reduced its fee schedule to subsidize the use of photovoltaic cells. Continued Appropriateness: This Program continues to be appropriate for the 6 th Cycle

Goal and Associated Programs		Accomplishments
		Housing Element--see Program 20 (Energy Use and GHG Emission Reductions).
Program 17: Advancement of Residential Design and Character	Continue to review overall design, size, scale, and other quality issues as they relate to residential development.	Ongoing, as part of review of development applications, especially in Hillside areas. Continued Appropriateness: This Program is not continued in the 6 th Cycle Housing Element. The City will be preparing objective design standards as part of Programs 3 and 4 in the 6 th Cycle Housing Element.
Promoting Equal Housing Opportunities		
Program 18: Fair Housing Program	Continue to promote fair housing practices and provide educational information on fair housing to the public. Provide referral to the fair housing service providers (Housing Rights Center and Fair Housing Council of San Fernando Valley). Place fair housing brochures at City counters and community locations and provide a link to the fair housing service providers on the City's website.	On-going through LACo Development Authority. Continued Appropriateness: This Program continues to be appropriate. See Program 22 (Affirmatively Furthering Fair Housing) of the 6 th Cycle Housing Element.

Appendix C: Sites Inventory

Table C-1: 2021-2029 Sites Inventory

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
1	5815-013-012	845 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.131	N/A	25-30	25	4	4	Above Moderate	Yes	Commercial-Professional		1953	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
2	5815-013-014	823 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.112	N/A	25-30	25	3	3	Above Moderate	Yes	Commercial-Store		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
3	5815-013-016	831 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.112	N/A	25-30	25	3	3	Above Moderate	Yes	Commercial-Store		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
19	5815-014-005	729 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.71	C	25-30	25	18	18	Lower	Yes	Commercial-Restaurant		1961	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
21	5815-014-009	743 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.105	C	25-30	25	3	3	Above Moderate	Yes	Commercial-Auto service		1959	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
22	5815-014-010	739 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.053	C	25-30	25	2	2	Above Moderate	Yes	Commercial-Office		1950	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
23	5815-014-011	737 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU25	0.053	C	25-30	25	2	2	Above Moderate	Yes	Commercial-Store		1950	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
27	5814-020-001	720 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU12	0.248	D	12-15	12	3	3	Moderate	Yes	Commercial-Restaurant		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
28	5814-020-014	712 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU12	0.292	D	12-15	12	4	4	Above Moderate	Yes	Commercial-Store		1960	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
29	5814-020-028	700 FOOTHILL BLVD	DVSP	DVSP-MU1	DVSP	DV-MU12	0.42	D	12-15	12	5	5	Moderate	Yes	Commercial-Restaurant		1999	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development
30	5812-023-006	1021 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.126	E	25-30	25	4	4	Moderate	Yes	Commercial-Store/office		1939	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
35	5812-023-001	1039 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	U	25-30	25	2	2	Moderate	Yes	Commercial-Store		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
37	5812-023-003	1037 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.08	V	25-30	25	2	2	Moderate	Yes	Commercial-Office		1956	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
38	5812-023-004	1033 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	V	25-30	25	2	2	Moderate	Yes	Commercial-Office		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
39	5812-023-005	1029 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.112	V	25-30	25	3	3	Moderate	Yes	Commercial-Store/office		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
40	5812-023-018	1057 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.065	F	25-30	25	2	2	Moderate	Yes	Commercial-Office		1996	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development
41	5812-023-019	1055 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	F	25-30	25	2	2	Moderate	Yes	Commercial-Office		1996	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development.0).
42	5812-023-020	1053 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	F	25-30	25	2	2	Moderate	Yes	Commercial-Office		1996	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development
43	5812-023-022	1047 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.057	F	25-30	25	2	2	Moderate	Yes	Commercial-Store		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
45	5812-023-024	1043 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.115	U	25-30	25	3	3	Moderate	Yes	Commercial-Office		1959	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
46	5812-023-032	1051 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	F	25-30	25	2	2	Moderate	Yes	Commercial-Office		1996	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development
47	5812-023-033	1049 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU25	0.058	F	25-30	25	2	2	Moderate	Yes	Commercial-Office		1996	Yes	Underutilized site (ILR < 1.0). Underutilized parking lot supporting low intensity development).
48	5814-002-002	1040 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Restaurant		1951	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
49	5814-002-003	1038 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Office		1946	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
50	5814-002-018	1044 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.15	G	12-15	12	2	2	Moderate	Yes	Commercial-Store		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
51	5814-008-024	954 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.563	H	12-15	12	7	7	Moderate	Yes	Commercial-Store		1946	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
52	5814-008-026	1004 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.405	H	12-15	12	5	5	Moderate	Yes	Commercial-Store		1966	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
53	5814-008-027	1010 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.293	H	12-15	12	4	4	Moderate	No	Commercial (House America Financial)		2010	Yes	Developer or property owner interest to redevelop site.
54	5814-008-028	CHEVY CHASE DR SOUTH OF FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.434	H	12-15	12	6	6	Moderate	Yes	Parking Lot		1961	Yes	Underutilized site (ILR<1.0) Vacant lot or parking lot with minimal existing site improvements.
55	5814-009-013	928 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.137	I	12-15	12	2	2	Moderate	Yes	Commercial-Store/office		1957	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
56	5814-009-025	942 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.296	I	12-15	12	4	4	Moderate	Yes	Commercial-Fast food		1977	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
59	5815-021-038	4603 INDIANOLA WAY	DVSP	DVSP-MU2	DVSP	DV-MU25	0.97	K	25-30	25	25	25	Lower	Yes	Institutional-Private school		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
60	5815-021-010	4532 RINETTI LN	DVSP	DVSP-MU2	DVSP	DV-MU25	0.187	K	25-30	25	5	5	Moderate	Yes	Commercial-Office		1949	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
61	5815-021-011	4526 RINETTI LN	DVSP	DVSP-MU2	DVSP	DV-MU25	0.186	K	25-30	25	5	5	Moderate	Yes	Commercial-Medical/dental		1950	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
64	5820-001-002	514 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.441	L	12-15	12	6	6	Moderate	Yes	Commercial-Store		1961	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
65	5820-001-003	502 FOOTHILL BLVD	DVSP	DVSP-MU2	DVSP	DV-MU12	0.657	L	12-15	12	8	8	Moderate	Yes	Commercial-Store		1961	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
67	5815-022-002	4522 INDIANOLA WAY	DVSP	DVSP-MU2	DVSP	DV-MU25	0.267	M	25-30	25	7	7	Moderate	Yes	Commercial-Medical/dental		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
68	5815-022-003	4526 INDIANOLA WAY	DVSP	DVSP-MU2	DVSP	DV-MU25	0.27	M	25-30	25	7	7	Moderate	Yes	Montessori School		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
69	5815-022-004	4532 INDIANOLA WAY	DVSP	DVSP-MU2	DVSP	DV-MU25	0.256	M	25-30	25	7	7	Moderate	Yes	Montessori School		1948	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
74	5823-001-016	104 BERKSHIRE PL	Institutional	RI-OZ (P/SP)*	Institutional	RI-OZ (PSP)	1.66	N/A	25-30	25	42	42	Lower	No	United Methodist Church		1977	N/A	Developer or property owner interest to redevelop site. Property has not been reassessed since 1975. Existing use retained and institution would add residential units.
75	5810-023-001	1830 FOOTHILL BLVD	Institutional	RI-OZ (P/SP)*	Institutional	RI-OZ (PSP)	1.28	N/A	25-30	25	32	32	Lower	No	The Church of Jesus Christ of Latter Day Saints, portion of parking area and adjacent landscape but excludes joint use field		1951	N/A	Vacant lot or parking lot with minimal existing site improvements. Property has not been reassessed since 1975. Existing use retained and institution would add residential units.
76	5814-027-019	4435 WOODLEIGH LN	DVSP-Institutional	RI-OZ (DVSP-I)*	DVSP - Institutional	DV-RI-OZ	0.98	N/A	25-30	25	25	25	Moderate	No	La Cañada Presbyterian Church—Parking lot		N/A	Yes	Underutilized site (ILR<1.0) Vacant lot or parking lot with minimal existing site improvements.
78	5813-006-022	1700 FOOTHILL BLVD	Institutional	RI-OZ (P/SP)*	Institutional	RI-OZ (PSP)	1.17	N/A	25-30	25	30	30	Lower	No	Lutheran Church of the Foothills open space and a portion of existing parking area		1950	N/A	Vacant lot or parking lot with minimal existing site improvements. Property has not been reassessed since 1975.

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
79	5813-015-055	1200 FOOTHILL BLVD	Institutional	RI-OZ (P/SP)*	Institutional	RI-OZ (PSP)	1	N/A	25-30	25	25	25	Lower	No	La Cañada Congregational Church		1924	N/A	Vacant lot or parking lot with minimal existing site improvements. Property has not been reassessed since 1975. Existing use retained and institution would add residential units.
80	5870-001-013	N SIDE OF FOOTHILL BLVD, WEST OF LEATA LN	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.4	O	25-30	25	10	9	Lower	Yes	Parking lot		N/A	Yes	Underutilized site (ILR<1.0) Vacant lot or parking lot with minimal existing site improvements.
81	5870-001-014	2111 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	2.7	O	25-30	25	68	68	Lower	Yes	Commercial-Shopping center (Ross Dress-for-Less)		1955	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.
82	5870-001-015	2125 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.44	O	25-30	25	11	11	Lower	Yes	Commercial-Shopping center (FedEx Office Print & Ship Center)		1955	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.
83	5870-001-016	2135 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.307	O	25-30	25	8	8	Lower	Yes	Commercial-Shopping center (Lotte Market)		1955	Yes	Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking. Property has not been reassessed since 1984..
84	5870-001-017	2137 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.128	O	25-30	25	4	4	Lower	Yes	Commercial-Shopping center (Avianti Jewelry)		1955	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.
85	5870-001-018	2139 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.54	O	25-30	25	14	14	Lower	Yes	Commercial-Shopping center (Restaurant)		1955	Yes	Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking. Property has not been reassessed since 1981..
86	5870-010-046	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.32	P	25-30	25	8	8	Lower	Yes	Commercial-Shopping center		1966	Yes	Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking. Property has not been reassessed since 2011..
87	5870-010-043	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.72	P	25-30	25	18	18	Lower	Yes	Commercial-Shopping center (Big Lots)		1966	Yes	Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking. Property has not been reassessed since 2011..
88	5870-010-044	2243 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.07	P	25-30	25	26	26	Lower	Yes	Commercial-Shopping center (Big Lots)		1966	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
89	5870-010-045	2251 W FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	0.73	P	25-30	25	19	19	Lower	Yes	Commercial-Shopping center		1966	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.
90	5870-011-056	2383 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.18	Q	25-30	25	30	30	Lower	Yes	Commercial-Shopping center		1977	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking.
91	5870-011-057	2355 FOOTHILL BLVD	Mixed Use	Mixed Use	Mixed Use	Mixed Use	1.48	Q	25-30	25	37	37	Lower	Yes	Commercial-Auto service (Car wash)		1967	Yes	Developer or property owner interest to redevelop site.
92	5810-014-002	2242 FOOTHILL BLVD	CPD	MU*	Mixed Use	Mixed Use	0.12	R	25-30	25	3	3	Above Moderate	No	Commercial-Restaurant		1957	Yes	Developer or property owner interest to redevelop site.
93	5810-014-003	2238 FOOTHILL BLVD	CPD	MU*	Mixed Use	Mixed Use	0.09	R	25-30	25	3	3	Above Moderate	No	Parking lot		1978	Yes	Developer or property owner interest to redevelop site.
94	5810-014-004	2236 FOOTHILL BLVD	CPD	MU*	Mixed Use	Mixed Use	0.08	R	25-30	25	2	2	Above Moderate	No	Commercial-Restaurant		1958	Yes	Developer or property owner interest to redevelop site.
95	5808-008-020	N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-3*	High Density Residential	R-3	0.26	T	25-30	25	7	7	Lower	No	Vacant		N/A	Yes	Developer or property owner interest to redevelop site.
96	5808-008-021	EAST OF N/E CORNER OF FOOTHILL BLVD & EL CAMINO CORTO ST	Low Density Residential	R-3*	High Density Residential	R-3	0.26	T	25-30	25	7	7	Lower	No	Vacant		N/A	Yes	Developer or property owner interest to redevelop site.
97	5814-028-009	600 FOOTHILL BLVD	DVSP-Institutional	Institutional	DVSP	DV-MU12	1.28	N/A	12-15	12	16	16	Above Moderate	No	Former Christian Science Church (owned by a private party)		1949	Yes	Developer or property owner interest to redevelop site.
98	5810-015-016	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.56	AA	25-30	25	14	14	Lower	Yes	JOANN Fabric & Crafts Store		1958	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking
99	5810-015-015	2160 FOOTHILL BLVD	High Density Residential	R-3	High Density Residential	R-3	0.27	AA	25-30	25	7	7	Lower	Yes	JOANN Fabric & Crafts Store		1958	Yes	Underutilized site (ILR<1.0) Buildings that are older than 30 years. Antiquated commercial uses with significant surface parking
105	5820-009-017	458 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU12	0.47	DD	12-15	12	6	6	Moderate	No	Commercial-Store		1959	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
106	5820-009-021	N/A (directly south of 458 FOOTHILL BLVD)	DVSP	R-1	DVSP	DV-MU12	0.19	DD	12-15	12	3	3	Moderate	No	Parking lot for 5820-009-017 (behind building)		N/A	Yes	Underutilized site (ILR<1.0) Vacant lot or parking lot with minimal existing site improvements.
107	5820-009-016	456 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU12	0.23	DD	12-15	12	3	3	Moderate	No	Commercial		1955	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
108	5820-009-014	440 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU12	0.23	N/A	12-15	12	3	3	Moderate	No	Commercial		1986	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.
109	5820-009-019	420 FOOTHILL BLVD	DVSP	MU2	DVSP	DV-MU12	0.45	N/A	12-15	12	6	6	Moderate	No	Commercial (tire store)		1976	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.

Site #	APN	Address	Existing GP Designation	Zoning	Proposed GP Designation	Proposed Zoning	Acres	Consolidation Potential (A-V)	Density Range (du/ac)*	Density Factor	Unit Potential (rounding up)	NET Unit Potential (rounding up)	Income Category	5th Cycle	Existing Use		Year Built	Improvements to land value ratio (ILR): ILR>1.0	Criteria
114	5810-009-001	Adjacent to 4450 BRIGGS	Institutional	R-3	Institutional	RI-OZ (PSP)	0.19	A	25-30	25	5	5	Lower	No	Vacant portion of Kingdom Hall of Jehovah's Witness site		N/A	Yes	Underutilized site (ILR<1.0) Vacant lot or parking lot with minimal existing site improvements.
115	5810-009-002	4450 BRIGGS AVE	Institutional	P-SP	Institutional	RI-OZ (PSP)	0.33	A	25-30	25	9	9	Lower	No	Kingdom Hall of Jehovah's Witness parking lot		1974	N/A	Vacant lot or parking lot with minimal existing site improvements. Property has not been reassessed since 1974. Existing use retained and institution would add residential units.
116	5810-009-009	4442 BRIGGS AVE	High Density Residential	R-3	High Density Residential	R-3	0.46	A	25-30	25	12	10	Lower	No	Two dwelling units		1940	Yes	Underutilized site (ILR < 1.0). Buildings that are older than 30 years.

Figure C-2: Sites Inventory Grid A

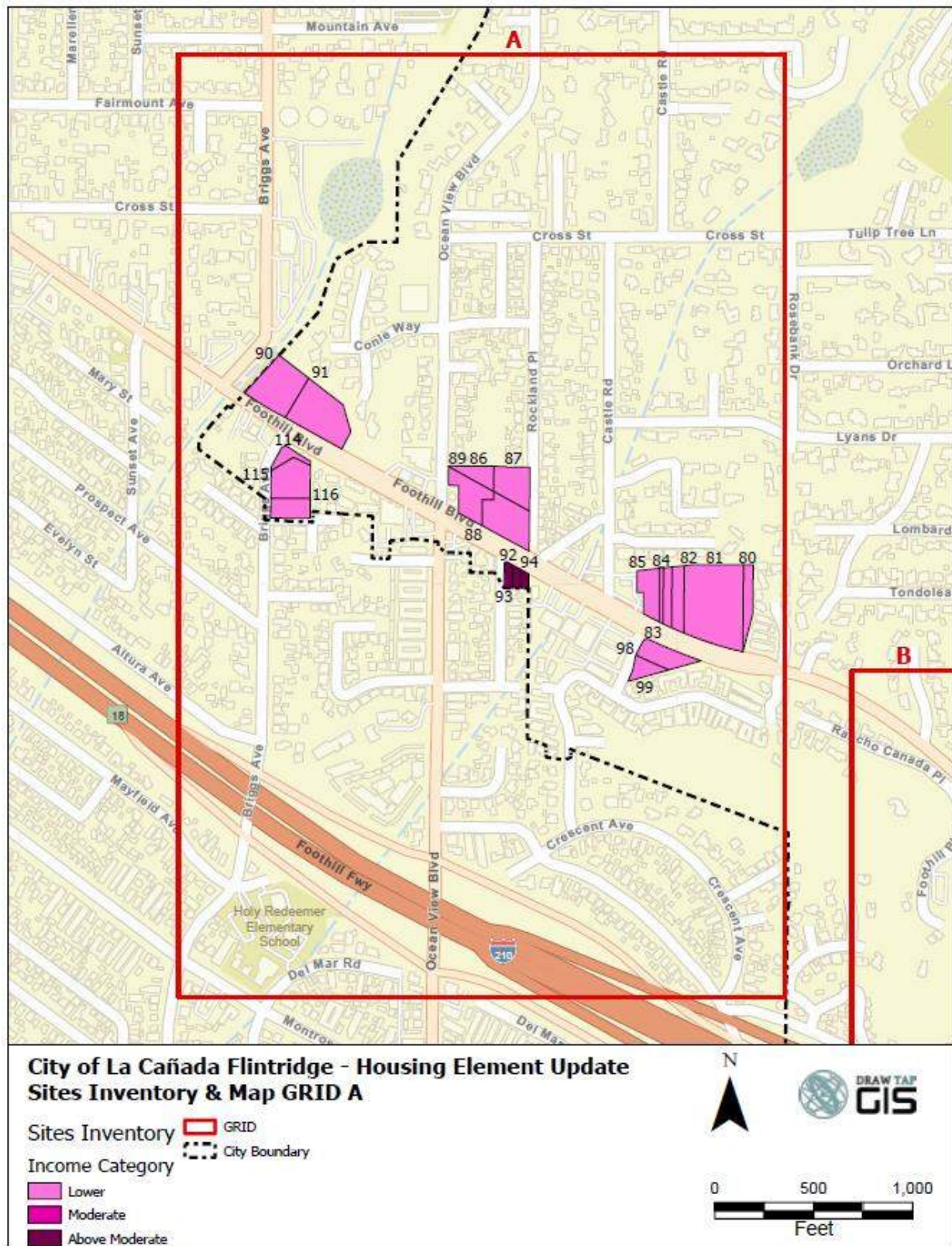


Figure C-4: Sites Inventory Grid C

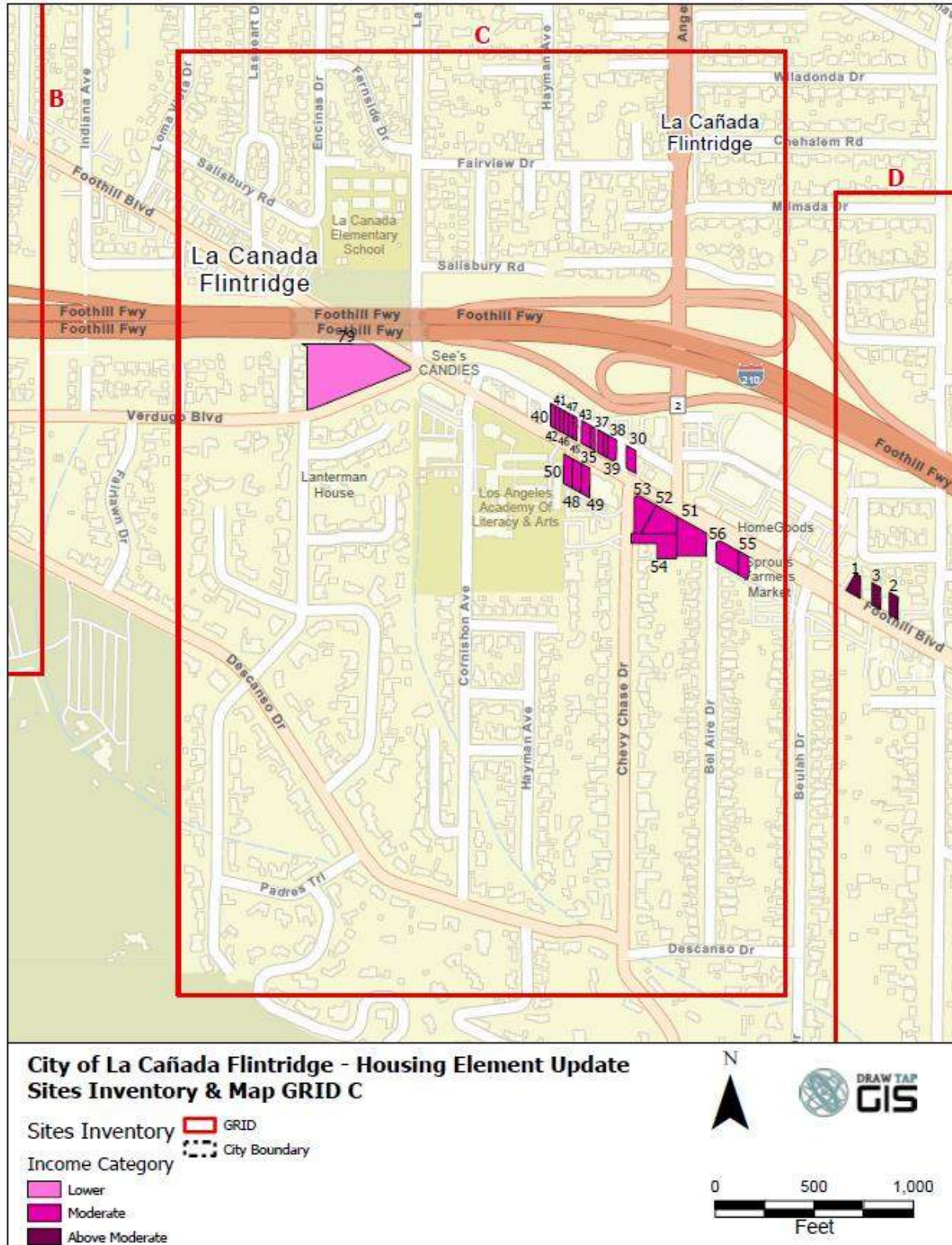
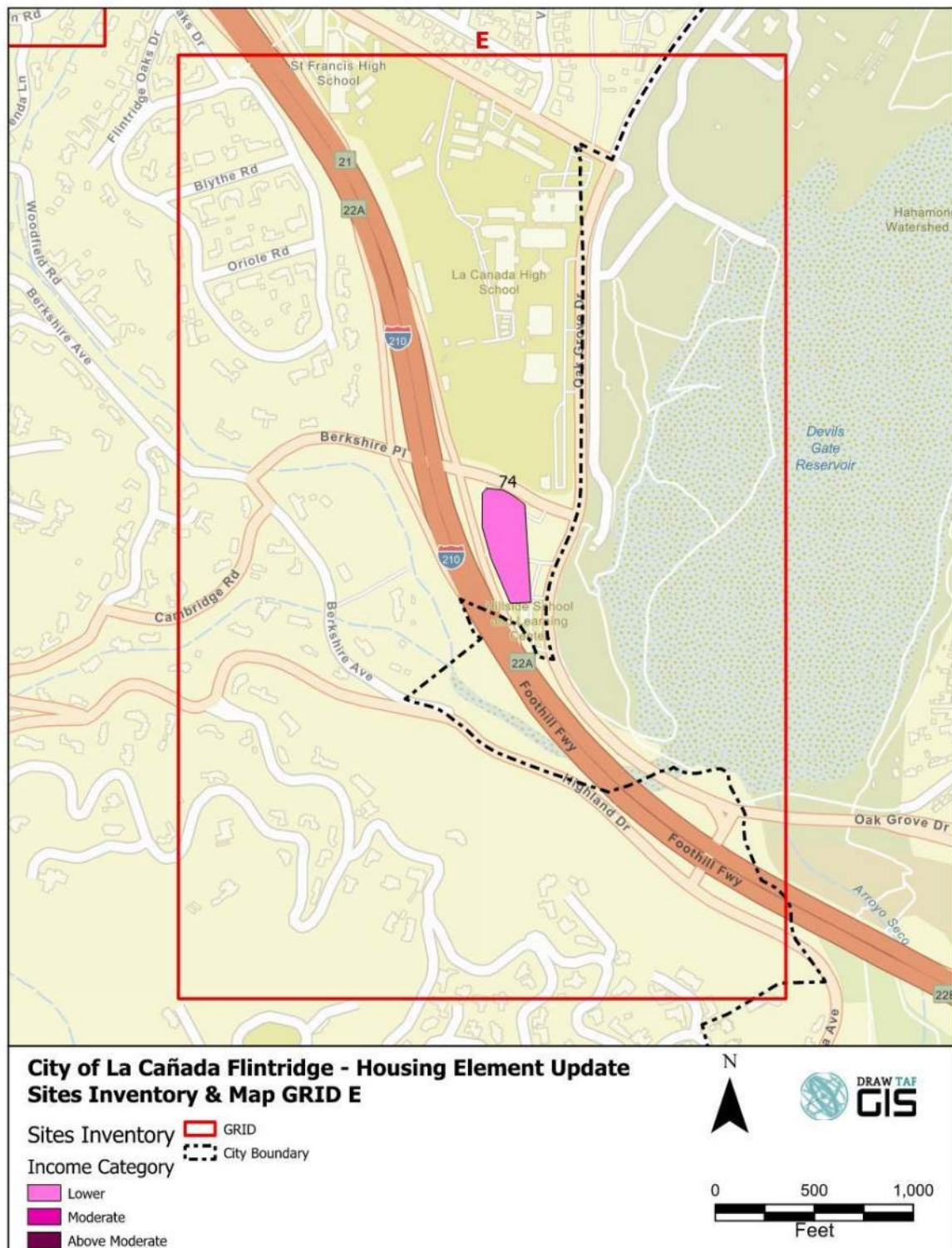


Figure C-6: Sites Inventory Grid E



Appendix D: Assessment of Fair Housing

D.1 Introduction and Summary of AB 686

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of segregation patterns, racially/ethnically concentrated areas of poverty, disparities in access to opportunities and disproportionate housing needs;
- An assessment of contributing factors; and
- An identification of fair housing goals and actions.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions (with population over 50,000) that can receive U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) funds directly from HUD. Before the 2016 federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

For the purpose of HUD CPD funds (CDBG, HOME, and ESG), the County of Los Angeles functions as the lead agency to receive these funds on behalf of 48 small cities (with population less than 50,000), including La Cañada Flintridge, and the unincorporated County areas. Collectively, this geography is known as the Urban County. Some of the data provided by HUD for the purpose of housing and community development and AFFH analysis is based on this collective Urban County geography.

D.2. Fair Housing Assessment

D.2.1 Enforcement and Outreach

La Cañada Flintridge is part of the CDBG Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. For federally funded Urban County programs, La Cañada Flintridge has committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. The Los Angeles County Development Authority (LACDA) policy prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex. Furthermore, the HRC, under contract with LACDA, monitors fair housing compliance for both state and federal fair housing laws.

Housing Element Outreach

Two virtual joint Housing Element and Safety Element community workshops were conducted, on March 11, 2021, and June 10, 2021, to inform the community and stakeholders about what the Housing and Safety Elements include, why they must be updated, and receiving Planning Commission and public input regarding the update of the City's Housing and Safety Elements. These workshops were advertised through the local paper, the City website, and email lists. In addition, two focus group sessions were held on May 5, 2021. One of the meetings was with parties potentially interested in building affordable housing, including representatives of local religious facilities and Habitat for Humanity. The second session was held with developers of market rate housing.

The City also created a webpage on its website that is dedicated to the Housing Element update. It includes background information; announcements for the public workshops; the announcement for and link to the Notice of Preparation (NOP) for the Initial Study/Negative Declaration prepared for the Housing Element update; and links to the PowerPoint presentations that were presented at the public workshops.

The City continued to engage the public following the first review of the Housing Element by HCD. See Sections 9.1.5.4, 9.1.5.5, and 9.1.5.6 for a summary of the City's continuing efforts to conduct outreach to the public.

Fair Housing Outreach

In addition, HRC conducts outreach and education throughout the Los Angeles Urban County. Some HRC activities include public service announcements (PSAs)/media/advertisements; community presentations; literature distribution; and management trainings. HRC holds regular workshops and offers counseling and personalized guidance to residents seeking housing or concerned about housing discrimination. HRC also compiles rental listings and investigates discrimination complaints. Information about fair housing, including an overview of housing rights, contact information for HRC, and brochures in Spanish and English are provided on the City's website (<https://cityoflcf.org/community-preservation-and-housing/>). The City also includes information about CDBG funding for residential rehabilitation and sewer connection on its website (<https://cityoflcf.org/cdbg-grant/>).

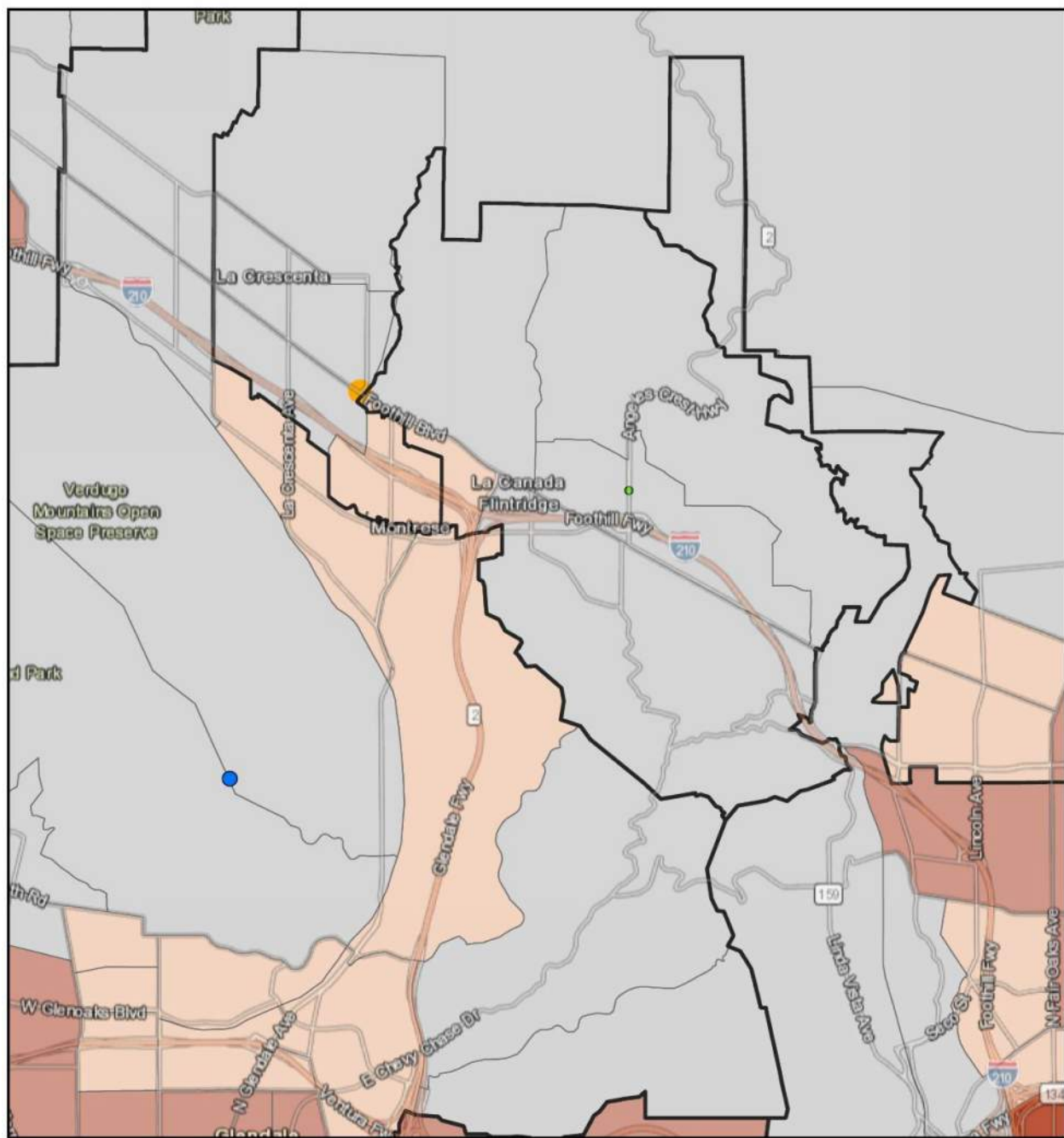
Fair Housing Enforcement

In FY 2019-2020, HRC received 2,038 calls for general housing inquiries and 356 calls related to fair housing inquiries. Among the 356 inquires, fair housing issues relating to disabilities (physical and mental) represented the majority (82%) of the protected classifications. Trailing distantly behind was source of income at 5% of the inquiries.

During the FY 2019-2020, 83 fair cases were opened, with the majority being reconciled or withdrawn. Two cases were referred to litigation and three cases were referred to the Department of Fair Employment and Housing (DFEH). Among the 83 cases opened, physical disability (47%), mental disability (22%), and source of income (19%) represented the majority of the protected classes. According to HUD's fair housing records, La Cañada Flintridge received two fair housing inquiries from January 2013 to March 2021.

As shown in Figure D-1, there is no data for housing choice vouchers in the majority of La Cañada Flintridge tracts. To protect the confidentiality of those receiving Housing Choice Voucher Program assistance, tracts containing 10 or fewer voucher holders have been omitted. One tract spans the boundaries of La Cañada Flintridge and La Crescenta, and includes 16 housing choice vouchers, representing about one percent of the renter-occupied housing units in that tract. There are no public housing buildings located in the City.

Figure D-1: Housing Choice Vouchers, Public Housing Buildings, and FHEO Inquiries



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City/Town Boundaries

(R) Public Housing Buildings

36 - 89 Units

(R) FHEO Inquiries by City (HUD, 2013-2021)

< .25 Inquiries

< .5 Inquiries

(R) Housing Choice Vouchers - Tract

No Data

> 0 - 5%

> 5% - 15%

> 15% - 30%

1:72,224

0 0.5 1 2 mi

0 0.75 1.5 3 km

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D.2.2. Integration and Segregation

D.2.2.1 Race/Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility.

HUD tracks racial or ethnic dissimilarity trends for the Los Angeles Urban County, which includes the La Cañada Flintridge and the Los Angeles County region.¹¹ Dissimilarity indices show the extent of distribution between two groups, in this case racial/ethnic groups, across census tracts. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

The indices for the Urban County and Los Angeles County from 1990 to 2020 are shown in Table D-1. Dissimilarity between non-White and White communities in the Urban County and Countywide has worsened since 1990. In the Urban County and countywide, dissimilarity between Hispanic/White and Asian or Pacific Islander/White communities has worsened, while dissimilarity between Black and White communities has improved. Based on HUD's definition of the various levels of the index, segregation between Asian or Pacific Islander and White communities is moderate, while Non-White/White, Black/White and Hispanic/White communities are highly segregated.

Table D-1: Racial/Ethnic Dissimilarity Index

	1990	2000	2010	2020
Los Angeles Urban County				
Non-White/White	53.33	53.62	53.85	55.87
Black/White	68.29	63.51	60.24	64.21
Hispanic/White	62.81	64.99	64.38	65.12
Asian or Pacific Islander/White	41.58	48.57	49.62	52.79
Los Angeles County				
Non-White/White	56.66	56.72	56.55	58.53
Black/White	73.04	67.4	64.99	68.24
Hispanic/White	60.88	63.03	63.35	64.33
Asian or Pacific Islander/White	46.13	48.19	47.62	51.59

Sources: U.S. Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) Database, 2020.

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. Tables D-2 and D-3 show the racial/ethnic

¹¹ Index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across a geographic area. It is the most commonly used and accepted method of measuring segregation.

makeup of Los Angeles County, La Cañada Flintridge, and several surrounding cities in 2010 and 2020. As show in these tables, the majority of Los Angeles County residents belong to a racial or ethnic minority group. Between 2010 and 2020, the number of residents belonging to a racial or ethnic minority group increased slightly from 72 percent to 74 percent.

Table D-2: 2010 Regional Race/Ethnic Groups												
	Los Angeles County		Burbank		Glendale		Pasadena		San Marino		La Cañada Flintridge	
Race	Total	Pct	Total	Pct	Total	Pct	Total	Pct	Total	Pct	Total	Pct
Total	9,818,605	100%	103,340	100%	191,719	100%	137,122	100%	13,147	100%	20,246	100%
Hispanic or Latino	4,687,889	48%	25,310	24%	33,414	17%	46,174	34%	855	7%	1,267	6%
White	2,728,321	28%	60,265	58%	117,929	62%	53,135	39%	4,872	37%	13,094	65%
Black	815,086	8%	2,443	2%	2,325	1%	13,912	10%	53	0%	101	0%
American Indian & Alaska Native	18,886	0%	196	0%	192	0%	211	0%	1	0%	4	0%
Asian	1,325,671	14%	11,753	11%	31,073	16%	19,293	14%	7,010	53%	5,181	26%
Native Hawaiian & Pacific Islander	22,464	0%	76	0%	105	0%	106	0%	2	0%	4	0%
Other	25,367	0%	249	0%	366	0%	434	0%	25	0%	50	0%
Two or more races	194,921	2%	3,048	3%	6,315	3%	3,857	3%	329	3%	545	3%

Source: 2010 Decennial Census

Table D-3: 2020 Regional Race/Ethnic Groups												
	Los Angeles County		Burbank		Glendale		Pasadena		San Marino		La Cañada Flintridge	
Race	Total	Pct	Total	Pct	Total	Pct	Total	Pct	Total	Pct	Total	Pct
Total	10,014,009	100%	107,337	100%	196,543	100%	138,699	100%	12,513	100%	20,573	100%
Hispanic or Latino	4,804,763	48%	25,961	24%	33,575	17%	45,742	33%	888	7%	1,717	8%
White	2,563,609	26%	60,350	56%	122,519	62%	50,858	37%	3,469	28%	11,127	54%
Black	760,689	8%	2,891	3%	3,365	2%	10,795	8%	58	0%	129	1%
American Indian & Alaska Native	18,453	0%	222	0%	203	0%	201	0%	4	0%	24	0%
Asian	1,474,237	15%	12,282	11%	29,461	15%	24,149	17%	7,581	61%	6,408	31%
Native Hawaiian & Pacific Islander	20,522	0%	98	0%	120	0%	130	0%	7	0%	2	0%
Other	58,683	1%	618	1%	709	0%	835	1%	22	0%	129	1%
Two or more races	313,053	3%	4,915	5%	6,591	3%	5,989	4%	484	4%	1,037	5%

Source: 2020 Decennial Census

Generally, the racial composition in La Cañada Flintridge differs from LA County and nearby cities in that the Hispanic/Latino population is lower (8% compared to 20% or more surrounding areas), the White population is higher than several cities (54% compared to 37% or less in other

locations), and the Asian population is higher than LA County and surrounding cities, with the exception of San Marino. There has been an increase in La Cañada Flintridge residents belonging to a racial or ethnic minority between 2010 and 2020, but the number of residents belonging to these groups is still significantly lower than in LA County overall (46% in La Cañada Flintridge vs. 74% countywide).

Figure D-2 and Figure D-3 compare racial or ethnic minority concentrations in 2010 and 2018. There has been an increase in racial/ethnic minority populations since 2010 in the northeast and southwest parts of La Cañada Flintridge, where racial/ethnic minorities make up 41-60% of the population.

Distribution of RHNA Units by Percent Racial/Ethnic Minority Concentration

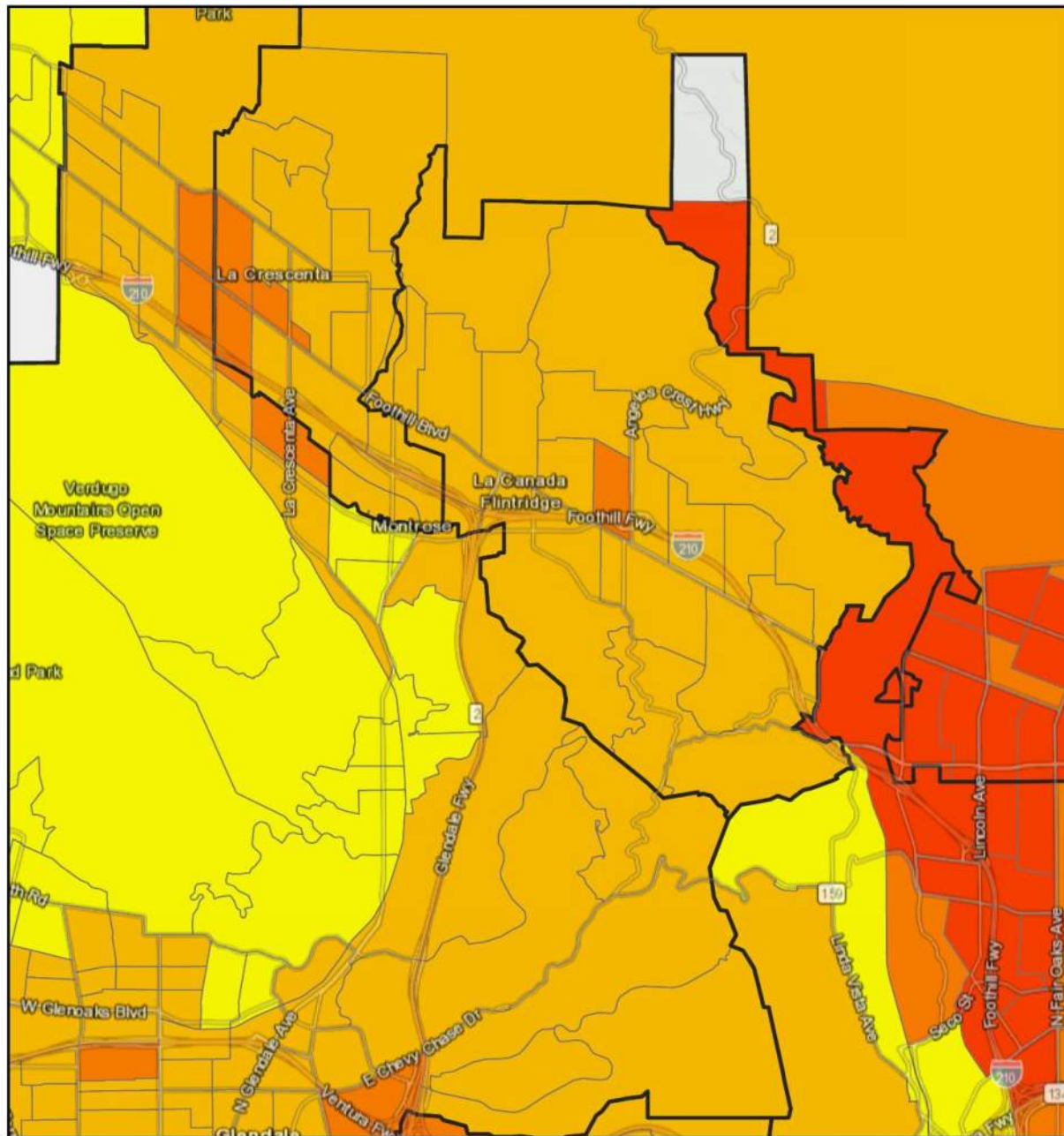
Figure D-3 also shows the sites inventory used to meet the City's 2021-2029 Regional Housing Needs Assessment (RHNA). Table D-4 shows how RHNA units are distributed across block groups by non-white population.

As shown in Table D-4, the majority (73.3%) of sites are located in census block groups where the non-white population is between 21 and 40 percent. This includes 69.4% of lower income units, 82.6% of moderate income units, and 82.2% of above moderate units. Areas where 41-60 percent of the population is non-White have about one quarter of all RHNA units. All block groups in the City have a non-White population between 21 and 40 percent or between 41 and 60 percent, so all RHNA units must be located within block groups in one of these categories. However, the distribution of RHNA units is not proportionate to the distribution of the non-white population by block group. Instead, more RHNA units are located within block groups with a majority White population.

Table D-4: RHNA Distribution by Percent Racial/Ethnic Minority Population

Block Group by Non-White Population		RHNA Units by Income Level			
Non-White Population in Block Group	% of Total Block Groups	Total	Lower	Moderate	Above Moderate
≤ 20%	0%	0.0%	0.0%	0.0%	0.0%
21 - 40%	55%	73.3%	69.4%	82.6%	82.2%
41 - 60%	45%	26.7%	30.6%	17.4%	17.8%
61 - 80%	0%	0.0%	0.0%	0.0%	0.0%
> 81%	0%	0.0%	0.0%	0.0%	0.0%
Total	20	689	483	161	45

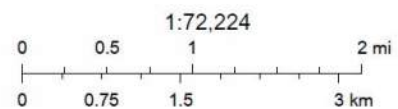
Figure D-2: Racial/Ethnic Minority Concentrations (2010)



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City/Town Boundaries

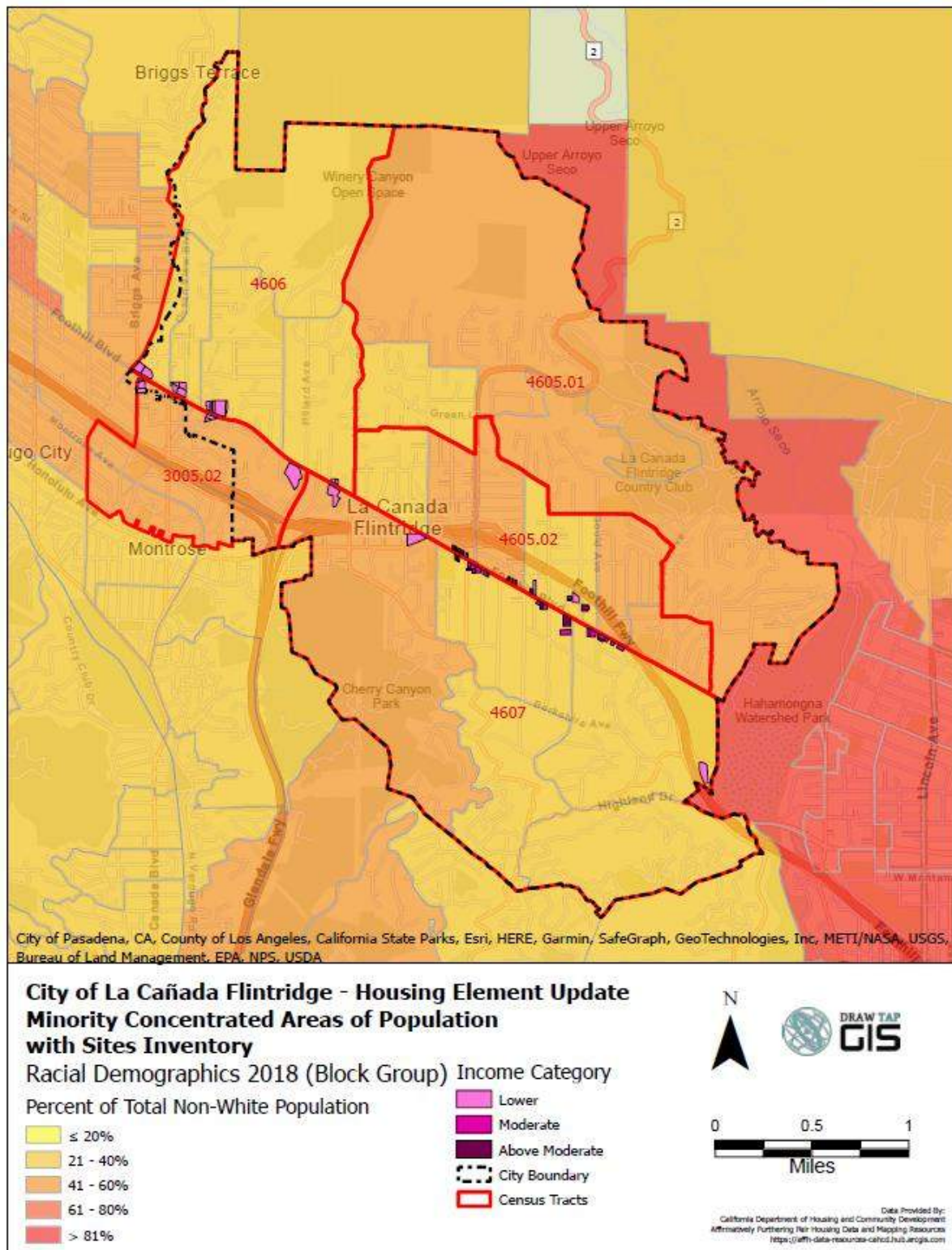
(A) Racial Demographics (2010) - Block Group



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CA HCD
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Figure D-3: Racial/Ethnic Minority Concentrations (2018)



Source: California Department of Housing and Community Development (HCD) Data Viewer, 2021.

D.2.2.2 Disability

According to the 2016-2020 ACS, approximately 5.2 percent of La Cañada Flintridge residents experience a disability, compared to 10.1 percent Countywide. Since the 2008-2012 ACS, the disabled population in La Cañada Flintridge has decreased from 6.6 percent to 5.2. percent.

Table D-5 shows the number of residents with disabilities in La County, La Cañada Flintridge, and the surrounding cities. Compared to other cities in the region, La Cañada Flintridge has a lower percentage of people with a disability. In general, the percentage of people with disabilities in La Cañada Flintridge is lowest for the younger population, and increases with age. However, even among people 65 years and older, residents of La Cañada Flintridge have fewer disabilities than residents of other nearby cities.

Figure D-4 and Figure D-5 compare the disabled population during the 2010-2014 ACS and 2015-2019 ACS. The disabled population is spread evenly across tracts in the City, with no concentration of people with disabilities. There has been no significant change in the percent of the population with disabilities between 2014 and 2019.

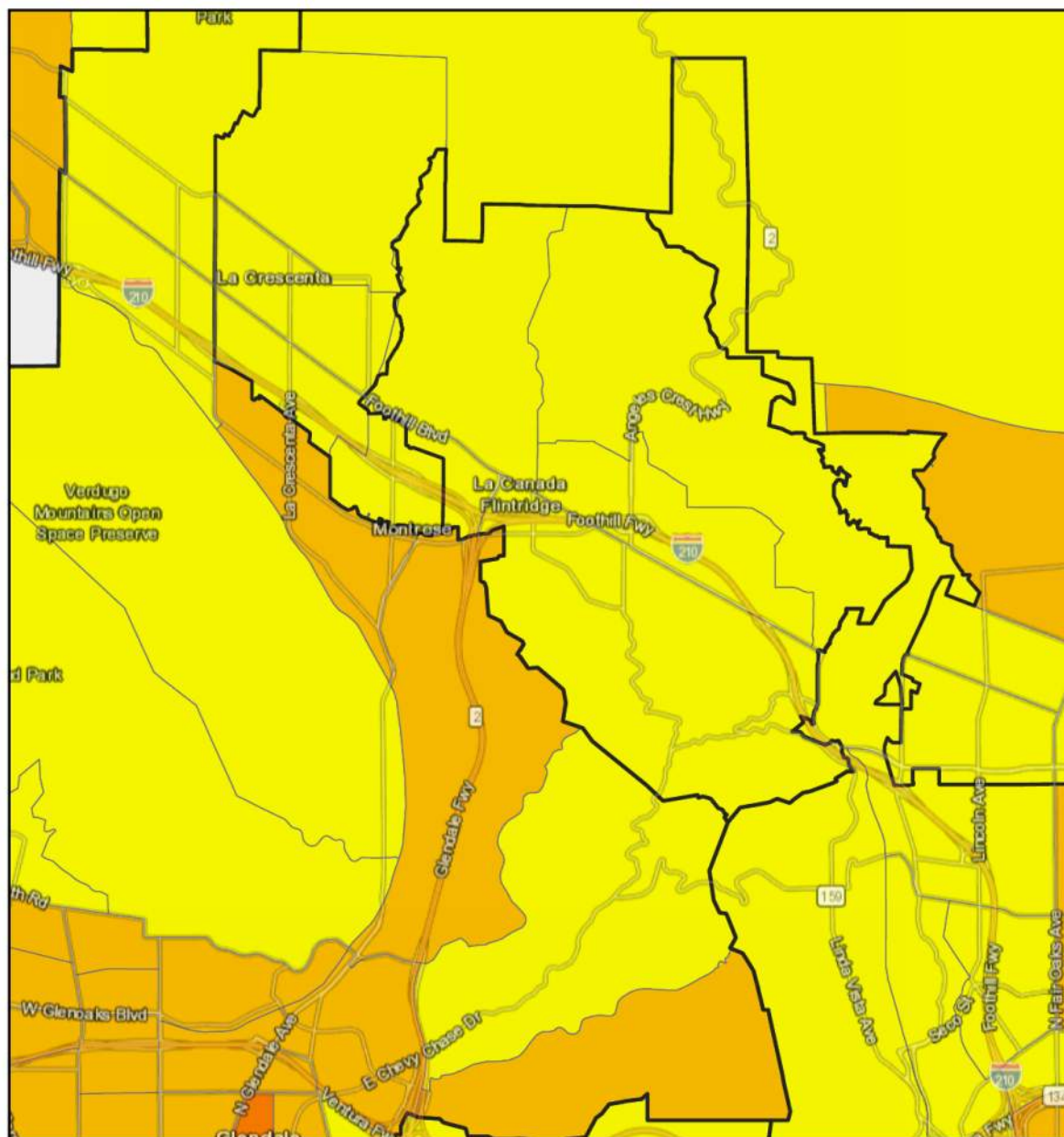
Figure D-5 includes the City's sites inventory used to meet the 2021-2029 RHNA. The majority of the RHNA sites are located along Foothill Boulevard. All sites are located in tracts where persons with disabilities make up less than 10 percent of the population, as there are no tracts with a higher concentration of people with disabilities.

Table D-5: 2020 Population with a Disability

	LOS ANGELES COUNTY		BURBANK		GLENDALE		PASADENA		SAN MARINO		LA CAÑADA FLINTRIDGE	
	Total	% of Total Pop.	Total	% of Total Pop.	Total	% of Total Pop.	Total	% of Total Pop.	Total	% of Total Pop.	Total	% of Total Pop.
Population Total	9,970,085		103,002		198,024		140,850		13,020		20,057	
Population with a Disability	1,005,489	10.1%	11,525	11.2%	27,106	13.7%	13,405	9.5%	847	6.5%	1,050	5.2%
Under 5 years												
With a hearing difficulty	2,480	0.0%	-	0.0%	-	0.0%	114	0.1%	-	0.0%	-	0.0%
With a vision difficulty	2,206	0.0%	-	0.0%	-	0.0%	37	0.0%	-	0.0%	-	0.0%
5 to 17 years												
With a hearing difficulty	7,210	0.1%	24	0.0%	90	0.0%	32	0.0%	-	0.0%	-	0.0%
With a vision difficulty	11,179	0.1%	134	0.1%	118	0.1%	94	0.1%	-	0.0%	17	0.1%
18 to 64 years												
With a hearing difficulty	79,789	0.8%	555	0.5%	1,659	0.8%	686	0.5%	25	0.2%	147	0.7%
With a vision difficulty	95,104	1.0%	729	0.7%	1,319	0.7%	940	0.7%	120	0.9%	49	0.2%
With a cognitive difficulty	201,648	2.0%	2,077	2.0%	3,887	2.0%	2,517	1.8%	104	0.8%	125	0.6%
With an ambulatory difficulty	212,567	2.1%	2,009	2.0%	5,378	2.7%	2,431	1.7%	70	0.5%	231	1.2%
With a self-care difficulty	99,923	1.0%	1,259	1.2%	3,601	1.8%	1,170	0.8%	49	0.4%	95	0.5%
With an independent living difficulty	436,563	4.4%	6,376	6.2%	18,027	9.1%	6,897	4.9%	312	2.4%	601	3.0%
65 years and over												
With a hearing difficulty	163,502	1.6%	2,401	2.3%	4,372	2.2%	2,483	1.8%	242	1.9%	233	1.2%
With a vision difficulty	88,831	0.9%	1,495	1.5%	1,925	1.0%	1,094	0.8%	129	1.0%	109	0.5%
With a cognitive difficulty	140,962	1.4%	2,729	2.6%	5,640	2.8%	2,280	1.6%	107	0.8%	136	0.7%
With an ambulatory difficulty	320,461	3.2%	4,106	4.0%	13,021	6.6%	5,351	3.8%	301	2.3%	326	1.6%
With a self-care difficulty	159,893	1.6%	3,147	3.1%	10,576	5.3%	3,097	2.2%	143	1.1%	211	1.1%
With an independent living difficulty	257,207	2.6%	4,095	4.0%	12,892	6.5%	4,401	3.1%	221	1.7%	355	1.8%

Source: 2020 ACS 5-Year Estimates

Figure D-4: Concentration of Persons with Disabilities (2010-2014)



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City/Town Boundaries

(A) Population with a Disability (ACS, 2010 - 2014) - Tract

< 10%

10% - 20%

20% - 30%

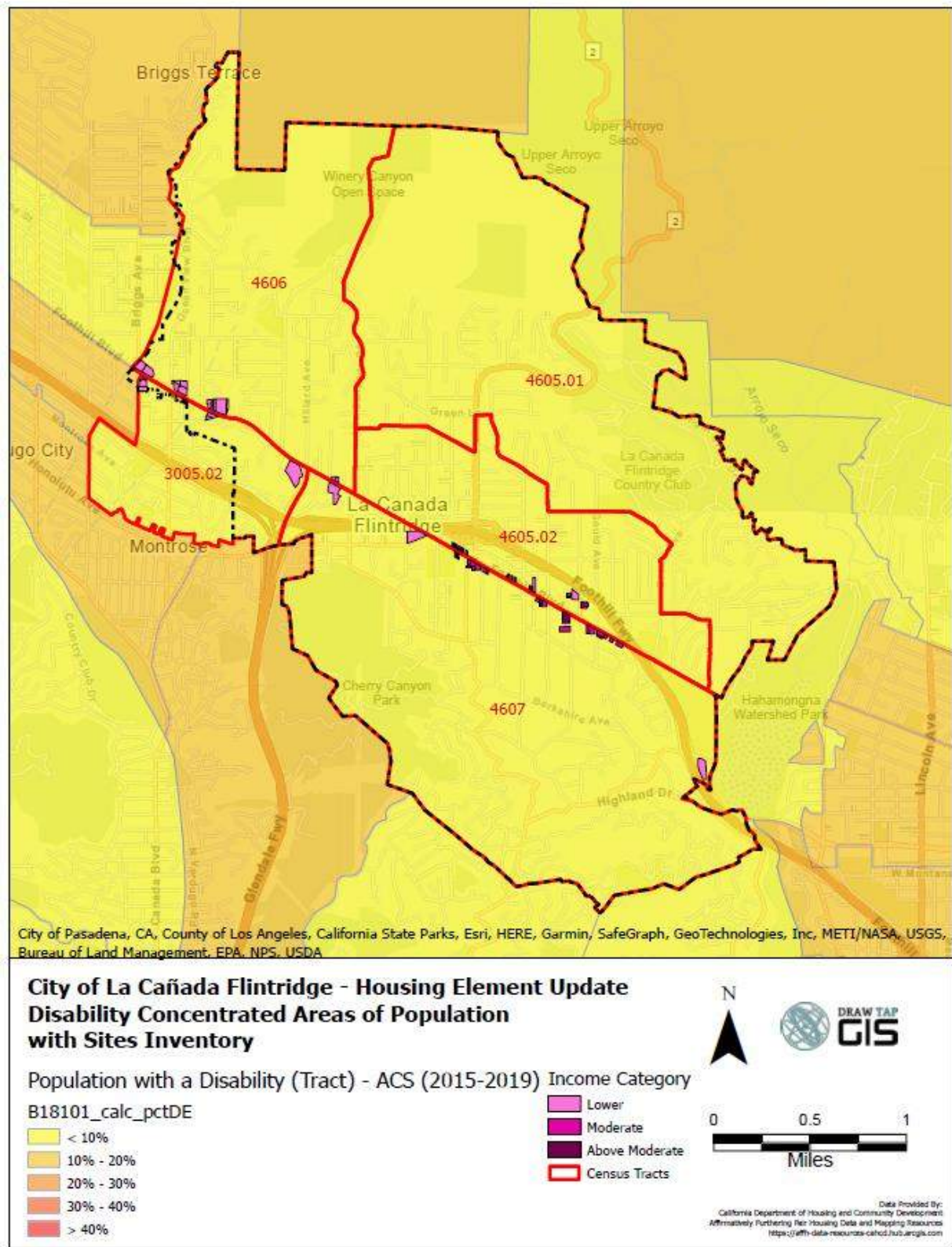
1:72,224
0 0.5 1 2 mi
0 0.75 1.5 3 km

County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD Data Viewer, 2010-2014 American Community Survey (ACS), 2021.

Figure D-5: Concentration of Persons with Disabilities (2015-2019)



Source: HCD Data Viewer, 2015-2019 ACS, 2021.

RHNA Unit Distribution by Disability

As shown in Figure D-5, the overall percentage of the population with a disability is relatively low, so all RHNA units are located within census tracts that have few people with disabilities. Table D-6 shows the how RHNA units are distributed across census tracts by the percentage of the population with a disability. Overall, 100% of RHNA units are located in places where the population with a disability is less than 10 percent, because all census tracts in the City have a disabled population that is less than 10 percent

Table D-6: RHNA Distribution by Disability

Tract by Disability		RHNA Units by Income Level			
Disabled Population in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 10%	100%	100.0%	100.0%	100.0%	100.0%
10 - 20%	0%	0.0%	0.0%	0.0%	0.0%
20 - 30%	0%	0.0%	0.0%	0.0%	0.0%
30 - 40%	0%	0.0%	0.0%	0.0%	0.0%
> 40%	0%	0.0%	0.0%	0.0%	0.0%
Total	5	689	483	161	45

D.2.2.3 Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. As shown in Table D-7, approximately 43.9% of La Cañada Flintridge households have one or more child under the age of 18. The City's share of households with children is higher than the County (33.8%), and the neighboring cities of Burbank (27.5%), Glendale (28.9%), Pasadena (23.8%), and San Marino (38.3%).

Single parent households are also protected by fair housing law. There are 237 single-parent households in the City representing 10 percent of all households with children under 18. Female-headed households with children typically require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Only 2 percent of households with children under 18 in La Cañada Flintridge are single female-headed households with children.

As shown in Figure D-6, the percent of children in married-couple households is mostly consistent throughout the City. With the exception of a single tract that spans the boundaries of La Cañada Flintridge and La Crescenta, in all other La Cañada Flintridge tracts, over 80 percent of children live in married-couple households. Conversely, in nearly all City tracts, less than 20 percent of children live in single female-headed households (Figure D-7).

Table D-7: Regional and Local Family Status

Household Type	2010								2020							
	Total	Married-couple		Male-headed		Female-headed		Total	Married-couple		Male-headed		Female-headed		Total	Pct
		Total	Pct	Total	Pct	Total	Pct		Total	Pct	Total	Pct	Total	Pct		
Los Angeles County																
Total households	3,217,889	1,465,486	NA	213,313	NA	491,428	NA	3,332,504	1,493,670	NA	227,880	NA	489,792	NA		
With own children under 18 years	1,087,704	735,852	68%	90,266	8%	261,586	24%	919,959	627,589	68%	85,234	9%	207,136	23%		
Burbank																
Total households	41,365	18,769	NA	1,808	NA	4,473	NA	41,473	18,038	NA	2,003	NA	4,669	NA		
With own children under 18 years	11,360	8,696	77%	688	6%	1,976	17%	9,815	7,256	74%	485	5%	2,074	21%		
Glendale																
Total households	71,509	36,524	NA	3,165	NA	8,827	NA	74,766	35,871	NA	4,419	NA	9,071	NA		
With own children under 18 years	20,438	16,196	79%	717	4%	3,525	17%	18,644	14,570	78%	1,112	6%	2,962	16%		
Pasadena																
Total households	52,987	21,635	NA	2,514	NA	5,687	NA	56,718	22,924	NA	2,727	NA	5,613	NA		
With own children under 18 years	12,614	9,215	73%	841	7%	2,558	20%	11,741	8,702	74%	961	8%	2,078	18%		
San Marino																
Total households	4,416	3,390	NA	105	NA	282	NA	4,026	2,923	NA	148	NA	395	NA		
With own children under 18 years	1,693	1,495	88%	62	4%	136	8%	1,446	1,275	88%	48	3%	123	9%		
La Cañada Flintridge																
Total households	6,906	5,199	NA	218	NA	501	NA	6,305	4,926	NA	106	NA	365	NA		
With own children under 18 years	3,031	2,703	89%	113	4%	215	7%	2,586	2,349	91%	41	2%	196	8%		
Source: 2010 ACS 5-Year Estimates, 2020 ACS 5-Year Estimates																

RHNA Unit Distribution by Familial Status

Tables D-8 and D-9 show the distribution of RHNA units by familial status, including the percent of children in married-couple households and the percent of children in single female-headed households. Throughout the City, most children live in married-couple households, so most RHNA units are located in census tracts with high concentrations of children in married-couple households. Over 80% of RHNA units are located in census tracts with more than 80% of children in married-couple households, including 100% of moderate-income RHNA units, 82.2% of above moderate-income RHNA units, and 84.1% of lower income RHNA units. The remaining RHNA units are located in census tracts with 60-80% of children in married-couple households. The overall distribution of RHNA units is generally proportionate to the distribution of census tracts with children in married-couple households.

Table D-8: RHNA Distribution by Children in Married-Couple Households

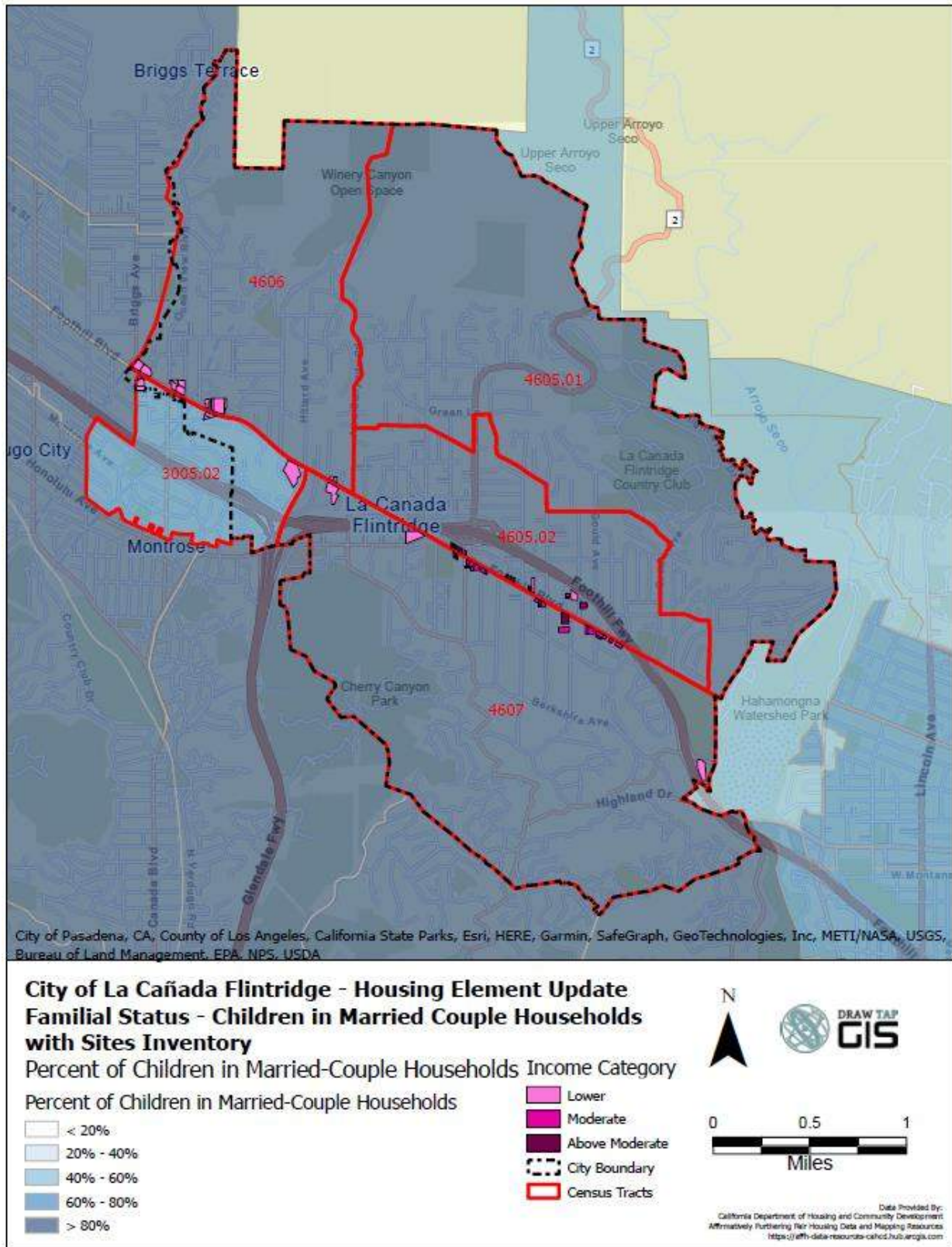
Tract by Children in Married-Couple Households		RHNA Units by Income Level			
Children in Married-Couple HH in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 20%	0%	0.0%	0.0%	0.0%	0.0%
20 - 40%	0%	0.0%	0.0%	0.0%	0.0%
40 - 60%	0%	0.0%	0.0%	0.0%	0.0%
60 -80%	20%	12.3%	15.9%	0.0%	17.8%
> 80%	80%	87.7%	84.1%	100.0%	82.2%
Total	5	689	483	161	45

Most RHNA units are located in census tracts with a low concentration of children in single female-headed households, as most children do not live in these types of households. Over 85% of RHNA units are located in census tracts with less than 20 percent of children living in single female-headed households, including 100% of moderate RHNA units, 82.2% of above moderate-income RHNA units, and 84.1% of above lower income RHNA units. This corresponds with the general distribution of census tracts within children living in single female-headed households.

Table D-9: RHNA Distribution by Children in Single Female-Headed Households

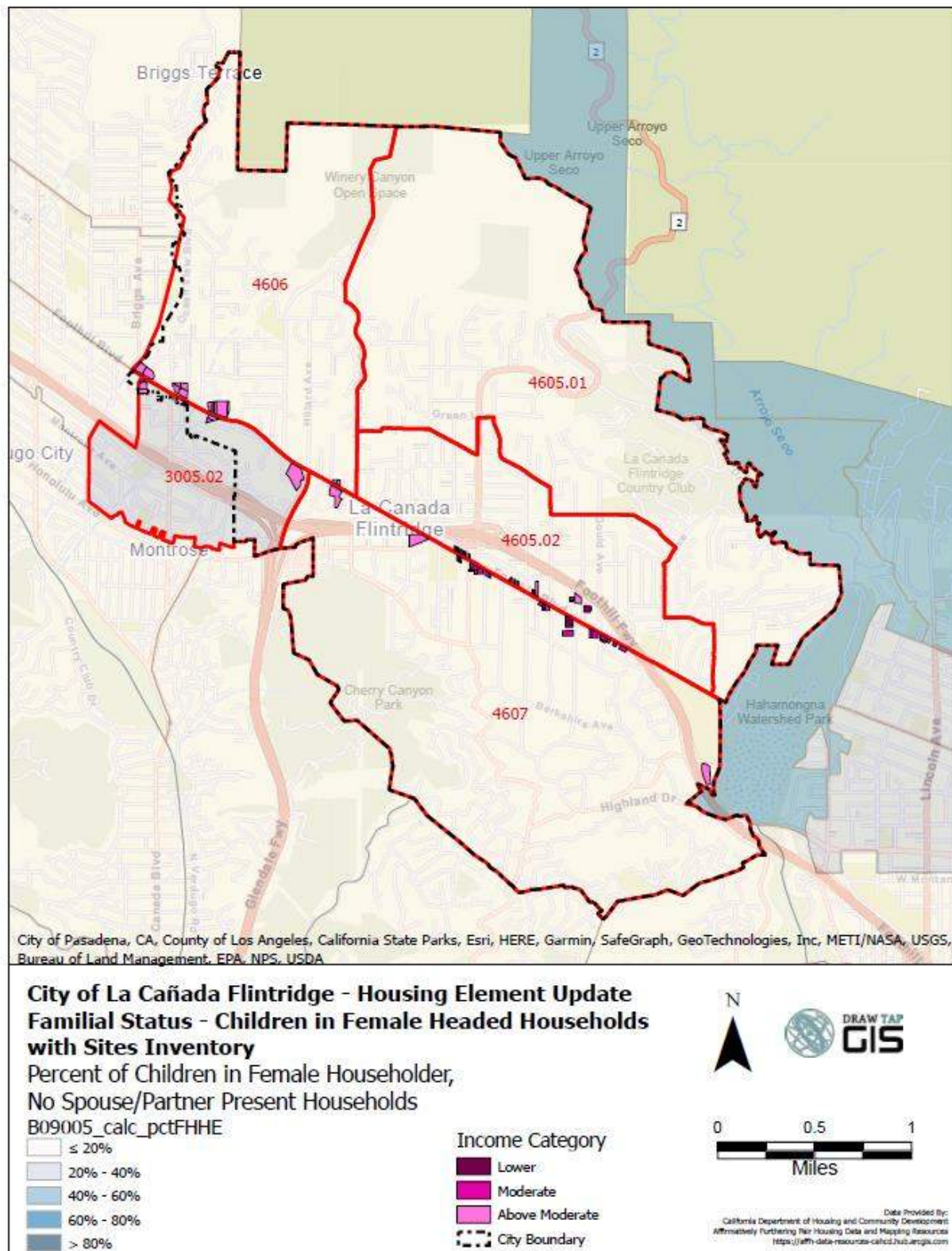
Tract by Children in Single Female-Headed Households		RHNA Units by Income Level			
Children in Single Female-headed HH in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 20%	80%	87.7%	84.1%	100.0%	82.2%
20 -40%	20%	12.3%	15.9%	0.0%	17.8%
40 - 60%	0%	0.0%	0.0%	0.0%	0.0%
60 -80%	0%	0.0%	0.0%	0.0%	0.0%
> 80%	0%	0.0%	0.0%	0.0%	0.0%
Total	5	689	483	161	45

Figure D-6: Percent of Children in Married Couple Households



Source: HCD Data Viewer, 2015-2019 ACS, 2021.

Figure D-7: Percent of Children in Female-Headed Households



Source: HCD Data Viewer, 2015-2019 ACS, 2021.

D.2.2.4 Income

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD’s 2013-2017 CHAS data (Table D-10) shows that only 19.6 percent of La Cañada Flintridge residents earn 80 percent or less than the area median family income and are considered lower income, compared to 51.6 percent Countywide. According to the 2015-2019 ACS, the median household income in La Cañada Flintridge is \$175,788, higher than \$68,044 for the County.

Table D-10: Income Level Distribution

Income Category	La Cañada Flintridge		Los Angeles County	
	Households	Percent	Households	Percent
<30% HAMFI	310	4.7%	641,055	19.5%
31-50% HAMFI	450	6.8%	482,070	14.6%
51-80% HAMFI	530	8.1%	578,285	17.5%
81-100% HAMFI	265	4.0%	312,595	9.5%
>100% HAMFI	5,035	76.5%	1,281,195	38.9%
Total	6,580	100.0%	3,295,200	100.0%

Sources: HUD Comprehensive Housing Affordability Strategy (CHAS) Data (based on 2013-2017 American Community Survey (ACS)), 2020.

Figure D-8 shows the Lower and Moderate Income (LMI) areas in the City by census tract. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI. There are no tracts in the City with LMI populations over 51 percent. One tract in the western side of the City, spanning the boundary of La Cañada Flintridge and La Crescenta, has a LMI population between 25 and 50 percent. Portions of Glendale and Pasadena south of La Cañada Flintridge have similarly low concentrations of LMI households, but to the southeast and southwest of the City, including areas of Pasadena, Glendale, and Altadena, there are higher concentrations of LMI households.

Table D-11 shows the poverty status for LA County and cities in the region by age, sex, and race. In the Los Angeles County overall, 14.2 percent of residents are below the poverty level. Cities in the region generally have lower poverty rates, with La Cañada Flintridge having a notably low percentage (3.3%) of residents below the poverty level. Countywide Black residents have higher poverty rates than people of other races, and this is especially true in La Cañada Flintridge where 31.1 percent of Black residents are below the poverty level. Poverty rates are also typically higher for women and people over 65, which is true of most cities in the region, including La Cañada Flintridge.

Table D-11: Regional Poverty Status (2020)

	Population	AGE		SEX		RACE AND HISPANIC OR LATINO ORIGIN							
		Under 18	65+	Male	Female	American Indian & Alaska Native	Black	Asian	Native Hawaiian & Pacific Islander	Other	Two or more races	Hispanic or Latino	White
Los Angeles County	9,884,138	2,145,717	1,342,535	4,865,252	5,018,886	787,711	76,403	1,464,802	24,520	2,093,575	717,876	4,797,018	2,554,426
Below Poverty Level	1,401,656	419,142	178,084	630,981	770,675	158,947	12,461	161,028	2,618	372,864	86,955	811,959	239,696
% Below Poverty Level	14.2	19.5	13.3	13.0	15.4	20.2	16.3	11.0	10.7	17.8	12.1	16.9	9.4
Burbank	102,900	18,800	15,843	49,918	52,982	3,350	764	12,208	39	8,343	8,719	24,294	56,630
Below Poverty Level	10,890	1,982	2,451	5,168	5,722	873	162	837	-	647	556	1,814	6,924
% Below Poverty Level	10.6	10.5	15.5	10.4	10.8	26.1	21.2	6.9	-	7.8	6.4	7.5	12.2
Glendale	197,902	35,029	34,830	92,739	105,163	3,470	420	27,883	208	9,118	10,230	35,890	123,187
Below Poverty Level	27,510	5,725	6,303	11,767	15,743	334	51	1,718	-	1,527	862	5,097	19,827
% Below Poverty Level	13.9	16.3	18.1	12.7	15.0	9.6	12.1	6.2	-	16.7	8.4	14.2	16.1
Pasadena	139,634	24,981	22,446	67,332	72,302	11,538	538	25,216	291	23,085	11,414	49,033	48,112
Below Poverty Level	19,531	3,976	3,535	8,511	11,020	1,919	186	3,318	20	5,138	1,474	9,021	4,843
% Below Poverty Level	14.0	15.9	15.7	12.6	15.2	16.6	34.6	13.2	6.9	22.3	12.9	18.4	10.1
San Marino	12,992	3,066	2,537	6,619	6,373	68	-	8,377	25	294	309	916	3,391
Below Poverty Level	925	199	58	474	451	6	-	625	-	44	-	64	230
% Below Poverty Level	7.1	6.5	2.3	7.2	7.1	8.8	-	7.5	-	15.0	-	7.0	6.8
La Cañada Flintridge	20,051.0	5,549.0	3,549.0	9,906.0	10,145.0	135.0	-	5,968.0	-	477.0	1,184.0	1,982.0	11,153.0
Below Poverty Level	664	53	139	252	412	42	-	142	-	12	28	107	345
% Below Poverty Level	3.3	1.0	3.9	2.5	4.1	31.1	-	2.4	-	2.5	2.4	5.4	3.1
Source: 2020 ACS 5-Year Estimates													

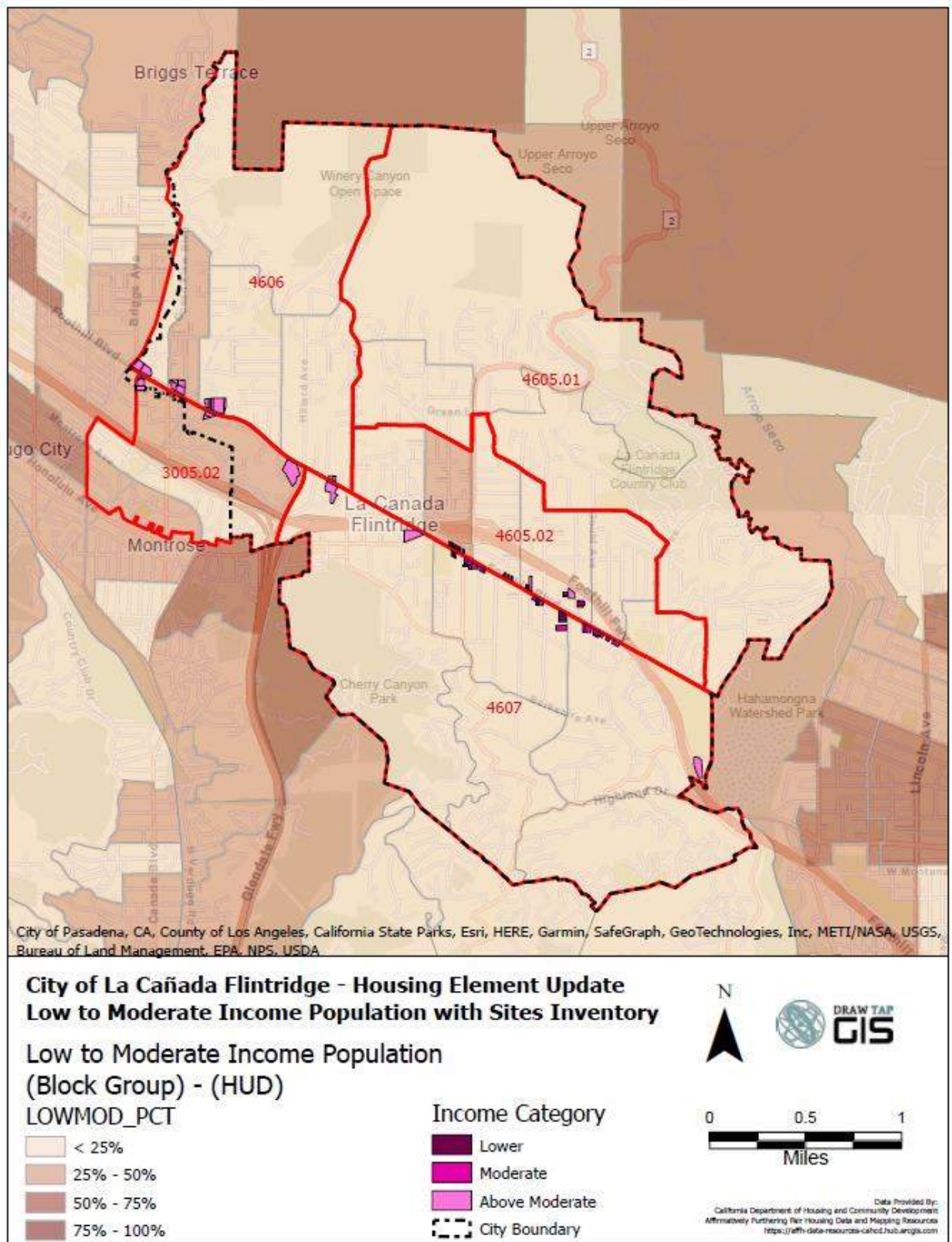
Distribution of RHNA Units by Percent Low and Moderate Income Population

Table D-12 shows the distribution of RHNA units based on the concentration of low and moderate income population throughout the City. As shown in Table D-12, About 73% of RHNA units are located within census tracts that have a low and moderate income population below 25 percent and about 27% of RHNA units are located within census tracts that have a low and moderate income population between 25-50%. RNHA units are slightly more concentration in census tracts that have a higher percentage of low and moderate income households, with 17.4% of moderate RHNA units, 17.8% of above moderate income RHNA units, and 30.6% of above moderate income RHNA units located in these tracts.

Table D-12: RHNA Distribution by Percent Low and Moderate Income Population

Low and Moderate Income Population		RHNA Units by Income Level			
Low and Moderate Income HH in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 25%	85%	73.3%	69.4%	82.6%	82.2%
25% - 50%	15%	26.7%	30.6%	17.4%	17.8%
50% - 75%	0%	0.0%	0.0%	0.0%	0.0%
< 75 - 100%	0%	0.0%	0.0%	0.0%	0.0%
Total	21	689	483	161	45

Figure D-8: Concentration of LMI Households



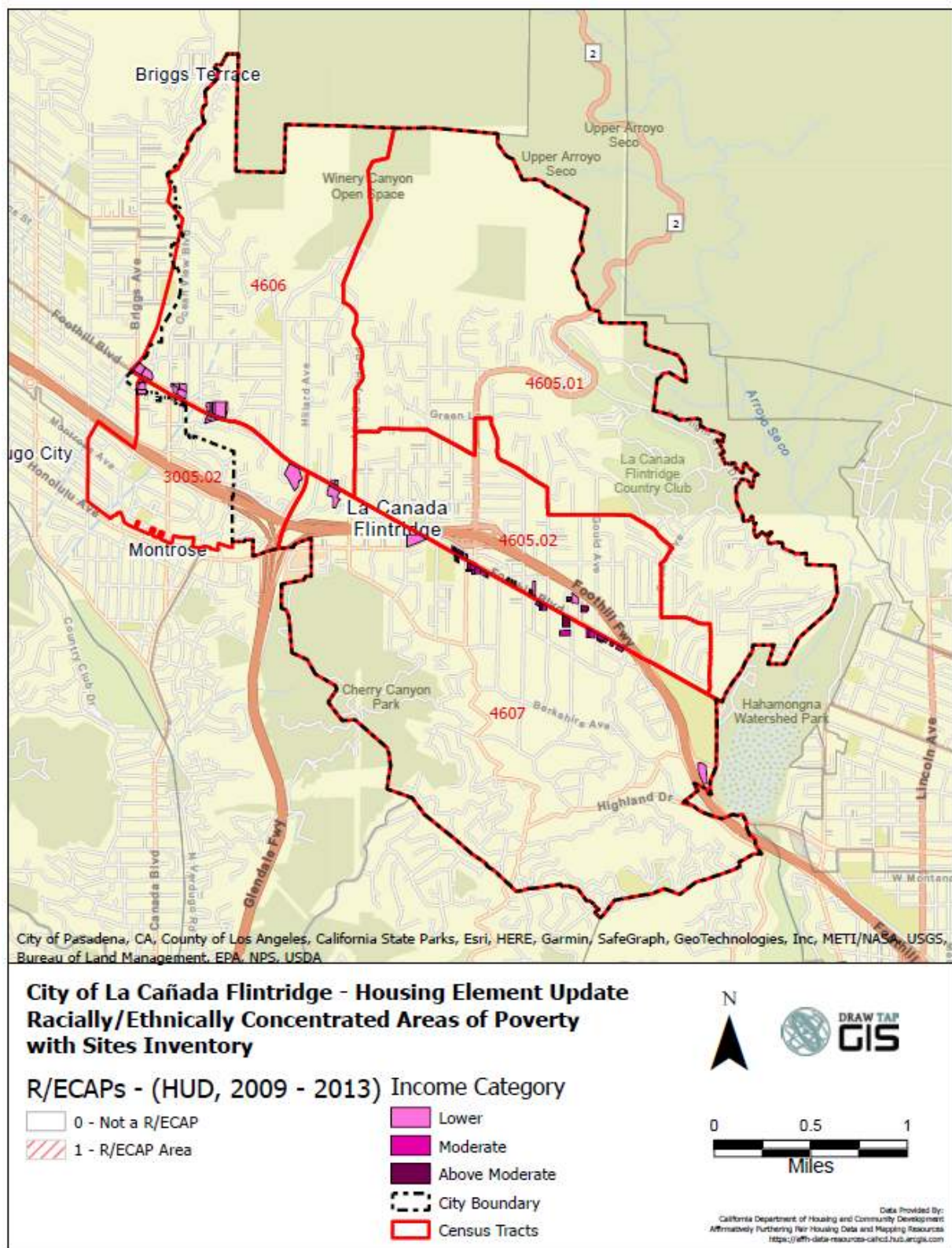
Source: HCD Data Viewer, HUD LMI Database, 2021.

D.2.3 Racially or Ethnically Concentrated Areas of Poverty

D.2.3.1 Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50%) with a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. According to HCD's 2020 R/ECAP mapping tool based on the 2009-2013 ACS, there are no R/ECAPs in La Cañada Flintridge. The R/ECAPs closest to the City are located in significantly to the south and west in the City of Los Angeles (Figure D-9).

Figure D-9: Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)



Source: HCD Data Viewer, HUD R/ECAP Database, 2021.

D.2.3.2 Racially or Ethnically Concentrated Areas of Affluence (RCAAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities.¹² According to this report, Whites are the most racially segregated group in the United States and “in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.” Based on their research, HCD defines RCAAs as census tracts where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016).

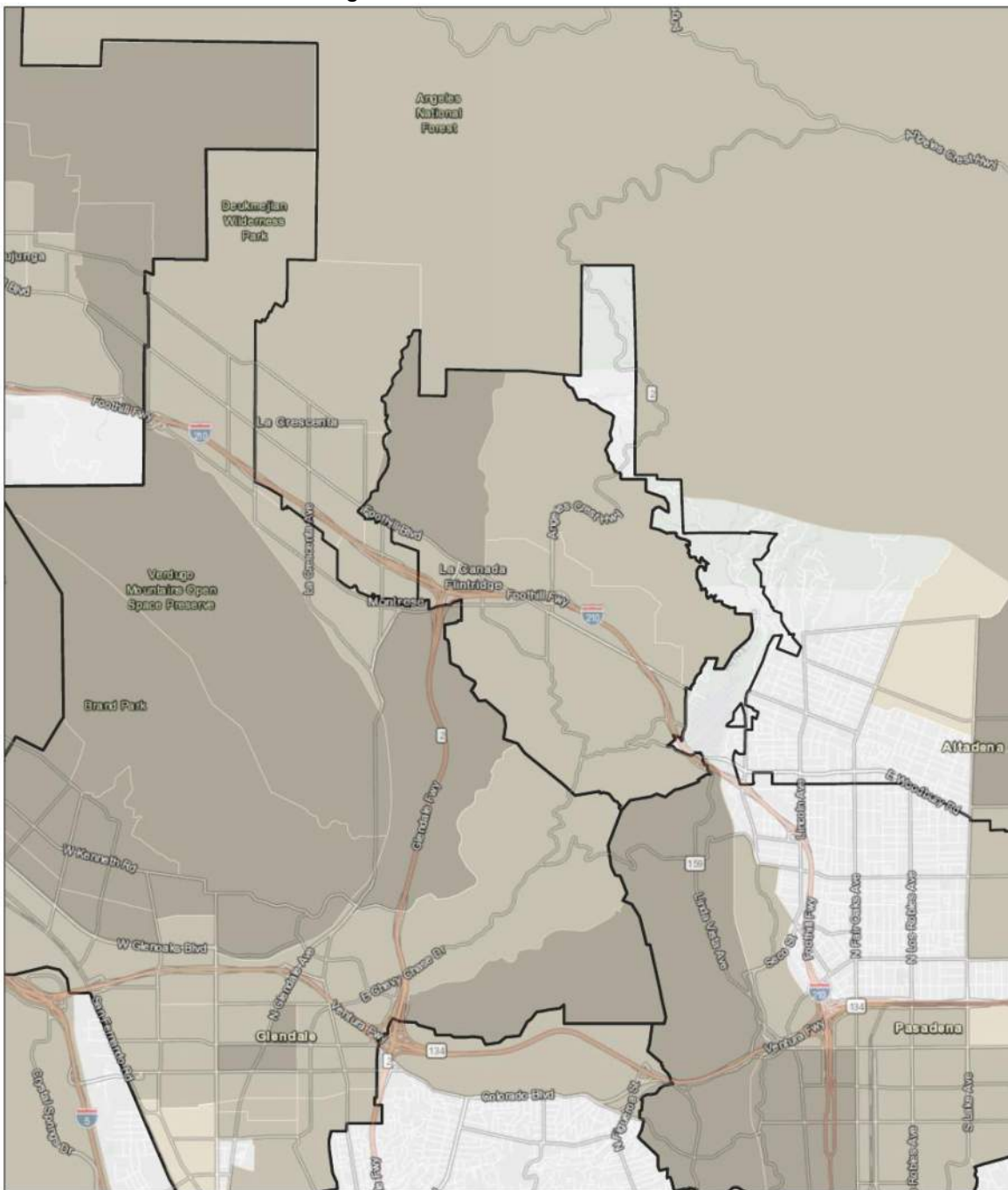
As shown in Figure D-10, all of La Cañada Flintridge is predominantly White. The northwestern side of the City has a larger population of White residents compared to the remainder of the City. However, as shown in Figure D-310, there are no areas in the City with racial/ethnic minority concentrations below 20 percent. As shown in Figure D-11, nearly all block groups in the City have a median income greater than \$125,000. There are two block groups in the southwest part of the City, spanning the border with La Crescenta, where the median income is below \$125,000, but still above the State median of \$87,100.

Home values are very high throughout the City, with the city’s median home price approximately \$1.4 million in 2020 and \$2 million in 2021. Rentals are limited in the City and are similarly expensive, with a two-bedroom apartment renting for nearly \$2,000 in 2021. This, combined with the City’s historic isolation, slow growth through much of the 20th century, and history of racial restrictions, has contributed to a concentration of white, affluent residents throughout the entire City (see also Section D.4.5).

The sites used to meet the City’s 2021-2029 RHNA are shown in Figure D-3 above. All sites are located in block groups where the median income exceeds the State median income and the population mostly White, as the entire City has these characteristics. Several of the lower-income sites are concentrated in the west area of the city, where median incomes are somewhat lower than elsewhere in the City.

¹² Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.’ Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-124).

Figure D-10: White Predominant Areas



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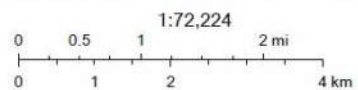
City/Town Boundaries

(R) Predominant Population - White Majority Tracts

Slim (gap < 10%)

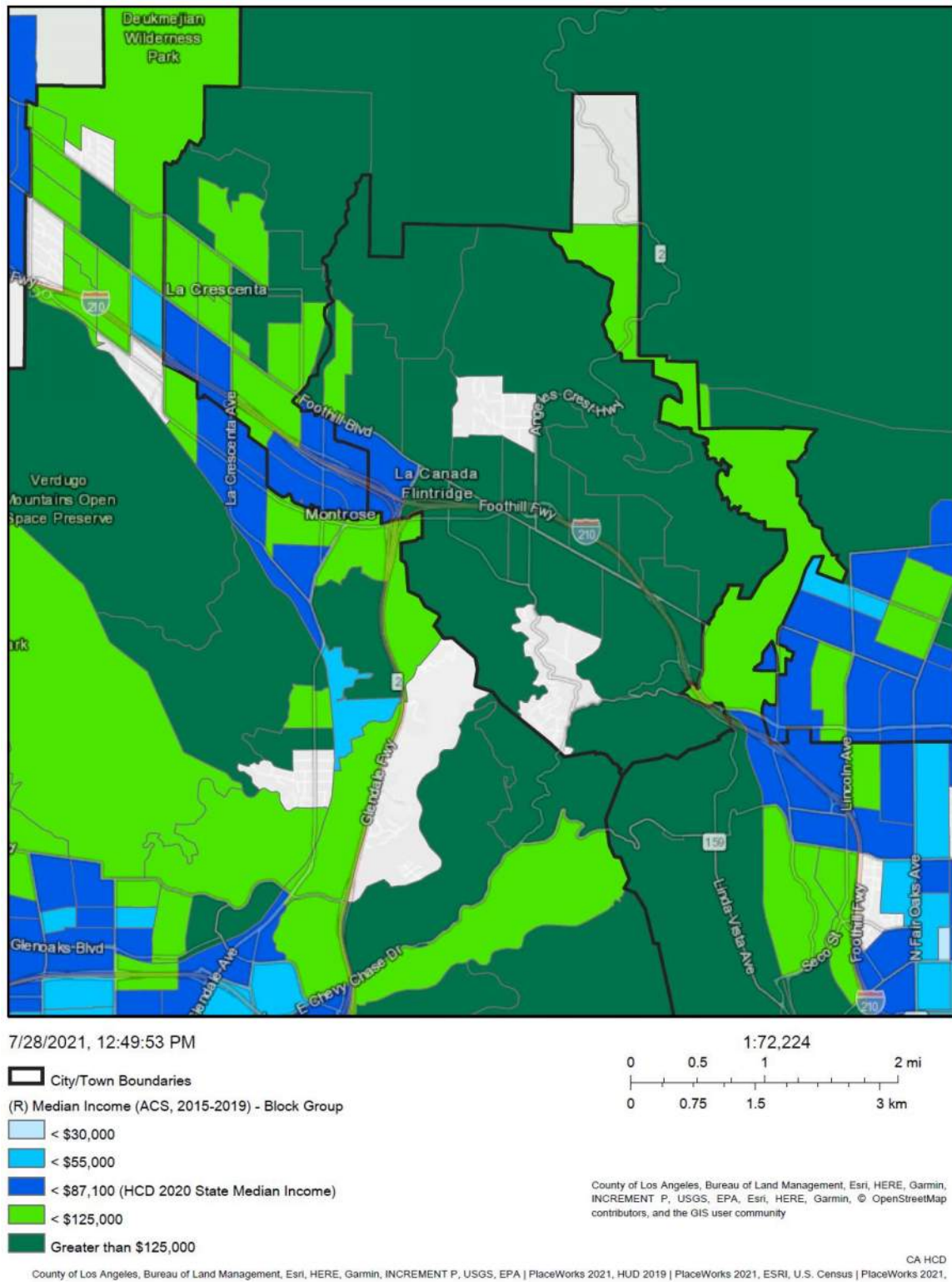
Sizeable (gap 10% – 50%)

Predominant (gap > 50%)



Source: HCD Data Viewer, 2021.

Figure D-11: Median Income by Block Group



Source: HCD Data Viewer, 2015-2014 ACS, 2021.

D.3 Access to Opportunities

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Table D-13: HUD Opportunity Indicators shows index scores for the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

In the Urban County, Hispanic residents are most likely to be impacted by poverty, low labor market participation, and poor environmental quality. White residents in the Urban County and Countywide are least likely to be exposed to poverty and have the highest exposure to better environmental quality. White residents also have the best access to high quality school systems and employment opportunities and have the highest labor market participation rates in both the Urban County jurisdictions and County.

Urban County residents, regardless of race or ethnicity, have less access to public transit and pay more for transportation. However, Los Angeles County residents as a whole are more exposed to poor environmental quality compared to Urban County jurisdictions.

Table D-13: HUD Opportunity Indicators

	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
Los Angeles Urban County							
Total Population							
White, Non-Hispanic	70.12	72.18	68.22	76.66	67.60	55.10	22.89
Black, Non-Hispanic	46.29	41.09	42.82	84.10	73.91	41.10	14.44
Hispanic	40.70	43.31	34.05	84.98	73.75	44.48	11.98
Asian or Pacific Islander, Non-Hispanic	68.38	72.86	66.73	82.22	68.98	51.22	13.86
Native American, Non-Hispanic	54.75	55.06	48.03	77.80	69.62	45.65	20.02
Population below federal poverty line							
White, Non-Hispanic	61.23	66.91	61.96	79.48	71.75	55.51	20.59
Black, Non-Hispanic	29.03	29.31	27.29	85.47	76.25	30.59	12.84
Hispanic	28.75	35.77	26.10	87.23	76.67	41.99	10.38
Asian or Pacific Islander, Non-Hispanic	61.63	70.67	62.58	83.88	72.41	51.16	13.30
Native American, Non-Hispanic	41.92	47.90	41.36	84.81	73.95	51.00	12.82
Los Angeles County							
Total Population							
White, Non-Hispanic	62.59	65.09	65.41	82.63	74.09	55.80	18.99
Black, Non-Hispanic	34.95	32.37	34.00	87.70	79.18	40.13	11.66
Hispanic	33.91	38.38	33.18	87.19	77.74	41.53	11.91
Asian or Pacific Islander, Non-Hispanic	53.57	59.34	55.94	86.52	76.45	51.82	12.16
Native American, Non-Hispanic	45.04	46.90	44.50	83.17	75.65	44.24	16.74
Population below federal poverty line							
White, Non-Hispanic	50.68	58.06	57.49	86.42	79.48	57.52	16.66
Black, Non-Hispanic	23.45	27.16	25.52	88.65	81.18	36.59	11.62
Hispanic	23.66	32.87	27.66	89.45	81.02	42.84	10.30
Asian or Pacific Islander, Non-Hispanic	42.97	54.52	50.06	89.62	81.49	54.19	9.84
Native American, Non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01

Sources: HUD AFFH Database, 2020.

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs).” These opportunity maps are made from composite scores of

three different domains made up of a set of indicators. Based on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table D-14 shows the full list of indicators.

Table D-14: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Sources: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, 2020.

Composite opportunity map scores for La Cañada Flintridge census tracts are presented in Figure D-12. All tracts in the City are categorized as Highest Resource. The surrounding areas, including parts of Pasadena and Glendale, are also all classified as Highest or High Resource areas. The individual economic, environmental, and education scores for La Cañada Flintridge are further detailed below.

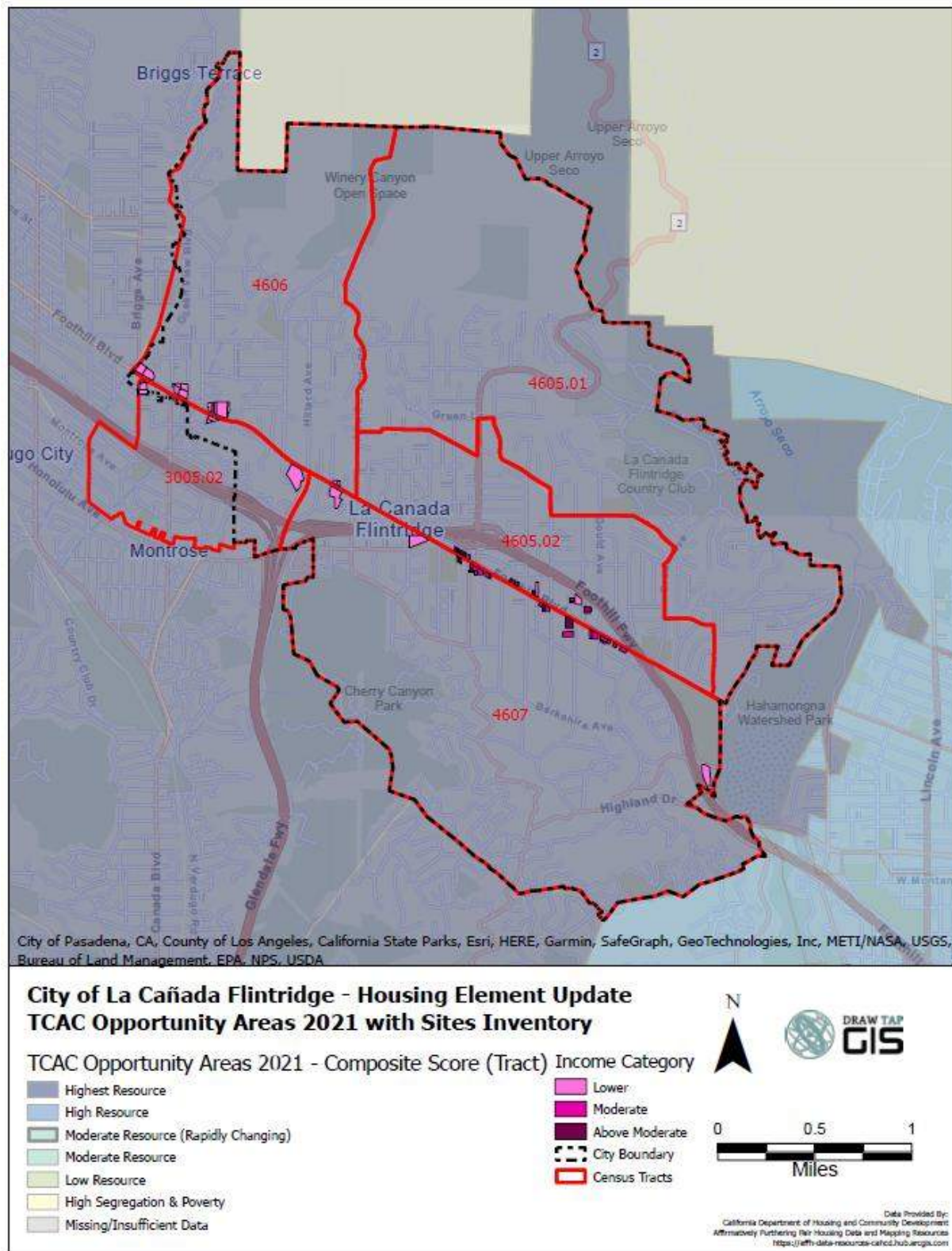
Distribution of RHNA Units by TCAC Opportunity Area Composite Score Category

Table D-15 shows the distribution of RHNA units by TCAC Opportunity Area Composite Score Category. As all of the City is within the Highest Resource category, all RHNA sites are located within tracts in the Highest Resource Category.

Table D-15: RHNA Distribution by TCAC Opportunity Area

TCAC Opportunity Area Category		RHNA Units by Income Level			
Category	% of Total Tracts	Total	Lower	Moderate	Above Moderate
Highest Resource	100.0%	100.0%	100.0%	100.0%	100.0%
High Resource	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate Resource (Rapidly Changing)	0.0%	0.0%	0.0%	0.0%	0.0%
Low Resource	0.0%	0.0%	0.0%	0.0%	0.0%
High Segregation & Poverty	0.0%	0.0%	0.0%	0.0%	0.0%
Missing/Insufficient Data	0.0%	0.0%	0.0%	0.0%	0.0%
Total Units	5	689	483	161	45

Figure D-12: TCAC Opportunity Areas with Composite Scores

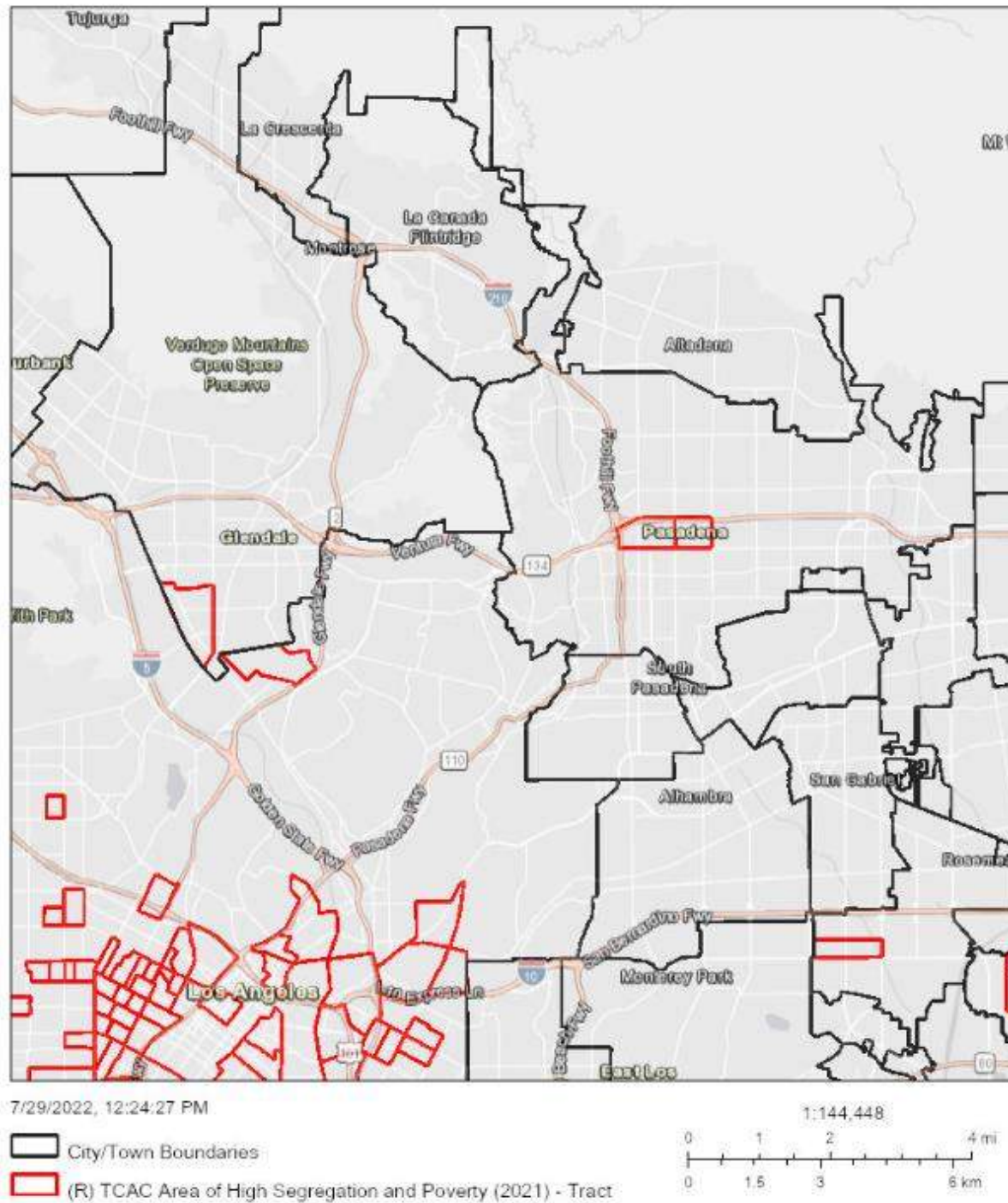


Source: HCD Data Viewer, TCAC Opportunity Maps, 2021

Tax Credit Allocation Committee (TCAC) Opportunity Areas

In February 2017, HCD and the California Tax Credit Allocation Committee (TCAC) also created an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families – particularly long-term outcomes for children. The TCAC opportunity areas of high segregation and poverty in the region are shown outlined in red in Figure D-13. As shown in the figure, there are no TCAC areas of high segregation and poverty in the City – the entire city is identified as an area whose characteristics have been shown to support positive economic, educational, and health outcomes for low-income households. The nearest TCAC opportunity areas of high segregation and poverty are located to the east and southeast of the City.

Figure D-13: Tax Credit Allocation Committee (TCAC) Opportunity Areas



Source: HCD Data Viewer, HUD R/ECAP Database, 2021.

D.3.1 Economic

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force maps presented in Figure D-4, all tracts in La Cañada Flintridge have the highest economic scores above 0.75, with the exception of the one tract located in the southwest part of the City that spans the boundary of in La Cañada Flintridge and La Crescenta.

D.3.2 Education

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. As shown in Figure D-15, all parts of the City for which data is available received education scores in the highest quartile. There is no data for the tracts in the northeastern area of the City.

D.3.3 Environmental

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. In addition to environmental hazards identified in CalEnviroScreen, the entire City is located within a Very High Fire Hazard Zone, where risk for property damage and injury from wildfires is most severe.

Figure D-16 shows that about half of the tracts in La Cañada Flintridge have the highest environmental scores, between 0.75 and 1.0. However, the southern tracts in the City have lower environmental scores (0.25-0.50), due to factors such as traffic, air and water pollution, and hazards from toxic releases and waste facilities in the region. Environmental scores vary in the surrounding areas, with areas to the east and west having higher scores, while areas to the north and south are lower. Figure D-17 shows more recent environmental data from CalEnviroScreen 4.0. As shown in the figure, environmental quality the same under this updated analysis, with most tracts having the highest environmental scores but southern tracts having slightly lower scores.

D.3.4 Transportation

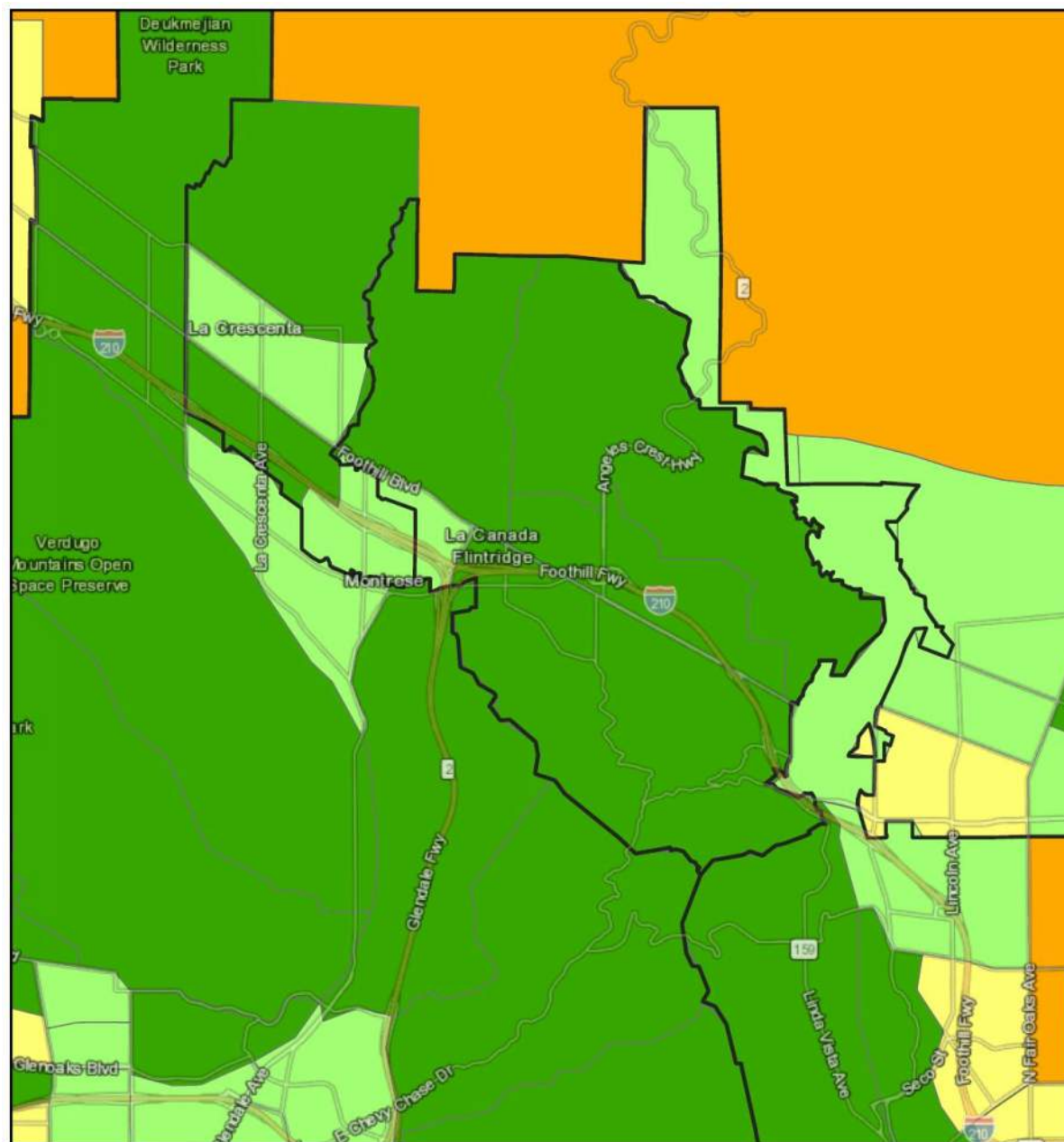
HUD's Job Proximity Index, described previously, can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. As shown in Figure D-18, the southeastern parts of the City have the best access to employment opportunities, while the northwestern areas have poorer access. Sites used to meet the City's 2021-2029 RHNA are mostly located along Foothill Boulevard.

As shown in Figure D-18, job proximity for sites on Foothill Boulevard is higher in the southeast part of the City, becoming increasingly lower to the west. Some sites on Foothill Boulevard are located in areas with the lowest 20-40 percent job proximity.

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HQTAs) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. Figure D-19 shows that there are no HQTAs in La Cañada Flintridge. The closest HQTAs are located south of the City.

Figure D-20 shows the AllTransit Performance Score for in La Cañada Flintridge, which rates the City at 3.8 (low) overall for transit access, with better transit scores within the central part of the City along Foothill Boulevard.

Figure D-14: TCAC Opportunity Areas - Economic Scores



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City/Town Boundaries

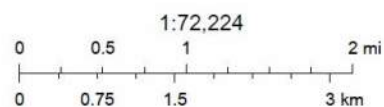
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

< 0.25 (Less Positive Economic Outcome)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Economic Outcome)



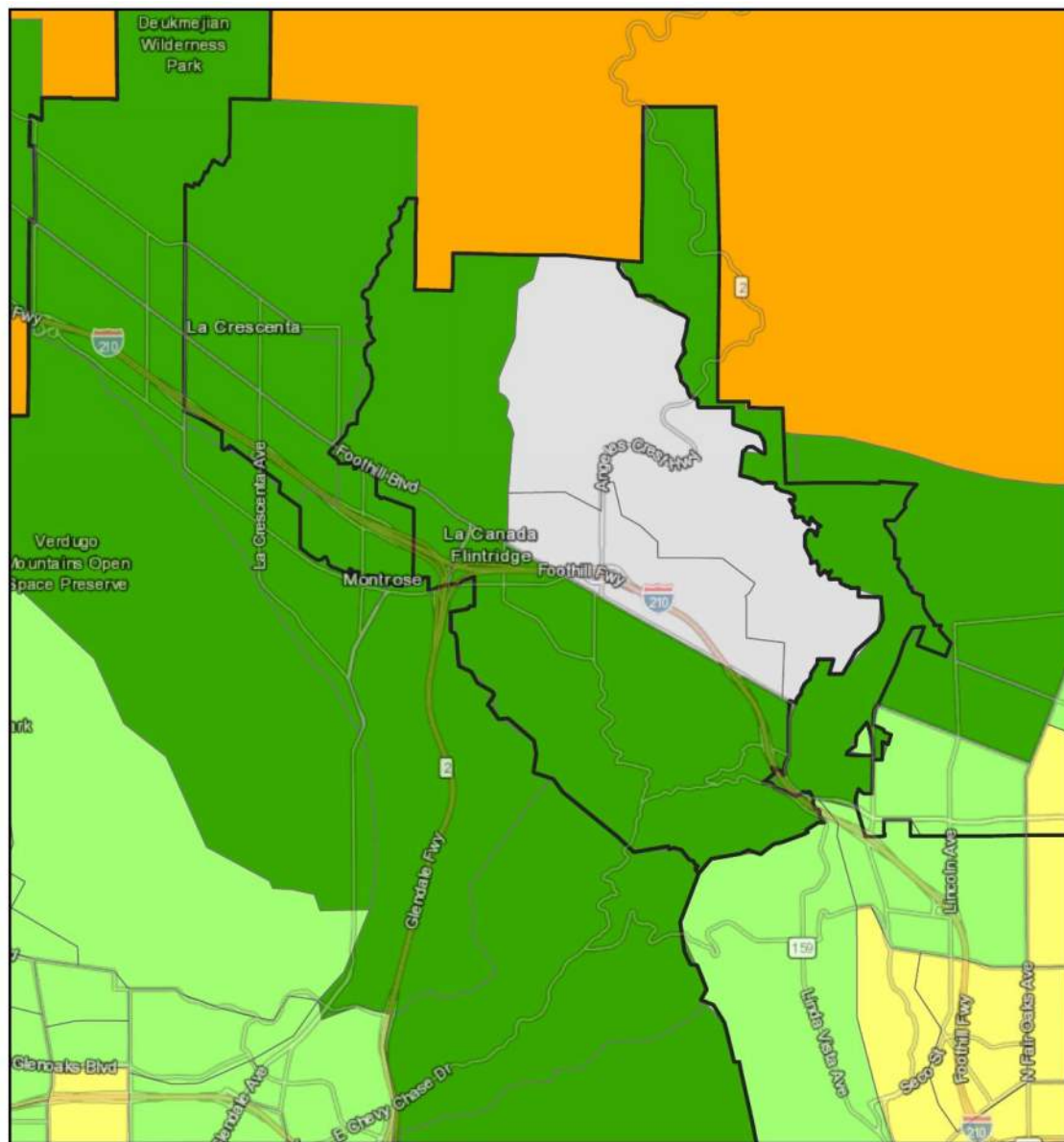
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Source: HCD Data Viewer, TCAC Opportunity Maps, 2021

Figure D-15: TCAC Opportunity Areas - Education Scores



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

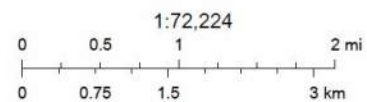
< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

No Data

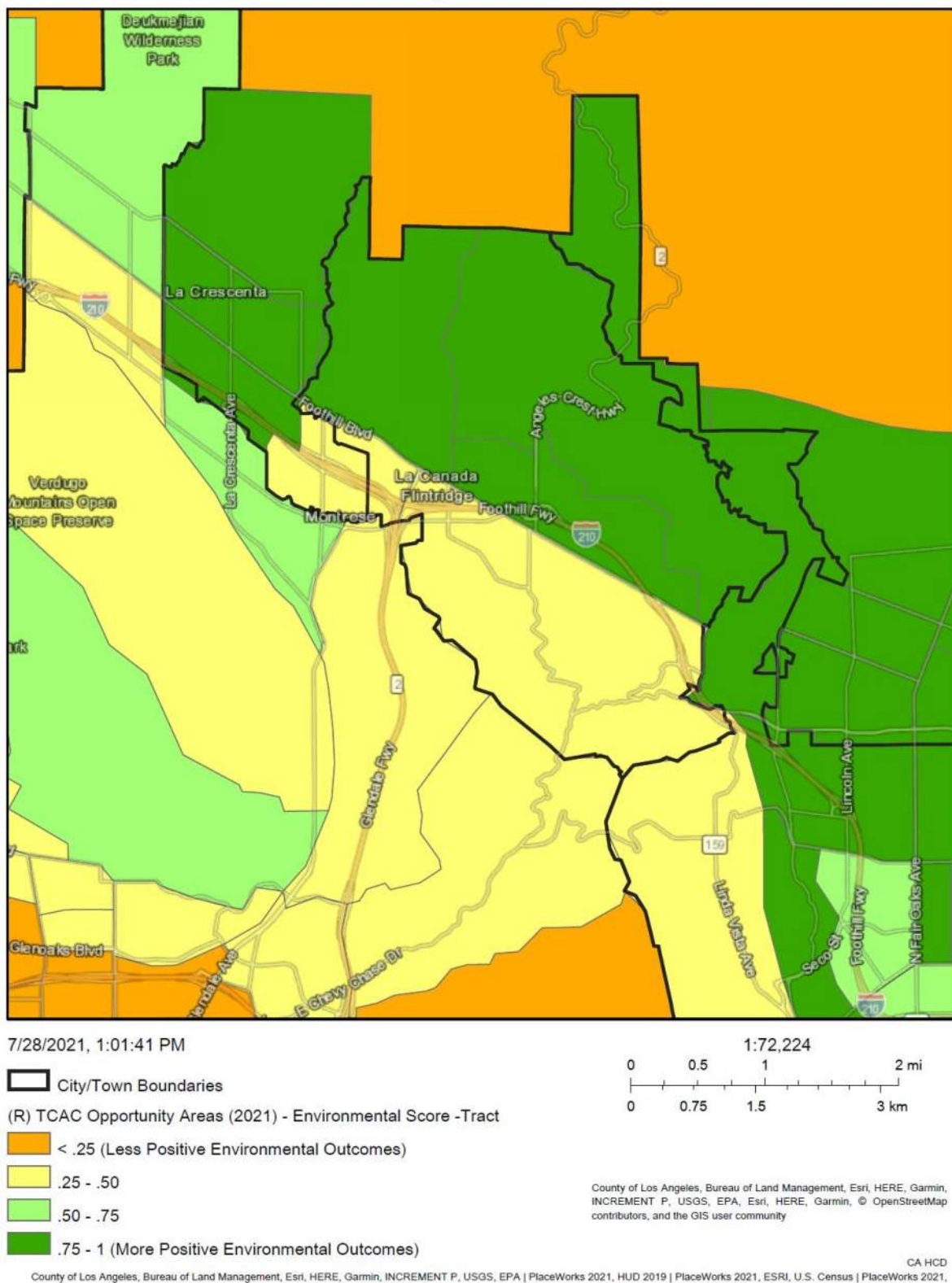


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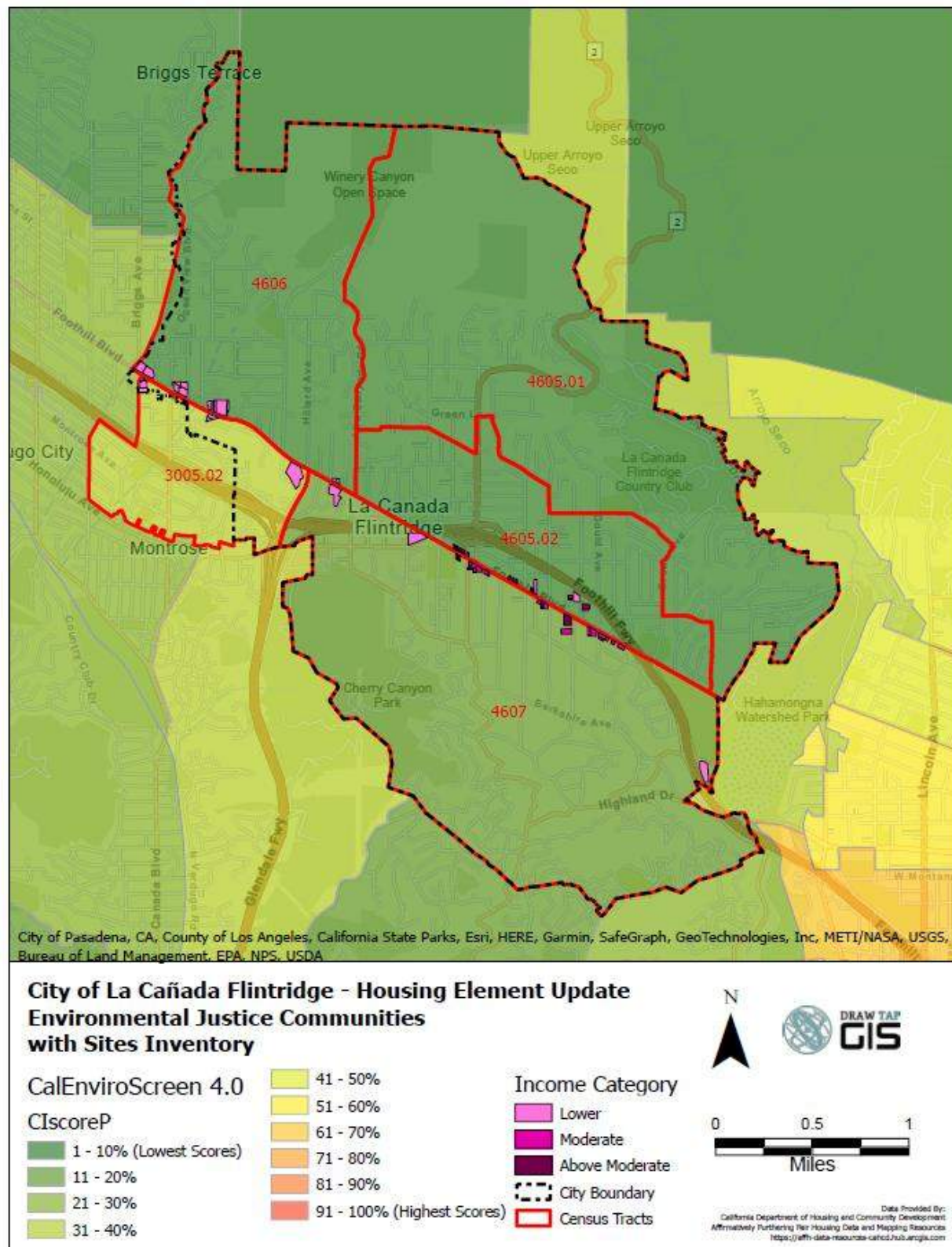
Source: HCD Data Viewer, TCAC Opportunity Maps, 2021

Figure D-16: TCAC Opportunity Areas - Environmental Scores



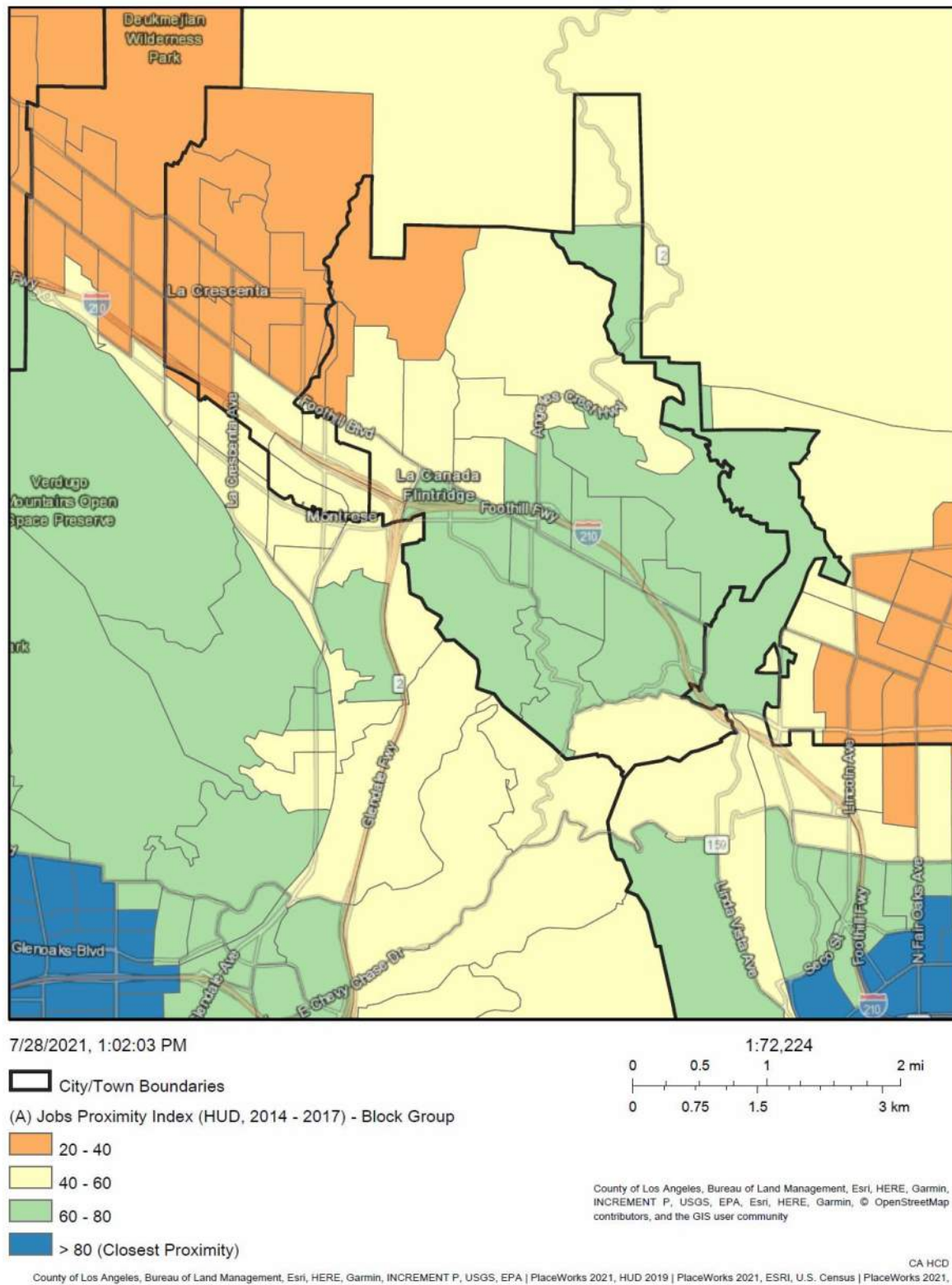
Source: HCD Data Viewer, TCAC Opportunity Maps, 2021

Figure D-17: CalEnviroScreen 4.0 Environmental Scores



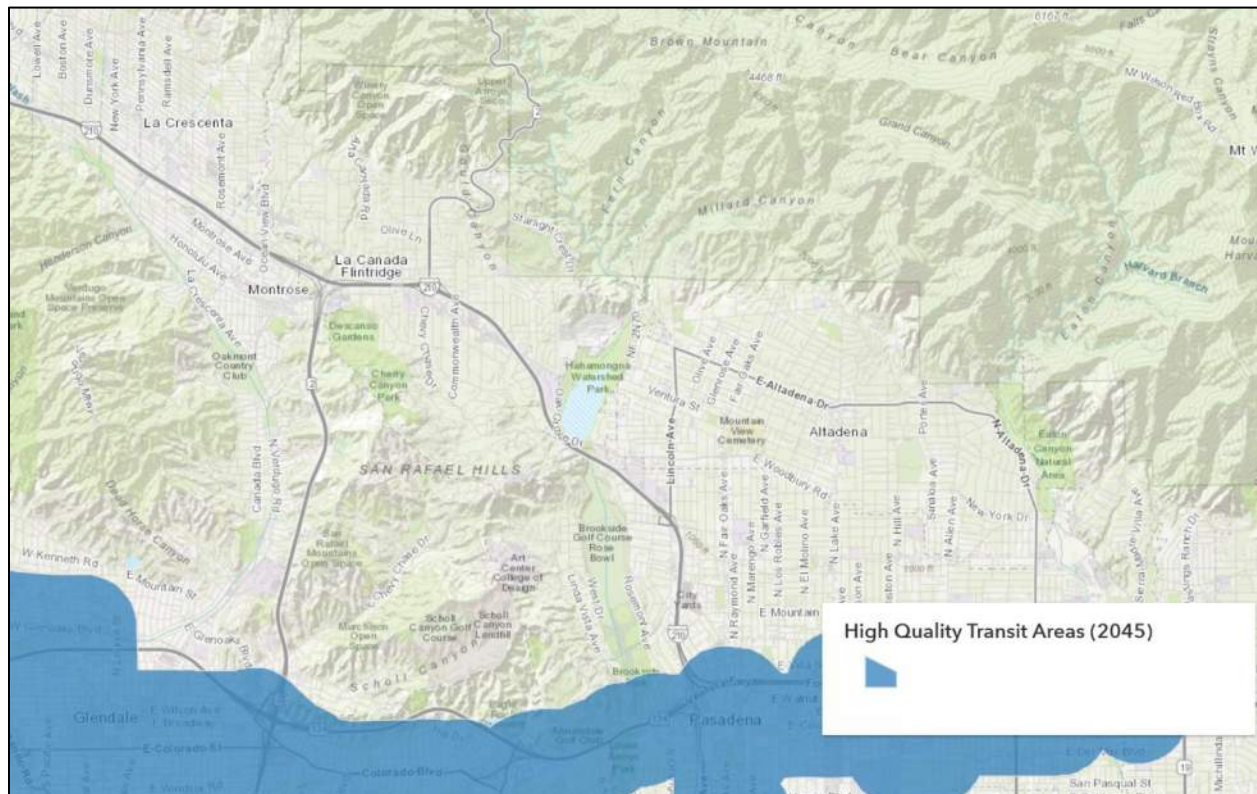
Source: HCD Data Viewer, CalEnviroScreen 4.0, 2022

Figure D-18: Jobs Proximity Index by Block Group



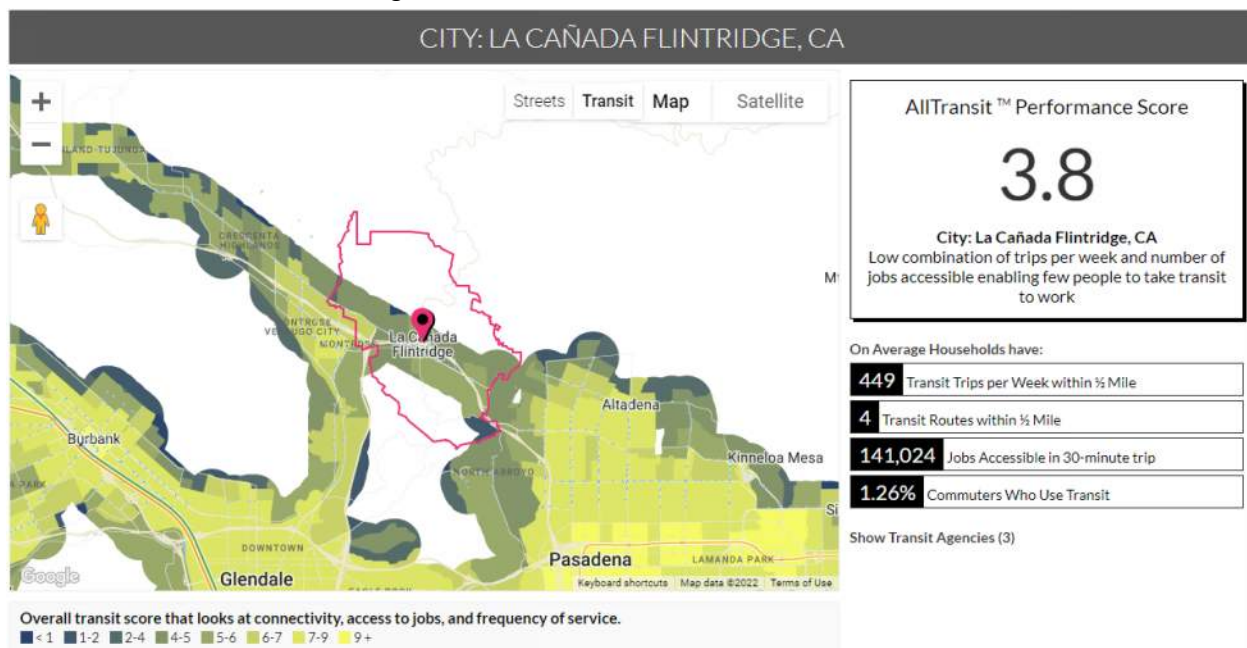
Source: HCD Data Viewer, HUD Opportunity Indices, 2021.

Figure D-19: High Quality Transit Areas (HQTAs)



Source: Southern California Association of Governments (SCAG) 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), 2021.

Figure D-20: AllTransit Performance Score



Source: <https://alltransit.cnt.org/metrics/>

D.4 Disproportionate Housing Needs

Housing problems for La Cañada Flintridge were calculated using HUD’s 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table D-16 breaks down households by race and ethnicity and presence of housing problems for La Cañada Flintridge and Los Angeles County households. The following conditions are considered housing problems:

- Substandard Housing (incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30%)

In La Cañada Flintridge, 33.9 percent of owner-occupied households and 53.0% of renter-occupied households have one or more housing problem. The City had a slightly lower proportion of households with a housing problem compared to the County, where 39.9 percent of owner-occupied households and 62.3 percent of renter-occupied households experience a housing problem. In La Cañada Flintridge, non-white owner-occupied households experience higher rates of housing problems than white owner-occupied households. In renter-occupied households, 73.8 percent of Asian households experienced a housing problem. In both the City and County, renter-occupied households tend to experience housing problems at a higher rate, with the exception of Other households in La Cañada Flintridge.

Table D-16: Housing Problems by Race/Ethnicity

Race/Ethnicity	La Cañada Flintridge		Los Angeles County	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
White	30.3%	48.1%	32.1%	52.6%
Black	--	--	41.5%	63.7%
Asian	44.0%	73.8%	38.3%	56.3%
American Indian	--	--	39.7%	56.4%
Pacific Islander	--	--	39.7%	55.5%
Hispanic	34.8%	42.9%	48.2%	71.1%
Other	34.3%	0.0%	36.5%	55.7%
All	33.9%	53.0%	38.9%	62.3%

Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021.

D.4.1 Cost Burden

Cost burden by tenure based on HUD CHAS data is shown in Table D-17. Asian households and Hispanic households have the highest rate of cost burden in the City. Over 20 percent of Asian owner-occupied households, and over 40 percent of Asian renter-occupied households have a severe cost burden (over 50%). Asian households represent approximately 25 percent of the City’s overall households. White households represent the largest proportion of households in the City but experience lower cost burdens. Approximately 14.8 percent of White owner-occupied

households and 19.5 percent of White renter-occupied households experience a severe cost burden.

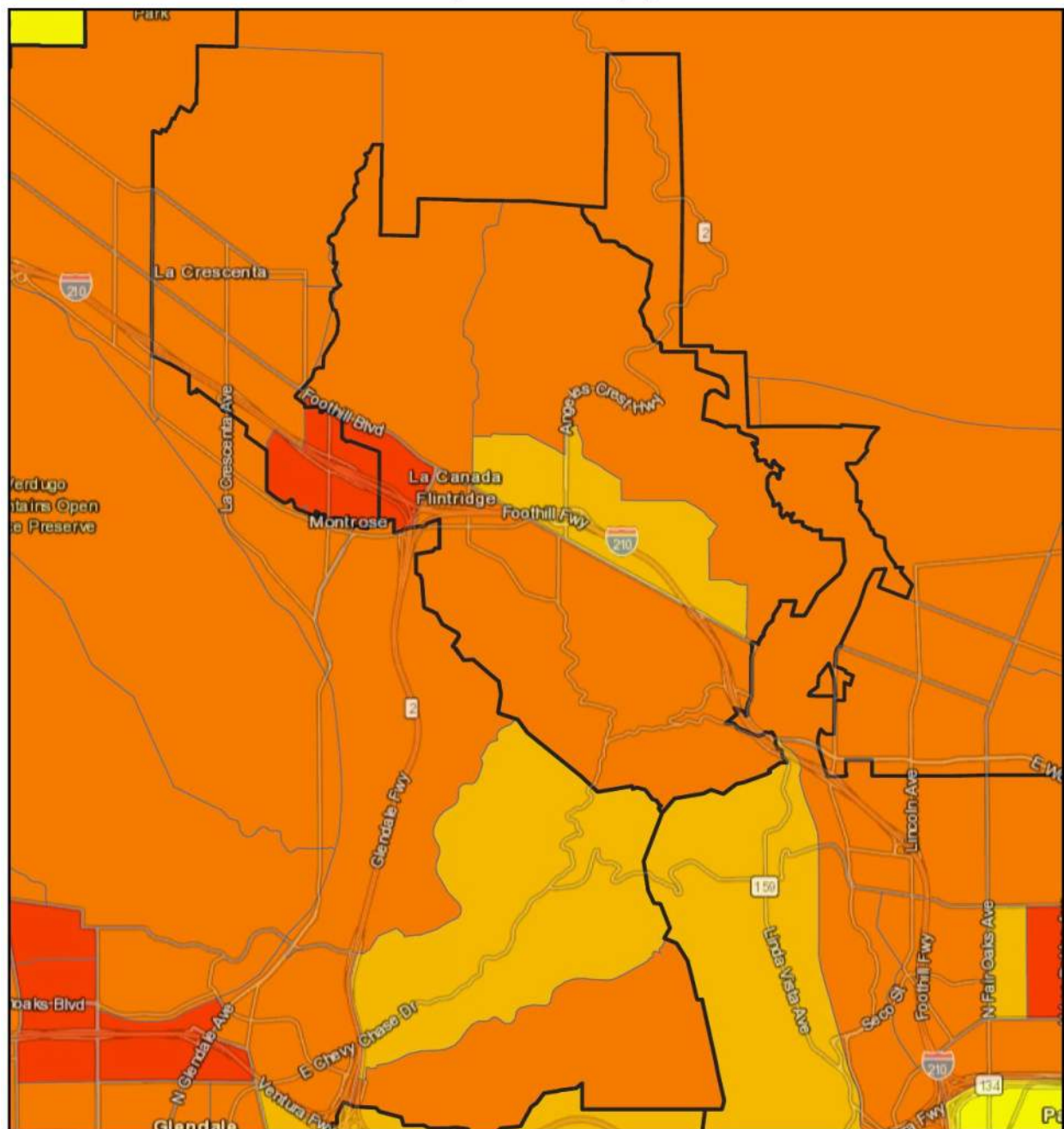
Figure D-21 (A) through (D) compare overpayment by tenure over time using the 2010-2014 and 2015-2019 ACS. The proportion of overpaying homeowners has remained the same over this time periods. Currently, 40 to 60 percent of owners in most tracts in the City are cost burdened, with a higher percentage in the southwest corner of the City in the tract that spans the boundaries of in La Cañada Flintridge and La Crescenta. Overpayment by renters has increased in the central part of the City but has decreased in the northwest area.

Table D-17: Cost Burden by Race/Ethnicity

Race/Ethnicity	Cost Burden (>30%)	Severe Cost Burden (>50%)	Total Households
Owner-Occupied			
White, non-Hispanic	30.4%	14.8%	4,045
Black, non-Hispanic	--	--	0
Asian, Non-Hispanic	41.3%	21.8%	1,490
Hispanic	34.8%	13.0%	230
Other	34.3%	5.7%	70
Renter-Occupied			
White, non-Hispanic	44.2%	19.5%	385
Black, non-Hispanic	--	--	0
Asian, Non-Hispanic	73.8%	38.1%	210
Hispanic	21.4%	21.4%	140
Other	0.0%	0.0%	10

Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021.

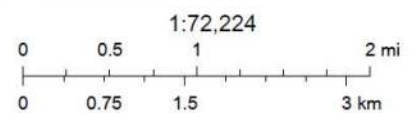
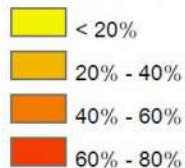
Figure D-21: (A) Overpaying Owners (2010-2014)



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City/Town Boundaries

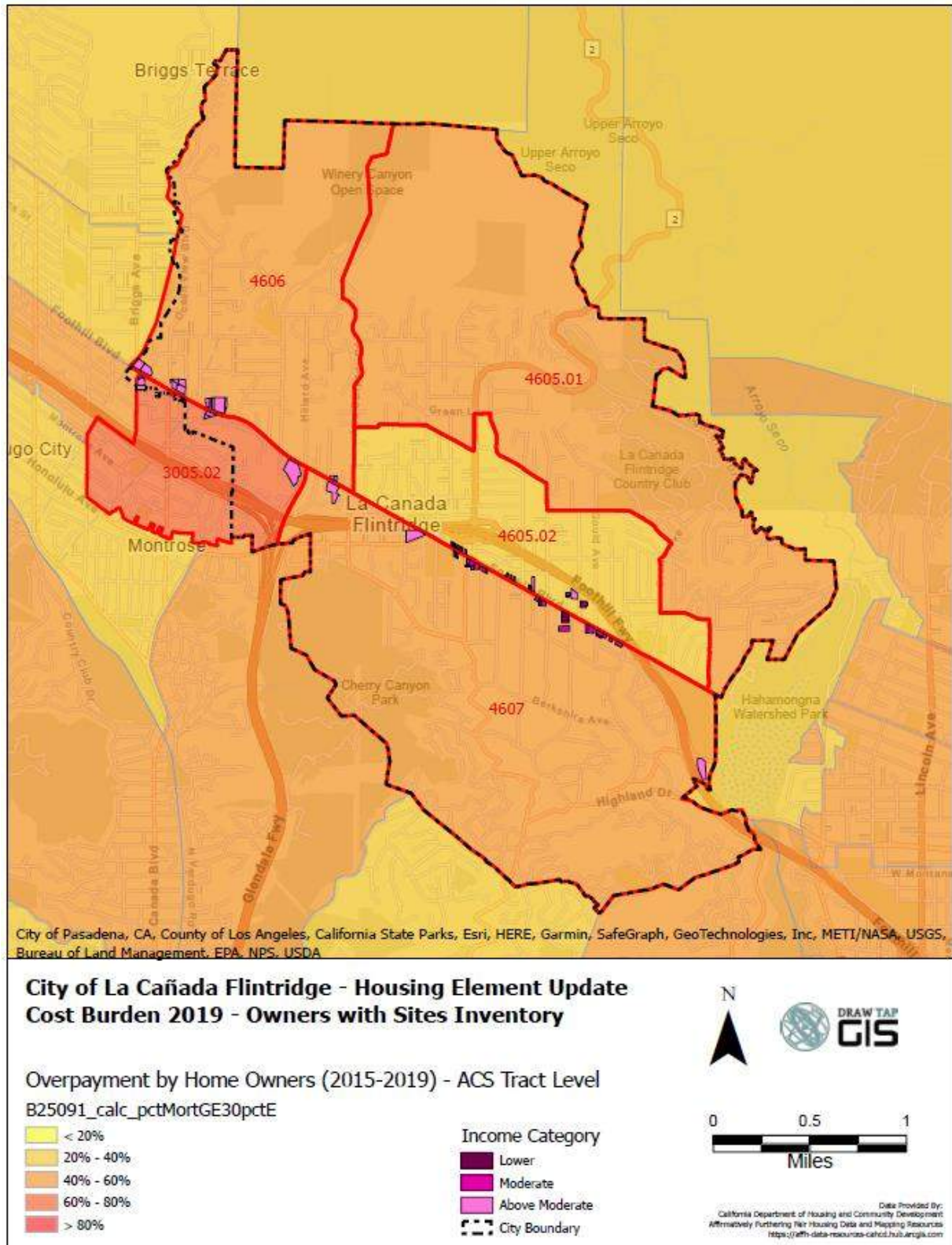
(A) Overpayment by Home Owners (ACS, 2010 - 2014) - Tract



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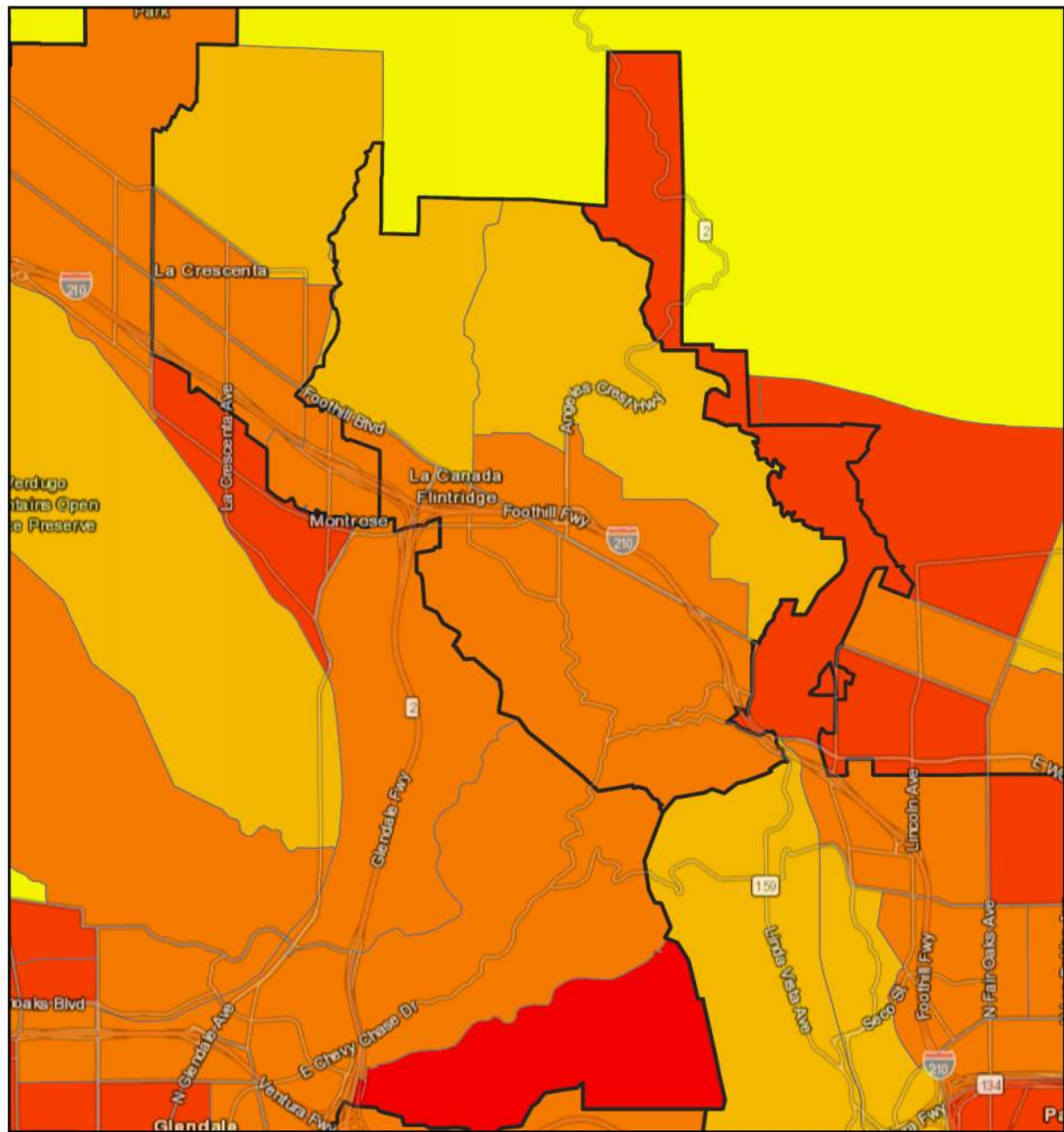
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

(B) Overpaying Owners (2015-2019)



Source: HCD Data Viewer, 2010-2014 and 2015-2019 ACS, 2021.

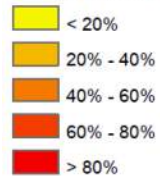
(C) Overpaying Renters (2010-2014)



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City/Town Boundaries

(A) Overpayment by Renters (ACS, 2010 - 2014) - Tract ACS

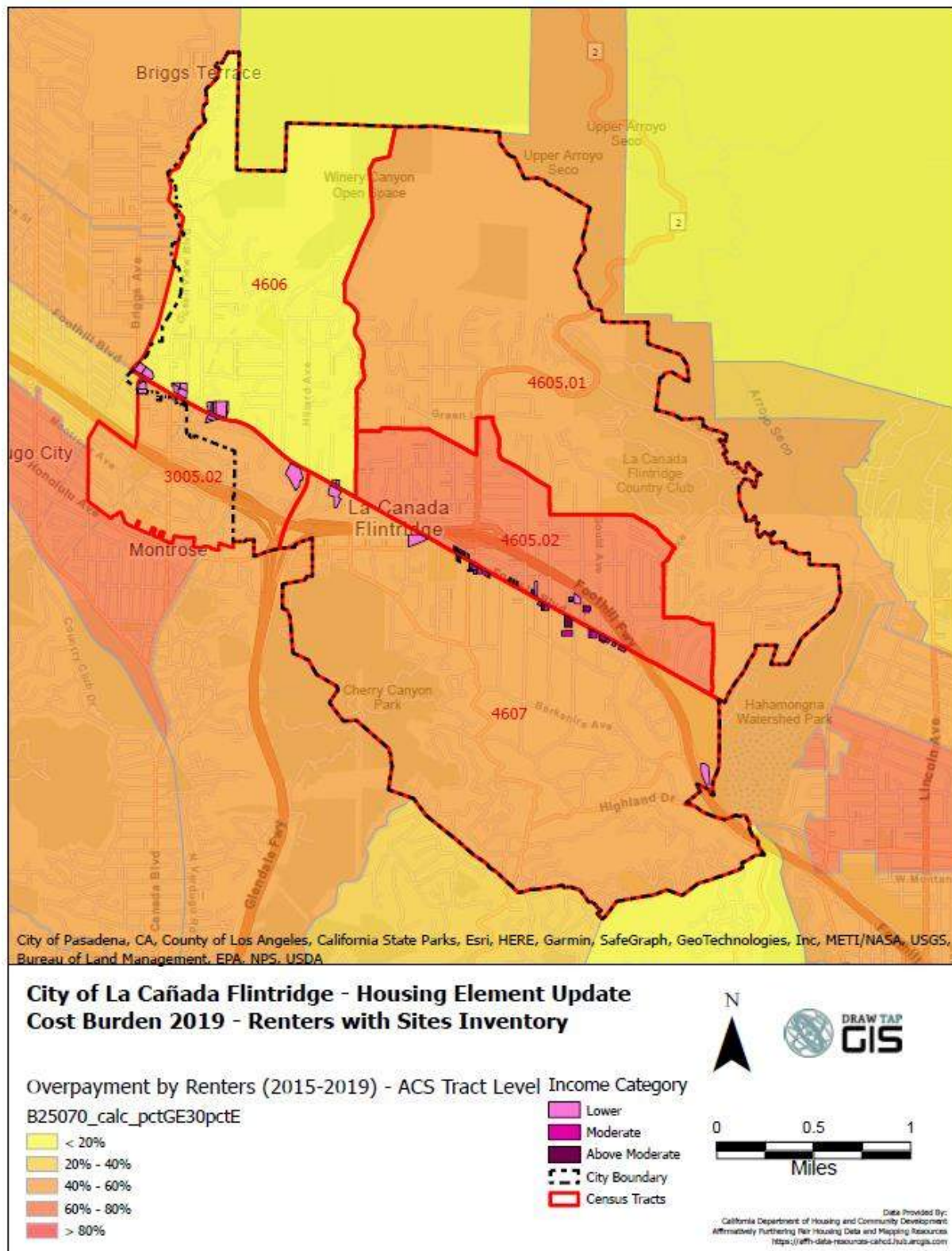


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(D) Overpaying Renters (2015-2019)



Source: HCD Data Viewer, 2010-2014 and 2015-2019 ACS, 2021.

RHNA Unit Distribution by Cost Burden

Table D-18 shows the distribution of RHNA units by owner cost burden. Most RHNA units (70.4%) are located in census tracts where 40 to 60 percent of homeowners are overpaying for housing, which is slightly higher than the percentage of census tracts (60%) in the City with owners overpaying for housing. No RHNA units are located in census tracts where over 80 percent of owners are cost burdened because no such areas exist within the City.

Table D-18: RHNA Distribution by Owner Cost Burden

Owners Overpaying for Housing		RHNA Units by Income Level			
Overpaying Owners in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 20%	0%	0.0%	0.0%	0.0%	0.0%
20 - 40%	20%	17.3%	8.9%	36.6%	37.8%
40 - 60%	60%	70.4%	75.2%	63.4%	44.4%
60 - 80%	20%	12.3%	15.9%	0.0%	17.8%
> 80%	0%	0.0%	0.0%	0.0%	0.0%
Total	5	689	483	161	45

Table D-19 shows the distribution of RHNA units by renter cost burden. As shown in the table, RHNA units are primarily located in census tracts where under 20 percent renters are overpaying for housing or in census tracts where 40 to 60 percent of renters are overpaying for housing. No RHNA units are located in areas where over 80 percent of renters are cost burdened because no such areas exist within the City.

Table D-19: RHNA Distribution by Renter Cost Burden

Renters Overpaying for Housing		RHNA Units by Income Level			
Overpaying Renters in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
< 20%	20%	38.6%	55.1%	0.0%	0.0%
20 - 40%	0%	0.0%	0.0%	0.0%	0.0%
40 - 60%	60%	44.1%	36.0%	63.4%	62.2%
60 - 80%	20%	17.3%	8.9%	36.6%	37.8%
> 80%	0%	0.0%	0.0%	0.0%	0.0%
Total	5	689	483	161	45

D.4.2 Overcrowding

Table D-20, below, shows that approximately 1.3 percent of owner-occupied households and 5.4 percent of renter-occupied households in La Cañada Flintridge are overcrowded. Overcrowding is more common Countywide, where 5.7 percent of owner-occupied households and 16.7 percent of renter-occupied households are overcrowded. Approximately 0.3 percent of owner-occupied households and 1.3 percent of renter-occupied households in La Cañada Flintridge are severely overcrowded.

RHNA Unit Distribution by Percent Overcrowded Households

Table D-21 shows the distribution of RHNA units by percent of overcrowded households. All census tracts in the City are below the state average percent of overcrowded households, so all RHNA units are located within this category of census tracts.

Table D-21: RHNA Distribution by Percent Overcrowded Households

Overcrowded Households		RHNA Units by Income Level			
<u>Overcrowded HH in Tract</u>	<u>% of Total Tracts</u>	<u>Total</u>	<u>Lower</u>	<u>Moderate</u>	<u>Above Moderate</u>
≤ 8.2% (State Average)	100%	100.0%	100.0%	100.0%	100.0%
≤ 12%	0%	0.0%	0.0%	0.0%	0.0%
≤ 15%	0%	0.0%	0.0%	0.0%	0.0%
≤ 20%	0%	0.0%	0.0%	0.0%	0.0%
≤ 70%	0%	0.0%	0.0%	0.0%	0.0%
Total Units	5	689	483	161	45

Figure D-22 shows the concentration of overcrowded households in La Cañada Flintridge by census tract. There are no tracts in the City with a concentration of overcrowded households above the Statewide average of 8.2 percent. There are some areas of overcrowded households in the surrounding cities of Glendale and Pasadena, but not in the areas immediately adjacent to La Cañada Flintridge.

Table D-20: Overcrowded Households

Overcrowded	La Cañada Flintridge		Los Angeles County	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
Overcrowded (>1 person per room)	1.3%	5.4%	5.7%	16.7%
Severely Overcrowded (>1.5 persons per room)	0.3%	1.3%	1.5%	7.6%
Total Households	5,840	745	1,512,365	1,782,835

Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021

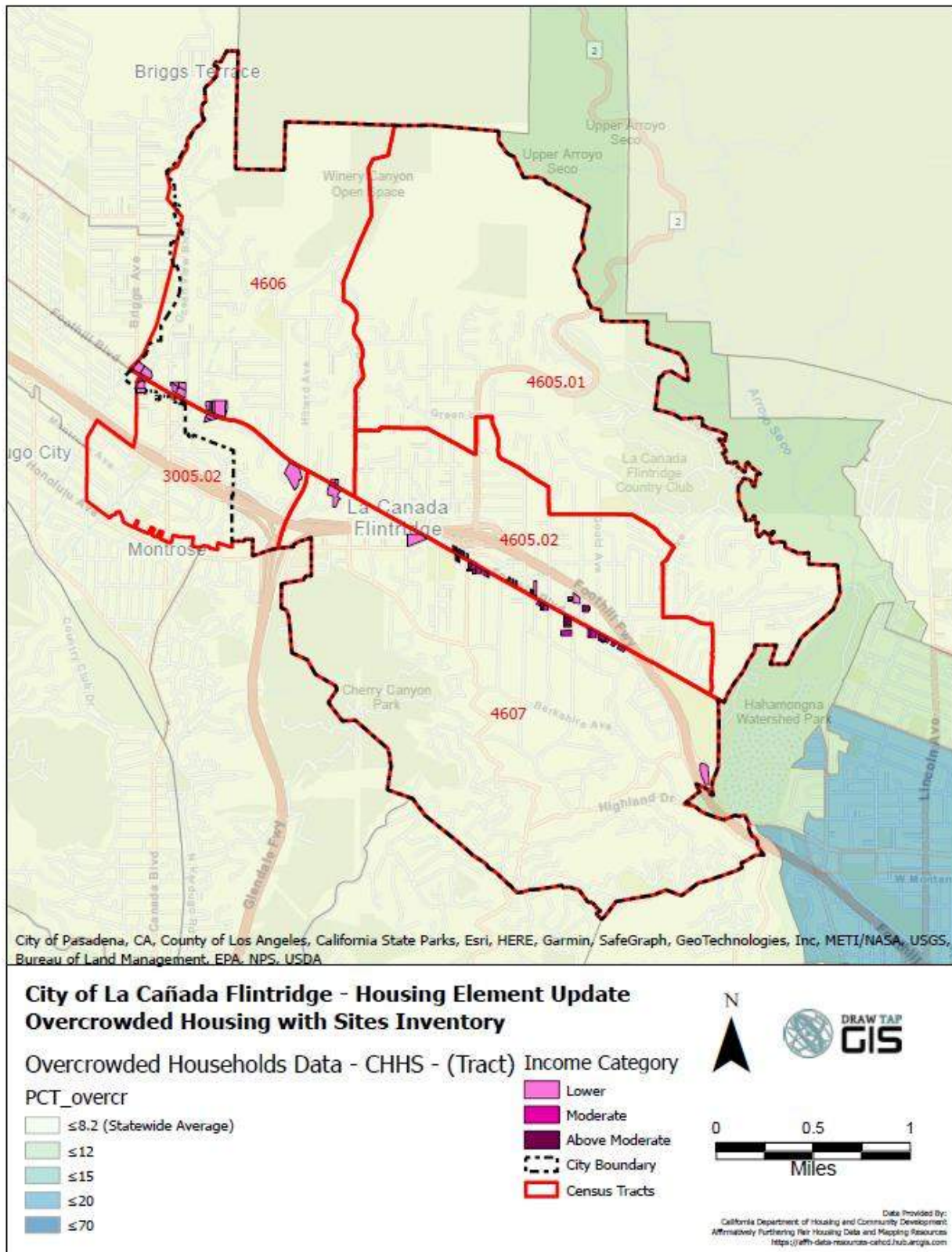
RHNA Unit Distribution by Percent Overcrowded Households

Table D-21 shows the distribution of RHNA units by percent of overcrowded households. All census tracts in the City are below the state average percent of overcrowded households, so all RHNA units are located within this category of census tracts.

Table D-21: RHNA Distribution by Percent Overcrowded Households

Overcrowded Households		RHNA Units by Income Level			
Overcrowded HH in Tract	% of Total Tracts	Total	Lower	Moderate	Above Moderate
≤ 8.2% (State Average)	100%	100.0%	100.0%	100.0%	100.0%
≤ 12%	0%	0.0%	0.0%	0.0%	0.0%
≤ 15%	0%	0.0%	0.0%	0.0%	0.0%
≤ 20%	0%	0.0%	0.0%	0.0%	0.0%
≤ 70%	0%	0.0%	0.0%	0.0%	0.0%
Total Units	5	689	483	161	45

Figure D-22: Concentration of Overcrowded Households



Source: HCD Data Viewer, 2013-2017 HUD CHAS Data, 2021.

D.4.3 Substandard Housing Conditions

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. There are currently 25 owner-occupied households and 20 renter-occupied households in La Cañada Flintridge lacking complete plumbing or kitchen facilities according to HUD CHAS data. Countywide, 0.4 percent of households lack complete plumbing facilities and 1.6 percent of households lack complete kitchen facilities.

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Approximately 63 percent of housing is older than 60 years old in La Cañada Flintridge compared to 45.7 percent Countywide. Table D-22 presents housing age by census tract. Tract 4605.02 in the central part of the City has the largest proportion of housing units older than 60 years, with over 80 percent of occupied units over 60 years old. In comparison, Tract 3005.03 located in the southwest of the City has only 38.3 percent of units 60 years or older.

Table D-22: Age of Housing Units

Age of Housing Units	Census Tract				
	4605.01	4605.02	4606	4607	3005.02
1959 or earlier (60+ Years)	51.3%	81.6%	66.2%	66.8%	38.3%
1960-1979 (40-60 Years)	37.0%	11.6%	20.8%	12.8%	67.2%
2000 or Later (<20 Years)	3.2%	1.3%	6.8%	4.6%	3.1%

Sources: 2015-2019 ACS (5-Year Estimates).

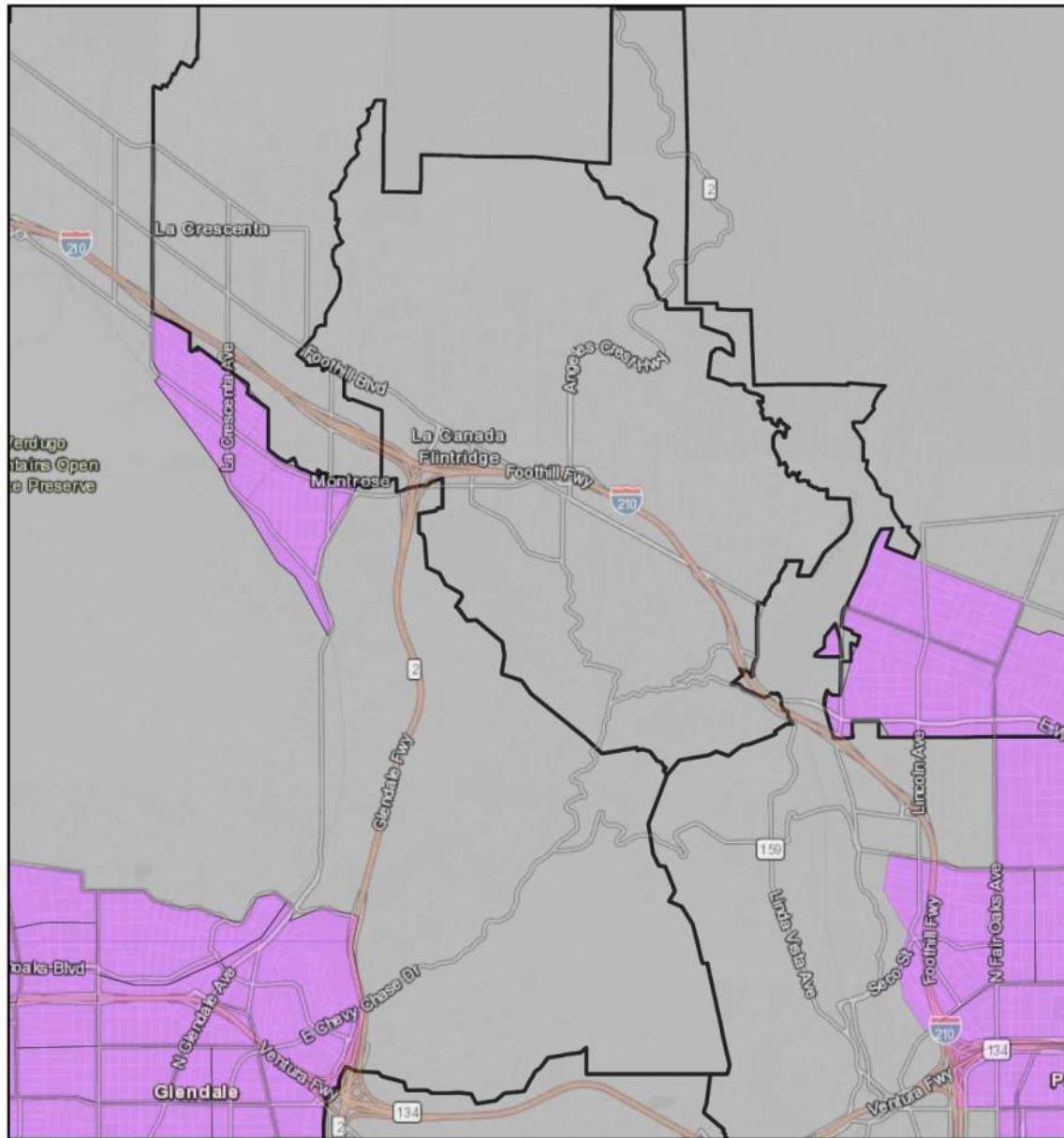
D.4.4 Displacement

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low income residents is above 20 percent; and
- The tract meets two of the following criteria:
 - Share of renters is above 40 percent,
 - Share of people of color is above 50 percent,
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median,
 - They or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases), or
 - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

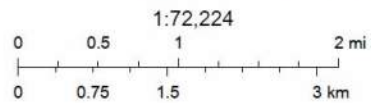
There are no tracts in La Cañada Flintridge that have been identified as vulnerable communities at risk of displacement (Figure D-23). There are vulnerable communities in the cities of Glendale and Pasadena, to the southeast and southwest of the City.

Figure D-23: Sensitive Communities at Risk of Displacement



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- City/Town Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
- Vulnerable
- Other



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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

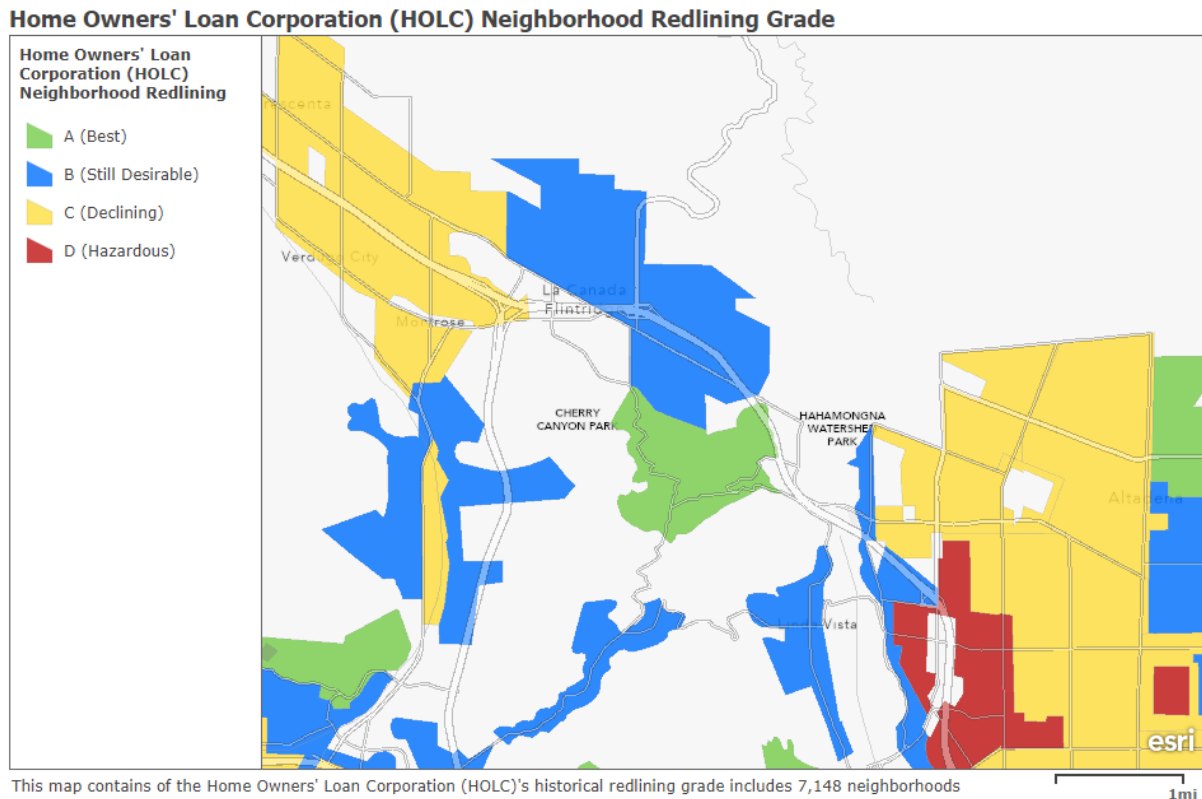
Source: HCD Data Viewer, Urban Displacement Project, 2021.

D.5 Local Data and Knowledge, and Other Relevant Factors

A lack of water, transportation services, and access points across the areas canyons and steep terrain prevented significant development in La Cañada Flintridge through the first decades of the 20th century. While the advent of electricity improved access to water, and the construction of new streetcar lines, roads, and bridges connected the City more directly to neighboring communities, these developments coincided with the start of the Depression, during which time only a handful of new homes were constructed in the area.

As the community began to grow following the Depression, discriminatory lending practices and restrictive racial covenants prevented non-white buyers from purchasing homes in the area. Figure D-24 shows the Home Owners' Loan Corporation redlining maps for the area, which grade La Cañada Flintridge as "best" or "still desirable." The maps' documentation notes "Many subdivisions are included in this area, all of which are said to have favorable deed restrictions which include protection from racial hazards" and characterizes the population as high-income white-collar professionals and retirees.

Figure D-24: Home Owners' Loan Corporation Neighborhood Redlining Grade maps



City of Pasadena, CA, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA | City of Pasadena, CA, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA | City of Pasadena, CA, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Formal restrictions were supported by social pressure from the community to maintain La Cañada Flintridge as a whites-only area. For example, in the early 1940s community leaders encouraged homeowners to add racial covenants to their deeds to prevent the mixing of racial groups. While racial covenants were declared unconstitutional shortly thereafter, established patterns of racial and economic segregation were difficult to change. A predominance of single-family zoning, municipal code requirements that promoted the construction of larger homes, and residents' efforts to promote high-quality local schools ensured that housing costs and associated living expenses remained high in the community. Though the intent of these rules and actions may not have been to directly discriminate, the effect was to exclude certain groups of people, such as lower-income and/or non-white families, from moving into the City.

Today, nearly one-half of the City of La Cañada Flintridge is in a hilly area and the entire City is located in the Very High Fire Hazard Severity Zone as identified by CALFIRE. After the Station wildfire just to the north of the City denuded about 160,000 acres of the Angeles Forest in 2010, heavy rains caused a mudflow that destroyed three homes and a multitude of vehicles in the City. Because of the terrain and the historic development pattern, several areas of the City are not served by sewer, and remain on antiquated septic systems.

During the update of the General Plan approximately 10 years ago, some of the older residents in the City commented that they would like to downsize from their large home yet stay in the community, and there are no options for them to do so. Others stated that their children who grew up in La Cañada Flintridge and left to attend college are not able to return to the community because there are no affordable housing options.

After decades of effort, the City has one of the highest rated school districts in the State of California. Families wanting to take advantage of the excellent schools were willing or able to pay more to live in the City, which raised the cost of housing. Over time, a combination of homeowners whose children had completed high school yet remain in the City, and high housing prices have led to fewer families with young children able to afford a home. Schools have recently been faced with declining enrollments and the City would like to offer more affordable housing options for this demographic.

The City has also realized that the current densities and development standards need to be modernized to enable the development of affordable housing.

D.6 Sites Inventory

The City of La Canada Flintridge is largely built out. With very little vacant land left the City's strategy is to identify remaining vacant properties and underutilized sites, primarily focusing along the Foothill Boulevard corridor to for the Sites Inventory are located to meet the City's RHNA. Foothill Boulevard is the City's main commercial and transit corridor.

The intent of the City's General Plan Land Use Element and the DVSP has been to encourage a walkable, mixed use village atmosphere along Foothill Boulevard, the City's primary commercial corridor. Promoting housing in mixed use areas via mixed use and stand-alone residential development also supports use of transit, bicycling, and walking as alternatives to the use of a personal automobile, which is beneficial to a broad spectrum of residents who depend on or choose alternative modes of transportation.

One of the factors that is making mixed use and residential development in predominantly commercial corridors more viable is the impact of e-commerce on local and national retail shopping. The last decade has brought a significant increase in online sales, with e-commerce sales rising steadily from 6.4 percent in 2010 to 21.3 percent in 2020.¹³ This national trend, which was exacerbated by the coronavirus disease (COVID-19) pandemic (which started in 2019 and is still ongoing as of the date of adoption of this Housing Element), is not expected to decline. One economic impact of the COVID-19 lockdown is the number of businesses that have permanently closed, with small businesses especially hard hit. Even many services are moving to an online platform, such as banking and insurance. The impact of the pandemic also has resulted in more people working remotely (usually from home); although many will return to their places of employment after the pandemic, estimates are that as many as 25-30% of the workforce will continue to work at home on a multiple-days-a-week basis.¹⁴

Due to a variety of factors, including online sales trends, businesses closing, and more people working remotely, cities across the country are recognizing the need to provide flexibility in land uses in traditionally commercial areas by allowing a greater mix of uses, including mixed use development (a mix of residential and compatible non-residential uses in the same building or on the same site), and even stand-alone residential uses in traditionally commercial areas to create mixed use areas. Additionally, there are many underutilized parcels in La Cañada Flintridge that were constructed prior to the 1980s, with 1953 as the median year these parcels were developed. Many are antiquated commercial uses with significant amounts of surface parking. These properties exhibit similar characteristics in terms of conditions and existing operations as other properties that have been redeveloped in the past, such as the Town Center project, which was the most significant redevelopment project in several decades.

According to the methodology developed by the University of California at Berkeley for the State of California Business, Transportation, and Housing Agency, the ratio of land improvements to

¹³ US Ecommerce Grows 44.0% in 2020 (<https://www.digitalcommerce360.com/article/us-ecommerce-sales/#:~:text=Online's%20share%20of%20total%20retail,2019%20and%2014.3%25%20in%202018.>) Accessed 4.22.2

¹⁴ <https://globalworkplaceanalytics.com/work-at-home-after-covid-19-our-forecast>. Accessed 4.23.21

land value (ILR) can facilitate identification of underutilized sites with potential for infill or redevelopment with higher density residential and/or mixed use developments. An improved site may be considered underutilized if it is located in a non-single-family area (e.g., commercial, industrial, multi-family, etc.) and the total value of improvements on the site is less than the total value of the underlying land (i.e., $ILR < 1.0$).

A parcel-specific analysis was conducted on properties within the City to identify vacant and underutilized properties by reviewing Los Angeles County assessor data of improvement and land values. The underutilized properties have an ILR less than 1.0, indicating the land is worth more than the improvements on site. Sites that are identified as being proposed for a Religious Institution Overlay Zone (see below) were not evaluated for their ILR value because the assumption is that the existing use will be retained, and the institution will add residential units to the property.

As a result of the issues and trends identified above and the City's land use policies expressed in the DVSP and Land Use Element, the Sites Inventory prepared for La Cañada Flintridge's 6th Cycle Housing Element anticipates and provides for additional opportunities for mixed use and stand-alone multifamily residential development, as summarized below. The City desires to retain and support its commercial and service establishments, which is why the mixed use land use designation and zones are retained, to encourage both development of new residential uses and maintenance of the community's commercial core. The RHNA also estimates the construction of additional ADUs/JADUs in the coming years.

Many of the sites on the Sites Inventory are antiquated uses with large parking lots. No parcels with a single family home were included because the City has not seen single family homes transition to multifamily in the past two decades. The exception is one lot with two (2) single family homes is on the Sites Inventory, and is included with the knowledge and consent of the owners.

AB 1851 (2020) incentivizes religious institutions to construct housing on their properties by prohibiting a local agency from requiring the replacement of religious-use parking spaces that a developer of a religious institution affiliated housing development project proposes to eliminate as part of that project. Due to the built-out nature of La Cañada Flintridge, religious institutions in the city provide the potential to accommodate housing on their sites to assist the City in meeting the RHNA. The City proposes to facilitate housing on religious institution properties by establishing an affordable housing overlay [Religious Institution Overlay Zone (RI-OZ), Program 5)]. These properties would be appropriate for the addition of multifamily housing due to their locations near transit, services, businesses, and other resident-serving uses. Not all religious institutions in the city are proposed for the RI-OZ due to the built-out nature of their properties; however, the RI-OZ is a tool that could be utilized by any religious institution should conditions change.

These sites are shown in Figure D-25, which organizes sites by census tract. Each census tract has been assigned a geographical name. Table D-23 summarizes the number and type of RHNA sites in each neighborhood, along with the RHNA variables associated with that part of the City.

Figure D-25: Sites Inventory by Neighborhood



City of La Cañada Flintridge - Housing Element Update Sites Inventory and Census Tracts

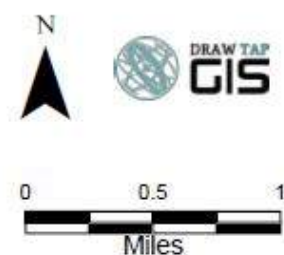


Table D-23: Residential Sites Inventory by Area and AFFH Variable

Tract	Households		Total Capacity (Units)		Income Distribution						TCAC Opp. Category	% Non-White (Block Group)	% LMI Pop. (Block Group)	R/ECAP?	% Over-crowded	Renter Cost Burden	Owner Cost Burden
					Lower		Moderate		Above Moderate								
	Total	%	Total	%	Total	% of all units	Total	% of all units	Total	% of all units							
Northwest (tract 4606)	1,416	17%	266	39%	266	39%	0	0%	0	0%	Highest Resource	31% - 35%	4% - 36%	0 - Not a R/ECAP	0.00%	14%	41%
Northeast (tract 4605.01)	1,754	21%	0	0%	0	0%	0	0%	0	0%	Highest Resource	37%-46%	9%-21%	0 - Not a R/ECAP	0.81%	54%	42%
Central (tract 4605.02)	1,338	16%	119	17%	43	6%	59	9%	17	2%	Highest Resource	39% - 54%	7% - 40%	0 - Not a R/ECAP	0.63%	66%	37%
Southeast (tract 4607)	1,559	18%	219	32%	97	14%	102	15%	20	3%	Highest Resource	38%	18% - 23%	0 - Not a R/ECAP	0.98%	41%	46%
West LCF/Montrose (tract 3005.02)	2,409	28%	85	12%	77	11%	0	0%	8	1%	Highest Resource	49%	35%	0 - Not a R/ECAP	2.48%	59%	61%
Total	8,476		689	100%	483	70%	161	23%	45	7%							

Northwest La Cañada Flintridge (Census Tract 4606)

Northwest La Cañada Flintridge includes census tract 4606 in the northwest portion of the City, bounded by the City borders to the north and west, Alta Canyon Rd to the east and Foothill Boulevard to the south. This neighborhood currently includes 1,416 households, or 17 percent of the City's households. Zoning in Northwest La Cañada Flintridge is primarily single family residential and open space, with some commercial and planned development located along Foothill Blvd. Most of the census tract is built out with single-family homes, steep terrain and open space areas to the north.

This neighborhood is designated Highest Resource, with a low-moderate population between 4 and 36 percent. On average, the nonwhite population is slightly lower in this neighborhood than in the rest of the City, and the renter and owner households with a housing cost burden is lower than elsewhere in the City. This neighborhood includes 266 RHNA units, which represents 39% of the total RHNA units within the City. All are lower income units.

All the sites in the Sites Inventory occur along Foothill Boulevard as discussed earlier in this section, and three clusters of sites on the north side of Foothill Boulevard in this census tract are on the Sites Inventory. These are antiquated commercial shopping centers or commercial retail shops with buildings older than 30 years old and large parking lots. The sites tend to be larger than other sites throughout the City, and offer the potential for larger scale development. The sites are designated as mixed use with a density of 25-30 dwelling units per acre. Property owners are encouraged to develop a mix of uses (1.5 total FAR) or standalone residential development with the specified density. A property owner who wishes to recycle these properties with all commercial development is only allowed an FAR of 0.5. In all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities. Incentives are available to those converting unpermitted ADUs if they rent the units to households in one of the aforementioned categories.

Northeast La Cañada Flintridge (Census Tract 4605.01)

The Northeast La Cañada Flintridge neighborhood includes census tract 4605.01 that makes up the northernmost portion of the City, east of Alta Canyon Rd. This neighborhood is a mix of single-family residential, public, and open space uses, and the terrain is quite steep in the northern portions of this census tract.

This neighborhood includes 1,754 households in the City, or 21% of the occupied households. This neighborhood is designated Highest Resource and the low-moderate income population is between 9 and 21 percent.

No part of Foothill Boulevard passes through this census tract, so no properties are included in the Sites Inventory. During the development of the Sites Inventory, public comment was received suggesting the City consider part of the La Cañada Flintridge Country Club. Staff considered this suggestion but did not recommend addition of this area to the Sites Inventory for a number of reasons. The parcel sizes were too large (more than 10 acres), the use is currently a viable use, and access to the Country Club site is at least two miles along a winding portion of State Highway 2 from the Foothill Boulevard corridor, where transit is available and a mixed use, walkable area is

desired. As in all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities. Incentives are available to those converting unpermitted ADUs if they rent the units to households in one of the aforementioned categories.

Central La Cañada Flintridge (Census Tract 4605.02)

Central La Cañada Flintridge includes census tract 4605.02 in the portion of the City located immediately north of Foothill Blvd and east of Alta Canyon Rd. The I-210 Freeway passes through this census tract in an east-west direction. This neighborhood includes 1,338 households or 16% of the City's households. Land use north of the I-210 Freeway includes primarily single-family residential uses. Land uses south of the I-210 Freeway in this census tract mostly falls within the DVSP.

This neighborhood is designated Highest Resource. This neighborhood includes 119 RHNA units, which represents about 17% of the total RHNA units within the City. Of these, most are lower or moderate, with some above moderate income.

Sites Inventory parcels are located along the northern portion of Foothill Blvd. or in the nearby vicinity. All the Sites Inventory parcels in this census tract are designated for mixed use development at a density of 25-30 dwelling units per acre. In all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities. Incentives are available to those converting unpermitted ADUs if they rent the units to households in one of the aforementioned categories.

Southeast La Cañada Flintridge (Census Tract 4607)

Southeast La Cañada Flintridge is located directly south of Foothill Blvd, and south and west of the 210 Freeway, and includes census tract 4607. This neighborhood includes primarily single-family residential and open space uses, with hilly, steep terrain in the southern part of this census tract. Mostly commercial and institutional uses are located along the south side of Foothill Blvd.

There are 1,559 households in this neighborhood, which represents 18% of the City's households. This neighborhood is designated Highest Resource. This neighborhood includes 219 RHNA units, which represents 32% of the total units within the City. Of these, most are lower or moderate income.

Parcels included on the Sites Inventory in this area have been designated either MU-12 which allows a density of 12 - 15 dwelling units per acre, MU-25 which allows a density of 25-30 dwelling units per acre, or they are religious institutions which are also allowed a density of 25-30 dwelling units per acre. MU-12 is applied in areas where a density transition is desired. In all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities. Incentives are available to

those converting unpermitted ADUs if they rent the units to households in one of the aforementioned categories.

West La Cañada Flintridge/Montrose (Census Tract 3005.02)

West La Cañada Flintridge is located directly south of Foothill Blvd and is bisected by the 210 Freeway from east to west, and includes census tract 3005.02. Only approximately the eastern one-third of the census tract is located within the City boundaries. There are 2,409 households in this neighborhood, which represents 28% of the City's households. Land use in this census tract includes a mix of single-family residential, commercial, public use and open space.

This neighborhood is designated Highest Resource, but does include a higher non-white population than other neighborhoods in the City, as well as a higher percentage of households that have a housing cost burden. This neighborhood includes 85 RHNA units, which represents 12% of the total units within the City. Of these, most are lower income, with one cluster of above moderate parcels.

All sites will allow 25-30 dwelling units per acre including religious institutions and mixed use zoned sites. In all areas of the City, property owners are encouraged to build ADUs and restrict them to extremely low or low income households, seniors, and/or those with disabilities. Incentives are available to those converting unpermitted ADUs if they rent the units to households in one of the aforementioned categories.

D.7 Summary of Fair Housing Issues

As shown in Table D-24, below, summarizes the fair housing issues identified in this Fair Housing Assessment. Fair housing issues were most prevalent in the southwestern area of the City, in the census tract that spans the boundaries of La Cañada Flintridge and La Crescenta. In this location, there are higher concentrations of racial/ethnic minorities, children in female-headed households, cost-burdened households with lower incomes. However, jobs proximity is better in this part of the City. La Cañada Flintridge also has a significant portion of housing built prior to 1959, with the largest concentration in the central part of the City.

Table D-24: Summary of Fair Housing Issues

Fair Housing Issue	Summary
<i>Enforcement and Outreach</i>	<ul style="list-style-type: none"> HRC conducts outreach and education throughout Los Angeles County, including La Cañada Flintridge. Between January 2013 and March 2021, La Cañada Flintridge received two fair housing inquiries. LACDA has committed to complying with the Fair Housing Act and related regulations. There are few renters receiving HCVs in the City. There are no public housing buildings in La Cañada Flintridge.
<i>Integration and Segregation</i>	
Race/Ethnicity	<ul style="list-style-type: none"> Based on HUD dissimilarity indices, segregation between non-White and White communities in LA County overall is high and has worsened since 1990. However, there has been an increase in racial/ethnic minority populations in La Cañada Flintridge, from 32.9% in 2010 to 46% in 2019. Racial/ethnic minorities are more concentrated in the northeastern and southwestern areas of the City.
Disability	<ul style="list-style-type: none"> 5.5% of La Cañada Flintridge residents experience a disability, an decrease from 6.6% in 2012. Populations of persons with disabilities are spread evenly throughout the City.
Familial Status	<ul style="list-style-type: none"> 41.1% of households have one or more children under age 18; 3.9% of households are single-parent households; 3.1% of households are single-parent female-headed households. Over 80% of children live in married-couple households in the majority of the City, with the exception of one census tract in the southwest that spans the border of La Crescenta; this tract is the only one with a higher concentration of children in female-headed households.
Income	<ul style="list-style-type: none"> 19.6% of households earn less than 80% of the area median family income. There is one tract in the southwest of the City with at LMI population greater than 25%, however this tract on only located partially within the City.
<i>Racially or Ethnically Concentrated Areas of Poverty</i>	
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	<ul style="list-style-type: none"> There are no R/ECAPs located in La Cañada Flintridge. The R/ECAPs closest to the City are located significantly to the south and west in the City of Los Angeles.

Racially or Ethnically Concentrated Areas of Affluence (RCAAs)	<ul style="list-style-type: none"> All tracts in La Cañada Flintridge are White predominant; none of the tracts have White populations of 80% or more. All block groups in the City have median incomes exceeding the 2020 State median; the median income for most of the City exceeds \$125,000.
Access to Opportunities	<ul style="list-style-type: none"> In the Urban County, Hispanic residents are most likely to be impacted by poverty, low labor market participation, and poor environmental quality. All tracts in La Cañada Flintridge are considered Highest Resource areas.
Economic	<ul style="list-style-type: none"> There is one tract in the City with an economic score below the highest quartile; however, this tract is only partially within the City boundaries.
Education	<ul style="list-style-type: none"> All parts of the City for which data is available received education scores in the highest quartile; there is no education score data for the northeastern area of the City.
Environmental	<ul style="list-style-type: none"> About half the tracts in the City have the highest environmental scores. The southern tracts in the City have lower environmental scores.
Transportation	<ul style="list-style-type: none"> Block groups on in the northwestern areas of the City scored the lowest in jobs proximity (40-60, or lower); most of the southeastern block groups scored the highest (60-80). There are no HQTAs in the City; the closest HQTAs are located south of the City.
Disproportionate Housing Needs	<ul style="list-style-type: none"> 33.9% of owner households and 53.0% of renter households have a housing problem. Non-white owner-occupied households have higher rates of housing problems than white owner-occupied households. 73.8% of Asian households experienced a housing problem. Renter-occupied households experience housing problems at a higher rate than owner-occupied households, with the exception of Other households in the City.
Cost Burden	<ul style="list-style-type: none"> Asian households and Hispanic households have the highest rate of cost burden in the City. Over 20% of Asian owner-occupied households, and over 40% of Asian renter-occupied households have a severe cost burden. Cost burdened households most concentrated in the southwest corner of the City, in the tract that spans the boundaries of the City and La Crescenta.
Overcrowding	<ul style="list-style-type: none"> 1.3% of owner households and 5.4% of renter households are overcrowded. 0.3% of owner-occupied households and 1.3% of renter-occupied households are severely overcrowded. There are no tracts with a concentration of overcrowded households exceeding the Statewide average of 8.2%.
Substandard Housing Conditions	<ul style="list-style-type: none"> There are 25 owner-occupied households and 20 renter-occupied households lacking complete plumbing or kitchen facilities in La Cañada Flintridge. Tracts in the central area of the City have the highest proportion of housing units built in 1959 or earlier.
Displacement	<ul style="list-style-type: none"> There are no vulnerable communities at risk of displacement in La Cañada Flintridge; the closest vulnerable communities area located in the cities of Glendale and Pasadena, to the southwest and southeast of the City.

D.8 Prioritization of Contributing Factors

The following are contributing factors that affect fair housing choice in La Cañada Flintridge. Table HE-50 (Sec. 9.5 Housing Plan) identifies actions the City will take to address these factors.

D.8.1 Insufficient and Inaccessible Outreach and Enforcement

According to the Fair Housing Survey included in the 2018 Regional AI, 39% of respondents were not aware of their right to request accommodations per Fair Housing, Section 504 and ADA laws. The City currently has limited information regarding fair housing laws, discriminatory practices, and services available to the public. Very few renters in the City receive housing choice vouchers despite the concentration of overpaying renters in some La Cañada Flintridge tracts.

Contributing Factors

- Lack of a variety of input media (e.g., meetings, surveys, interviews)
- Minimal fair housing information on the City's website (Housing information can be found at: <https://cityoflcf.org/community-preservation-and-housing/>)
- Insufficient local public fair housing enforcement and testing

D.8.2 Concentration of Senior Population

Over 18.6% of the La Cañada Flintridge population is elderly (65+ years) compared to only 13.3% Countywide. These households require increased access to affordable housing and improved infrastructure and public facilities.

Contributing Factors

- Lack of private investment
- Location and type of affordable housing and housing that is designed, sized, and located appropriately for senior citizen persons and households.
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure

D.8.3 Lack of Income Diversity

There are fewer low-moderate income households and a higher median household income in La Cañada Flintridge compared to other cities Countywide. The lowest income households are concentrated in the southwestern area of the City. While higher household incomes are generally considered a good thing, the overall lack of lower-income households in La Cañada Flintridge suggests that many people may be priced out housing in the City entirely.

Contributing Factors

- Lack of private investment in affordable housing
- Development costs

D.8.4 Displacement Risk to Low Income Households Due to Economic Pressures

There are no areas in the City that are categorized as vulnerable communities at risk of displacement according to the Urban Displacement Project (Figure D-23). Asian and Hispanic households have the highest rate of cost burden in the City, with both owner-occupied and renter-occupied Asian households bearing a significant cost burden. Asian households represent a significant portion (about 25%) of households in the City.

Contributing Factors

- Unaffordable rents
- Lack of availability of affordable housing

D.8.5 Lack of Affordable Housing

Home values are very high throughout the City, with the city's median home price approximately \$1.4 million in 2020 and \$2 million in 2021. Rentals are limited in the City and are similarly expensive, with a two-bedroom apartment renting for nearly \$2,000 in 2021. Based on these values, housing is not affordable to even moderate-income families in La Cañada Flintridge. Further, there are no publicly assisted affordable housing projects within the City.

Contributing Factors

- High land costs
- Limited housing stock

D.8.6 Environmental Hazards

La Cañada Flintridge is a hillside community located entirely within a Very High Fire Hazard Severity Zone. Steep slopes limit the buildable area within some parts of the City, lowering the available land for constructing new housing. Safety concerns due to potential wildfire danger also limit ADU and JADU construction. Fifteen neighborhoods in the City have a single point of access and egress that could create a serious danger during evacuation in a wildfire. Building additional ADUs and JADUs in these areas is prohibited due to safety restrictions.

Contributing Factors

- Steep hillside slopes
- Fire hazards

D.8.7 Infrastructure Availability

Both water and sewer facilities are a potential constraint to development in La Cañada Flintridge. While many fire hydrants do not meet current standards, the City does not have the jurisdiction

over these facilities in order to directly address firefighting capacity. Further, many parts of the City are not served with sanitary sewers. While future development is expected to be concentrated in areas with sewer service, a lack of sewers makes development in some areas more difficult and diminishes the availability of land for housing throughout the City generally.

Contributing Factors

- Outdated water infrastructure
- Lack of jurisdiction over water infrastructure
- Lack of sanitary sewer facilities.

D.8.8 Historic Patterns of Exclusion

Over the past century, discriminatory lending practices and restrictive racial covenants prevented non-white buyers from purchasing homes in La Cañada Flintridge. Even after racial covenants were declared unconstitutional, established patterns of racial and economic segregation were difficult to change. A predominance of single-family zoning, municipal code requirements that promoted the construction of larger homes, and residents' efforts to promote high-quality local schools ensured that housing costs and associated living expenses remained high in the community. Though the intent of these rules and actions may not have been to directly discriminate, the effect was to exclude certain groups of people, such as lower-income and/or non-white families, from moving into the City.

Contributing Factors

- Historic racial covenants on home deeds
- Land use and zoning rules that promoted housing for higher-income households

Appendix E: Market Feasibility Analysis

Market Feasibility Analysis

This residential feasibility study gauges the potential for developing affordable housing in La Cañada-Flintridge. This study looks at several factors that define the form and scale of residential development, including housing types, various densities, floor area ratios, market rents, and affordable rents. These factors were combined in various scenarios to give a picture of the range of possible residential projects that could be built on available sites in the city. The study's goal is to describe projects that are in keeping with the city's zoning and General Plan land policies.

Conceptual Level Development Pro Forma

Residual Land Value (RLV) Test

The RLV of a development project is a common metric for comparing the feasibility of different uses for land in a community. Simply put, the RLV is the remainder (residual) after the cost of development, excluding the cost of the land, is subtracted from the project's predicted market value. In a market feasibility analysis, the RLV represents the maximum amount a developer of a project would be able to pay for the land and still make a reasonable profit; the developer's profit as a percentage of the total cost (except the land) is included in the cost of the project. The RLV is a project-specific indicator that must be compared with the RLVs of other alternative conforming uses for the parcel. For a housing development to be feasible, the RLV must be comparable to those of the alternatives. If not, the developer would not be able to offer the landowner what the competing alternatives are able to offer. Therefore, the RLV must bear some relationship to the market value for land. In this analysis, the market value of land in La Cañada-Flintridge is assumed to be \$100 per square foot.¹ Therefore, an RLV of \$100 per square foot indicates a potentially viable project. A metric frequently used in feasibility analyses is to calculate the ratio of RLV to market land values; a ratio of .90 is the feasibility threshold.

Market-Rate Rental Development

Market-rate development is analyzed to establish a feasibility baseline. The feasibility baseline is the minimum units per acre density that will result in a viable RLV. The analysis is conducted for three density scenarios: 25, 26, and 30 units per acre. All three scenarios are development of a half-acre parcel with a similar mix of unit types: studio, 1-bedroom, 2-bedroom, and 3-bedroom units. The following market-rate monthly rents are assumed:²

Studio:	\$2,500
1-bedroom:	\$3,000
2-bedroom:	\$3,500
3-bedroom:	\$4,200

¹ Based on comparison of parcels in La Canada Flintridge, Pasadena, and Glendale, with similar zoning and area, found on Zillow, LoopNet, and recent sales of parcels on the LA County Tax Assessor's website.

² Monthly rents found on Zillow for La Cañada-Flintridge, Glendale, and Pasadena. These values are 3% to 25% higher, depending on unit bedrooms, than the HUD advisory small area Fair Market Rents for La Canada ZIP Code 91011.

Table 1 gives the results of a static pro forma for the three densities. Static pro forma is used to compare alternative scenarios and differs from a more detailed cash-flow pro forma that provides project construction and permanent financing, carrying costs, absorption, and cost increases over time.

Table 1 Market Rate Rental Development

Units per Acre	25	26	30
Parcel Size	0.5 acres	0.5 acres	0.5 acres
Number of Units	12	13	15
Parking Spaces	26	28	34
Number of Stories	2	2	2
Floor Area Ratio	0.56:1	0.61:1	0.70:1
Construction Cost	\$210 per square foot	\$210 per square foot	\$210 per square foot
Parking Cost	\$50,000 per space	\$50,000 per space	\$50,000 per space
Off/On-site Improvements	\$35 per square foot of the site	\$35 per square foot of the site	\$35 per square foot of the site
Total Development Cost (excluding land acquisition)	\$6,351,100	\$6,850,327	\$7,834,380
Financing Cost	\$308,416	\$332,500	\$380,216
Net Annual Income	\$382,203	\$419,749	\$500,745
Developer's Fee: 12% of Gross Revenue from the Sale of the Project	\$1,146,608	\$1,259,247	\$1,502,235
Net Proceeds from the Sale (market value based on 4% capitalization rate less sales costs and developer's fee)	\$8,121,804	\$8,919,666	\$10,640,828
Market Value per Square Foot of Parcel	\$439	\$482	\$575
Residual Land Values, per Parcel	\$1,770,704	\$2,069,339	\$2,806,449
per Square Foot	\$81	\$95	\$129

Table 1 indicates that 26 units per acre is reasonably close to market feasibility, using the assumed \$100 per square foot acquisition cost for land in La Cañada-Flintridge as a threshold. The density at 30 units per acre is well above the threshold.

Rental Development Including Affordable Units

The next set of scenarios look at projects at the two densities that are above the feasibility threshold of .90 for market-rate units but now with a percentage of the units with rents restricted to meet moderate-, low-, and very low-income thresholds. Table 2 lists the affordable rents for income levels by number of bedrooms per unit. These rents are based on the person per household income limits from the US Department of Housing and Urban Development using the annual median income of \$77,300 for a 4-person household in the Los Angeles-Long Beach-Glendale MSA.

Table 2 Affordable Rents

	Studio	1-Bedroom	2-Bedroom	3-Bedroom
Very Low (60% of AMI)	\$811	\$869	\$1,043	\$1,205
Low (80% of AMI)	\$1,082	\$1,159	\$1,391	\$1,607
Moderate (100% of AMI)	\$1,352	\$1,449	\$1,739	\$2,009
Above Moderate (120% of AMI)	\$1,623	\$1,739	\$2,087	\$2,411

Rents are 30 percent of income limits for households in the Los Angeles-Long Beach-Glendale MSA.

Table 3 shows the results of the pro forma analysis for the 26 units and 30 units per acre scenarios. Except for the rent revenues and projects' market values, all parameters are the same as the market rate projects. The densities in Table 3 are nominal—no density bonus has been applied.

Table 3 Rental Development with Affordable Units

Units per Acre	26	30
Affordable Units Percentage	15%	20%
Parcel Size	0.5 acres	0.5 acres
Number of Units	13	15
Affordable Units	2	3
<ul style="list-style-type: none"> • Very Low • Low • Moderate 	1 studio 1 1-bdrm 0	1 studio 1 1-bdrm 1 2-bdrm
Net Annual Operating Income	\$390,175	\$439,105
Net Proceeds from the Sale (market value based on 4% capitalization rate less sales costs and developer's fee)	\$8,291,229	\$9,330,990
Market Value per Square Foot of parcel	\$448	\$504
Residual Land Values, per Parcel per Square Foot	\$1,440,901 \$66	\$1,496,610 \$69

As would be expected, the inclusion of affordable units significantly diminishes the feasibility of the projects at both densities where the market-rate analysis showed feasibility. Based on the \$100 per square foot RLV threshold, even the 30 unit per acre density will not derive enough market value due to the restricted rental income to justify acquiring land at the prevailing market value of land in La Cañada-Flintridge.

Density Bonus

The next analysis looks at what effect on feasibility the application of the State of California's Density Bonus Law (DBL) would have on the nominal 25 units per acre project. A density bonus of 22.5 percent is granted to a project with between 5.5 percent and 6.5 percent very low-income restricted units. Applying that density bonus to 25 units per acre yields 31 units per acre or 16 total units (rounding up) on the 0.5-acre parcel. The inclusion of one very low-income unit among the 16 total units is a 6.25 percent inclusion rate, satisfying the numeric affordability threshold. The density-bonused project will

also include one low-income unit and one moderate-income unit in order to achieve a 19 percent overall affordability. The DBL also limits the ratio of parking spaces per unit, resulting in a large cost reduction.

Note: no density bonus is given for including low and/or moderate-income units at less than 10 percent each. The density-bonused project with 31 units per acre (after the bonus is applied) yields a RLV of \$103 per square foot (see Table 4).

Table 4 Inclusionary Project with Density Bonus

Units per Acre	31
Parcel Size	0.5 acres
Number of Units	16
Affordable Units	3
<ul style="list-style-type: none"> • Very Low • Low • Moderate 	1 studio 1 1-bdrm 1 2-bdrm
Parking Spaces	26
Number of Stories	2
Floor Area Ratio	0.73:1
Residential Construction Cost	\$210 per square foot
Parking Cost	\$50,000 per space
Off/On-site Improvements	\$35 per square foot of the site
Total Development Cost (excluding land acquisition)	\$5,967,944
Financing Cost	\$358,077
Net Annual Income	\$453,802
Developer's Fee: 12% of gross revenue from the sale of the project	\$1,361,406
Net Proceeds from the Sale (market value based on 4% capitalization rate less sales costs and developer's fee)	\$9,643,294
Market Value per Square Foot of parcel	\$521
Residual Land Values, per parcel per square foot	\$2,253,051 \$103

Findings and Conclusions

The static pro forma analyses indicate which projects meet the feasibility threshold. Projects that include a certain percentage of units with rents restricted so as to be affordable to moderate-, low-, and very low-income households may be feasible if densities are increased in accordance with the DBL. The above analysis shows that feasibility is possible at a minimum density of 31 units per acre on a half-acre parcel by applying a 22.5 percent density bonus to the nominal 25 units per acre density with the reduced parking ratio that is also required by the DBL.

Potential changes in residential development standards informed by the public survey on the subject and being studied by the Michael Baker team, may result in changes to the feasibility of projects. Subsequent pro-forma will need to be conducted if the proposed development standards indicate larger parcel areas and/or different minimum densities are warranted.

Appendix F: Public Comments and Responses

6th Cycle 2021-2029 Draft Housing Element – Public Comments and Responses

(Does not include comments/responses from/to State Department of Housing and Community Development (HCD))

ID #	Date	Name/ Organization	Comment Summary	Response
2-0001	07/04/22	Bob Ford	Owns vacant lots and interested in zone change to multi family	Developer or property owner interest to redevelop site. Properties (5808-008-020 and 5808-008-021; NE corner of Foothill and El Camino Corto) will rezone to R3, with potential to increase density to 25-30 du/ac. Included on the sites inventory (#95 and 96).
2-0002	07/05/22	Alan Pezeshkian	Owns former bookstore at 1010 Foothill Blvd and interested in learning more about housing opportunity	Developer or property owner interest to redevelop site. Property (5814-008-027) in DVSP and will rezone to Mixed Use 12. Potential to transition to housing. Included on the sites inventory (#53).
2-0003	07/11/22	Marcy Berkman, trustee	Possible sell property in next 8 years at 2355 Foothill family car wash. Potential for multifamily or mixed use development. Questions about legal non-conforming uses in mixed use.	Developer or property owner interest to redevelop site. Site (5870-011-057) is zoned mixed use and included on sites inventory. Potential to increase density 25-30 du/ac. Included on sites inventory (#91)
2-0004	07/05/22	Amy Pringle, St. George's	Sent letter to City explaining long range planning of church property, declining need for physical space.	Developer or property owner interest to redevelop site but indicated at public hearing that no plans to redevelop during this cycle. Supports housing plan. In the future, church and rectory may have an overlay zone that allows MF. Explained density bonus opportunity.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0005	03/30/22	Garret Weyand	Comments and information with exhibits to support the analysis of sites inventory. Contends 487 units should be dropped from housing element because not realistic and provides feedback and site photos on each. Includes spreadsheet with notes about certain sites. Includes list of sites found not have a realistic capacity for redevelopment over the next planning cycle for reasons including: - Existing uses are an impediment to additional residential development; - Long-term commercial leases in place do not expire during the next planning period; -Property owner provided letter stating its intention to retain the existing commercial use, and has no intention of redeveloping the site for housing; -Properties recently sold (within past 4 years) but existing use has been retained. Also, questions distribution of lower income units. Recommends densities at 20-30 du/acre.	<p>Some of the sites identified in comments have been removed from inventory (removed #11-12, 26, 31-34, 57-58, 62-63, 70-73, 104) because they lack significant justification for reuse or are under state or federal ownership. Other sites identified in comments have been retained based on following criteria: a) underutilized site (ILR<1.0); b) buildings that are older than 30 years; c) antiquated commercial uses with significant surface parking; d) vacant lot or parking lot with minimal existing site improvements; or e) existing use retained and institution would add residential units.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p> <p>According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p>
2-0006	07/19/22	Richard Harris, Caltech Employees Federal Credit Union	Expressed interest in zone change on 4 properties owned by Caltech Employees FCU. Seem worthy of consideration and would like to participate in process. 528, 542, 801 and 817 Foothill Blvd.	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.
2-0007	07/20/22	Scott Van Dellen	Recommends rethinking ADU and 2nd unit standards. Example project that meets need but not the city's design standards.	The City allows and regulates accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) (collectively considered ADUs) in compliance with California Government Code Sections 65852.2 and 65852.22, with the most recent ADU/JADU ordinance adopted in 2020. New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of ADUs. As a result, the City has seen increases in ADUs in the community. In the first six months of 2022, the City issued 24 building permits for ADUs/JADUs. This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0008	07/20/22	Scott Van Dellen	Opposes density increase for 600 Foothill project from 12-15 du/ac to 25-30 du/ac as shown on sites inventory. Also opposes increase to House America "clock" property, St. Georges church and surrounding commercial properties. Recommends other sites for higher densities. ADU/2nd unit can add to RHNA.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97). This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law
2-0009	07/20/22	Susan Mastrodemos	Believes 2100 and 2200 blocks of Foothill Blvd are suitable for high-density housing. South side of street could be a nice senior village if grocery store located on retail level.	Properties zoned mixed use and potential to increase density to 25-30 du/ac. Included on sites inventory (#81 through 89)
2-0010	07/20/22	Bernard Shih	1535 Foothill Blvd. Strongly supports zone change of their property to allow MF, commercial or mixed use development.	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.
2-0011	07/21/22	Patricia Wynne-Hughes	Questions whether an accurate inventory of guest houses has been completed. Could decrease need for more units. Asks that incentives to build guest houses be issued before making decisions about rezoning.	The City allows and regulates accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) (collectively considered ADUs) in compliance with California Government Code Sections 65852.2 and 65852.22, with the most recent ADU/JADU ordinance adopted in 2020. New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of ADUs. As a result, the City has seen increases in ADUs in the community. In the first six months of 2022, the City issued 24 building permits for ADUs/JADUs. This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.
2-0012	07/22/22	Alex Venneri	Supports rezoning of 842-858 Foothill to expand uses on the sites.	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0013	07/22/22	Anita Hossepian	Opposes density increase for 600 Foothill. Opposes density increase to Housing America, LC Presbyterian Church and St Georges Church on south side of Foothill. Recommends other sites. Supports ADUs.	<p>There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).</p> <p>This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.</p>
2-0014	07/24/22	Anita Hossepian	Issues with state housing plan and why doesn't work for LCF. Lists items that need discussion. Supports ADUs.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, and must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in the city.</p> <p>This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.</p>
2-0015	07/25/22	Scott Van Dellen	Feedback on draft site inventory. Viewed as comprehensive and well distributed. Concerns about certain properties being on list and says they can be removed with little impact. Disagrees with criteria used. Suggests other sites for higher density.	<p>Included sites (#53) because of developer or property owner interest to redevelop site. Proposed MU-12 zone with density at 12-15 du/ac.</p> <p>This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.</p>
2-0016	07/25/22	Alex Khatchaturian	Owns 2200 Foothill and demands removal of sites #100 and #101 from inventory. No intention to build residential and it is not economically feasible.	Not included in sites inventory because signed lease for medical office building. Not available for housing during this cycle.
2-0017	07/26/22	Kendra Becker	Opposes too high per acre zoning. It is too dense for Foothill Blvd and other town infrastructure.	<p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p> <p>According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p>

ID #	Date	Name/ Organization	Comment Summary	Response
2-0018	07/26/22	Edward Nowak	Previous denial decision on 600 Foothill should be maintained. Opposes increased density.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0019	07/26/22	Anne Buettner	Opposes increase in density to 25-30 du/ac. Should remain 12-15 in DVSP. Traffic concerns. Need to construct more ADUs.	<p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p> <p>According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>The City allows and regulates accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) (collectively considered ADUs) in compliance with California Government Code Sections 65852.2 and 65852.22, with the most recent ADU/JADU ordinance adopted in 2020. New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of ADUs. As a result, the City has seen increases in ADUs in the community. In the first six months of 2022, the City issued 24 building permits for ADUs/JADUs. This Housing Element also includes Program 8 to facilitate the development of ADUs, in accordance with state law.</p>
2-0020	07/26/22	Clayton Clark	Opposes increase in density at 600 Foothill. Keep at 15 and 2 stories. Traffic concerns. Keep charm, safety, and integrity of community.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).

ID #	Date	Name/ Organization	Comment Summary	Response
2-0021	07/26/22	Carol Cupp	Longtime resident. Adding 600 units will scar community. Questions increase in density at 600 Foothill. Inappropriate for large building. Traffic concerns. Questions adding churches and parking lots.	<p>The City is assigned 612 units in the Regional Housing Needs Allocation (RHNA) developed by the Southern California Association of Governments (SCAG). The sites inventory demonstrates how the City will accommodate the RHNA. Some sites have developer or property owner interest to redevelop, including churches and parking lots.</p> <p>According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p>
2-0022	07/27/22	Parham Natanzi	Interested in merging parcels and changing the zoning to accommodate a mixed use building to be occupied by retail at ground level and apartment or condominium units above for the future. Existing Shell station and car wash.	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.
2-0023	07/27/22	Toni Cavanagh Johnson	Opposes 25-30 units per acre developments on the South Side of Foothill Blvd. in the Downtown Village Specific Plan area.	<p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p> <p>According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p>
2-0024	07/28/22	Alexis Phillips	Opposes rezoning of 600 Foothill project. Area already impacted by other development and traffic. Wants more public notice of change before a decision is made.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0025	07/28/22	Richard Asher	Opposes proposed density and rezoning at 600 Foothill project.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).

ID #	Date	Name/ Organization	Comment Summary	Response
2-0026	07/28/22	Glenn Fischel	Opposes multifamily development at 600 Foothill.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0027	07/28/22	Linda Washburn	Opposes 25-30 units per acre zoning for 600 Foothill Blvd.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0028	07/28/22	Edward Nowak	Sites inventory in DVSP said to be inconsistent with past decisions and 600 Foothill denial. Concern about transparency of process. Needs more public involvement and more justification.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97). The residents of La Cañada Flintridge were provided with ample opportunities to provide early input into the development of the draft Housing Element and to review and comment on the City's draft Housing Element and recommend programs before it was sent to HCD for review, and again prior to adoption. Section 9.1.5 provides an overview of the public outreach process and input received. Details are provided in Appendix A.
2-0029	07/28/22	Bob Antonoplis	Disagrees with reasoning behind sites inventory and proposed 25-30 du/ac for certain properties. Opposes 600 Foothill rezoning and recommends removing from list.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0030	07/28/22	Tom Salehi	Would be interested in rezoning parcels to mixed use (commercial and residential) for APNs 5870011055, 5870011047, 5870011049	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.
2-0031	07/29/22	Together La Canada	Provided letter and over 170 signatures opposing certain properties on the sites inventory.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).

ID #	Date	Name/ Organization	Comment Summary	Response
2-0032	07/28/22	Pamela Woncik	Provides detailed feedback on sites inventory with support for some locations and serious concerns about other locations. Concerns about traffic impacts of multifamily developments.	Recommended locations are included on sites inventory. Other sites (#1-3, 48-53, 74, 79) identified in comments have been retained based on following criteria: a) developer or property owner interest to redevelop site; b) underutilized site (ILR<1.0); c) buildings that are older than 30 years; d) antiquated commercial uses with significant surface parking; e) vacant lot or parking lot with minimal existing site improvements; or f) existing use retained and institution would add residential units.
2-0033	07/28/22	Annsley Strong	Increase density in center of town not appropriate, like 600 Foothill. Doesn't support adding churches to list. Recommends sites. Wants focus on development that fits with community, like Honolulu Avenue with ground level stores and units above.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97). Some sites have developer or property owner interest to redevelop, including churches and parking lots.
2-0034	07/28/22	Bob Phillips	Opposes 600 Foothill project. Location is bad safety wise and traffic signals. Opposes mid-size high rise at location.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0035	07/29/22	David McLaughlin	Please don't.	Unclear what he opposes.
2-0036	07/29/22	David Haxton	Wants R3 properties on inventory such as LC Pet Clinic and wants explanation why not included. Will complain to HCD about issue. Wants wider view of properties not just those not next to SF. Wants 12-15 density to be 10-20 du/acre instead. 600 Foothill should be 10-20 du/ac. Water infrastructure concern for sites 95 and 96.	There is developer or property owner interest to redevelop sites #95-96. While sites identified within the correspondence had been identified during the 5 th cycle Sites Inventory, it was determined there was a lack of sufficient justification for inclusion within the 6 th cycle Sites Inventory. There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0037	07/29/22	Joan Taylor	Opposes multi-unit building requested for the 600 Foothill project. Traffic and congestion concerns. Previously denied project.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).

ID #	Date	Name/ Organization	Comment Summary	Response
2-0038	07/30/22	Jennifer Taw	Support removing/reducing housing restrictions to allow for denser more affordable housing. Strongly supports 25-30 du/ac density for 600 Foothill. Appreciates work to bring town into compliance with state. Make town more bike and ped friendly, more shaded communal spaces, and bring more small business.	Supports proposed sites and density on sites inventory.
2-0039	07/31/22	Chris & Asuka Wessing	Responding to letter about possible zoning of our property at 4510 Castle Ln. Considering re-zoning property since it was split from the Jack In The Box property when we purchased in 2018. Wants more information about what is possible. It seems pretty small to fit a multi-family.	Developer or property owner interest to redevelop site. Outreach to commercial property owners received positive response. These properties will be evaluated for potential zone change and/or future site inventories to implement housing goals.
2-0040	07/31/22	Ronald Falasca	Strongly oppose the current development at 600 Foothill Blvd in LCF. The project should be denied or revised to suit the community better.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0041	08/01/22	Alex Khatchaturian	Detailed response with concerns about 2nd draft of the sites inventory. Includes photos of steep site, resolution, and deed of trust. Several sites noted.	Sites (92-94) identified in comments are included due to developer or property owner interest to redevelop site. The other sites (#80-89) identified in comments have been included based on following criteria: a) underutilized site (ILR<1.0); b) buildings that are older than 30 years; c) antiquated commercial uses with significant surface parking; or d) vacant lot or parking lot with minimal existing site improvements.
2-0042	08/01/22	Bob Ford	Owns the two lots at the N/E corner of Foothill and El Camino. Interested in changing the zoning to mixed use or multi-family. Has question whether he would have option to develop the property as multi-family.	Developer or property owner interest to redevelop site. Properties (5808-008-020 and 5808-008-021; NE corner of Foothill and El Camino Corto) will rezone to R3, with potential to increase density to 25-30 du/ac. Included on the sites inventory (#95 and 96).
2-0043	08/01/22	Susan Gauthier	I am absolutely against this project!	Unclear what she opposes.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0044	08/01/22	David Stassel	In support of the principle that political decisions are best when made as near to the voters as practical, please consider showing courage and fight the Sacramento tyranny manifested in social engineering through imposition of dense housing. The city can efficaciously make its own zoning decisions; it needs no input from the state level. Other cities have combined to seek to overturn Sacramento's tyranny in court. Please join in the resistance. Opposes 25-30-unit per acre housing.	Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, and it must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in the city.
2-0045	08/01/22	Garret Weyand	Identifies problems with financial analysis by Michael Baker. Concern about density number not being realistic. Requests the full report be released to the public. Concern about money spent on consultants and no further along in process.	According to state law, the city must allow at least 20 units per acre for low income housing. Additionally, Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.
2-0046	08/08/22	Renee Weihe, Albertsons Company	Received notice. Albertson's is no longer in possession of this property. Ask to be removed from the mailing list for this property.	Site (5870-010-044) is zoned mixed use and included on sites inventory. Potential to increase density to 25-30 du/ac. Included on sites inventory (#88).
2-0047	03/10/22	Susan Koleda, LCF Community Development Director	LCF PC Staff report from March 10, 2022. Provides background and details on the sites inventory.	Provides background and details on the sites inventory.
2-0048	03/10/22	Alex Khatchaturian	Owns sites #100 and #101 from inventory. Does not want properties on inventory.	Not included in sites inventory because signed lease for medical office building. Not available for housing during this cycle.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0049	03/09/22	David Haxton	Thought the purpose of the public comment period was to collect public comments and then share them, along with your responses, with those making the MND decision. Thinks comment should be part of staff report.	Staff responded that since meetings are once again in-person, the comment will not be acknowledged during the meeting or within the minutes and will not be posted on the City's website. This comment is not viewed as a "public comment" but will be made part of the administrative record for the project.
2-0050	03/08/22	Together La Canada	Letter of support for March 10, 2022, staff report about sites inventory	Refer to comment ID #2-0031 with concerns about certain sites on inventory.
2-0051	03/10/22	Alexandra Hack	Comments concerning the revised Sites Inventory list as part of the Housing Element. Supplementary materials include sewer map and correspondence from the City of Glendale Dept of Public Works regarding infrastructure sewer capacity for the Verdugo Hills Hospital parking lot	Some of the sites identified in comments have been removed from inventory (removed #11-12, 26, 31-34, 57-58, 62-63, 70-73, 104) because they lack significant justification for reuse or are under state or federal ownership. Other sites identified in comments have been retained based on following criteria: a) underutilized site (ILR<1.0); b) buildings that are older than 30 years; c) antiquated commercial uses with significant surface parking; d) vacant lot or parking lot with minimal existing site improvements; or e) existing use retained and institution would add residential units.
2-0058	02/08/22	Nancy Antonopolis	Concern that previously rejected 3 story, 600 Foothill Blvd project is recycled into the housing element. Opposes site and concern about community character.	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0059	02/08/20	Briggs D'Eliscu, City Ventures	An eco-friendly homebuilding company. Would like to receive updates about the process and new housing element.	Added to the Stakeholder distribution list.
2-0060	02/11/21	Tim Ramm, Province Group	Would like to be included on any list of interested parties and follow the process if there is a way to participate.	Added to the Stakeholder distribution list.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0061	02/07/22	Nancy Antonopolis	Concern about lack of public involvement and content of city website for housing element. Gives examples of cities with better website information. Talks about news coverage of this important issue.	As of August 15, 2022, the City's website has been revised and updated to consolidate information about the Housing Element update and make it more user friendly.
2-0062	02/07/22	David Haxton	Talks about compressed schedule for housing element. Requests a better job with getting public input. Recommends an inclusionary housing ordinance and density bonuses. Believes counting ADUs toward low income housing is pure fiction.	Staff appreciates the comment. Public input is built into the process of developing the Housing Element. SCAG provided a Regional Accessory Dwelling Unit Affordability Analysis for jurisdictions to determine the anticipated affordability of ADUs in order to determine which RHNA income categories they should be counted toward for the 6 th Cycle Housing Element.
2-0063	02/07/22	Scott Van Dellen	Finds state RHNA too high for LCF. Sierra Madre has half the population but only 1/3 the RHNA goals. Need to make case to SCAG that it's too high for us.	The appeal period was closed at the time this comment was received and SCAG had adopted the final RHNA.
2-0064	02/08/22	Mary Blencowe	Essential background is needed in housing element for state to effectively evaluate. The geography and topographic of LCF varies greatly from our neighbors. LCF is not solely a series of numbers. Freeway bisects our city, Descanso gardens in city limits, much borders Angeles National Forest with hills and canyons, cherry canyon and memorial parks, and trails system. Not much is available for residential or commercial building. Are we telling businesses they must vacate? Suggests other sites.	Staff appreciates the comments and suggestions for alternate sites for consideration.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0065	02/08/22	Lauren Oakes	Opposes proposed 3 story, over 20 du/acre and reduced parking standards. Concern about harm to community character. Thinks RHNA can be met with ADUs and MU2 zone. Wants real citizen involvement.	Staff appreciates the comment. Public input is built into the process of developing the Housing Element. HCD provides a formula for determining a City's projected ADU production, and SCAG provided a Regional Accessory Dwelling Unit Affordability Analysis for jurisdictions to determine the anticipated affordability of ADUs in order to determine which RHNA income categories they should be counted toward for the 6 th Cycle Housing Element. As a result, only a portion of projected ADUs can be counted toward the RHNA.
2-0066	02/08/22	Garrett Weyand	Suggest removing Caltrans site #73, and other sites (#52, 54, 57, 58, 62). Notes acreage mistake on site #87. Low income housing needs to be spread throughout city. Feels ADU count too optimistic.	Acreage corrected on site #87. Some of the sites identified in comments have been removed from inventory (removed #57-58, 62, 73) because they lack significant justification for reuse or are under state or federal ownership. Other sites identified in comments have been retained based on following criteria: a) underutilized site (ILR<1.0); b) buildings that are older than 30 years; or c) vacant lot or parking lot with minimal existing site improvements.
2-0067	04/03/22	David and Nancy Jensen, ARCO	Objects to evaluation and conclusion to add 550 Foothill property to the sites inventory. Successful gas station generates tax revenue for city. Hydrogen fueling station too. Previous plans to upgrade site.	Site #57 identified in comments has been removed from inventory because it lacks significant justification for reuse.
2-0068	04/04/22	Rev. Amy Pringle, St George	Concern that the latest round of proposed LCF policies in fact makes it more difficult for churches to do so, by reducing (rather than increasing, as the Bill 1851 allows) the allowed number of dwelling units per acre, for our property and other churches in town, which are almost all on the south side of Foothill Blvd. a limit of 12-15 dwelling units per acre would make building housing, the form of development most in keeping with our mission as a church – and the one most needed by the City – financially unfeasible. Concern that planning is reactionary instead of proactive.	The density for religious institutions on the Sites Inventory with a Religious Institution Overlay Zone has been increased to 25 – 30 dwelling units per acre.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0069	04/05/22	Together La Canada 3rd	Supports maintaining 12-15 du/ac and two story limit in DVSP on the south side of Foothill Blvd. Suggests more RHNA units be assigned to ADUs.	The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate. HCD provides a formula for determining a City's projected ADU production, and SCAG provided a Regional Accessory Dwelling Unit Affordability Analysis for jurisdictions to determine the anticipated affordability of ADUs in order to determine which RHNA income categories they should be counted toward for the 6 th Cycle Housing Element. As a result, only a portion of projected ADUs can be counted toward the RHNA.
2-0070	04/05/22	Scott Van Dellen	Suggests City collaborate with the City of Los Angeles' ADU/standard plan program mentioned in article to encourage 2nd units in the City. Could meet 612 units goal in the eight year planning period on 2nd units and lot splits alone.	HCD provides a formula for determining a City's projected ADU production, and SCAG provided a Regional Accessory Dwelling Unit Affordability Analysis for jurisdictions to determine the anticipated affordability of ADUs in order to determine which RHNA income categories they should be counted toward for the 6 th Cycle Housing Element. As a result, only a portion of projected ADUs can be counted toward the RHNA.
2-0071	04/06/22	Rev Amy Pringle, St George	Pleased addressing challenge of affordable housing. Discusses missing middle housing and apartment types in South Pasadena, Sierra Madre, Altadena, Alhambra, and some neighborhoods of Pasadena and Glendale. Duplexes, four- and six- and eight-plexes, bungalow havens, cottage courts. These are where moderate income people want to live, not in concrete towers with no soul. Provides a list of all the types of people who need housing and the income levels. Put policies in place to help get these built.	The Draft Housing Element includes policies to encourage the production of a variety of housing types and includes a number of Programs to address the production of affordable housing in the city.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0072	07/06/22	Rody Stephenson	Impressed with competence and hard work of staff and city council members who remained at meeting. Said to get things in writing from HCD before responding and stick with October 15 deadline to get this behind us and let the city move on to other business.	Staff and City officials appreciate the comment. The Draft Housing Element is anticipated to be adopted by the City Council in October 2022, and subsequently submitted for HCD certification
2-0073	09/02/22	John Powers	Concern about 4463 Commonwealth being on sites inventory and impact of potential multi-family on the neighbors. Total number of units is well over the 612 target so it makes no sense to include this property.	According to the LA County assessor data, the property is located on the same parcel as 800 Foothill (site #77). This St. George's Church site was removed because indicated at public hearing that there are no plans to redevelop during this cycle.
2-0074	09/03/22	Anita Hossepian	Concern that letters of support for sites inventory are from developers while residents strongly opposed 2nd draft. Wants appropriate development. Concern that high density development in commercial core will cause irreparable damage to infrastructure.	The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate. Some sites have developer or property owner interest to redevelop, including churches and parking lots.
2-0075	09/05/22	Scott Van Dellen	Housing element has many positive additions. Concern about five sites on inventory that do virtually nothing to assist the city's housing element needs, are extremely detrimental to the health, safety, and wellbeing of the city, are opposed by virtually everyone in the community and in direct conflict with the sentiments expressed at many meetings and direction from the City Council issued in April. [Note: the comment lists addresses, and the response refers to the associated site numbers.]	Staff appreciates the comment. Site #53 will rezone to Mixed Use 12. There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97). Removed St. George's Church sites #'s 77, 110, 111 and 112, and 113 because indicated at public hearing that there are no plans to redevelop during this cycle.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0076	09/05/22	Scott Van Dellen	Provides tables to support restoring south side of Foothill to MU-12 density.	<p>The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate.</p> <p>Site #53 will rezone to Mixed Use 12.</p> <p>There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).</p> <p>Removed St. George's Church sites #'s 77, 110, 111 and 112, and 113 because indicated at public hearing that there are no plans to redevelop during this cycle.</p>
2-0077	09/07/22	Kristene Hossepian	Disappointed in 2nd draft. Concern about 600 Foothill on sites inventory and suggest removal does not hurt numbers. Suggests up-zoning areas near USC VHH and the east and west ends of Foothill to avoid traffic congestion in center of town. City infrastructure and fire risk areas cannot support higher density. We can do what is right for city and comply with state requirements.	<p>There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).</p> <p>The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate.</p>
2-0078	09/07/22	John Powers	Concern about 4463 Commonwealth being on sites inventory and staggering potential densities. Suggests reducing density in high traffic Foothill corridor and removing any single family residences from plan.	<p>According to the LA County assessor data, the property is located on the same parcel as 800 Foothill (site #77). This St. George's Church site was removed because indicated at public hearing that there are no plans to redevelop during this cycle.</p> <p>The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate.</p>

ID #	Date	Name/ Organization	Comment Summary	Response
2-0079	09/08/22	Linda Van Winkle Deacon	Concern with certain portions of the site selection draft. Opposes 600 Foothill Blvd., 1010 Foothill Blvd., 820 Foothill Blvd. W of 820 Foothill Blvd. and 824 Foothill Blvd. Opposes 35-foot and 30 unit/acre for these sites. Says that excuses for including them as false. Believes current trend for La Canada is a very big increase in accessory dwelling units (ADU).	<p>The revised Sites Inventory takes a tiered approach along the City's single commercial/transit corridor with areas of higher density (25 – 30 dwelling units per acre) and areas of lower density (12-15 dwelling units per acre) where appropriate.</p> <p>Site #53 will rezone to Mixed Use 12.</p> <p>There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).</p> <p>Removed St. George's Church sites #'s 77, 110, 111 and 112, and 113 because indicated at public hearing that there are no plans to redevelop during this cycle.</p> <p>HCD provides a formula for determining a City's projected ADU production, and SCAG provided a Regional Accessory Dwelling Unit Affordability Analysis for jurisdictions to determine the anticipated affordability of ADUs in order to determine which RHNA income categories they should be counted toward for the 6th Cycle Housing Element. As a result, only a portion of projected ADUs can be counted toward the RHNA</p>
2-0080	09/08/22	Glen Fischel	Opposes 600 Foothill site.	<p>There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).</p>
2-0081	09/08/22	David Haxton	Questions ADU program and fee reductions proposed. Wants to know if fee reduction program currently exists.	<p>The fee reduction program envisioned for ADUs does not currently exist. This Housing Element includes Program 8 to facilitate the development of ADUs, in accordance with state law, and proposes the fee reduction program be in place by April 2023.</p>

ID #	Date	Name/ Organization	Comment Summary	Response
2-0082	09/09/22	Patty Wynne-Hughes	Concern about St George's properties on sites inventory and existing traffic congestion on Commonwealth Avenue. Placing housing there is bad idea and will change our lives and city forever.	Removed St. George's Church sites #'s 77, 110, 111, 112, and 113 because indicated at public hearing that there are no plans to redevelop during this cycle.
2-0083	09/12/22	Matthew Gelfand, Californians for Homeownership	Monitoring local compliance with the law governing housing elements and has determined that the inventory is legally inadequate, and that the City will not be able to meet its obligation to support the inventory with evidentiary findings as the law requires. Urge City Council to continue this item so that staff can return with a compliant housing element. Existing uses of the non-vacant sites listed in the City's inventory would be presumed to impede additional residential development, making those sites inappropriate for inclusion.	The City reached out to non-vacant, commercial property owners about possible rezoning that would allow the option for multi-family residential, commercial, or mixed use development. The potential rezoning would also allow religious organizations to partner with developers to provide multifamily housing. The City received positive response from several properties interested in redevelopment. These properties were evaluated for potential zone change and/or inclusion in this or future site inventories to implement housing goals.
2-0084	09/12/22	Various	Petition with 41 names to keep building code for 600 Foothill property at 12-15 du/acre and 24 foot height (2-story).	There is currently no active development application for the property at 600 Foothill Blvd (5814-028-009). However, there is developer or property owner interest to redevelop site. Property is in DVSP and will rezone to Mixed Use 12. Included on sites inventory (#97).
2-0085	09/12/22	Linda Klibanow	Wants the St. George's properties removed from consideration by the city for any purposes until time is allowed for careful examination by parish of episcopal law.	Removed St. George's Church sites #'s 77, 110, 111, 112, and 113 because indicated at public hearing that there are no plans to redevelop during this cycle.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0086	09/14/22	Rev Amy Pringle, St George	Sharing planned remarks in advance of city council meeting. Suggests zoning property however the city would like. Has thriving church and preschool. Either high or low density is a non-issue for St. George's. Hopes that this Planning Commission and Council will take a hard look at housing equity. Recommends additional housing with 'missing middle' housing – beautiful duplexes and fourplexes scattered throughout town, where the teachers in our schools, employees of JPL, shop owners and managers and other professionals can live.	Indicated at public hearing that there are no plans to redevelop during this cycle. Removed St. George's Church sites #'s 77, 110, 111 and 112, and 113.
2-0087	09/12/22	Rody Stephenson	Suggests city pass housing element and send to state as final. Suggests not receiving any comments back from the state by phone; only in writing, by USPS and from high official. Suggests not spending any time on housing element for six years.	Staff and City officials appreciate the comment. The Draft Housing Element is anticipated to be adopted by the City Council in October 2022, and subsequently submitted for HCD certification.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0088	09/12/22	Anna Tom	Opposes changing zoning to allow high density apartments. Wants to preserve our beautiful neighborhoods.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, which must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge.</p> <p>The City has been assigned a RHNA of 612 housing units, which must be accommodated for this current 6th Cycle Housing Element. According to state law, the city must allow at least 20 units per acre for low income housing. Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p>
2-0089	09/12/22	Ken Ueda	Opposes proposal for high density apartments, which will bring traffic and crime.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, which must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge.</p> <p>The City has been assigned a RHNA of 612 housing units, which must be accommodated for this current 6th Cycle Housing Element. According to state law, the city must allow at least 20 units per acre for low income housing. Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p>

ID #	Date	Name/ Organization	Comment Summary	Response
2-0090	09/12/22	Stella and Derek Wong	Strongly opposes rezoning LCF to build more than 900 apartments. Concern about major traffic jams, increased crime, huge impact to schools, adverse affect property values, strain electricity and water, override current restrictions like parking, building set backs, etc.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, which must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge.</p> <p>The City has been assigned a RHNA of 612 housing units, which must be accommodated for this current 6th Cycle Housing Element. According to state law, the city must allow at least 20 units per acre for low income housing. Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p>
2-0091	09/12/22	Andy Wong	Strongly opposes rezoning LCF to build more than 900 apartments. Concern about major traffic jams, increase crime, huge impact to schools, adverse affect property values, strain electricity and water, override current restrictions like parking, building set backs, etc.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, which must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge.</p> <p>The City has been assigned a RHNA of 612 housing units, which must be accommodated for this current 6th Cycle Housing Element. According to state law, the city must allow at least 20 units per acre for low income housing. Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p>

ID #	Date	Name/ Organization	Comment Summary	Response
2-0092	09/12/22	Grace Wong	Family owns three homes in LCF. Opposes rezoning to high density apartments. Traffic already very heavy. Many cities in Los Angeles County are not safe to live in. Does not want to open the door to making LCF a dangerous community for residents.	<p>Recognizing the importance of providing adequate housing in all communities, the state of California (state) mandated a Housing Element within every General Plan since 1969, which must be updated every 8 years. The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in La Cañada Flintridge.</p> <p>The City has been assigned a RHNA of 612 housing units, which must be accommodated for this current 6th Cycle Housing Element. According to state law, the city must allow at least 20 units per acre for low income housing. Michael Baker International (MBI) prepared a Market Feasibility Analysis that is presented in Appendix E and recommends establishing a base density of 25 dwelling units per acre for high density housing.</p> <p>In addition to promoting additional residential development, the proposed changes in density provide an opportunity to create an appropriate transition of density and land uses along the Foothill Boulevard/transit corridor which is the City's commercial spine.</p>
2-0093	09/13/22	David Haxton	Concern about leaving FAR at 1.5 for lower density (12-15 du/ac) properties because it would result in oversized projects being built with a token amount of housing. Believe a FAR of 1.0 is more appropriate and would limit projects to two stories.	The City Council, at its October 4, 2022 hearing, agreed to evaluate this suggestion as part of implementation of the Housing Element.
2-0094	09/16/22	Pamela Woncik	Supports need for senior housing and believes can be mindful and make work. Concerned about traffic and parking a multi-unit housing might produce. Concerned about misleading messages and advertising in Outlook newspaper. Higher density might work on south side if limited to senior housing.	Under state law, senior housing may qualify for a density bonus.

ID #	Date	Name/ Organization	Comment Summary	Response
2-0095	09/29/22	Marji Golden, preschool director	Preschool at 4603 Indianola Way is owned and occupied by Parents and Children's Nursery School, a non profit. States they have no intention of discontinuing the current use in the foreseeable future. They do not intent to redevelop to housing with the next eight year planning period and request removal from sites inventory.	<p>The property owner was notified of the City's plan to be included on the Sites Inventory in June and July, 2022. The letter to the City stating their request to be removed from the Sites Inventory was received 4 business days prior to adoption, after the 2nd Draft Housing Element was finalized.</p> <p>The property owner's objection should not exclude site #59 from inventory. This site is underutilized (ILR < 1.0) with buildings that are older than 30 years.</p>
2-0096	10/04/22	David Landsberg, All State Realty Co., Inc. DBA Panda Express	Panda Express is located at 700 Foothill and they have no intention of discontinuing the use within the eight year planning period. Request that the site be removed from inventory.	<p>The property owner was notified of the City's plan to be included on the Sites Inventory in June and July, 2022. The letter to the City stating their request to be removed from the Sites Inventory was received the day of the adoption hearing, after the 2nd Draft Housing Element was finalized.</p> <p>The property owner's objection should not exclude site #19 from inventory. This site is underutilized (ILR < 1.0) with an underutilized parking lot supporting low intensity development.</p>
2-0097	10/04/22	Lisa Hsu, manager, GTR Realty	Owner of 2243-2265 Foothill Blvd and the site, improvements and premises are leased to Big Lots under a 20-year lease with two (2) 10-year extension options. No intention to discontinue use. Request that the sites be removed from inventory.	<p>The property owner was notified of the City's plan to be included on the Sites Inventory in June and July, 2022. The letter to the City stating their request to be removed from the Sites Inventory was received the day of the adoption hearing, after the 2nd Draft Housing Element was finalized.</p> <p>The property owner's objection should not exclude sites #86, 87, 88, and 89 from inventory. These sites contain a) buildings that are older than 30 years; b) antiquated commercial uses with significant surface parking, and c) some have not been reassessed since 2011.</p>