

November 1, 2021

Megan Kirkeby, Deputy Director  
Department of Housing and Community Development  
Division of Housing Policy Development  
2020 W. El Camino, Suite 500  
Sacramento, CA 95833

**Subject: City of San Marino Draft 2021-2029 Housing Element**

The City of San Marino is pleased to submit its Draft Housing Element for the 6<sup>th</sup> RHNA Cycle. This Housing Element describes the City's plan for addressing the housing needs of its current and future residents through October 15, 2029. The City of San Marino is committed to working with the California Department of Housing and Community Development to ensure that the Housing Element obtains certification to maintain eligibility for grant funding programs, to ensure the legal adequacy of the General Plan, and to preserve local control of land use decisions.

As noted throughout the Housing Element, San Marino is a fully built-out community with no vacant land to be used to demonstrate a sufficient inventory of adequate sites. Because the City has not previously allowed multi-family development nor received any applications for affordable housing developments, it cannot demonstrate market feasibility of sites proposed to be considered for rezoning within the next three years. The City is committed to rezoning for multi-family development at default densities and for adopting creative new overlay programs to encourage housing developers to include affordable units within their developments.

As demonstrated in the City's recent building permit data, the best option for the City to provide affordable units within its built-out neighborhoods continues to be through the continued provision of Accessory Dwelling Units. The development of ADUs has increased exponentially since the minimum parcel size was lifted, and development interest is expected to increase further once the new incentive programs are in place.

The City is requesting expedited review of its Draft Housing Element because of the short remaining time frame and upcoming scheduled time off for some City staff and elected officials. The recent change in City Attorneys and the unexpected loss of two-thirds of the City's planning staff has also caused a significant delay in completion of the Draft. If HCD's review takes the full 60 days, the City Council may be unable to adopt the 2021-2029 Housing Element until late February and render the City out of compliance. We therefore would very much appreciate a 50 day review, concluding prior to the start of the winter holidays in December.

We look forward to hearing from your office. Please do not hesitate to contact me at (707) 309-4775 or [jriley@4leafinc.com](mailto:jriley@4leafinc.com) with any questions regarding the draft. Please also note that my colleague Bret McNulty of McNulty Consulting will be taking the Housing Element through the final review, revision and adoption process; Bret can be reached at (805) 722-5585 or [bretmc@gmail.com](mailto:bretmc@gmail.com). Bret will continue to work with the 4LEAF team to ensure a successful adoption and certification process.

Sincerely,

*Jane Riley*

Jane Riley, AICP  
Director of Housing Policy – 4LEAF, Inc.

# CITY OF SAN MARINO DRAFT HOUSING ELEMENT



NOVEMBER 1, 2021

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# SECTION I: INTRODUCTION & SUMMARY

## 1.1 INTRODUCTION

This chapter of the San Marino General Plan presents goals, policies, programs, and supporting information related to the provision of housing for existing and future residents of the City. The purpose of the Housing Element is twofold: 1) to present specific policies and actions for housing development to meet San Marino's specific, identified housing needs; and 2) to meet regional standards and achieve State certification, pursuant to statutory requirements.

## 1.2 DEFINITION AND PURPOSE

The Housing Element of the General Plan is a detailed statement of the housing goals, policies, programs, and quantified objectives for the City. The Element is based on a comprehensive technical assessment of existing housing policies and programs; current and projected housing needs, especially related to low income households and special needs populations; an analysis of market, environmental, governmental, and other factors which constrain housing production; an assessment of ways that the City can affirmatively further fair housing for its residents; an inventory of sites available for housing construction; and an assessment of new programs and policies that can enhance housing production in the City.

The purpose of the Housing Element is to guide decision-making by elected and appointed officials. Specifically, the Housing Element sets forth how the City will address the need for housing, especially by low- and moderate-income families and special needs families and individuals. The Housing Element also provides housing-related data and information to the public.

## 1.3 CONSISTENCY WITH STATE LAWS AND GENERAL PLAN

State law requires that the General Plan include an integrated, consistent set of goals and policies. The City of San Marino's General Plan contains elements relating to land use, community services, natural resources, safety (including noise), housing, and circulation. The 2021 Housing Element provides goals, policies and implementation measures that are consistent with all other elements of the General Plan; amendments to the City's Land Use Element and zoning are planned for immediately after adoption of the Housing Element. As the General Plan is amended in the future, the City will ensure the Housing Element remains consistent with the General Plan.

New State law requires that the Safety Element be updated to address climate adaptation upon revision of the Housing Element. The City will ensure compliance with this requirement by updating and adopting its updated Safety Element concurrent with the 2021 Housing Element. The City will provide a copy of the Housing Element to water and sewer service providers and has coordinated with these agencies in the preparation of this Housing Element. Within 60 days after adoption, the City will send the updated Housing Element to water and sewer providers with a memo regarding the State-mandated water and sewer service priority for housing projects that

will help San Marino meet its regional housing need for lower-income households (Government Code Section 65589.7). Because San Marino does not have any disadvantaged communities, an Environmental Justice Element is not required; however, a fair housing analysis has been conducted and policies and programs to affirmatively further fair housing are included within the Housing Element.

## 1.4 PUBLIC PARTICIPATION

Housing issues affect the entire community and can be confusing and contentious. State requirements about what Housing Elements must allow often seem at odds with long-standing community values. The public participation requirement of Housing Element law presents an opportunity to engage constituents in defining housing issues, and in creating solutions that both meet the needs of the community and the requirements of state law.

The ongoing restrictions on gatherings due to the COVID-19 pandemic have forced community outreach and engagement into a virtual world. While in some cases this has made it possible for more people to be engaged in the process, a digital divide often exists in cases where households may lack internet connections or may be unable to attend virtual meetings due to work obligations.

To ensure that community outreach during the pandemic was as equitable as possible, the community outreach program was designed to provide participation opportunities via cell phone and at the convenience of the resident. San Marino's Housing Element Update has included the public outreach efforts summarized below and detailed in **Section 4**:

- December 7, 2020: A Community Town Hall was held via Zoom. The Town Hall was covered by the press.
- December 29, 2020: City established a Housing Element Update webpage <http://cityofsanmarino.org/housingelement> The webpage provides the current update status, access to meeting agendas and materials, document drafts, a dedicated email for comments about the Housing Element Update, and community opinion surveys in Spanish, Chinese and English.
- November 2020- January 2021: Community opinion surveys were conducted in English, Spanish, and Chinese.
- January-April 2021: Stakeholder interviews conducted with responsive contacts representing for- and not-for-profit developers, advocacy groups, and service providers, including Southern California Non-profit Housing Association; Milestone Housing Development Corporation; the Chinese Club of San Marino; the Los Angeles County Economic Development Corporation; and the Pasadena-Foothills Association of Realtors.
- February 24, 2021: Planning Commission held a publicly noticed workshop on the Housing Element Update. Commission discussed challenges faced by City, took public input, and provided policy direction to staff.
- April 16, 2021: City Council held a publicly noticed workshop on the Housing Element Update and reviewed the Draft Housing Strategy (Policies and Programs for the Housing

Element), potential sites, and a preliminary rezoning program to address the City's RHNA shortfall. Notices for this workshop were sent to the outreach and notification list, as well as to those who had provided contact information on the community surveys and those that had spoken at previous meetings.

- July 20, 2021: Public Review Draft Housing Element was released and made available on the established website. Notices of the release of the draft document were sent to the outreach and notification list, including those who had spoken at previous meetings.
- July 17, 2021: City Council held a publicly noticed workshop to review the Draft Housing Element for possible transmittal to the State. The City Council took public comments and set another meeting to continue the public discussion.
- August 3, 2021: City Council held a publicly noticed meeting to receive public input regarding the Housing Element Update and provided further direction to staff and consultants regarding sites to include on the inventory lists to be considered for rezoning.
- August 25, 2021: City held a Town Hall to continue to receive public input on the Draft Housing Element and advise the community of future opportunities to provide comments on the updated Draft Housing Element or to meet with a planner individually to discuss the update process.
- September 24, 2021: The City Council held a duly noticed public meeting to take public comment and requested additional changes to be made to the Draft Housing Element;
- October 29, 2021: The City Council held a public meeting and authorized staff to transmit the Draft to HCD to begin their review.
- November 1, 2021: The Draft Housing Element and all public comments received to date were transmitted to HCD to begin their mandatory 60-day review period, during which time all interested parties were invited and encouraged to submit comments directly to HCD.
- December xxx, 2021: HCD responded with several changes needed for the Draft Housing Element to be compliant with State law. These changes were subsequently incorporated into the Planning Commission Draft.
- December xxx, 2021: Mitigated Negative Declaration released
- January xxx, 2022: Planning Commission hearing on MND and Draft Housing Element;
- January xxx, 2022: City Council hearing to adopt MND and Housing Element

## 1.5 ORGANIZATION OF THE HOUSING ELEMENT

The Housing Element is organized into four main sections. **Section 1** introduces the overall Housing Element update effort, a summary of housing needs and constraints, a Fair Housing summary, and a review of the effectiveness of the 2014 Housing Element and the City's progress in its implementation. **Section 2** sets forth the City's Housing Strategy, which is comprised of the Goals, Policies and Programs that it intends to implement over the next 8-year planning cycle. The City's Quantified Objectives are also included in Section 2. **Section 3** presents a detailed housing site inventory, including a discussion of the availability of services, and compares this inventory to the City's projected housing needs. **Section 4**, the Technical Background Report, provides statutorily required data including an assessment of housing needs & programs, an

analysis of non-governmental and governmental constraints to affordable housing provision, and a discussion of special needs populations. Pre-certified housing and demographic data provided by the Southern California Association of Governments (SCAG) is included here.

## 1.6 DEFINITION OF TERMS

Throughout the Housing Element, a variety of technical terms related to income levels are used in describing and quantifying conditions and objectives. The definitions of these terms follow:

**Affordable Housing** -- Housing which costs no more than 30 percent of a low-, very low-, or extremely low-income household's gross monthly income. For rental housing, the residents may pay up to 30 percent of gross income on rent plus tenant-paid utilities. For homeownership, residents can pay up to 30 percent on the combination of mortgage payments, taxes, insurance, and Homeowners' dues.

**Area Median Income (AMI)** -- The income figure representing the middle point of all Los Angeles household incomes. Fifty percent of households earn more than or equal to this figure and 50 percent earn less than or equal to this figure. The AMI varies according to the size of the household. For the year 2021, the AMI for a four-person household in Los Angeles County was \$80,000.

**Extremely Low-Income Households (ELI)** -- Households earning not more than 30 percent of the Los Angeles County AMI.

**Very Low-Income Households (VLI)** -- Households earning between 31 and 50 percent of the Los Angeles County AMI.

**Low Income Households** -- Households earning between 51 and 80 percent of the Los Angeles County AMI.

**Moderate Income Households** -- Households earning 81 to 120 percent of the Los Angeles County AMI.

**Middle Income Households** -- Households earning from 80 percent to 150 percent of the Los Angeles County AMI.

**Above Moderate-Income Households** -- Households earning not less than 120 percent of the Los Angeles County AMI.

## 1.7 DATA SOURCES

The 2021 Housing Element Update makes full use of the pre-certified data package provided by SCAG, which is contained in its entirety within the Technical Background Report. Data provided within this policy document is taken from the SCAG data set and by other sources as noted. In addition to the SCAG dataset, the following sources of data were used to help identify historic patterns of segregation, assess constraints to housing and the market conditions in San Marino; and to better identify specific housing needs:

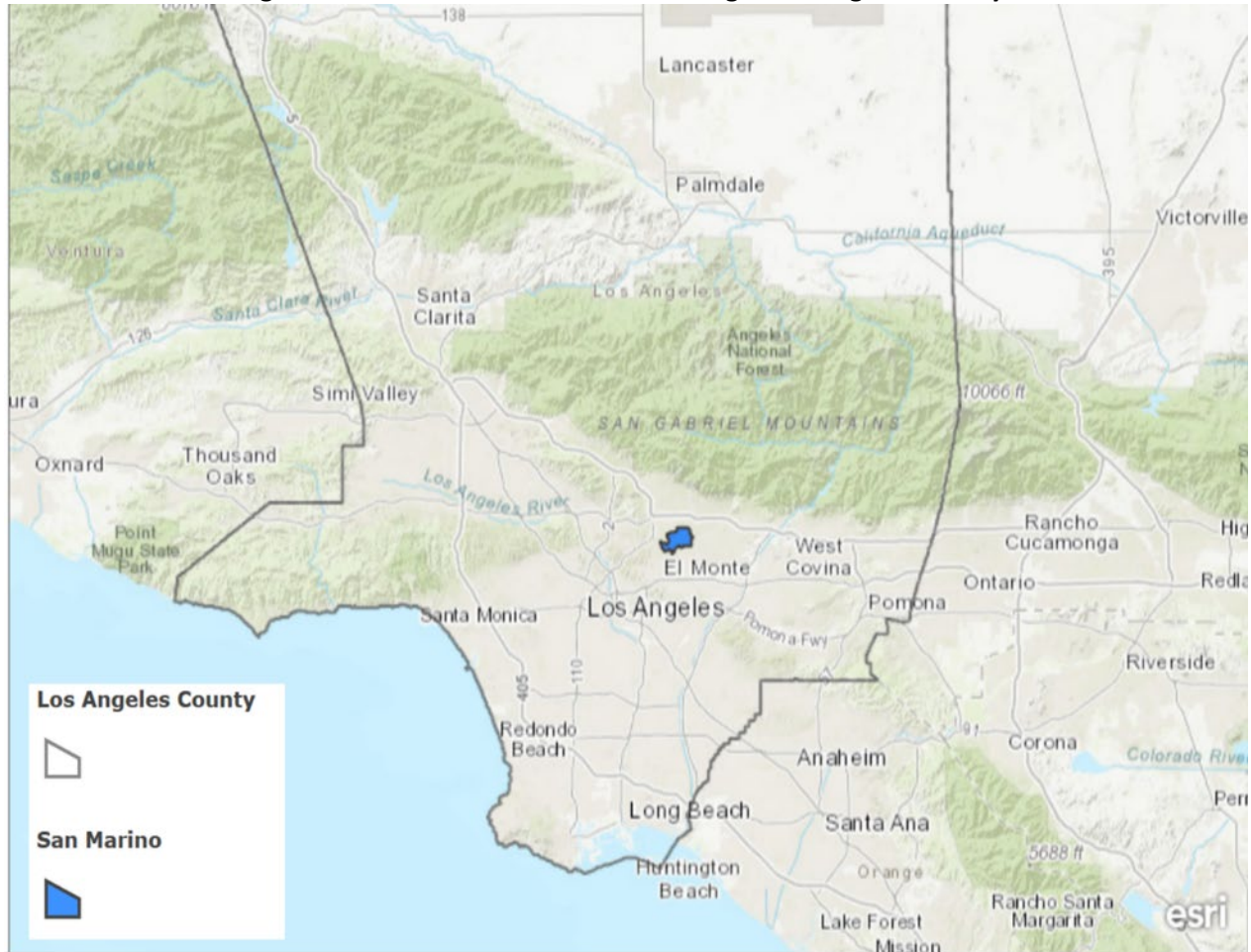
- U.S. Census 2010
- 2014-2018 American Community Survey 5-year Estimates
- Realtor.com
- Zillow.com
- Los Angeles Economic Development Commission 2021 Economic Forecast
- LACDA Analysis of Impediments to Fair Housing Choice/Assessment of Fair Housing
- Connect SoCal 2020-2045
- Los Angeles County Affordable Housing Action Plan, 2018
- Los Angeles County Office of the Assessor
- Pasadena-Foothills Association of Realtors
- Los Angeles Homeless Services Authority 2020 Homeless Count, by City
- City of San Marino Building Permit Data
- San Marino Historic Resource Survey, October 2020
- Historic neighborhood development data provided by City of San Marino staff
- 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data for San Marino
- EPA's San Marino Environmental Justice Report
- Rich Blocks, Poor Blocks – based on the 2012-2016 American Community Survey for San Marino
- Income by Neighborhoods Map, CityData.com accessed March 2021
- A Portrait of Los Angeles County, San Marino–Measure of America, as of March 2021
- Los Angeles County Annual Affordable Housing Outcomes Report, CHP, 30 April 2019
- CA Department of Housing and Community Development, Housing Needs Data Certification Letter, 2020

## 1.8 COMMUNITY PROFILE

San Marino is a small city within the very large and diverse Los Angeles County (Figure 1). It is located 11 miles from the City of Los Angeles, and is surrounded by the cities of Pasadena, South Pasadena, San Gabriel, and Alhambra. While San Marino is served by the nearby freeway network (210 and 164) and by the Metro bus line 78/79/379, it does not have high-speed rail services and does not contain any Priority Growth Areas envisioned in Connect SoCal 2020-2045. San Marino's 2020 population of 12,870 represents a decrease from the 2010 population of 13,187. This lack of growth is consistent with that of Los Angeles County and the State of California, both of which have recently begun decreasing in population.



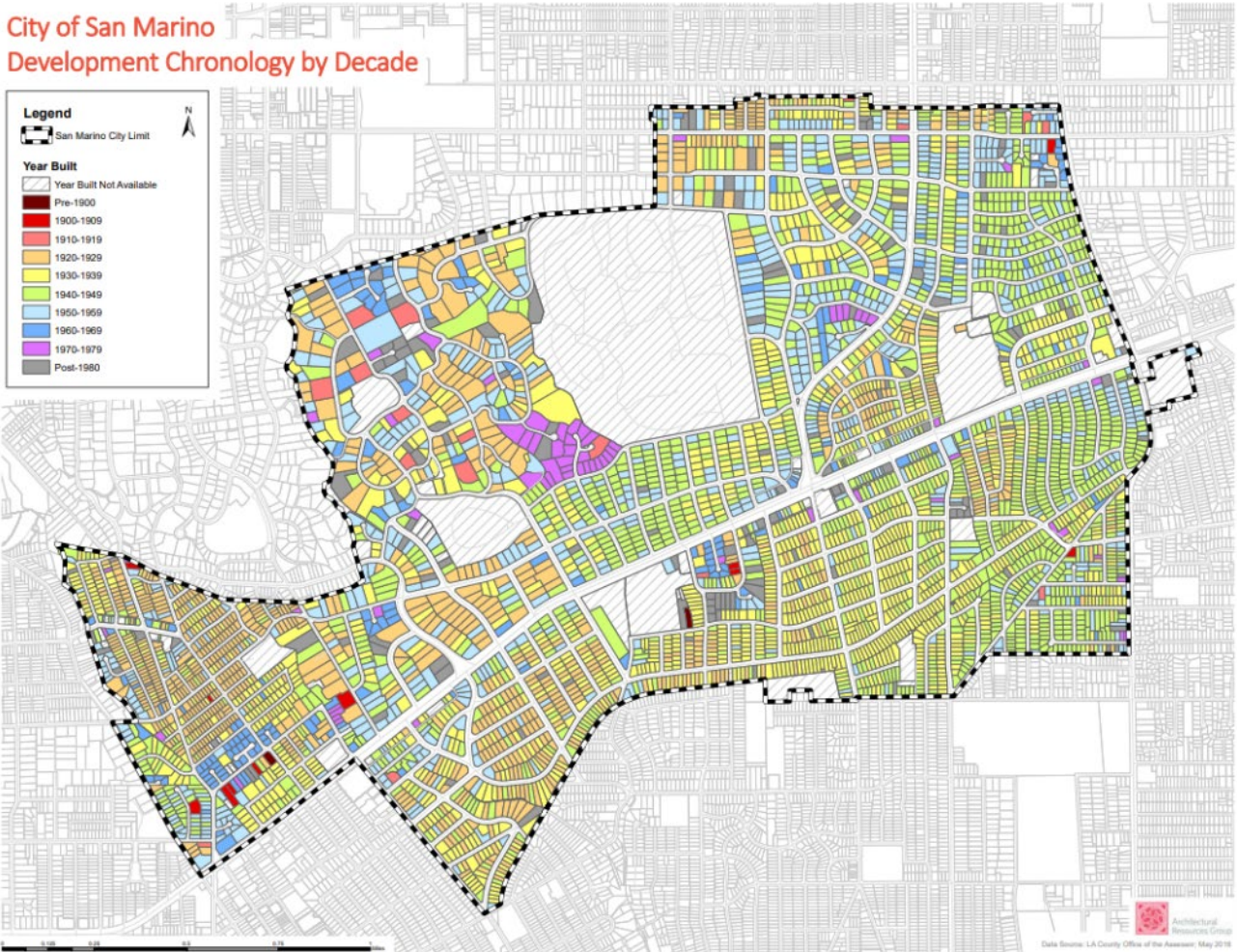
**Figure 1: San Marino Location within Larger Los Angeles County**



Esri, HERE, Garmin, FAO, USGS, NGA, EPA, NPS

Incorporated in 1913, San Marino was almost completely built out by the 1970s (Figure 2). San Marino is characterized by its beautiful homes and has multiple historic neighborhoods and structures. The intention of the City’s founding fathers was a high-quality, crime-free residential area that provides great schools, parks, and an exclusive lifestyle; the City’s physical form today reflects those early values and development patterns. The City’s lack of vacant parcels and subdivision potential has impeded development since the 1970s: an average of less than 6 new home permits have been issued annually since 1980, not counting Accessory Dwelling Units.

**Figure 2: San Marino Neighborhood Development Chronology**



*Source: San Marino Historical Survey, 2020 and San Marino staff*

## 1.9 CHANGING HOUSING NEEDS AND DEMOGRAPHICS

Comparisons between San Marino’s data and that of the larger Los Angeles County show stark differences in many areas, as reflected in the information highlighted below. San Marino’s median household income and median housing price are both more than twice that of the surrounding county or region. As the City ages and demographics change, different housing needs have arisen, and new programs are needed to meet changing demands. This section explores the characteristics and the housing needs of the San Marino community and helps to provide direction in updating the City’s Housing Element goals, policies, and programs.

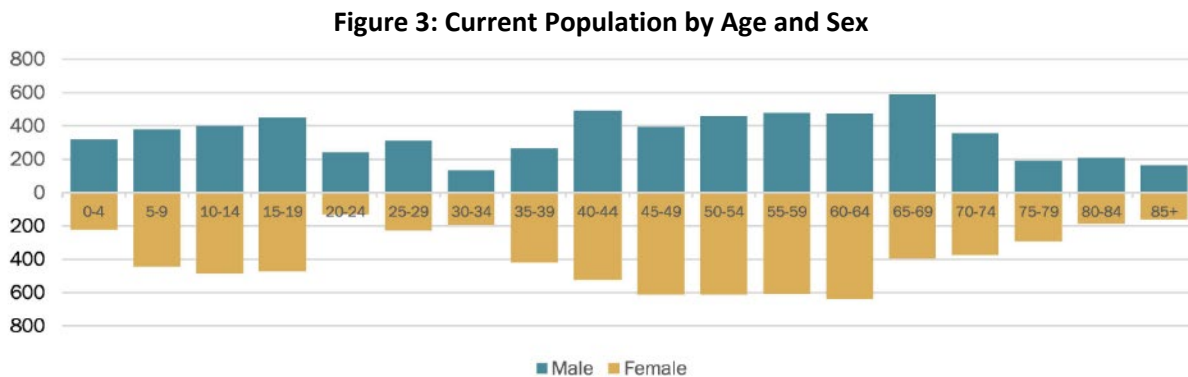
### 1.9.1 Population Characteristics and Trends

Los Angeles County’s population increased slightly (1.89%) between 2010 and 2020, from 9,787,747 residents in 2010 to 9,969,510 in 2020. By contrast, San Marino’s population decreased 2.1% over the same period, from 13,147 residents in 2010 to 12,870 residents in 2020. In addition

to the population decrease, the average household size in San Marino also decreased and now average 2.92 persons per household, down from a household size of 3.02 persons in 2010. This decrease in household size coupled with a decrease in population is not unexpected in a community that has both a growing number of seniors and a shrinking number of young families.

*Age Composition*

Figure 3 helps to tell San Marino’s housing needs story: it has an aging population to be housed and cared for, and it will need to create reasonably inexpensive housing opportunities for young families if it is to stop the outmigration of young adults and families seeking a more affordable place to live.



*Source: American Community Survey 2014-2018 5-year estimates*

*Race and Ethnicity*

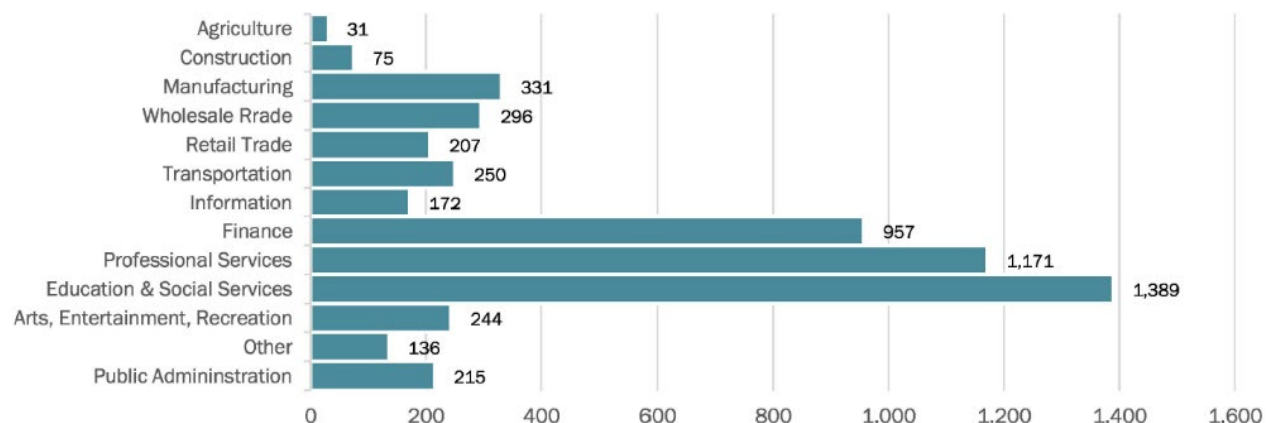
The U.S. Census provides statistics regarding the race and ethnicity of a city's population. The 2010-2019 population estimates show that the City of San Marino is made up of persons classified as "Asian alone" at 60.5 % of the population, and with persons classified as "White alone" at 31.5% of the population. Hispanic or Latino persons formed 6.3% of the population; Blacks or African Americans formed about 2% of the population; and about 3% of the population identified as two or more Races. Additional discussion of San Marino’s racial and ethnic composition is included in the Technical Background Report (**Section 4**).

*Employment and Income*

According to the American Community Survey 2014-2018, the City of San Marino has 5,474 residents in the workforce. This represents a 7.4% decrease from the 5,904 residents reported to be in San Marino’s workforce by the American Community Survey 2007-2011, consistent with the City’s aging workforce and its recent decrease in population. The industries with the highest percentage of employees are education and social services with 1,389 employees (25.4% of total). Professional services and finance make up another large segment of occupations. Figure 4 illustrates the breakdown of employment by industry.



**Figure 4: Employment by Industry**



Source: American Community Survey 2014-2018 5-year estimates w/ groupings of 2-digit NA/CS codes.

San Marino has relatively few low-paying jobs. It is primarily residential in nature and has only 2 streets (Mission and Huntington) with commercial uses that could support local employment. These areas are primarily made up of small-scale retail and professional office spaces. The City’s largest employers are the San Marino Unified School District with 315 employees and the Huntington Library, Art Collections and Botanical Gardens with 459 employees.

### 1.9.2 Household Incomes and Housing Affordability

As noted, San Marino’s median household income of \$159,509 is more than twice that of greater Los Angeles County at \$77,300. While most San Marino residents have higher incomes than Los Angeles County in general, there are still a considerable number of San Marino households (970) with 2017 incomes at the “lower” level (80% or less of AMI). The distribution of incomes for 2018 is shown in Table 1.

**Table 1: San Marino Income Groups, by Type of Tenancy**

Income Distribution Overview	Owner Households	Renter Households	Total Households	Percentage of Households
Extremely Low Income	275	165	440	10%
Very Low Income	235	45	280	6%
Low Income	210	40	250	6%
Moderate Income	240	90	330	7%
Above Moderate	2,840	370	3,210	71%
Total	3,800	710	4,510	100%

Sources: Consolidated Planning /CHAS Data for San Marino; 2013-2017 ACS

### *Housing Costs and Overpayment*

When housing prices are very high, many households must “overpay” for housing. Households are considered housing cost-burdened when their total housing costs exceed 30% of their gross monthly income, and to be “severely cost burdened” when their total housing costs exceed 50% of their gross monthly income. As would be expected, households with very-low and extremely low incomes are disproportionately housing cost-burdened. In San Marino, 22% of households are severely cost burdened and are paying more than 50% of their gross monthly incomes for housing. Another 15% of households are paying more than 30% of their incomes on housing, and 62% are paying less than 30% of their incomes for housing. While the high median household incomes in San Marino result in a relatively low overpayment rate, there are still 1,697 San Marino households who are overpaying for housing.

### **1.9.3 Special Needs Populations**

#### *Homeless*

The Los Angeles County Community Development Commission conducts bi-annual point-in-time surveys of homeless populations. San Marino is occasionally reported to have 1 unhoused person, but typically is reported to have zero unhoused persons. Services for homeless individuals are available in neighboring Pasadena. San Marino allows emergency shelters to be established in any commercially zoned property as a permitted use; however, no interest has been shown on the part of homeless service providers in initiating homeless services in San Marino.

#### *Disabled*

Census data indicate that San Marino has 461 persons with an independent living disability, 248 with a self-care disability, 413 with an ambulatory disability, 229 with a vision disability, 199 with a cognitive disability and 163 with a hearing disability. These numbers are not exclusive, as some residents have more than one type of disability. The most commonly occurring disabilities among seniors 65 and older were independent living and ambulatory disabilities, each experienced by more than ten percent of San Marino’s seniors. The provision of ADUs (Accessory Dwelling Units) and JADUs (Junior Accessory Dwelling Units), and the adoption of a voluntary Universal Design program, can help to address these special needs.

#### *Elderly*

According to the 2019 U.S. Census population estimates, about 21 percent of San Marino’s population are aged 65 and above. As shown earlier in Figure 3, a large and growing percentage of San Marino’s population is elderly; by the end of the Housing Element period, the 70-75 age group will be the most prevalent, followed by the 65-70, 60-65, and 55-60 age groups. Elderly persons often have fixed incomes in addition to other special needs related to housing and may require physical improvements to their homes such as ramps, handrails, lower cupboards and counters, creation of a downstairs bedroom, and other modifications to enable them to remain in their homes. They may also need additional assistance in the form of a part-time or live-in caretaker. In most instances the elderly would like to stay in their own homes rather than move

to a retirement community. In San Marino, and particularly among the Asian community, it is common for multiple generations of a family to live together. Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) will become increasingly important in accommodating the housing needs of this aging community. Encouraging new homes, additions, and remodels to include Universal Design elements will also be important to serving the needs of the mobility- or vision-impaired.

*Large Households*

Household size can be influenced by a lack of affordable housing options, an increase or decrease in family formations, or families leaving an area. Ethnicity can also affect sizes of households if a particular ethnic group has a tradition of living with family members upon retirement age. In San Marino, the average household size has continued to decrease, from 3.02 to 2.92 persons per household, while the number of smaller households (1-3 persons) has increased. San Marino has a relatively small number of large households, but when they do occur, they tend to be rental households.

**Figure 5: Households by Household Size**



Source: SCAG Local Housing Data

*Female-headed households*

State law requires an analysis of female-headed households to ensure adequate childcare and job training resources. Of San Marino’s 4,566 households, only 8.8% were female-headed (compared to 14.3% in the SCAG region); of those, just 3.9% had children at home and none had children under age six.

*Farmworkers*

Statewide, farmworker housing is of unique concern and importance. While only a small number of SCAG jurisdictions have farmworkers living in them, they are essential to the region’s economy and its food supply. According to the United States Department of Agriculture (USDA), more than 80 percent of hired crop farmworkers are not migrant workers but are considered settled and work farm(s) within 75 miles of their residences. This share is up significantly from 41 percent in 1996-1998, reflecting a fundamental change in the nature of the crop farming workforce. The



majority of farmworkers in California reside in metropolitan areas, where the average hourly wage of \$16.05 puts them in the extremely-low to very-low income category (between 30-50 percent of the area median income). The 2014 – 2018 ACS indicated that no farmworkers live in San Marino, and there is no nearby farmland that would indicate a need for farmworker housing in San Marino.

## 1.10 CHARACTERISTICS OF HOUSING STOCK

### *Type*

San Marino's housing stock consists almost exclusively of single-family homes (98.8%), compared to 54.4% for the greater SCAG region. Slightly more than 86% of San Marino's homes are owner-occupied, compared to 52.5% for the SCAG region. Conversely, only 13.6% of San Marino's homes are renter-occupied, compared to 47.5% of the SCAG region. The age group most likely to be renting in San Marino are those between 35 and 44; however, owners outnumber renters across all age groups.

### *Age & Condition*

San Marino's housing stock is much older than the SCAG regional average. As previously noted, San Marino was largely built-out by 1960 and has seen very little construction after 1980. The time period where the highest share of San Marino's housing was built is before 1939, while in the larger SCAG region the period when most housing was built was during the 1970s.

### *Overcrowding*

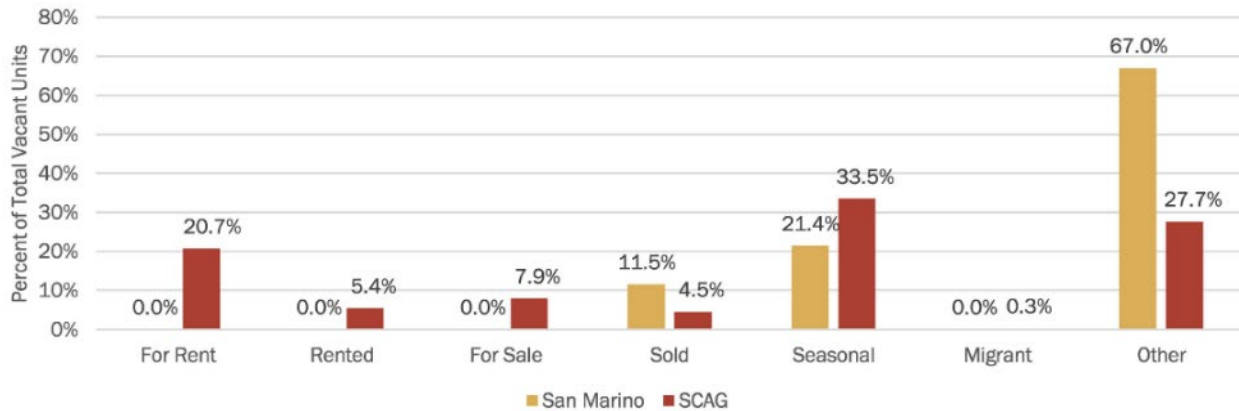
The ACS definition of overcrowding is more than 1.0 occupants per room, where the number of rooms includes all except kitchens, bathrooms, and hallways. Severe overcrowding is defined as more than 1.5 occupants per room. In San Marino, just 3.4% of households were overcrowded and less than 1% were severely overcrowded. Rental units were more likely to be overcrowded than were owner-occupied units.

### *Vacancy*

The vacancy rate is a measure of the general availability of housing. It also shows how well the available units meet the current housing market demand. A low vacancy rate suggests that households will have difficulty finding housing within their price range. While the average vacancy rate across the US is approximately 7%, in metropolitan areas rates are generally about 3% - 4%. San Marino's vacancy rate is 4.6%, with about 200 vacant units.

A "Vacancy" occurs for several reasons; a home may be listed for sale or being prepared for a rental tenant. Homes can also be held for seasonal or occasional use by their owners. The American Community Survey has categorized vacancy in San Marino by type as displayed in Figure 6:

Figure 6: Vacant Units by Type



The type of vacancy can be instructive when one type varies significantly from the norm, such as the “Other” category for San Marino in Figure 6 above. This may occur in vacation-destination communities, where short-term vacation rentals drive the “seasonal” vacancy type higher. For ACS data, vacant units are subdivided according to their housing market classification shown in the sidebar. Units held vacant for “other” reasons make up 67%, or about 134 of San Marino’s vacant units as shown in Figure 6.

Public input received during preparation of the Housing Element included anecdotal information about “investor” houses, which are bought by investors who do not live in San Marino and are held, vacant, purely for investment purposes. These vacant homes are reflected as “other” by the ACS data of vacancy type in Figure 6; they are not used for housing people. This phenomenon has recently been seen in high-value real estate markets on both coasts, most notably in Vancouver, Seattle, and San Francisco; a 2021 Report by Strategic Actions for a Just Economy (SAJE) and UCLA Law found

Types of Vacancy in Census Data

**For Rent** - These are vacant units offered "for rent," and vacant units offered either "for rent" or "for sale."

**Rented, Not Occupied** - These are vacant units rented but not yet occupied, including units where rent has been paid or agreed upon, but the renter has not yet moved in.

**For Sale Only** - These are vacant units being offered "for sale only," including units in cooperatives and condominium projects if the individual units are offered "for sale only." If units are offered either "for rent" or "for sale" they are included in the "for rent" classification.

**Sold, Not Occupied** - These are vacant units sold but not yet occupied, including units that have been sold recently, but the new owner has not yet moved in.

**For Seasonal, Recreational, or Occasional Use** - These are vacant units used or intended for use only in certain seasons or for weekends or other occasional use throughout the year. Seasonal units include those used for summer or winter sports or recreation, such as beach cottages and hunting cabins. Seasonal units also may include quarters for such workers as herders and loggers. Interval ownership units, sometimes called shared-ownership or timesharing condominiums, also are included here.

**For Migrant Workers** - These include vacant units intended for occupancy by migratory workers employed in farm work during the crop season.

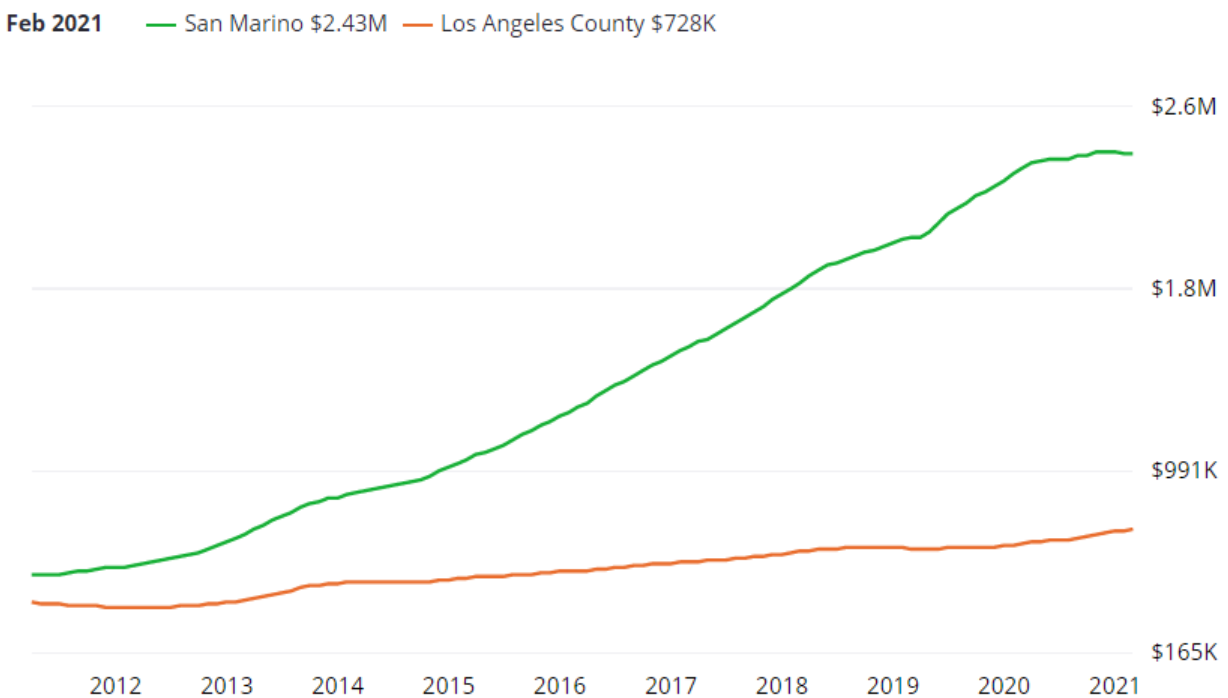
**Other Vacant** - If a vacant unit does not fall into any of the categories specified above, it is classified as "Other vacant." For example, this category includes units held for occupancy by a caretaker or janitor, and units held for personal reasons of the owner.

the same phenomenon occurring is the City of Los Angeles, where over 46,000 units are being held in this manner and thus not available for housing. If the census data and presence of speculative investor housing accurately represents the vacant home situation in San Marino, then the true housing vacancy rate for the City is actually much lower – less than 1 percent. As noted above, this shows there are not enough units to meet market demand and that households will have difficulty finding housing in San Marino.

*Prices*

San Marino’s housing prices have continued to accelerate at a greater rate than costs in Los Angeles County (Figure 7). While median household incomes in San Marino are high, even moderate- and middle-income households cannot afford a home in San Marino where the median sales price exceeds \$2 million, and the median rental price exceeds \$4000 per month (2021 figures). A moderate-income family of three could afford a home with a sales price of \$385,859 or a monthly rent of \$1,818. San Marino currently lacks homes for these households, which include young families and first-time homebuyers.

**Figure 7: Growth in San Marino and Los Angeles County Homes Sale Prices, 2012 - 2021**



Source: Realtor.com

*Preservation of Assisted Units at Risk of Conversion*

There are no existing assisted housing units that are deed-restricted for lower-income households in San Marino. There are no units at risk of conversion to above-moderate housing.

## 1.11 SUMMARY OF CONSTRAINTS

As discussed in **Section 4**, the primary constraints to housing in San Marino are the lack of vacant land and extremely high land values. Discussion with both market-rate and affordable housing developers revealed that the high land costs, together with San Marino's relatively small lot sizes and lack of available land, render San Marino unattractive for the development of affordable or market-rate housing. While these forces are beyond the City's control, they are some of the primary drivers of high land costs and high median home prices. Affordable housing developers indicated that if larger lots of one acre or more could be identified and rezoned, or if smaller lots could be combined and rezoned, it would help achieve the economies of scale needed to develop 100 percent affordable multi-family housing. The City will explore a lot consolidation program; however, the potential to combine adjacent lots is somewhat limited by the lack of common parcel ownership in the City.

Two developers interviewed indicated areas where the City has potential (beyond ADUs and JADUs) to develop housing for multiple income levels. One opportunity is in the City's two commercial areas; the adoption of objective design and development standards for live-work and multi-family projects would significantly increase the viability of these types of projects. Other places where affordable and workforce housing could occur include the private Southwestern Academy campus; and a portion of the Huntington property. Another promising opportunity lies in the redevelopment of the City-owned Stoneman site, where the City could partner with non-profit developers to put together an attractive land deal to develop mixed-occupancy and mixed-income housing. All these programs will be considered by the City in order to make sufficient sites available and appropriately zoned for housing (see **Section 2**).

One of the secondary constraints to the development of housing in San Marino is community opposition. The public opinion survey and public input received during preparation of the Housing Element indicate that a significant number of residents feel that San Marino should not build any multi-family housing. Many residents feel that either all of San Marino's housing needs have been met, or that any needs that do exist can be satisfied by the development of Accessory Dwelling Units (ADUs). Additionally, stakeholder interviews revealed that San Marino can be difficult to get a project through, even if the project type and design are allowed by the City Codes. The development of objective design and development standards for the ministerial approval of qualified development projects will be important steps to ensure that San Marino is able to accommodate its fair share of the region's housing needs (see **Section 2**).

## 1.12 SUMMARY OF FAIR HOUSING ANALYSIS (FHA)

Assembly Bill 686 (Affirmatively Furthering Fair Housing, or AFFH) was adopted into law in 2018 and became effective on January 1, 2019. The law requires state and local agencies to take proactive measures to correct any housing inequalities related to race, national origin, color, ancestry, sex, marital status, disability, religion, or other protected characteristics. Agencies must ensure that their laws and programs affirmatively further fair housing, and that they take no actions that do not do so.

Under State law, affirmatively furthering fair housing, or AFFH, means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Agencies must include in their Housing Elements a program that promotes fair housing opportunities for all persons. In the context of a community’s housing needs, AFFH is not just about the *number* of units needed, but also about *where* the units are located and *who* has access to them.

AB 686 makes certain requirements for the analysis of fair housing issues; this analysis is contained in **Section 4** along with a history of San Marino and its past practices of allowing only single-family homes.

While HCD has not yet completed its guidance document for AFFH analysis within Housing Elements, discussions with HCD staff indicated that a proper course of action in Areas of Opportunity like San Marino would be to 1) analyze and discuss areas of ethnic or economic concentration; and 2) assess any exclusionary land use practices and include programs to overcome or reverse them. A history of San Marino’s development and growth patterns is provided in **Section 4** and summarized here.

San Marino is much more racially diverse than the average U.S. city. While there is a somewhat greater White population in the northwestern part of the City and a slightly greater Asian population in the southeastern part of the City, there are no areas of ethnic or economic concentration. Median incomes are high and fairly stable throughout the City, as is the racial mix of its citizens. While there are a considerable number of low-income senior households in San Marino, they tend to own their homes and are not concentrated in any area or neighborhood. San Marino does not have any areas of racial or ethnically concentrated areas of poverty (R/CAPs). It is a well-integrated community, and the entire City is designated as an Area of Opportunity. This designation is based on the consideration of factors affecting the quality of life and health outcomes including educational enrollment and attainment; employment rates; lack of overcrowding in housing or overpayment for housing costs; transportation costs; and environmental health.

San Marino’s rich and varied past spans multiple eras of California history and is associated with cultural and social themes that were definitive in the history of Los Angeles County and Southern California. Since its 1913 incorporation, “the City envisioned itself as a residential enclave for people of means, with zoning that ensured minimal commercial development and no industry or multi-family residences” (*Source: San Marino Historic Resources Survey Report, October 2020*). This exclusive designation has played out in the City’s zoning since its establishment. San Marino is almost exclusively residential, with its built environment dominated by detached single-family homes constructed primarily between the 1920s and the 1960s. As of 2021, there were no areas zoned for multi-family residences, or for industry/manufacturing. Small areas on Huntington Drive and Mission Street are zoned for commercial use, and the City has recently approved a mixed-occupancy project on Huntington Drive.

By definition, single-family zoning is exclusionary when it occurs to the exclusion of other types of residential uses. While not intended to be exclusionary, San Marino’s past prohibition of

anything but single-family homes has had the effect of excluding persons who do not have incomes high enough to live in the City. Because poverty occurs most often with persons of color, these practices have resulted in the exclusion of protected classes even though they were not intended to. AB 686 requires that the City adopt programs to overcome and reverse this pattern of exclusion, and to identify locations for affordable housing through the AFFH lens.

### Reversing Exclusionary Zoning Practices

The approach taken in the 2021 Housing Element to address past exclusionary zoning practices and to affirmatively further fair housing is two-fold: First, programs are included that change zoning to allow for all types of housing, including the multi-family apartments and duplexes that have previously been banned in the City; and secondly, the location of potential housing sites to meet the City's lower-income RHNA is considered through an equity lens, not only by choosing locations in areas throughout the City but also by including programs to promote the development of missing middle houses, duplexes, triplexes, ADUs, and affordable JADUs in the City's single-family residential neighborhoods. **Section 2** includes the specific policies and programs to reverse exclusionary zoning and to affirmatively further fair housing; **Section 3** contains the housing sites location information and maps. All sites to be considered for rezoning for higher-density housing are within High Opportunity Areas.

## 1.13 REGIONAL HOUSING NEEDS ALLOCATION

The Regional Housing Needs Allocation (RHNA) is a requirement of State housing law and is a process that determines projected housing needs for all jurisdictions in California. The Southern California Association of Governments, or SCAG, conducts the RHNA process every eight years and assigns a specific allocation, or RHNA, to each jurisdiction. Every jurisdiction must plan for its RHNA allocation in its Housing Element by ensuring there are enough sites with appropriate zoning to accommodate their RHNA. The goal is to ensure that local plans have enough appropriately zoned land to accommodate their existing and projected housing needs for all income levels for the entire 8-year planning period. Jurisdictions are not expected to build the housing, but they must plan and zone for it.

The RHNA methodology applies several factors to further the objectives of State law and meet the goals of the Connect SoCal plan. After a RHNA total is calculated, a social equity adjustment is applied to determine the four income categories. The social equity adjustment is based on household income and access to resources. One of the five objectives of State housing law is to ensure that there is not an overconcentration of households by income group in comparison to the county or regional average. To ensure that the RHNA methodology does not overburden low-income jurisdictions with more low-income households, a social equity adjustment is applied during the Income Group process. The result is that higher income jurisdictions like San Marino must plan and zone more affordable units, while lower income jurisdictions must plan and zone for more above-moderate income units and fewer affordable units.



San Marino's RHNA for the period between October 2021 – October 2029 is 397 units, divided between income groups as follows:

**Table 2: Quantified New Construction Objectives, 2021 - 2029**

	Very Low	Low	Moderate	Above Moderate	Total
San Marino	149	91	91	66	397

While the RHNA is assigned based on the four income categories above, the law also requires that communities plan for the needs of extremely low-income households, defined as those making less than 30% of the County AMI. The housing need for this income group is generally considered to be half of the very low-income need. Because San Marino is a high-income and high-resource community, it has a much greater RHNA for affordable and moderate-income units than it does for Above-moderate units. Since the RHNA cannot be accommodated on existing sites with appropriate zoning, San Marino has a "RHNA shortfall" and the City must rezone adequate new sites to meet its regional need and to meet the requirements of Government Code Section 65583 c. 1, which requires zoning for all types of residential uses including multi-family and manufactured homes. **Section 3** provides an analysis of the RHNA shortfall, the required sites information, and the housing sites inventory.

## 1.14 2014 SAN MARINO HOUSING ELEMENT REVIEW

The City has taken multiple steps to facilitate residential and live-work development since adoption of the 2014 Housing Element, including the following:

- Expanded opportunities for low- and moderate-income housing by adopting a revised Accessory Dwelling Unit Ordinance and a new Junior Accessory Dwelling Unit Ordinance, in compliance with State law;
- Provided no-cost ADU/JADU pre-application consultations with planning staff to ensure complete application submittals and the shortest possible processing time;
- Drafted a mixed-use ordinance for City Council consideration (this was ultimately not adopted, but residential uses continue to be allowed in the C-1 and the City Council has requested that staff prepare objective design standards to guide their development);
- Approved the first mixed-occupancy project at 2405 Huntington Drive (3 commercial ground floor units, 2 residential units above);
- Produced and distributed public handouts on Fair Housing;
- Established a specific page within the City's website that includes housing-related information; and
- Moved to an online permitting system to facilitate continued permit issuance during pandemic closure and beyond.

## Progress Implementing Programs

The City was successful in implementing most of the programs in its 2014 Housing Element and is implementing others with the adoption of this 2021 Housing Element Update. See Table 4 at the end of this Section for full program implementation status.

## Progress in Achieving RHNA and Quantified Objectives

The City was only partially successful in achieving its 5th cycle Quantified Objectives, as shown in Table 3 below. The City reached and exceeded its objectives for above-moderate and total units, and almost reached its objective for lower-income units. It saw the most success in converting existing pool houses and similar accessory structures to Accessory Dwelling Units, and in the construction of new Accessory Dwelling Units. This is not an unexpected outcome in a city that is fully built out. The City also gained its first multi-family units as part of a mixed-occupancy project near the end of the planning period.

**Table 3: Progress in Achieving 2014 Quantified Objectives, by Income Group**

Income Group	New Construction Projected/Actual	Rehabilitation Projected/Actual	Conservation Projected/Actual	2014 Quantified Objective	Total Units Realized 2014-2021
Very Low	6/3	5/0	2/0	13	3
Lower	6/9	5/2	2/0	13	11
Moderate	0	0/0	0/0	0	0
Above Moderate	6/37	0/0	0/0	6	37
Total	18/49	10/2	4/0	32	51

### *Lessons Learned*

The low level of permitting in San Marino is typical for a small, fully built-out City. The adoption of the new Accessory Dwelling Unit ordinance required by the State has had the greatest effect in adding housing units to San Marino's housing stock, as the program allows additional housing units to be integrated into the City's existing neighborhoods. Removal of the minimum parcel size requirement to establish an ADU more than doubled the number of eligible parcels and interest – and applications - increased exponentially. Expansion of this program and the new Junior Accessory Dwelling Unit provisions have the greatest potential to continue to add units within San Marino's existing neighborhoods.

The City also struggled to revise its C-1 standards to specifically allow and set standards for mixed-use developments. While the standards were drafted by staff and brought forward for approval, the new provisions were not adopted due to community concerns. The City was successful in achieving one mixed-occupancy project under its existing C-1 provisions, which allows housing units as a density of one unit per 5,000 square feet of parcel size. Some local developers continue to be interested in pursuing mixed-use projects, and the City recognizes that a higher density of residential development in and near the commercial areas could assist in

revitalizing them. Adaptive re-use and other redevelopment strategies would be appropriate for this area. The City will continue to allow residential uses within the C-1 zone, by-right if at least 20% of units are affordable. With the recent strengthening of the Housing Accountability Act and the passage of SB 35, the City has learned the importance of adopting objective design and development standards and anticipates the creation and adoption of such standards within the next year.

San Marino has always prided itself on having the best schools in the State, and one of the most difficult lessons for the City has been the loss of its student population. As reflected in Census data and school enrollment figures, young families cannot afford to live in San Marino because of the lack of housing affordable to lower, moderate, and middle-income households. The City recognizes the need to ensure that young families can live in San Marino and is committed to putting new programs into place for lower- to moderate-income households.

### 1.15 PROGRAM CHANGES IN 2021 HOUSING ELEMENT

The 2021 Housing Element update is not a comprehensive "new" Housing Element, but rather an update of the 2014 Housing Element. The focus of the update process has been to keep the programs that are working, adding new policies and programs where community needs have changed or where necessary to comply with new State laws. The same three goals of the existing 2014 Housing Element have been maintained, with new or revised policies and programs proposed to meet changing needs and legal requirements. Most ongoing policies and programs are successful and are continued in the Housing Element update; limited-term programs that have already been accomplished have not been carried forward.

The 2021 Housing Element updates housing numbers related to RHNA, outlines public participation, and makes limited changes in programs that commit the County to future land use changes to be made within three years. A brief summary of the changes and revisions are listed by Goal below:

#### **GOAL 1: Provide a range of housing opportunities for all income levels.**

- New Policy added to allow interior conversion of single-family residences into duplexes or triplexes in neighborhoods near jobs and transit, and to consider other missing middle housing solutions.
- New policy added to ensure that adequate sites continue to be available throughout the planning period (statutory requirement).
- Policy revised to encourage local lenders to become approved for the Home Ownership and Mortgage Credit Certificate programs for first-time homebuyers.
- New Policy added to affirmatively further fair housing throughout San Marino's neighborhoods (statutory requirement).
- Program revised to facilitate the development of ADUs and JADUs by providing promotional materials and pre-approved plans for ADUs, and to add consideration of a

and amnesty program for ADUs and a low-interest or forgivable loan program for lower-income households to create affordable JADUs.

- Program revised to increase the number of ADUs expected to be developed during the next planning period, consistent with recent permitting levels.
- New Program added to adopt objective design and development standards for residential and live-work projects.
- New Program added to consider adoption of a Housing Overlay Zone.
- New Program added to implement “missing middle” provisions in single-family neighborhoods near jobs and transit.
- New Program added to adopt a density bonus ordinance to comply with new State laws, and to consider adopting a City density bonus ordinance to better address local housing needs for seniors, moderate-income households, and first-time homebuyers.
- New Program added to consider and rezone sites by October 15, 2024 to accommodate the identified RHNA shortfall and any additional sites necessary to ensure compliance with No Net Loss laws.
- New program added to maintain an Administrative List of Housing Sites to ensure compliance with No Net Loss Laws
- New Program added to implement a Enhanced Affordability Overlay if sufficient sites are not rezoned by October 15, 2024.
- New Program added to promote first-time homebuyer programs and to encourage use of the housing land trust model.

### **GOAL 2: Maintain the existing housing stock.**

- New Policy added to ensure that the City’s housing stock is not lost to non-residential uses.
- New Program added to consider adopting the conservation measures in the EAP (Energy Action Plan) where appropriate for San Marino and not duplicative of Building Code requirements.
- New Program added to explore the nature of prolonged home vacancies in the City, and to consider adoption of an annual fee or “vacancy tax” if it is determined that vacant homes are being held only for investment purposes and are not being used for housing. Funds from this fee or “tax” would be used to support the City’s housing programs.

### **GOAL 3: Ensure the accessibility to housing for all segments of society.**

- New Policy added to promote and encourage special needs housing and universal design in new and remodeled homes.
- New Program added to implement Universal Design policies.

- New Program added to encourage ADUs and JADUs for seniors and persons with disabilities, and to include Universal Design provisions in pre-approved ADU plans.

**Table 4: Status of 2014-2021 Housing Element Program Implementation**

	<b>Policy Description</b>	<b>Implementation</b>	<b>Status</b>
GOAL 1: Provide a range of housing opportunities for all income levels.	Policy 1.1: Encourage the development of housing on vacant R-1 land to meet Above-moderate housing demand.	Program 1.1: Fast track all second unit applications through the permitting process.	Achieved and ongoing
	Policy 1.2: Continue to encourage the development of second units as a housing resource.	Program 1.2: Facilitate second unit construction by revising the Second Unit Ordinance.	Achieved and ongoing
	Policy 1.3: Encourage the construction of attached second units for multi-generational families, and as a source of affordable housing for extremely low/ lower income households and persons with disabilities.	Program 1.3: Distribute information on second units and the required development standards to achieve two second units annually for a total of 16 second units over the eight-year planning period.	Achieved and ongoing; will revise Program.
	Policy 1.4: Continue to allow residential uses in the C-1 zone as a conditionally permitted use.	Program 1.4: Three years from Housing Element adoption evaluate the City Code for residential development in the C-1 Zone. Assess possible barriers to development and re-evaluate the City's policies.	Not yet achieved; still pursuing. Council may consider a live work ordinance

	<p>Policy 1.5: Allow for development of housing for lower income households and seniors in the City through provision of density bonus as required by State law.</p>	<p>Program 1.5: Encourage the use of second units for senior housing and housing for persons with disabilities (including persons with developmental disabilities).</p>	<p>Achieved and ongoing</p>
		<p>Program 1.6: Adopt an implementing ordinance for density bonus law.</p>	<p>Not yet achieved; will continue and expand</p>
		<p>Program 1.7: Continue community outreach and education regarding the development process.</p>	<p>Achieved and ongoing</p>
<p>GOAL 2: Maintain the existing housing stock.</p>	<p>Policy 2.1: Ensure that currently sound housing is maintained through code enforcement activities and nuisance abatement procedures.</p>	<p>Program 2.1: Maintain code enforcement activities to ensure building safety and integrity of neighborhoods.</p>	<p>Achieved and ongoing</p>
	<p>Policy 2.2: Pursue programs offered by State and Federal governments to provide monetary assistance to lower and moderate-income households (including extremely low income) for home maintenance.</p>	<p>Program 2.2: Continue to implement the “abatement of nuisance” ordinance which seeks to ensure the continued maintenance and good appearance of the City’s residential structures and neighborhoods.</p>	<p>Achieved and ongoing</p>
		<p>Program 2.3: Continue to implement the Community Development Block Grant</p>	<p>Achieved but at a lower rate</p>



		(CDBG) program. Target limited resources to extremely low-income households and persons with disabilities.	than projected. Will continue.
		Program 2.4: Gather and distribute information to homeowners on the use of rebates and incentives for making their homes more energy efficient.	Achieved and ongoing
		Program 2.5: Continue to encourage seismic retrofitting.	Achieved and ongoing
GOAL 3: Ensure the accessibility to housing for all segments of society.	Policy 3.1: Promote equal housing opportunity for all economic, racial, and social groups currently residing in the City.	Program 3.1: Continue implementation of the reasonable accommodation ordinance and allow for exceptions to the zoning code when necessary to provide an equal opportunity for housing.	Achieved and ongoing
	Policy 3.2: Promote housing that meets the special needs of elderly and disabled (including those with developmental disabilities).	Program 3.2: Work with fair housing service providers to ensure that procedures are in place if a complaint of housing discrimination is made. In 2014, update the City's website to include fair housing resources.	Achieved and ongoing
	Policy 3.3: Allow for housing opportunities for the homeless and special needs populations.	Program 3.3: Distribute information at City counters and other community locations regarding housing	Achieved and ongoing

		discrimination and what to do if it occurs.	
		Program 3.4: Update the Zoning Code to allow for emergency shelters by right without discretionary action in the C-1 zone subject to certain development and operational standards.	Achieved 2019
		Program 3.5: Update the Zoning Code to address the provision of transitional housing and supportive housing as residential uses, to be permitted in the same manner as similar uses in the same zones.	Achieved 2021
		Program 3.6: Update the Zoning Code to address the provision of single-room occupancy housing as a conditionally permitted use in the C-1 zone.	Not specifically achieved, but deemed possible under existing allowances for residential uses in the C-1
		Program 3.7: Update the Zoning Code to address the provision of employee housing pursuant to the State Employee Housing Act.	Achieved 2021

## SECTION II: HOUSING STRATEGY

### 2.1 GOALS, POLICIES, AND PROGRAMS

The City of San Marino, in adopting the Housing Element, adopts the goals and policies that follow as the framework for implementing its housing policies and programs over the timeframe of the Element.

**GOAL 1: Provide a range of housing opportunities for all income levels.**

#### Policies:

- Policy 1.1:** Encourage the development of housing on R-1 land to meet moderate and above-moderate housing demand.
- Policy 1.2:** Allow the interior conversion of single-family homes into duplexes or triplexes in identified neighborhoods, subject to standards, and consider integrating other missing middle housing types into San Marino’s neighborhoods.
- Policy 1.3:** Continue to encourage and promote the development of accessory dwelling units as an important housing resource.
- Policy 1.4:** Encourage the construction of attached accessory dwelling units and junior accessory dwelling units to house multi-generational families, and as a source of affordable housing for extremely low- and lower-income households and persons with disabilities (including those with developmental disabilities).
- Policy 1.5:** Maintain a sufficient inventory of sites suitably zoned for housing at all income levels throughout the planning period.
- Policy 1.6:** Continue to allow residential uses in the C-1 Zone as a conditionally permitted use. Allow these uses as a permitted use if at least 20 percent of project units are affordable to lower-income households, subject to objective design and development standards.
- Policy 1.7:** Allow for development of housing for lower-income households and seniors in the City through provision of density bonuses. Consider expanding the state’s density bonus program to provide bonuses and incentives for moderate-income housing.
- Policy 1.8:** Participate in the LACDA’s Home Ownership Program and Mortgage Credit Certificate program to provide opportunities for first-time homebuyers. Encourage local lenders to become approved for these programs.

**Policy 1.9:** Affirmatively Further Fair Housing by ensuring that housing opportunities for all income levels are available throughout San Marino’s neighborhoods.

**Implementing Programs:**

**Program 1.1:** Fast track all ADU and JADU applications through the permitting process.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.2:** Adopt a program to encourage and facilitate accessory dwelling unit and junior accessory dwelling unit construction. In addition to website and printed promotional materials, the program should include the following components:

- Utilize pre-approved plans that have already gone through the City’s building plan check process, and which meet the City’s guidelines for architectural design, to save time and money for applicants.
- Consider adoption of a program to financially assist low-income property owners in the development of junior attached accessory dwelling units through a low-interest or forgivable loan in exchange for continued affordability. A pilot program would be started while ongoing funding is identified and pursued.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>2022</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.3:** Annually monitor the effectiveness of the City’s strategy for facilitating accessory dwelling unit and junior accessory dwelling unit construction, including conversion of pool houses and other accessory structures. If the City is not meeting its fair share objectives for ADUs by 2024, consider the following actions to enhance the program effectiveness:

- Adopt reduced fees or fee waivers for ADU and JADU permits;
- Adopt a penalty relief program to allow conversion of unpermitted, existing, accessory structures into accessory dwelling units without penalty, provided that all other applicable Code requirements are met.
- Increase efforts to promote ADU development, including joint promotions on a subregional level; and
- Develop alternative strategies, within one year, as appropriate to accommodate the City’s RHNA obligations.

<i><b>Timeline:</b></i>	<i><b>Responsibility:</b></i>	<i><b>Funding:</b></i>
<i>Review &amp; adopt any needed changes or alternative strategies by end of 2024; then monitor effectiveness annually.</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.4:** Distribute information on accessory dwelling units and the required development standards with the goal of achieving an average of twenty-five to thirty units annually for a total of 221 accessory dwelling units over the eight-year planning period, through new construction (attached or detached) or from conversion of residential accessory structures. Information and/or links about accessory dwelling units, their costs, financing, tax implications, and return on investment will be posted on the City website, available at public counters, and published in the City newsletter.

<i><b>Timeline:</b></i>	<i><b>Responsibility:</b></i>	<i><b>Funding:</b></i>
<i>2022 then ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.5:** Adopt objective design and development standards for residential and live-work developments.

<i><b>Timeline:</b></i>	<i><b>Responsibility:</b></i>	<i><b>Funding:</b></i>
<i>2022</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.6:** Within three years from the date of adoption of the Housing Element, evaluate the City Code as it relates to residential and live-work development in the C-1 Zone. Consideration shall be given to the following changes:

- Minimum lot size per residential unit;
- Establish a maximum size for residential units;
- Establish limits for the percentage of total project square feet that may be in residential use;
- Allow these developments by-right if at least 20% of project units are provided as affordable to low-income households and design & development standards are met. Waivers and incentives under GC 65915 would continue to be available to qualifying density bonus projects without invoking the need for a use permit.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Not later than October 15, 2024</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.7:** Consider adoption of a housing overlay zone that would allow either the underlying land use; multifamily housing at a density of 16 to 24 units per acre; or both. Once adopted into the Code, the overlay would proactively be applied to designated sites by the City within 3 years from the date of adoption of the Housing Element. The housing overlay zone could also apply to public and quasi-public uses in addition to commercial uses.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Not later than October 15, 2024</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.8:** Within three years from the date of adoption of the Housing Element, update the City Code and Zoning Maps to allow “missing middle” residential uses within designated single-family residential neighborhoods. The single-family areas for potential consideration for this Program include areas identified in Figure 17. This Program is intended to add realistic capacity for a minimum of 250 new “missing middle” housing units suitable for households with very low to middle incomes, subject to adopted design and development standards. Missing Middle projects containing four or more units would be subject to Use Permit.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Program: Not later than October 15, 2024</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.9:** Adopt an implementing ordinance to address the recent changes made to the state’s density bonus law. Consider adopting an additional City density bonus program that is at least as permissive as the state program, but that better encourages and rewards projects that meet the City’s demonstrated housing needs such as for seniors and for moderate-income households.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>2023</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.10:** Continue community outreach and education regarding the development process. Consider holding an annual “open house” at the planning and building department to introduce members of the public to personnel and procedures so that the development process is less daunting.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budgets</i>

**Program 1.11:** Within three years from the date of adoption of the Housing Element, rezone adequate sites to facilitate development of housing affordable to lower- and moderate- income households. Total sites in inventory should accommodate more than the RHNA shortfall to maintain an adequate inventory throughout the planning period.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Not later than October 15, 2024</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.12:** The Enhanced Affordability Overlay would be placed on all C-1 parcels in the 800 and a portion of 900 blocks along Huntington Drive. The Overlay would allow any of the C-1 land uses or would allow housing projects at a density of 20 units per acre when at least 50% of project units are available to low- and moderate- income households in the same proportions as the City's low- and moderate- income RHNA. For the 6th cycle, those minimum affordability proportions are as set below; a deeper level of affordability may be provided. The remaining units may be market-rate or affordable, at the developer's option.

- 25% very low income
- 13% low income
- 12% moderate income.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Goes into effect automatically if rezone is not accomplished by October 15, 2024</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>



**Program 1.13:** 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 indicates that sufficient sites may not exist to accommodate the City’s remaining RHNA, by income level, for the planning period.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Create list by 2024; consider adding sites from this list to inventory on an annual basis</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 1.14:** Provide information about the Mortgage Credit Certificate Program and other programs for first-time homebuyers administered by the Los Angeles County Community Development Commission. Provide links to this information from the City’s website. Encourage local lenders to become approved under these programs. Consider use of the Housing Land Trust model to provide additional first-time homebuyer opportunities for San Marino residents under a local program.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>2022 and ongoing</i>	<i>Community Development Department; Administration; LACCDC</i>	<i>Departmental Budgets</i>

**Program 1.15:** Ensure compliance with the Surplus Land Act and undertake the following measures prior to offering Stoneman or any other City-owned lands for sale, in compliance with the State Department of Housing and Community Development’s Surplus Land Act Guidelines (“Guidelines”):

- City Council will make formal findings declaring the land as surplus;
- City will provide notices of availability of surplus land for lease or purchase to local public entities and designated housing sponsors, receive any notices of interest from entities desiring to purchase or lease the surplus land, and shall negotiate with those entities in good faith, provide HCD with descriptions of the notices of availability sent, and of any negotiations conducted, and shall forward to HCD a copy of any restrictions to be recorded against the surplus land as described in Government Code Section 54230 and in the form prescribed by HCD in the Guidelines; and
- City shall report annually information about all locally owned surplus land sites in accordance with the APR (Annual Progress Report) instructions.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; City Attorney</i>	<i>General Fund</i>

**GOAL 2: Maintain the existing housing stock.**

**Policies:**

**Policy 2.1:** Ensure that currently sound housing is maintained through code enforcement activities and nuisance abatement procedures.

**Policy 2.2:** Pursue housing programs offered by the State and Federal governments to provide monetary assistance to lower and moderate-income households (including extremely low-income households and special needs households) for maintenance of their homes.

**Policy 2.3:** Improve conservation of energy and natural resources.

**Policy 2.4:** Ensure that the City’s limited housing stock is not lost to non-residential uses.

**Implementing Programs:**

**Program 2.1:** Maintain code enforcement activities to ensure building safety and integrity of neighborhoods.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Code Enforcement</i>	<i>Departmental Budget</i>

**Program 2.2:** Continue to implement the “abatement of nuisance” ordinance which seeks to ensure the continued maintenance and good appearance of the City’s residential structures and neighborhoods.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; Code Enforcement</i>	<i>Departmental Budgets</i>

**Program 2.3:** Continue to implement the Community Development Block Grant (CDBG) program that offers assistance to income-qualified households for home repairs. Target limited resources to extremely low-income households and persons with disabilities (including developmental disabilities). Annually pursue

other State and Federal programs that offer funding and other incentives for housing rehabilitation, energy efficiency improvements, and affordable housing development. Continue to make information available on the City’s website about the assistance available for home repairs for income-qualified households.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; Administration; LACCDC</i>	<i>Departmental Budget; CDBG</i>

**Program 2.4:** Gather and distribute information to homeowners on the use of rebates and incentives for making their homes more energy efficient. Provide links to related information and applications on the City’s website.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 2.5:** Continue to encourage seismic retrofitting.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 2.6:** Consider adopting the conservation measures in the Energy Action Plan where appropriate for San Marino and not duplicative of Building Code requirements.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>2026</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 2.7:** Explore use of the housing land trust model to enable the City to purchase less-expensive homes when they go on the market, for resale at the cost of the home only (land leased through land trust) to first-time homebuyers.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>

<i>By 2024</i>	<i>Community Development Department; LACCDC; Administration</i>	<i>Departmental Budget</i>
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**Program 2.8:** Explore the nature of the prolonged home vacancies within the City. If appropriate, consider adoption of an annual “vacancy tax” on vacant homes that are being held for investment purposes and not used for housing. Proceeds from this tax would be used to support housing programs that assist the City in meeting its identified housing needs, including its regional needs.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department, Administration</i>	<i>Departmental Budgets</i>

**Responsible Agencies:** San Marino Community Development Department, Administration (Code Enforcement and CDBG), Policy Department (Code Enforcement)

**Funding Sources:** Departmental budget and CDBG funds

**GOAL 3: Ensure the accessibility to housing for all segments of society.**

**Policies:**

**Policy 3.1:** Promote equal housing opportunity for all economic, racial, and social groups currently residing in the City.

**Policy 3.2:** Promote housing that meets the special needs of elderly and disabled, including those with developmental disabilities. Encourage universal design in all new and remodeled homes.

**Policy 3.3:** Allow for housing opportunities for the homeless and special needs populations.

**Implementing Programs:**

**Program 3.1:** Continue implementation of the reasonable accommodation ordinance and allow for exceptions to the zoning code when necessary to provide an equal opportunity for housing. Monitor the effectiveness of this ordinance; identify

and address any constraints to accommodating the housing needs of persons with disabilities.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; LACCDC</i>	<i>Departmental Budget</i>

**Program 3.2:** Work with the fair housing service providers to ensure that procedures are in place if a complaint of housing discrimination is made. Continue to update the City’s website with fair housing resources, including a link to the fair housing service provider’s website. Annually contact the fair housing service provider to obtain updated contact information for questions and referrals.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; LACCDC</i>	<i>Departmental Budget</i>

**Program 3.3:** Distribute information at City counters and other community locations regarding housing discrimination and what to do if it occurs. Utilize flyers sent out with utility bills or City newsletters to ensure that fair housing information is broadly available. Encourage landlords to provide fair housing handbooks to all new tenants and real estate offices and lending institutions to display and provide information about discrimination in sales and landing practices.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 3.4:** Consider amending the Zoning Code to address the provision of single-room occupancy housing as a conditionally permitted use in the C-1 Zone.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>2022 (within 1 year of Housing Element adoption)</i>	<i>Community Development Department</i>	<i>Departmental Budget</i>

**Program 3.5:** Consider adoption of a Universal Design program that encourages but does not require that new and remodeled homes meet the basic tenets of Universal Design (stepless entry, ground floor living, environmental controls at accessible heights). Produce and distribute information about Universal Design.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; LACCDC</i>	<i>Departmental Budget</i>

**Program 3.6:** Encourage the use of accessory dwelling units and junior accessory dwelling units for seniors and for persons with disabilities, including persons with developmental disabilities. Pre-approved plans for ADUs and JADUs should incorporate the basic tenets of Universal Design, and promotional literature should include information about requesting reasonable accommodations under the Fair Housing Act.

<i>Timeline:</i>	<i>Responsibility:</i>	<i>Funding:</i>
<i>Ongoing</i>	<i>Community Development Department; LACCDC</i>	<i>Departmental Budget; CDBG</i>

## 2.1 QUANTIFIED OBJECTIVES

The following table summarizes the City’s quantified objectives for the 2021-2029 planning period.

**Table 5: Quantified Objectives by Income Group**

<b>Extremely Low</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
<b>75</b>	<b>74</b>	<b>91</b>	<b>91</b>	<b>66</b>	<b>397</b>

The different unit types and programs that will be utilized to meet the Quantified Objectives are discussed below.

### 2.2.1 New Construction

#### *Accessory Dwelling Units*

Achieve construction of 221 Accessory Dwelling Units at the rate 40 units/year in the first year; 30 units in the second year; and 25 units/year for the rest of the planning period (until 2029). These figures are based on the substantial increase in inquiries and applications received, and in permits issued for accessory dwelling units following the City’s adoption of an updated Accessory Dwelling Unit ordinance removing the minimum parcel size, which had previously been 12,000 square feet and prohibited ADUs on more than half of the City’s residential parcels. The new ordinance without the minimum parcel size went into effect in early 2020 and since the new ordinance has been in effect, the City has received more ADU applications. The City approved a

total of 37 ADUs in 2020, and is on track to achieve similar numbers in 2021.. With the new programs put into place by the 2021 Housing Element to encourage and facilitate the provision of additional accessory dwelling units, the City expects a large number of permits during the first year and that permit applications will decrease over the next seven years.

#### *Junior Accessory Dwelling Units*

Achieve construction of 20 Junior Accessory Dwelling Units over the next 8 years. The City will promote the construction of Junior Accessory Dwelling Units as the least expensive method to provide housing units for very low and extremely low-income households, including seniors who wish to live near their families but in an independent living space. The City has approved one JADU to date and expects to approve three to four units per year once the programs outlined in the 2021 Housing Element have been put into place.

#### *Additional New Construction – Vacant Sites*

Achieve construction of one additional above-moderate residential unit on the City's one remaining vacant residential lot.

### **2.2.2 RHNA Shortfall**

Under existing zoning, the City does not have adequate sites to fulfill its regional housing need allocation (RHNA). Actions to address the shortfall of approximately 150 units will include changes to the zoning code; a program to allow duplexes and triplexes in single-family zones; the rezoning of sites to multifamily, 20 units per acre; rezoning to add the Housing Overlay with densities of 16-24 units per acre; potential addition of an Enhanced Affordability Overlay; and the potential redevelopment of a City-owned parcel (see **Section 3**). Through the rezonings and other programs in the 2021 Housing Element, the City will ensure adequate sites zoned at appropriate densities to address its RHNA shortfall.

#### *Rehabilitation*

Two of San Marino's identified housing needs are supporting an aging housing stock and helping low-income senior who own their homes. The City will rehabilitate 10 homes belonging to low-income (up to 80 percent AMI) families or seniors over the planning period using CDBG (Community Development Block Grant) money and other sources as available. The City expects to rehabilitate one to two homes per year, for a total of 10 units over the next 8 years.

#### *Conservation*

There are no affordable units in the City that are at risk of being converted to above-moderate units. There are currently no restricted affordable or multi-family units to conserve.



# SECTION III: HOUSING SITES

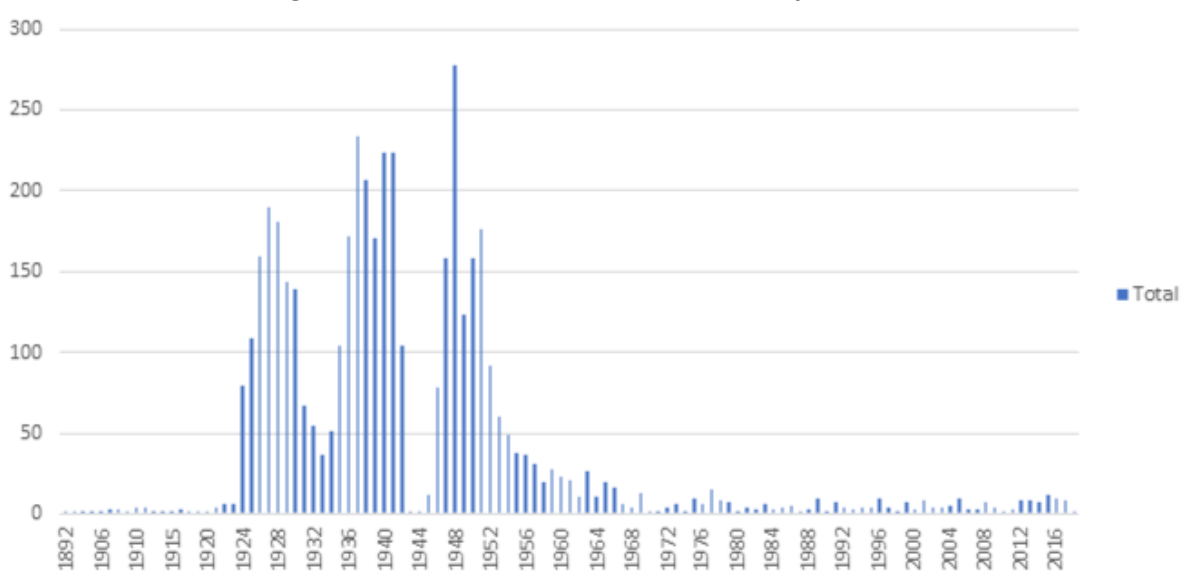
## 3.1 CONTEXT

Assembly Bill 1397 has added additional requirements for the adequacy of inventoried housing sites, including non-vacant sites and sites that were identified in previous elements. This severely limits the sites available to use in the City of San Marino, which is fully built-out with no vacant sites that can meet the new inventory requirements. San Marino cannot demonstrate adequate sites to meet its RHNA under the current zoning, and rezoning programs will be required as described below and in **Section 2**.

According to HCD’s Housing Element Sites Inventory Guidebook, there are unusual circumstances where “local governments with limited vacant land resources or with infill and reuse goals may rely on the potential for new residential development on nonvacant sites.” In accordance with Government Code Section 65583.2(g)(1) and the Guidebook, this Section will describe the nonvacant sites to be considered in the rezoning programs and estimate a realistic development potential.

The City’s lack of vacant parcels and subdivision potential has impeded development since the 1970s. Only 11 percent of the current housing units in San Marino were built in 1970 or after, and the biggest periods of housing growth occurred from 1923 until around 1952, when residential development began experiencing a steady decline (Figure 8). Since 1980, the rate of residential development with the City has remained low at only 214 units since 1980. *(Source: Assessor Parcel Open Data; City of San Marino staff).*

**Figure 8: Residential Units in San Marino, by Year Built**



*Source: County of Los Angeles Assessor Parcel Data 2019*

### 3.2 DEVELOPMENT CAPACITY ASSUMPTIONS

Development capacity for sites in inventory is not a simple calculation of site area times density. Capacities must be adjusted to reflect the realistic potential for development and must consider the impact of environmental considerations as well as development controls like setbacks, parking requirements and height limitations.

San Marino is fully built out and mostly level; there are no special status species or habitats and no significant environmental features that would affect development potential. Utilities and infrastructure such as streets and sidewalks are existing and are not required to be provided by new development. Requirements for on-site parking can be met with tuck-under parking and structures; because land values are so high in San Marino, this type of construction is used to provide sufficient parking to larger projects (see Figure 9 and Figure 10, below).

**Figure 9: Underground parking entrance for EastWest Building, 2090 Huntington Dr**



**Figure 10: Parking for Wells Fargo Building, 2375 Huntington Dr**

It is not possible to use existing densities within San Marino to estimate site capacities, as San Marino has not allowed multi-family housing development until this 6<sup>th</sup> cycle Housing Element. Because higher-density projects do not yet exist within the city limits, the development densities achieved in adjacent jurisdictions and within the region are used to estimate the densities and development types that builders are pursuing in the local area. For example, the surrounding jurisdictions of Pasadena, South Pasadena and the San Pasqual CDP typically achieve overall densities of more than twice of the development pattern that currently exists within San Marino. In adjacent Pasadena, residential development achieves medium densities of between 16 and 30 units per acre, with the highest density projects achieving more than 40 units per acre with similar lot coverage and height limits as those under consideration in San Marino's new design standards for multi-family projects.

Unless otherwise noted below, development assumptions used to calculate realistic capacities consider the following:

Assumptions for largely unbuilt sites rezoned to default density. For largely unbuilt sites such as those with underutilized parking lots, development capacity of 85 percent of gross is assumed. This calculation assumes 2 floors with a half-floor of tuck under parking, similar to the construction types shown in Figure 9 and Figure 10 above. Sites using these development assumptions include the underdeveloped sites pictured in Figure 11 and Figure 12:



Figure 11: Sites from 810 to 900 Huntington Dr



Figure 12: Sites at Huntington Dr and S San Gabriel Blvd



Assumptions for developed sites rezoned to default density. Listed sites that are already developed with a single-storied structure have had individual calculations made depending on each site's size, physical characteristics, and existing structures. Where the City has been approached by property owners and managers to develop housing on their properties, the densities set are as envisioned by the developer. In some cases where existing structures are old and falling into disrepair, assumptions are made that a complete rebuild will occur, but in other cases the assumption is made that an additional story of residential can be developed above the existing commercial use. The 2016 San Marino Security Building project demonstrates that the market supports this; the existing one-storied office building was expanded, and a second floor added to accommodate workforce housing (see Figure 13, below).

**Figure 13: San Marino Security Building and Mixed Occupancy Development, 2405 Huntington Dr**



Assumptions for nonvacant sites rezoned to add the Housing Overlay. The Housing Overlay Zone is unique in that it simply adds another allowed use – residential development of 16 to 24 units per acre – to the underlying commercial, public, or institutional use. While the housing could be constructed in place of the existing land use, the assumption is made that the existing land uses will remain in place and only the underutilized portion of the site would be used to provide housing, at an average density of 20 units per acre.

Assumptions for nonvacant sites rezoned to add the Enhanced Affordability Overlay. The Enhanced Affordability Overlay Zone would be applicable to C-1 parcels on the 800 and a portion of the 900 blocks of Huntington Drive, adjacent to bus stops and walkable to daily services. Parcels along these lots generally consist of one-story underutilized buildings and lots. The Enhanced Affordability Overlay will allow densities of 20 units per acre, as long as minimum affordability requirements are met. This Overlay utilized the same development capacity assumptions as discussed above for parcels rezoned to default density of 20 units per acre, which would provide a realistic capacity of 25 units within the Enhanced Affordability Overlay Zone.

Overall, the City has taken a conservative approach when calculating realistic development capacities, as shown in Table 16: Available Sites for Housing After Rezoning Programs\*. With a total capacity of about 5,000 new units, the calculated realistic development capacity, including ADUs and JADUs is set at less than 600 units.

### 3.3 REALISTIC CAPACITY OF SITES ZONED FOR HOUSING

The City currently allows only single-family dwellings on lots zoned for housing. All residential properties are categorized into eight Area Districts allowing various densities through minimum lot size requirements; these range from 1-4 units per acre to 2-6 units per acre. Each residentially zoned parcel only allows one residence, one ADU, and one JADU under existing zoning. Because not all housing types are currently allowed, rezoning will be necessary to accommodate the regional housing need as well as to enable the development of all types of housing.

The one vacant residentially zoned site available in the City has a realistic capacity of one above-moderate income unit; a building permit has been issued. The non-vacant City-owned Stoneman property could have capacity for 11 residential units were it to be subdivided into 11 lots; however, this is not a realistic capacity because the City does not intend to subdivide the property in this manner, and instead intends either split and surplus a portion of the property consistent with the Surplus Lands Act, or to find a non-profit developer through the RFP process. While both properties could also accommodate an ADU and a JADU, those types are summarized below and are not included here. Table 6 summarizes the realistic capacity for residentially zoned sites:

**Table 6: Realistic Development Capacity for Residentially Zoned Sites**

<b>Realistic Capacity of Vacant Sites Zoned for Housing</b>						
<b>APN/ Address</b>	<b>Size</b>	<b>Zoning/ General Plan</b>	<b>Allowable Density</b>	<b>Realistic Capacity</b>	<b>Infrastructure Capacity</b>	<b>Income Group</b>
5323-016-030/ Winthrop Rd	0.12 acres	Low Density Residential/ R-1 District	4 units/ acre; 1 unit per parcel	1	Yes	Above Moderate
<b>Realistic Capacity of Non-Vacant Sites Zoned for Housing</b>						
5323-008-900/ 1570 Pasqualito Dr. (Stoneman property)	2.86 acres	Low Density Residential/ R-1 District	4 units/ acre; 1 unit per parcel	1	Yes	Above Moderate



Total Realistic Development Capacity for Residentially Zoned Sites						
Total	2.98 acres			2	Yes	Above Moderate

### 3.3.1 ADUs

The new ADU and JADU laws that became effective January 1, 2020 require ministerial approval of ADUs meeting certain requirements. Because this law required the City of San Marino to remove its minimum parcel size and discretionary approval process, the number of parcels qualifying for ADUs has more than doubled and ADU interest and applications have increased exponentially. The City is already averaging more than three ADU applications per month and has approved 37 ADUs during 2020 alone – a year when the global pandemic closed the permitting office for several months. This trend has continued, and the City is on track to achieve similar numbers in 2021.

Given San Marino’s changing demographics and housing needs, and with the new programs in the 2021 Housing Element to encourage and facilitate the provision of more ADUs, the City conservatively estimates that it will issue 40 ADU permits during the first year of the 6th cycle (2021-2022), and that permits will then decrease somewhat for the rest of the planning period, at the rate 40 units/year in the first year; 30 units in the second year; and then about 25 units/year for the remainder of the 6<sup>th</sup> cycle (Table 7). These figures are based on the significant increase in qualifying parcels and in applications received and approved following the City’s adoption of an updated ADU ordinance making permits ministerial and removing the minimum parcel size.

**Table 7: ADUs Anticipated 2022 - 2029**

Year/Years	Number of Units
2022	40
2023	30
2024-2029	151
6th Cycle Total	221

The Southern California Association of Governments (SCAG) has conducted a survey of ADU rents and has issued pre-certified affordability assumptions for ADUs. Application of these affordability assumptions to the expected number of ADUs through the planning period indicates that San Marino can expect 151 ADUs affordable to households making less than 80% of AMI; 4 ADUs affordable to moderate-income households, and 66 Above-moderate ADUs (see Table 8).

**Table 8: Assumed Affordability for 6th Cycle ADUs (SCAG survey)**

Category	Affordability Assumption for Rented ADUs	Affordability Assumption for ADUs (percent of total)
Extremely Low	33	15%



Very Low	19	9%
Low	99	45%
Moderate	4	2%
Above Moderate	66	30%
Total	221	100%*
<i>*Due to rounding, percentages may not always appear to add up to 100%</i>		

### 3.3.2 Junior Accessory Dwelling Units (JADUs)

JADUs have recently been enabled by State law and are now allowed in San Marino. JADUs are small independent living units created within an existing single-family dwelling and can be a maximum of 500 square feet in size. Construction of JADUs can supply housing units for very low- and extremely low-income individuals and small families and are expected to be especially popular in San Marino given its aging population and the prevalence multi-generational households. There has been one JADU approval to date and additional property owners have expressed interest in creating such a unit. Because of the increasing interest in the development of JADUs and a new program to finance and facilitate their construction, the City is projecting the creation of 20 new affordable JADUs during the planning period at the rate of about 3 per year for the first three years of the period, and an additional 14 through 2029 for a total of 20 during the planning period (Table 9). Because JADUs are created out of existing space and are inexpensive to build, and because of the new program to facilitate and finance their construction with a low-interest forgivable loan if rented affordably, the City expects that they will be affordable to very low and extremely low-income households (Table 10).

**Table 9: Expected JADUs per Year**

Year/Years	Number of Units
2022	3
2023	3
2024-2029	14
6th Cycle Total	20

**Table 10: Affordability Assumptions for JADUs**

Category	Expected Number, by Income Group	Affordability Assumption for all ADUs (percent of total)
Extremely Low	10	50%
Very Low	10	50%
Low	0	0%
Moderate	0	0%
Above Moderate	0	0%
Total	20	100%

### 3.4 REALISTIC CAPACITY OF OTHER SITES ALLOWING HOUSING

The below sites were identified in the previous Housing Element and remain ideal candidates for additional moderate- and above-moderate income housing units. They are in commercial areas near jobs and transit, and a CUP is currently required for residential use. Realistic development capacity was calculated at approximately 85% of the allowable densities for each lot, taking into consideration the units achieved in the last mixed-use project approved as well as parking requirements, landscaping requirements, and architectural design standards.

**Table 11: Realistic Capacity of Other Sites Allowing Housing**

APN/ Address	Size	Zoning/ General Plan	Allowable Density	Realistic Capacity	Infrastructure Capacity	Income Group
5335-007-001/ 810 Huntington Dr.	0.27 acres	Commercial/ C-1	8.7 units/ acre	2	Yes	Moderate, Above Moderate
5331-018-005/ 2995 Huntington Dr.	0.29 acres	Commercial/ C-1	8.7 units/ acre	2	Yes	Moderate, Above Moderate
<b>Total Realistic Capacity of Other Sites Allowing Housing</b>						
Total	0.56 acres	Commercial/ C-1	8.7 units/ acre	4	Yes	Moderate, Above Moderate

### 3.5 RHNA SHORTFALL

As noted above, San Marino is fully built out and its sites inventory must utilize non-vacant parcels to accommodate its RHNA. Of the 397 RHNA unit obligation, 247 units can realistically be accommodated with ADUs (221), JADUs (20), residentially zoned sites under current zoning (2), and other sites that allow residential development under current zoning (4). Even if all of these sites were to be developed to their realistic potential, the capacity under current zoning (247 units) leaves a RHNA shortfall of at least 150 units, including 77 units affordable at the very low and extremely low-income levels and 87 units for moderate-income households (see Table 11). These units must be planned for and accommodated by rezoning and zoning code changes within the next three years. **Section 2** includes policies and programs to address the RHNA shortfall, summarized below.

**Table 12: RHNA Shortfall & Potential Surplus After Rezoning and Programs, by Income Group**

	Extremely Low	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
<b>2021-2029 RHNA</b>	<b>75</b>	<b>74</b>	<b>91</b>	<b>91</b>	<b>66</b>	<b>397</b>
Residentially- Zoned Sites	0	0	0	0	2	2

Other Sites (C-1) Allowing Residential uses	0	0	0	0	4	4
ADUs	33	19	99	4	66	221
JADUs	10	10	0	0	0	20
<b>Total Realistic Capacity under Existing Zoning</b>	<b>43</b>	<b>29</b>	<b>99</b>	<b>4</b>	<b>72</b>	<b>247</b>
Sites Surplus or Shortfall (+/-)	-32	-45	+8	-87	+6	-150
Rezone to 20 upa	17	17	10	32	0	76
Stoneman	6	6	0	8	8	28
Housing Overlay	22	26	2	22	9	81
Missing Middle	0	0	0	75	75	150
Total New Units from Rezonings & Programs	45	49	12	145	92	335
<b>RHNA Surplus After Rezoning &amp; Programs*</b>	<b>13</b>	<b>4</b>	<b>20</b>	<b>58</b>	<b>98</b>	<b>185</b>
<i>*Surplus would only be achieved if all identified sites are rezoned                      Note: Enhanced Affordability Overlay Zone will go into effect automatically should rezonings to ensure adequate sites not be accomplished by the statutory deadline</i>						

### 3.5.1 Summary of Rezoning and Code Changes to Address RHNA Shortfall

To accommodate the remaining very-low and extremely-low income RHNA of 77 units, the City will rezone a minimum of five acres to allow at least 20 units per acre as a use by-right if at least 20% of project units are provided as affordable. Each site selected for rezoning for the remaining lower-income RHNA of 77 units will have capacity to accommodate at least 16 units, will be provided with water, sewer, and dry utilities, and will be available for development in the planning period. The sites to be considered for rezoning are included in Table 11 above and in the parcel listing required by HCD and provided electronically. The rezoning will be accomplished by October 15, 2024. Should the rezoning not be accomplished within the three year period, the Enhanced Affordability Overlay (see Program 1.12) will automatically go into effect.

To accommodate the remaining moderate-income RHNA of 87 units, the City will adopt a program allowing duplexes and triplexes within existing single-family homes in the single-family neighborhoods near jobs and transit, where those neighborhoods do not fall within a historic district. Adoption of the program to accommodate moderate-income units will be accomplished by October 15, 2024.

The rezoning and code changes to be considered are summarized below.

*Rezoning:*

- Rezoning 2.03 acres at 415 & 475 Huntington to Multifamily, 20 units per acre (34 units realistic capacity. Realistic capacities assume development at 75% of allowed density);
- Rezoning and subdivision of the City-owned Stoneman property into two parcels, with one 1.2 acre parcel housing the historic Stoneman School building and associated parking; and one parcel of 1.66 acres containing a vacant, non-historic structure and parking area. The 1.66 acre parcel would be made available to an affordable housing developer in compliance with the Surplus Land Act; if the City does not surplus the property, it would make the property available to a non-profit developer under a long-term lease specifying the minimum levels of affordability (28 units realistic capacity);
- Rezoning to apply the Housing Overlay (16-24 units per acre) to multiple sites meeting location criteria for proximity to transit and jobs. Sites to be considered include the 8-acre Southwestern Academy, a 1-acre portion of the Huntington Library site, two sites on church properties, and two sites of over one acre each along Huntington Drive (total of at least 81 units realistic capacity).

*Zoning Code Changes to Increase Allowable Densities & By-Right Uses*

- Zoning Code change to adopt the Housing Overlay zone;
- Zoning Code changes to include multifamily zoning, and to include objective design & development standards for by-right multi-family and live-work projects;
- Zoning Code change to allow multi-family and potentially live work developments by-right if at least 20% are affordable, subject to objective design & development standards; and
- Zoning Code change to allow “missing middle” housing in single-family neighborhoods that are near jobs and transit but that are not within the City-designated very high wildfire hazard area or City-designated historic areas (200 units realistic capacity); and
- Zoning Code change to adopt the Enhanced Affordability Overlay zone to go into effect automatically if the City fails to zone adequate sites for low-income households by October 15, 2024.

Additional Programs are included to facilitate and encourage the provision and ADUs and JADUs, two forms of housing that will best assist the City to meet its identified housing needs for aging and disabled households. In order to address No Net Loss requirements, the City will maintain an administrative list of appropriately-zoned parcels which can be added to the inventory list during the annual APR review if needed to maintain an adequate supply of appropriately-zoned land throughout the planning period.

### 3.6 PROGRAMS & REZONING TO ENSURE ADEQUATE SITES

In compliance with Government Code §65583 (d), the City of San Marino will pursue the rezoning of sites to meet the RHNA shortfall. To comply with the “No Net Loss” law and to ensure that sufficient sites are maintained to accommodate the remaining RHNA throughout the planning

period, the City will adopt Programs and will strive to identify and rezone enough sites to accommodate 120% of its RHNA shortfall. Rezoned sites will allow qualified developments by-right if at least 20% of units are provided as affordable; a Use Permit will be required for above-moderate projects. All new multi-family and live-work projects will be subject to objective design and development standards. The City is committed to identifying and rezoning adequate sites within the first three years of the housing element period through a variety of rezoning programs and other actions, as outlined below.

### 3.6.1 Rezoning to Default Density (Program 1.6)

The initial step is rezoning sites to meet the RHNA is to identify and rezone appropriate sites at a density of 20 units per acre, by-right if the project contains at least 20% affordable and subject to use permit if no affordability is included. While the City will consider a variety of sites to be rezoned to receive this high-density designation and will perform its environmental (CEQA) analysis after all sites have been identified, the sites in Table 13 below are included as having realistic redevelopment potential because of interest previously expressed by developers in building multi-family housing on these sites.

**Table 13: Sites to Consider for Rezone to Default Density of 20 units/acre**

APN/ Address	Size	Zoning/ General Plan	Previous Density	New Density	New Site Capacity	Realistic Site Capacity	Assumed Affordability Level
5323-020-035/ 415 Huntington	1.14 acres	C-1/ Commercial	8.7 upa	20 upa	40 units	34 units	Extremely low and very-low
5323-020-036/ 475 Huntington Dr	0.89 acres						
5335-007-001/ 810 Huntington Dr*	0.27 acres	C-1/ Commercial	8.7 upa	20 upa	14 units	10 units	Low
5335-007-002/ 840 Huntington Dr*	0.34 acres						
5335-007- 003/ 860 Huntington Dr*	0.12 acres						

5335-007-004 thru 006/ 900 Huntington Dr*	0.45 acres	C-1/ Commercial	8.7 upa	20 upa	9 units	7 units	Moderate
5331-018-005/ 2995 Huntington Dr	0.28 acres	R-1/ Community Use	8.7 upa	20 upa	5 units	4 units	Moderate
5332-004-010/ 2920 Huntington Dr	0.56 acres	C-1/ Commercial	8.7 upa	20 upa	11 units	8 units	Moderate
5323-020-024/ 375 Huntington Dr	0.9 acres	R-1/ Commercial	8.7 upa	20 upa	18 units	13 units	Moderate
* The parcels located on the 800 and 900 blocks of Huntington Drive are included in the Enhanced Affordability Overlay Zone and could be developed together or separately.							

### 3.6.2 Stoneman Site – Subdivision, Rezoning, Surplus and RFP Program (Program 1.15)

The City-owned 2.86 acre Stoneman site (Figure 14) has excellent potential for redevelopment. The City could retain the site and enter into a long-term lease with a non-profit housing developer. Alternatively, the City may subdivide the property to place the historic Stoneman school building on a 1.20 acre parcel, with the remaining 1.66 acre parcel declared as surplus and made available to an affordable housing developer consistent with the Surplus Lands Act. The 1.66 acre parcel currently contains the play area and a portion of the parking from the former Stoneman school, as well as a non-historic vacant storage structure. The site is currently zoned for lower density residential use and will be rezoned to another appropriate Planned Community designation that accommodates the development of multi-family housing to serve the local workforce. If an agreement cannot be reached with an affordable housing developer to purchase and develop the property consistent with the Surplus Lands Act, the City will issue an RFP outlining the minimum affordability requirements for the parcel. The selected developer would be responsible for all aspects of site design and development, including conducting environmental review once the full development project has been identified. Table 14 below shows the development potential for the City-owned Stoneman site with a subdivision and rezoning to allow 20 units per acre.



**Figure 14: Stoneman Site and Proposed Subdivision**



**Table 14: Realistic Capacity of Stoneman Site (portion)**

APN/ Address	Size	Zoning/ General Plan	New Allowable Units	Realistic Capacity	Constraints	Income Group
5323-008-900 1570 Pasqualito Dr. "Stoneman" yard	1.66 acres	R-1/Low Density Residential	33 units	28 units	Vacant building, parking, playground	Extremely low, very low, moderate

### 3.6.3 Housing Overlay Program and Rezoning (Program 1.7)

There are a number of sites within the City that are located near jobs or transit and may benefit from rezoning to allow affordable and workforce housing, either instead of or in addition to existing uses. Examples of these sites include Southwestern Academy, to allow construction of housing for teachers as well as the potential for conversion of existing dorm rooms into full units and an approximately two-acre portion of the Huntington site, to allow the development of housing for workers (see Figure 15, below). Additionally, there are two C-1 sites larger than one acre each that were listed in the City's 5<sup>th</sup> cycle housing element and remain excellent candidates for redevelopment due to the age of the structures and ongoing vacancies of the commercial spaces. (see Figure 16, below).

The City will consider a Housing Overlay to apply to these sites and will identify other suitable sites near jobs or transit for consideration of rezoning to apply the Housing Overlay. The Housing Overlay Zone will be adopted into the City's Code and will allow housing projects at a density of 16 to 24 units per acre, by-right if the project includes at least 20% affordable housing and otherwise subject to use permit. All Housing Overlay, live-work or adaptive reuse projects will be subject to objective design and development standards.

**Figure 15: Huntington Site for Housing Overlay**



**Figure 16: All Sites for Housing Overlay**



Identification of all sites to be considered for the Housing Overlay, a full project description, environmental review, and the actual rezoning to apply the Overlay must be accomplished within three years (by October 15, 2024) so that the sites are available to be developed at the listed densities in Table 15 prior to the end of the planning period. Should the rezoning not be completed by the deadline, an additional overlay program (Enhanced Affordability Overlay) that allows a developer to select one or more C-1 sites for housing will automatically go into effect (see Program 1.12).

Table 15: Realistic Development Potential for Selected Sites to be Considered for Housing Overlay

APN/ Address	Size	Current Zoning/ General Plan	New Allowable Unit Range	Realistic Capacity w/ Rezone	Existing Uses or Constraints	Income Group
5323-013-029/ 2800 Monterey Rd (Southwestern Academy)	8.0 acres	R-1/Low Density Residential	128-160 units	8 units	Existing Historic School on large property	Very Low
				10 units		Moderate
Portion of the Huntington Property	2 acres (of 207)	Historic	32-40 units	10 units	Huntington Library & Gardens; workforce housing needed	Extremely low
				10 units		Very low
5332-001-001 through 5332-001-004, 5332-002-009 through 5332-002-010 / 1225 S San Gabriel Blvd	1.18 acres	Commercial / C-1	19-28 units	1 unit	Small shopping center w/vacancies	Low
				9 units		Moderate, Above moderate
5334-016-016 through 5334-016-018 2000-2020/ Huntington Dr.	1.59 acres	Commercial / C-1	25-38 units	1 unit	1 story strip commercial w/large, underutilized parking lot	Low
				9 units		Moderate, Above moderate
5331-018-006/ 2975 Huntington Dr	2.12 acres	Commercial / C-1	34-50 units	3 units	2-story office bldg, long-term vacancy issues;	Moderate
5331-018-004/1155 S San Gabriel Blvd		Community Use/R-1		12 units	Church/Daycare center	Extremely Low

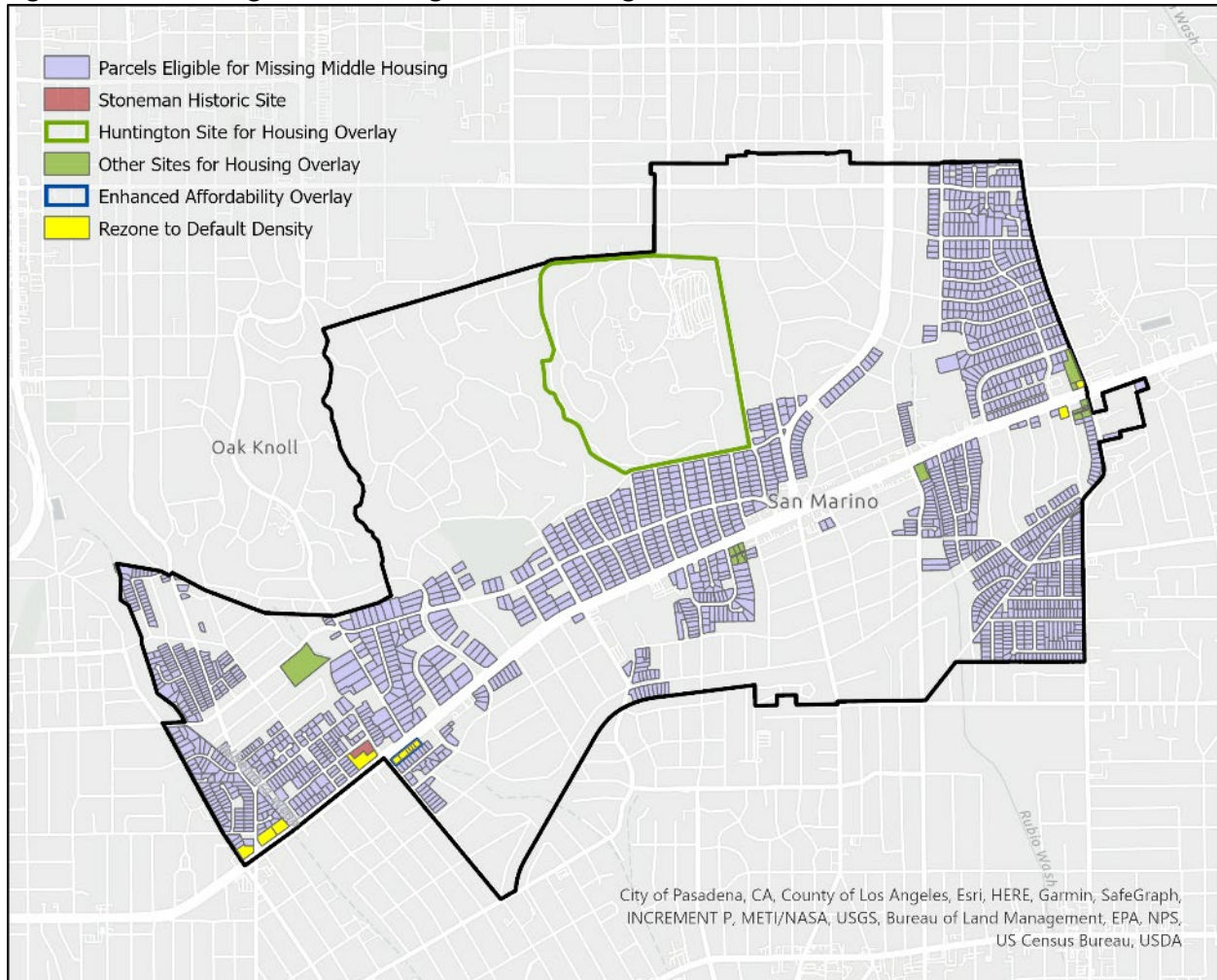


5332-021-007/ 2560 Huntington Dr	1.03	Community Use/ C-1	17-24 units	8 units	2-story church use	Very Low
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### 3.6.4 Program to Allow Missing Middle Housing in R-1 (Program 1.8)

“Missing middle” describes housing forms that are more than single family homes but are less than standard apartments. Examples include duplexes, triplexes, and cottage courts; each are compatible in scale with single-family neighborhoods. This form of housing responds to San Marino’s changing demographics and will provide housing for different generations at more affordable rates. Because any single-family property can already accommodate three dwelling units (the main dwelling, an ADU and a JADU), allowing duplexes and triplexes does not increase allowable densities within single-family neighborhoods. Instead, this flexibility will allow badly needed smaller, more affordable units to be created through interior remodeling of homes to add private living spaces for families and renters without changing a home’s appearance from the street. It may also allow more creative solutions in the form of cottage courts and missing middle developments of four or more units subject to the granting of a use permit.

**Figure 17: Parcels Eligible for Missing Middle Housing**



The City will make Zoning Code change to allow “missing middle” housing to expand San Marino’s housing stock and accommodate those seeking housing between single-family homes and higher-density apartment buildings. Parcels eligible for missing middle housing are those R-1 parcels that are located within 2000 feet of transit stops and jobs, to encourage walking to daily needs and decreasing the need to drive (see Figure 17, above). Parcels within a City-designated historic district or area are not eligible for this program. Using these parameters, there are a total of just under 1,800 single-family parcels that could qualify for missing middle housing. Assuming the development of duplexes and triplexes only, the changes to allow denser development in the R-1 zone have the potential to increase inventory by over 2,000 new infill dwelling units. However, because the Program is new and not yet proven, the City will anticipate the development of only about 7.5% of the total possible units for a total of 150 potential units under this program, including 75 units affordable to moderate-income households and 75 units affordable to above-moderate income households.

### **3.6.5 Program to Adopt Housing Overlay into Zoning Code (Program 1.7)**

As outlined in 3.5.3 above, before the Housing Overlay Zone can be applied to appropriate properties it must first be adopted into the City's Zoning Code. The Housing Overlay Zone will allow a variety of housing types, tenures, and densities to address the City's identified housing needs, including housing for seniors; the local workforce, including teachers, small households, and first-time homebuyers. Allowable densities would range from 16 to 24 units per acre, depending on housing type; multi-family rental housing would be allowed at a density of at least 20 units per acre and projects providing at least 20% of units as affordable would be eligible for both a density bonus and for by-right processing. The Housing Overlay may be placed over any base zoning designation but only to sites located within 2000 feet of jobs, transit, or both.

### **3.6.6 Programs to Promote & Encourage ADUs (Programs 1.1, 1.3, 1.4)**

Through aggressive ADU facilitation and promotion, the City can expect to develop 221 Accessory Dwelling Units (ADUs) over the 8-year planning period, including 40 units in the first year, 30 in the second year, and 25 per year for the balance of the planning period. In accordance with the Southern California Association of Governments (SCAG) survey of affordability levels of ADUs, the City can expect 33 extremely low income, 19 very low income, and 99 low-income units to be built with the adoption of aggressive programs designed to encourage and facilitate construction of ADUs. These programs are detailed in **Section 2**.

### **3.6.7 Program of Low-interest or Forgivable Loans for JADUs (Program 1.2)**

JADUs are the least expensive method to provide housing units for lower income households, including young adults starting out or seniors who wish to live near their families but in an independent living space. Because they are carved out of existing space and do not involve new construction, they can be accommodated in existing neighborhoods without impacting architectural and historic character, two qualities that the San Marino community feels strongly about. They are the least expensive way to produce additional housing units (as low as \$20,000 per unit) and can affirmatively further fair housing because they open up high-income neighborhoods to a very low-income source of housing.

Demographic information and survey data indicate that a significant percentage of San Marino's elderly households are low income, despite owning their own homes. A local low-interest or forgivable loan program can assist lower-income homeowners in constructing these small units in exchange for continued affordability. This would provide affordable units within San Marino's existing single-family neighborhoods. While a permanent source of funding for this program would need to be identified, the City could establish a pilot with limited funding while additional sources are explored.

### **3.6.8 With Rezoning, Housing Sites Adequate to Meet RHNA**

The City is committed to providing adequate sites to meet its regional housing need, while also addressing the City's identified housing needs and affirmatively furthering fair housing. The City will locate and consider a number of housing sites and will rezone appropriate sites before October



2024 to meet its RHNA shortfall, with enough remaining capacity to comply with No Net Loss laws. The wide range of programs adopted or enhanced with the 2021 Housing Element Update will assist the City in meeting its commitment by providing opportunities for all income levels, ages, and abilities throughout San Marino's high opportunity neighborhoods. With the adoption of all of the programs in the 2021 Housing Element, any site in San Marino can be an affordable housing site.

The realistic capacity of sites to be considered for rezoning and the Programs to be developed in the 2021 Housing Element are provided in Table 15, below. Implementation of these programs and rezonings would increase San Marino's housing capacity by over 600 units, exceeding its RHNA shortfall of 150 units and ensuring adequate sites to meet remaining RHNA needs throughout the planning period.

**Table 16: Available Sites for Housing After Rezoning Programs\***

<b>Category or Program</b>	<b>Total Possible Units</b>	<b>Realistic Capacity</b>	<b>Income Group</b>
Sites Currently Zoned for Housing	6	2	Above Moderate
Other Sites that Currently Allow Housing	60	4	Moderate, Above Moderate
Rezoning to Default Density	97	76	Ex. Low-Mod
Stoneman RFP & Rezoning	85	28	Ex. Low-Moderate
Housing Overlay Zone	394	81	Ex. Low-Moderate
Missing Middle	2000	150	75 Moderate 75 Above moderate
Programs to Facilitate ADUs	2,200	221	Ex. Low - Above moderate
Loan Program for JADUs	80	20	Ex. Low-V. Low
Return Vacant Homes to Housing	134	40	Above moderate
1 <sup>st</sup> Time Homebuyers Programs & Housing Land Trust Model	n/a	8	Moderate

Total New Units w/Changes	5,056 units	640 units	Ex. Low – Above moderate
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★ Table 15 reflects maximum potential units and is intended to demonstrate how San Marino could meet its regional housing need through a combination of Rezonings and adoption of the Programs outlined in the Housing Element. It is not intended to commit the City to adopting Programs and Rezonings to allow all units that are reflected above.

### 3.7 INFRASTRUCTURE

This subsection provides information about the availability of services to serve new housing and examines any infrastructure limitations within the City. San Marino is entirely developed and is surrounded by other incorporated communities with similar fully developed properties. As a developed city, San Marino has multiple infrastructure services developed and maintained by multiple agencies. Currently, the City’s infrastructure is in good condition and the agencies providing services have indicated there are no foreseeable issues maintaining service to existing housing or providing service to the additional housing anticipated in the 2021 Housing Element.

#### 3.7.1 Water

The City of San Marino is served with water by California American Water and by sewer from the Los Angeles County Sanitation District (District).

California American Water serves the City of San Marino with the “San Marino System” which also serves portions of neighboring cities of Rosemead, Temple City, San Gabriel, El Monte, Pasadena, and some unincorporated areas of Los Angeles County. The San Marino Water System is primarily supplied by groundwater sources in the Main San Gabriel and Raymond Basins; In 2019, the system supply consisted of 90 percent local well water and 10 percent purchased treated surface water from the Metropolitan Water District of Southern California (Water District). Since both basins have adjudicated groundwater allocations, additional supplies are purchased to meet seasonal and annual demands. The sources for these additional supplies are the Sacramento River Delta and the Colorado River. Drinking water provided by the Water District receives multiple technological treatments including sedimentation, filtration, and disinfection. Groundwater supplies are disinfected with chlorine and surface water supplies are treated with chloramines for bacteriological quality in the distribution system. The District’s technological treatments and practices are evaluated every five years by the State Water Resources Control Board Division of Drinking Water (Water Board). The water sources for the California American Water - San Marino System were assessed in 2003 to evaluate the pattern of pollutant sources and ensure proper decontamination of the water to make it suitable for human consumption. Ongoing monitoring and annual reporting are performed to ensure that tap water is safe to drink and compliant with the U.S. Environmental Protection Agency and the Water Board regulations limiting the quantity of contaminants in public water systems.

### 3.7.2 Sewer

The Sanitation District serves the City of San Marino through their Districts 15 and 16. Conversations with District staff in early 2021 indicate that the District is confident in the ability to serve the projected number of new residences of the City of San Marino. The District has enough capacity and adequate budget to ensure regular monitoring and maintenance and the ongoing provision of quality services to both residential and commercial properties in the City. San Marino is currently utilizing only 25 to 30 percent of its sewer capacity.

### 3.7.3 Other Utilities

San Marino is entirely developed and as such, connections for public utilities such as electricity, gas, telephone, cable, and garbage collection are readily available for future development. The streets are paved and receive regular maintenance by the Parks & Public Works Department. The Department facilitates street sweeping, sidewalk maintenance, streetlight repair, enforcement of the tree and landscape ordinance, coordinating trash and recycling materials collection, and is the point of contact for water and sewage services.

## 3.8 ENVIRONMENTAL CONSIDERATIONS

Because San Marino is built out and has no special status species or habitat, environmental considerations are generally not a constraint to the development of housing with the limited exceptions summarized below and discussed in more detail in **Section 4**.

### 3.8.1 Seismic Hazards

San Marino is located within an area of high seismic activity due to the proximity of the Raymond Hill fault. The greatest potential danger from seismic hazards is the collapse of older residential units constructed from unreinforced masonry, and explosions of petroleum and fuel lines. The City regulates the construction of new habitable structures within seismic hazard zones through required site investigations, setbacks, and construction standards to comply with State law and minimize risks from seismic events.

### 3.8.2 Flooding Hazards

While San Marino faces minimal risk from flood hazards, there are three limited areas that are susceptible to short periods of localized flooding during periods of intense rainfall: Huntington Boulevard near Old Mill Road; Lacy Park; and Huntington Boulevard near San Marino High School. Because there is minimal risk and no history of repeatedly damaged structures due to flooding, there are no additional conditions or requirements imposed on development in these areas that would pose a constraint to development.

### 3.8.3 Fire Hazards

San Marino contains no State-recognize wildfire hazard zones. However, the City has identified their own locally designated wildfire hazard zone in the Northwest area of the City with stricter

requirements, including construction standards and brush clearance, to minimize risk. Past fires have damaged or destroyed structures due to combustible roofing material, wood construction, and lack of defensible space. The City prohibits replacement or installation of new wood roofing and enforces fire safety building practices found within the California Building Code (*Source: San Marino Local Hazard Mitigation Plan, 2019*). Programs to increase densities are not applicable within this area, except as required under State law.

# SECTION IV: TECHNICAL BACKGROUND REPORT

## 4.1 INTRODUCTION

The Technical Background Report (TBR) of the 2021 San Marino Housing Element includes statutorily required data, an analysis of governmental and non-governmental constraints to the provision of housing. As part of the new AB 686 requirements to Affirmatively Further Fair Housing, the TBR also includes a brief history of San Marino's growth and exclusively single-family zoning practices, and an analysis of the economic and ethnic make-up of the City and its neighborhoods. **Section 1** of the Housing Element contains summary information and further analysis where new policies or programs are needed to overcome past exclusionary land use practices and to respond to changing demographics and housing needs.

## 4.2 PRE-CERTIFIED SCAG DATASET

The Southern California Association of Governments (SCAG) has compiled a housing needs data package for each jurisdiction. These housing data packages have been pre-certified by the California Department of Housing and Community Development (HCD) to meet statutory requirements for the quantification of existing and projected housing needs including:

- Identification of population and employment trends;
- Household characteristics (i.e., existing households by tenure, existing extremely low-income households, total, lower and extremely low-income households overpaying, overcrowded households);
- Special needs (i.e., number of persons with disabilities, number of persons with developmental disabilities, elderly households by tenure, large households by tenure and female headed households); and
- Regional Housing Need Allocation (RHNA) by income group, including extremely low-income households.

In order to meet all statutory requirements in Government Code §65583(a) (1 and 2) related to quantification and analysis of existing housing needs, this Technical Background Report also includes locally acquired information and data including but not limited to areas of economic and ethnic segregation, special needs, local knowledge of the housing stock, local housing resources, and an analysis of housing constraints. The San Marino 2020 Pre-Certified Local Housing Data Packet includes the requisite data on farmworkers, persons experiencing homelessness, substandard housing, and units at-risk of conversion to above-moderate uses in the jurisdiction. The packet also includes some analysis of the data; further analysis is provided herein and throughout the Housing Element (*Source: Housing Needs Data Certification Letter from HCD*).

The SCAG Housing Needs Dataset is included in Appendix A of this Section in its entire original form. The remainder of this Technical Background Report contains other data related to local housing programs and resources and housing constraints.

### 4.3 LOCAL HOUSING PROGRAMS & RESOURCES

San Marino is served by the Los Angeles County Development Authority (LACDA), formerly known as the Housing Authority of the County of Los Angeles. The LACDA was formed from a consolidation of the Los Angeles Housing Authority, Community Development Department, and the Redevelopment Agency. The LACDA provides resources for housing assistance, affordable rental housing, first-time homebuyers, home improvements, community development, construction management, economic development, and traffic services. The jurisdiction of the LACDA includes all unincorporated areas of Los Angeles County and the 70 incorporated cities in Los Angeles County that do not have their own public housing agencies. The City of San Marino is within the jurisdiction of the LACDA.

#### 4.3.1 Resources: Housing Assistance Programs

The following programs are primarily Federal- and State-run programs providing funding for construction, rehabilitation, or rental assistance for very low-, low-, and moderate-income households. This section describes programs that may be locally available and potentially applicable within the City.

- **The Section 8 Housing Choice Voucher (HCV Program)** is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Participants may choose any housing that meet the requirements of the program. The LACDA pays a housing subsidy directly to the property owner, and the participant pays the difference between the actual rent charged and the amount subsidized by the program. (*Source: LACDA*) The availability of this program depends on LACDA funding, efforts, and priorities. San Marino rental rates general exceed Fair Market Rents for the program and therefore are not eligible properties.
- **Home Investment Partnerships (HOME)** are grants provided by the U.S. Department of Housing and Urban Development (HUD) to fund a wide variety of projects that implement local housing strategies and create affordable housing for low-income households including building, buying, rehabilitating affordable housing, or providing direct rental assistance (*Source: HUD*). San Marino's existing housing stock and lack of developable land hampers the City's ability to compete for these funds.
- **Section 203(k) funding** provided by HUD facilitates the rehabilitation and repair of single-family residential properties by insuring homeowner loans for purchase or refinancing of properties and can enable homebuyers to purchase homes that need significant repairs. It can also be used for a variety of other improvements, including conversion of properties up to a four-unit structure, enhance accessibility for a disabled person, or elimination of health and safety hazards. Most homes in San Marino are not

eligible for this funding due to the well-maintained condition and high home values of the housing stock (*Source: HUD*).

- **Section 202 funding** provided by HUD finances construction, rehabilitation, or acquisition of structures for supportive housing for VLI elderly persons through interest-free capital advances and rental assistance funds. This funding is only available to private nonprofit organizations and consumer cooperatives and is highly competitive.
- **The Low-Income Housing Tax Credit (LIHTC) Program** provides State and Local agencies the equivalent of approximately \$8 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The California Tax Credit Allocation Committee (TCAC) competitively administers credits to projects based on priorities they set each year. Interested developers may apply for a 9% tax credit (which is often competitive) or a 4% tax credit. The developers who have been awarded the credits sell the credits to investors. This creates cash equity which provides a significant portion of the funds that developers need to build affordable housing. A 9% tax credit raises about 70% of the cost of a development and a 4% credit raises about 30% of the cost of a development. Since the debt needed to develop is lower, a project can offer more affordable rents while still being a financially viable venture. Investors buy these credits as a tax benefit; tax credits are subtracted directly from a taxpayer's liability each year for 10 years. Buildings eligible for the LIHTC must either have 20% of units must rent-restricted and occupied by tenants with incomes no higher than 50% of the Area Median Income (AMI) or 40% of units rent restricted and occupied by tenants with incomes no higher than 60% of AMI.

The Department of Housing and Urban Development (HUD) designates Qualified Census Tracts (QCTs) and Difficult Development Areas (DDAs) that have increased eligibility. QCTs must have 50 percent of households with incomes below 60 percent of the AMI or have a poverty rate of 25 percent or more. DDAs are areas with high land, construction, and utility costs relative to the area median income. There are no QCTs in San Marino. All of San Marino is in a DDA. San Marino is also within a 'Highest Resource' designation which provides an eligibility bonus in applying for this funding; however, even with the tax credit, affordable housing projects in a high-cost area can be very difficult to fund because of the high cost of land. The ability to apply for this program depends on the level of interest from developers, developable sites, constraints imposed by development standards, and the level of competition in the region for LIHTC funding. (*Sources: California Tax Credit Allocation Committee, National Housing Law Project, U.S. Department of Housing and Urban Development*)

- **Preservation Funding** is not currently needed due to the absence of at-risk housing units in the City.
- **The California Self-Help Housing Program (CSHHP)** is a state program that provides technical assistance and funding for the training and supervision of low- and moderate-income self-help homebuilders. Funding is provided through sponsor organizations, either local government agencies or nonprofit corporations.



- **The Section 811 Supportive Housing for Persons with Disabilities Program** is managed by HUD and provides funding through interest-free capital advances, operating subsidies, and/or project rental assistance for eligible projects developing affordable housing for persons with disabilities. This program is highly competitive and requires a nonprofit housing sponsor.
- **The Federal Home Loan Bank Act** establishes an Affordable Housing Program (AHP) within the Federal Housing Finance Agency. AHP funds are granted to financial institutions on behalf of a housing sponsor and may be used to finance the purchase, construction, or rehabilitation of owner-occupied housing for low- or moderate-income households and the purchase, construction, or rehabilitation of rental housing where at least 20 percent of the units are affordable for and occupied by very low-income households. Local development costs may deter local developers from applying for this program.

#### 4.3.2 Resources: Homeless Population

Individuals are considered homeless when they lack fixed and regular nighttime residences. Homeless individuals may be unsheltered, including those living in tents, cars, makeshift shelters, or on the street, or sheltered, including those in emergency shelters or transitional shelters. By the most recent count, the City of San Marino has no homeless residents. Over the past four years, there has occasionally been up to one homeless resident in the City. (*Source: Los Angeles Homeless Services Authority, 2020*)

#### 4.3.3 Resources: Homeless Shelters

Homeless shelters provide temporary shelter for the homeless population. Although the City of San Marino has little to no homeless population, the City does allow emergency shelters by-right within its commercial zone. There are currently no homeless shelters within the San Marino City limits; however, there are shelters available in nearby Pasadena. The closest homeless shelter to San Marino is Union Station Homeless Services, located at 412 S. Raymond Avenue in Pasadena.

#### 4.3.4 Resources: Transitional Housing

Transitional housing provides temporary lodging and is designed to move individuals and families into permanent housing within a specified period of time, no longer than 24 months. The City of San Marino does not currently have any known transitional housing facilities. The closest transitional housing facilities are located in the Euclid Village Condominium complex in nearby Pasadena.

#### 4.3.5 Resources: Supportive Housing

Supportive housing provides shelter and supportive services to homeless persons with a disability or mental illness. The Los Angeles Homeless Services Authority provides Safe Haven (SH) housing as temporary supportive housing for hard-to-reach homeless persons with severe mental illness that have been unwilling or unable to participate in supportive services, as well as Permanent Supportive Housing (PSH) to assist homeless individuals with a disability or families in which one

adult or child has a disability to live independently. The City of San Marino does not currently have any known supportive housing facilities.

#### **4.3.6 At-Risk Assisted Housing Developments.**

In compliance with Government Code §65583(a)(9), this section will report a zero inventory of at-risk units (10 years from the Housing Element due date). The City of San Marino contains no assisted housing developments, and therefore contains no at-risk assisted housing developments.

#### **4.3.7 Planning and Zoning Incentives**

AB 2345 provides developers with density bonuses or other incentives in exchange for the provision of affordable housing which meets certain requirements. As of January 2021, up to a 50% density bonus can be approved for housing projects consisting of a combination of affordable and Above-moderate homes. The legislation also reduces specific thresholds for obtaining approvals and allowances from local jurisdictions, requires density bonus reporting, and reduces parking obligations for many projects qualifying for a density bonus.

### **4.4 HOUSING CONSTRAINTS ANALYSIS**

This section of the Housing Element examines the constraints that could hinder the City's achievement of its housing objectives and the resources that are available to assist in the production, maintenance, and improvement of the City's housing stock.

#### **4.4.1 Non-Governmental Constraints**

In compliance with Government Code §65583(a)(6) the following is an analysis of potential non-governmental constraints:

##### *Vacant Land*

The City's vacant land supply is non-existent. There is one (1) vacant residential lot remaining in the City, and a building permit has been issued for its development with a single-family home. Since the City is built-out and there are no remaining subdividable parcels, subdivision standards do not form a constraint to development. The City's established policies of maintaining excellent design standards and very low densities to maintain community character apply to all new development. With no vacant lots in the City, there is no potential to develop new affordable housing units on vacant land within City limits and all development must take place on non-vacant parcels.

##### *Land Costs*

The cost of land directly influences the cost of housing. In turn, land prices are determined by several factors, most importantly the availability of land. As previously noted, there are no vacant residential parcels in San Marino. Compared to surrounding jurisdictions, as well as the region, land prices in San Marino significantly constrain the production of housing. Table 17 below provides the land cost for a standardized ¼ acre residential lot in San Marino (\$1,673,700)

compared to the highest-cost jurisdictions in Los Angeles County and the immediate area around the City. San Marino consistently ranks among the top 100 most expensive zip codes in the nation; in 2019 it ranked 34<sup>th</sup> most expensive in the annual Price Shark survey. Land costs in San Marino are a significant constraint to the development of housing; this is a factor that is outside of the City's control.

**Table 17: Land Costs in Selected LA County Zip Codes**

City	ZIP Code	Land Value (Per Acre, As-Is)	Land Value (1/4 Acre Lot, Standardized)	Land Share of Property Value	Home Price Appreciation	USA Rank
Santa Monica	90402	\$15,511,600.00	\$3,606,200.00	80.8%	160.7%	#3
Beverly Hills	90210	\$8,560,500.00	\$3,168,300.00	74.1%	160.2%	#4
San Marino	91108	\$5,574,100.00	\$1,673,700.00	69.8%	157.3%	#34

Source: American Enterprise Institute 2019; Property Shark Most Expensive US Zip Codes 2019

### Construction Costs

The cost of construction depends primarily on the cost of materials and labor, but it is also influenced by market demand and market-based changes in the cost of materials. The cost of construction depends on the type of unit being built and on the quality of the product being produced. Labor saving materials and construction techniques are available, but they tend to reduce the quality of the finished product. The type of product largely determines the cost of construction. The cost of labor is based on several factors, including housing demand, the number of contractors in an area and the unionization of workers, but it is generally two to three times the cost of materials.

Construction costs in the Los Angeles area are significantly higher than the state average with costs in San Marino higher still based on the high quality of living and design standards embraced by the community. According to the City's Building Official, construction costs in San Marino are as high as \$331 per square foot. Additionally, recent wildfires in the region have increased the demand for new construction, which in turn has driven up the cost of materials and resulted in a shortage of skilled labor. The construction cost of housing affects the affordability of new housing and is a significant constraint to housing in San Marino that is outside of the City's control.

### Financing

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Government insured loan programs may be available to reduce mortgage down payment requirements.

First time homebuyers are the group affected the most by financing requirements. Mortgage interest rates for new home purchases ranged from 2.3% to 4.5% for a fixed rate 30-year loan in 2021. Lower initial rates are available with other mortgage types. Although rates are currently low, they can change significantly and substantially impact the affordability of the housing stock.

Interest rates at the present time are not a constraint to affordable housing. Financing for both construction and long-term mortgages is generally available in San Marino subject to normal underwriting standards. A more critical obstacle to homeownership involves both the affordability of the housing stock and the ability of potential buyers to fulfill down payment requirements. Typically, conventional home loans will require 5% to 20% of the sale price as a down payment, which is the largest constraint to first time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment required and a potential homeowner's available funds.

According to local realtors, the market continues to experience many all cash offers for homes in San Marino. This makes it difficult for first time home buyers with minimal down payments to compete for a home. Anecdotal information received during the public input process for the Housing Element update indicated that smaller homes were almost always bought by “flippers” for cash with no intent to make it a home. Instead, the houses are enlarged and remodeled, then put back on the market for much higher prices where they sit vacant for months or even years. Vacancy rate data would seem to collaborate this anecdotal information. The City is exploring use of a subregional Housing Land Trust that could help to reduce this constraint.

#### *Community Opposition*

Many California homeowners, including those in San Marino, are resistant to new housing development, especially that of higher density, in their towns. Public input received during the Housing Element Update process identified an environment in which negative citizen input can make it difficult to build anything new or creative within the City, even if all zoning, development, and design guidelines are followed. Many residents are concerned that new development will negatively impact their quality of life by decreasing privacy, safety, property value, public health, or service levels.

A 2014 Housing Element program to consider amending the City's commercial development standards to make it easier to build mixed-use projects was met with significant community opposition and the program was abandoned. As shown by the community opinion surveys, residents have mixed feelings about new housing development in San Marino. While many community members express support for more low-cost housing choices and the introduction of more residential uses in the commercial areas, there are a significant number of community members who feel that all of San Marino's housing needs are being met and that there should be no changes made to the existing physical form of the City. Many respondents to the survey felt that no apartments should be built in San Marino. To help overcome this opposition, objective design and development standards will need to be adopted to provide for the ministerial review of qualified housing projects.

Community resistance can lead to a variety of constraints on housing development. Community members may pressure the Planning Commission and City Council to deny projects, and in some cases may also threaten legal action. This environment increases risk for developers and may discourage them from bringing development proposals to the City. It also means that development proposals, especially multifamily residential development or development at a higher density than currently exists, will likely require more time and resources in the development process to address community concerns. Constraints from community resistance in discretionary decision-making and design review processes make it even more important for the City to adopt objective design and development standards for residential and live-work projects.

#### 4.4.2 Potential Governmental Constraints

Governmental constraints are policies, standards, requirements, or actions imposed by the various levels of government upon land and housing ownership and development. Although federal and state agencies play a role in the imposition of governmental constraints, these agencies are beyond the influence of local government and are therefore not addressed in this document.

##### *General Plan and Zoning Code*

Every city must have a General Plan that establishes policy guidelines for development within the City. The General Plan is the basis for land use decisions in a jurisdiction. The Land Use Element identifies the location, distribution and density of land uses in the City. In implementing the General Plan, the City of San Marino uses Zoning Regulations and the Subdivision Ordinance. General Plan densities are expressed as dwelling units per acre. The San Marino General Plan provides for three residential land use designations in the City, as shown in Table 18.

**Table 18: Residential Land Use Categories**

Designation	Density Range	Description	Acreage	Maximum buildout
Low Density	0 - 2 du/ac	Low-density single family residential uses	585.29	1,170
Medium Density	2.1 - 4 du/ac	Medium-density single family residential uses	1,032.95	4,131
High Density	4.1 - 6 du/ac	High-density single family residential uses	411.04	2,466
TOTAL			Total	7,767
Additional Dwelling Units (ADUs and JADUs)	Not applicable	Permitted by-right on any residentially zoned lot	2,029	5,023 ADUs 5,023 JADUs
Residential Units in C-1 Zone	8.7 du/ac	Residential uses at a density of one residential unit per 5,000 SF of land area, with Conditional Use Permit	36.14	314
<i>Source: City of San Marino, 2021</i>				

Hypothetically, a total of 7,767 dwelling units could be accommodated within the existing City limits, based on build-out of all residentially designated acreage at the maximum of the density range. Because of lot configurations, however, the City is considered built-out at its current 5,023 dwelling units. The amount of single-family housing stock within the City is not expected to increase beyond the stated maximum build-out of the General Plan. Future growth could only be realized through the provision of ADUs, JADUs, and live-work developments unless new programs are developed.

### Density

Density is a critical factor in the development of affordable housing. Maintaining low densities typically increases housing costs per unit, while higher densities lower the per unit land cost and. This situation is amplified in San Marino: the land share of property values is nearly 70 percent and the 2019 standardized value for a quarter-acre lot was \$1,673,700, making San Marino the 3rd most expensive zip code in the SCAG region and the 34th most expensive in the nation (Table 17). San Marino's current highest allowable density is 6.0 dwelling units per acre in residential areas, and about 8.7 units per acre in commercial areas. No multi-family is currently allowed. The City's founding vision of San Marino as a high quality, low density residential community, together with the fact that it was essentially built out by 1970, has helped to drive up the land costs and results in a market cost for housing in the City that is well beyond the reach of median- or moderate-income households. As reflected in the census data, this has resulted in a sharp decrease of population in the 20-40 age brackets because first-time homebuyers cannot afford San Marino. There are currently no residential designations in the City which permit the density of development that will accommodate multi-family housing that might be affordable to Very Low- and Low-income households and rezoning to allow the City's default density of 20 units per acre will be required.

### Zoning

Zoning, which must be consistent with the General Plan, establishes more specific development standards, allowable uses, and limitations. Zoning regulations control development by establishing requirements related to height, density, lot area, yard setbacks, and minimum parking spaces. Site development standards are comparable to other community requirements and ensure a quality living environment for all household groups in the City. Design standards such as roofing materials, architectural enhancements, and landscaping may also increase the costs of housing. The City's perspective is that all housing should meet the same fundamental high quality design standards.

The City of San Marino's Zoning Code currently contains eight residential zone district classifications within the Residential R-1 Zone that accommodate a range of densities and lot size requirements from 60,000 square feet to 9,000 square feet per unit, as shown in Table 19. Additionally, residential units may be allowed in the C-1 Zone with a CUP (Conditional Use Permit) and a requirement for 5,000 square feet of land area per residential unit, resulting in allowable densities of 8.7 units per acre.

**Table 19: Development Standards - City of San Marino**

<b>Zone</b>	<b>Permitted Uses</b>	<b>Minimum Lot Area</b>	<b>Maximum Height</b>	<b>Front Setback</b>	<b>Interior Setback</b>	<b>Rear Setback</b>	<b>Minimum Avg. Width of Lot</b>	<b>Minimum Street Frontage</b>
R1 – IE	Single-family dwellings	60,000	35 ft.	40 ft.	20 ft.	40 ft.	125 ft.	100 ft.
R1- I	Single-family dwellings	30,000	35 ft.	40 ft.	20 ft.	40 ft.	125 ft.	100 ft.
R1 - II	Single-family dwellings	20,000	35 ft.	40 ft.	12 ft.	40 ft.	100 ft.	80 ft.
R1- III	Single-family dwellings	17,000	30 ft.	40 ft.	12 ft.	40 ft.	100 ft.	80 ft.
R1 – IV	Single-family dwellings	15,000	30 ft.	35 ft.	10 ft.	35 ft.	85 ft.	70 ft.
R1 – V	Single-family dwellings	12,000	30 ft.	30 ft.	8 ft.	30 ft.	80 ft.	70 ft.
R1 – VI	Single-family dwellings	10,000	30 ft.	25 ft.	5 ft.	25 ft.	70 ft.	60 ft.
R1 – VII	Single-family dwellings	9,000	30 ft.	25 ft.	5 ft.	25 ft.	60 ft.	60 ft.
C-1	Single-family dwellings with CUP	5,000	30 ft.	25 ft.	8 ft. for single-story buildings 18 ft. for multi-story buildings	20 ft.	-	60 ft.

Source: City of San Marino, 2021

### Parking Requirements

Parking requirements in San Marino are typical for a city of its size and character, as shown in Table 20. The number of parking spaces required for a single-family unit is related to number of bedrooms. These characteristics do not constrain the development of housing directly, although a greater amount of acreage is required for meeting parking requirements as the number of bedrooms increase.

For residential uses within a Commercial Zone, the parking requirements will be determined by the Planning Commission, based upon either the requirements for the most comparable use



specified in the Zoning Code, or upon a special study of parking requirements for that use. The City does have joint use provisions subject to approval of a CUP. The requirements for parking do not directly constrain the development of housing for single-family or live-work uses. As zoning changes are made to allow more residential units in commercial areas and to allow multi-family housing, new parking requirements will need to be adopted consistent with state laws.

**Table 20: Residential Parking Requirements**

Type of Residential Development	Required Parking Spaces <sup>1</sup>	Comments
Single Family Residential		
1 – 4 bedrooms	2 spaces	
5 – 6 bedrooms	3 spaces	
7 and above bedrooms	4 spaces	Plus one space per every 2 additional bedrooms
ADU	1 space <sup>2</sup>	
JADU	None	
Residential Units in the C-1 Zone	Not Specified	To be determined by special parking study or application of requirements for a similar use
<sup>1</sup> All required spaces must be within an enclosed garage; carports are prohibited. <sup>2</sup> Off-street; not subject to enclosed garage requirement <i>Source: City of San Marino, 2021</i>		

### *Density Bonus Law*

In general, this state law provides developers with density bonuses or other incentives in exchange for the provision of affordable housing which meets certain requirements. San Marino does not currently have its own density bonus ordinance and will comply with the provisions of the State Density Bonus law when or if such a project arises. Given that there is no subdividable land and no multi-family housing in San Marino, the City has not yet received an application for a project that would be subject to these laws. The City will review its existing provisions to ensure consistency with the revised density bonus programs under state law.

### *Provisions for a Variety of Housing Types*

San Marino has expanded its opportunities for different types of housing since the previous planning cycle. A table showing the Zone Districts where housing is allowed is include below:

**Table 21: San Marino Zones where Housing is Allowed**

Zone District	Permitted Residential Uses	Residential Uses Subject to Use Permit
C-1	Emergency shelters.	Projects with up to 1 residential unit for each 5,000 SF of lot area.
Historical and Cultural Zone	Housing for employees of on-site uses	Replacement or new residential structure (unless damaged or destroyed by natural disasters)

R-1 zones	Single family homes; accessory dwelling units; junior accessory dwelling units.	None.
<i>Source: City of San Marino, 2021</i>		

*A. Accessory Dwelling Units*

In response to state mandated requirements and local needs, the City of San Marino allows for the development of Accessory Dwelling Units (ADUs). The City strives to ensure the availability of affordable housing for family members, students, and the elderly, among others, while mitigating impacts to traffic, utilities, public health and safety, and preserving the character of residential neighborhoods. ADUs and JADUs are permitted on single family residential lots without discretionary approval. Any application for an ADU that meets the location and development standards contained in City Code Section 23.02.25(G) is approved following a ministerial review for compliance, and within sixty (60) days after submission of a complete application.

The Zoning Code requires:

- The ADU/JADU may be located only on residentially zoned lots;
- One ADU may be constructed on a lot zoned to allow residential use;
- One JADU may be constructed on a lot zoned to allow residential use;
- One JADU and one ADU may be constructed on a single-family residential lot where the JADU and ADU meet the requirements in Government Code Section 65852.2(e);
- For safety purposes, new ADUs and JADUs may only be located on a residential lot that has:
  - At least a 10-foot-wide fire lane within 150 feet of the subject property; and
  - A minimum fire flow of 1,000 gallons per minute.
- This restriction shall not apply to ADUs and JADUs that are exempt from planning review;
- The ADU/JADU shall not be sold separately from the primary residence;
- If the ADU/JADU is rented, it shall not be rented for a period of less than 90 consecutive days;
- Owner-occupancy is required for parcels with a JADU;
- The ADU/JADU shall be restricted to the Livable Area approved at the time of the building permit issuance; and
- The ADU/JADU may not have utility services separate from those of the main residential structure on the same property.

ADU Development Standards:

- ADUs are limited to a maximum of two bedrooms.
- Studio and one-bedroom ADUs shall not exceed 850 square feet of Livable Area.

- Two Bedroom ADUs shall no exceed 1,000 square feet of Livable Area.
- A Detached ADU shall not exceed 1000 square feet of Livable Area and shall not exceed one story or sixteen feet (16') in height.
- An ADU shall include a kitchen for cooking and eating and other permanent provisions for living and sleeping, including a closet or other reasonable storage area.
- Exterior lighting shall be shielded or directed so that it does not glare off-site or illuminate the primary residence or any adjacent property.
- Windows shall be located to avoid direct line of sign to windows of adjacent properties.
- An ADU shall have a separate exterior access and to the greatest extent feasible, shall not be visible from the street.
- Any common wall separating the accessory dwelling unit from the main building shall be soundproofed.
- A permanent foundation shall be required for all ADUs.
- One off-street parking space shall be provided for each ADU except when:
  - The ADU is located within a one-half mile walking distance of Public Transit.
  - The ADU is entirely within a proposed or existing primary dwelling or other existing structure.
  - The ADU is located within an historic district.
- The design of the second unit shall be consistent with that of the main building; and
- The ADU must be served by its own parking space.
- An ADU may not have separate utility services.

JADU Development standards:

- The Owner of a parcel proposed for a JADU shall occupy as a principal residence either the Single-Family Dwelling Unit or the JADU. Owner-occupancy shall not be required if the Owner is another governmental agency, land trust, or housing organization.
- The JADU shall be a minimum of 150 square feet and a maximum of 500 square feet of Livable Area.
- The JADU must be contained entirely within the walls of the existing or proposed Single Family Dwelling Unit.
- The JADU shall include an efficiency kitchen.
- The JADU shall have a separate entry from the main entrance to the Single-Family Dwelling.
- An interior entry to the main living area shall be provided to serv a JADU.
- No additional parking is required for a JADU.

*B. Manufactured Housing*

The City has allowed manufactured, prefabricated, and mobile home construction in its R-1 Zone since 1996. No manufactured housing currently exists in the City. It is subject to the

same development standards as otherwise required for that zone. Certain additional requirements are included in the City Code:

- Minimum Dimensions: Thirty feet (30') (excluding garage).
- Roof: Pressure treated, fire retardant wood shake or shingle, 300# or heavier composition shingle, clay or cement tile, rock, or gravel; shaped, rolled, or reflective roofs are prohibited.
- Eaves: Minimum sixteen-inch (16") eave protection unless otherwise approved by the Commission.
- Exterior Wall Treatment:
  - Permitted Materials: Wood siding, stucco, brick or as approved by the Commission.
  - Color: Natural earth tones, white, with complementary trim color.
  - Prohibited Materials: No reflective, glossy, polished, roll-formed, stamped, extruded, plastic, PVC or similar type of materials shall be used for roofing or siding.
- Foundation Required: All manufactured homes shall be installed on a foundation system, pursuant to section 18551 of the California Health and Safety Code, and no more than ten (10) years shall have elapsed between the date of manufacture of the home and the date of the application for issuance of a permit to install the manufactured home in the City.
- Design Review: Such manufactured homes shall meet all other requirements of this Code and are subject to design review.

#### *C. Emergency Shelters*

In accordance with State Law and as set forth in City Code 23.03.01(I) (1-9), Emergency shelters are permitted in the C-1 Zone. Emergency shelters must comply with the following standards in addition to the development requirements and other requirements generally applicable in the C-1 Zone:

- Maximum number of persons to be served on any given night shall not exceed ten (10).
- A minimum distance of three hundred feet (300') shall be maintained from any other emergency shelter.
- The maximum stay at the facility shall not exceed ninety (90) days in a three hundred and sixty-five (365) day period.
- On site client waiting and intake areas shall be located inside the building.
- A minimum of one manager, in addition to security personnel, shall be on duty and remain on site during intake hours.
- Security personnel shall be provided on site at all times.

- Exterior lighting shall be provided for the entire outdoor area of the site consistent with the provisions of The Code. Exterior lighting shall be stationary and shall be directed away from adjacent properties and public rights of way.
- A minimum of one parking space for every five (5) beds, or one parking space for each bedroom designated for families with children, plus one parking space for each employee/volunteer on duty during the largest shift, shall be maintained.
- Hours of operation for client intake and discharge shall comply with The Code.

#### *D. Transitional Housing and Supportive Housing*

Changes were made to the City Code in 2021 to specify that transitional, supportive, and employee housing types are considered permitted uses in all Districts that allow residential uses, subject only to the same standards as other residential uses in the same District.

#### *E. Residential Care Facility*

Licensed residential care facilities are state licensed facilities maintained and operated to provide non-medical residential care, day treatment, or foster agency services for six or fewer adults, children, or adults and children. State law requires that these facilities be treated as a single housekeeping unit for zoning purposes. Licensed residential care facilities are permitted in the R-1 Zone in accordance with state law. The City currently has at least one residential care facility in the R-1 Zone.

#### *F. SRO (Single Room Occupancy) Housing*

While the City of San Marino does not specifically address this use within the zoning code, the C-1 Commercial Zone allows residential uses with the issuance of a conditional use permit. The Code currently allows one residential unit per 5,000 square feet of land. Market conditions and the relatively small size of C-1 zoned parcels are the likely factors as to why higher density housing has not been pursued in the City.

#### *G. Farmworker Housing/Employee Housing*

Statewide, farmworker housing is of unique concern and importance. While only a small number of SCAG jurisdictions have farmworkers living in them, they are essential to the region's economy and its food supply. According to the United States Department of Agriculture (USDA), more than 80 percent of hired crop farmworkers are not migrant workers but are considered settled and work farm(s) within 75 miles of their residences. This share is up significantly from 41 percent in 1996-1998, reflecting a fundamental change in the nature of the crop farming workforce. The majority of farmworkers in California reside in metropolitan areas, where the average hourly wage of \$16.05 puts them in the extremely-low to very-low income category (between 30-50 percent of the area median income).

According to the United States Department of Agriculture, the average age of the agricultural workforce has risen significantly in the last few years and now stands at 41.6 years. A growing percentage (26.1%) are women. While the median farm size in Los Angeles County is only four acres, there are 25 "large" farms of 500 acres or more that rely on farmworkers (2017 County summary highlights, USDA). Most of the large farms in Los Angeles County are located

in or near the Palmdale-Lancaster area, and not near San Marino. (California Important Farmland: 2016, CA DOC. Lands identified here are indicated as being used for agriculture in the last four years in the Farmlands Mapping and Monitoring Program.) The 2014 – 2018 ACS indicated that no farmworkers live in San Marino, and there is no nearby farmland that would indicate a need for farmworker housing in San Marino. If employee housing were to be proposed under the Employee Housing Act, it would be allowed as a residential use so long as the program was licensed and administered by HCD.

### *Building Codes and Enforcement*

A variety of building and safety codes, while adopted for purposes of preserving public health and safety, and ensuring the construction of safe and decent housing, have the potential to increase the cost of housing construction or maintenance.

The City of San Marino has adopted the California Building Code, 2019 edition, based on the 2018 International Building Code as published by the International Code Council. The Codes are based on regulations necessary to protect the public health, safety, and welfare. The Building Codes and related amendments do not seem to impede the development of housing. Many newer requirements such as fire safety systems and green building requirements had been implemented by residents prior to being required.

Code enforcement is conducted by way of Code Enforcement Officers patrolling the City and investigating complaints received. The main issue that Code Enforcement addresses is construction or remodeling without permits. Very rarely are substandard housing conditions or other health and safety issues identified. The City's older housing stock is very well maintained.

### *Housing for People with Disabilities*

#### *Americans with Disabilities Act*

Americans with Disabilities Act (ADA) provisions include requirements for a minimum percentage of units in new multi-family developments to be fully accessible to the physically disabled. Development of fully accessible units may also increase the overall project costs. Enforcement of ADA requirements is not at the discretion of the City but is mandated under federal law. The provisions of the ADA applicable to residential uses would apply only to multi-family developments and any residential components of a live-work project in a Commercial Zone.

Compliance with building codes and the ADA may increase the cost of housing production. However, these regulations provide minimum standards that must be followed to ensure the development of safe and accessible housing. Therefore, the local enforcement of these codes does not significantly constrain the development of housing.

#### *Accessible Development*

The City has seen an increase in projects such as handicapped accessible bathrooms, elevators, and first floor master suites. These items are treated in the same manner as any other project in terms of fees, permitting, and processing. Residential Care Facilities are also treated in the same

manner as a single-family home. There is no additional hindrance on the development of housing for the disabled. No distance requirements have been adopted.

The City's aging population, which includes residents with disabilities related to vision and mobility, will need to be accommodated within this eight-year planning period. The City should consider adopting a Universal Design program and applying it to new and remodeled dwellings to ensure that residents can age in place and that homes are designed for all stages of life.

#### *Reasonable Accommodation*

The City has also adopted a reasonable accommodation ordinance. Under the ADA, cities must reasonably modify policies when necessary to avoid discrimination because of disability, unless they can show that the modifications "would fundamentally alter the nature of the service, program or activity." (28 Code of Federal Regulations 35.130(b)(7).) In general, the law states that local agencies retain their ability to regulate land uses and to apply neutral, non-discriminatory regulations, but are required to make accommodations to allow persons with disabilities an equal opportunity to use and enjoy housing in the community. The City's reasonable accommodation ordinance establishes a process for considering these types of accommodations and provides findings that must be met for an application to be approved as a reasonable accommodation. This process makes it easier for a resident to obtain approval for an accommodation, such as a wheelchair ramp or front yard parking space, that may not otherwise meet the Code requirements. Two reasonable accommodations have been requested and both have been granted within a reasonable time frame.

The City's Zoning Code defines "family" as "an immediate family related by blood, marriage or adoption, or a group of individuals who are unrelated and live together as a single housekeeping unit in a dwelling unit. This shall not include an individual paying rent to a landlord for the purpose of temporarily residing in a dwelling unit." This definition is inclusive of all types of households and does not serve to constrain housing for persons with disabilities.

#### *Development and Permitting Fees*

Various fees and assessments are charged by the City and other agencies to cover the cost of processing development permits and providing local services. These fees help ensure quality development and the provision of adequate public services. The City is legally required to set permit and development fees in amounts that are no more than equal the cost of providing services associated with these fees. The City recently conducted a comprehensive fee study to ensure the cost of providing the services was consistent with the required fee for those services. San Marino is a largely developed, suburban jurisdiction with most of its necessary infrastructure such as streets, electrical, sewer and water facilities in place. Aside from fees collected to offset public school impacts and General Plan maintenance, the City does not require impact fees to make the necessary land improvements to accommodate development. The City does not maintain a different fee schedule for single family or multi-family units.

Development and permitting fees are not believed to be a constraint to housing development in the City. In fact, based on informal input from local contractors, San Marino has reasonable permit fees that are lower than other surrounding cities. Table 22 displays the San Marino Community



Development Department Fee Schedule. This is a comprehensive list of fees. The City does not charge any development impact fees. School fees are required per State law. Average fees per single-family dwelling are displayed in Table 23; these fees are generally lower than all surrounding jurisdictions.

**Table 22: Community Development Department Fee Schedule**

<b>Item/Permit Type</b>	<b>Base Fee</b>	<b>Basis for Valuation/Square Foot Cost</b>
<b>Planning Fees</b>		
Design Review Committee - Major - Minor	\$865 \$285	N/A
Variance Application Minor Variance Major Variance Creation of 300-foot Radius Ownership List Minor Exception	\$1,260 \$2,450 \$65 \$145	N/A
Conditional Use Permit Application Minor CUP Major CUP Creation of 300-foot Radius Ownership List	\$1,420 \$3,165 \$65	N/A
Subdivisions or Lot-Splits	\$2,175 + \$2,000 deposit	N/A
Rezone or Boundary Change	\$5,000 deposit + hourly costs	N/A
Lot Line Adjustment	\$295 + \$2,000 deposit	N/A
Modification to Variance or Conditional Use Permit	\$955	N/A
Appeals To Planning Commission To City Council	\$805 \$805	N/A
Negative Declaration Fee	\$830	N/A
<b>Inspection Fees</b>		
Residential Compliance Inspection Reports	\$65	N/A
Special Inspections	\$160 each	N/A
Certificate of Use and Occupancy	\$95 each	N/A

Permits, Plan Check, & School Facility Fees		
Building Permit – Dwellings Processing Microfilming	Based on square footage/ valuation of work \$28.70 \$3.00	Type V Wood Frame Additions or Alterations - \$125.00/sq. ft. Basements - \$83/sq. ft. Garages - \$36.00/sq. ft. Patio Covers - \$36.00/sq. ft. Block Walls - \$11.00 - 13.00/sq. ft., depending on height.
Electrical Permit Processing Microfilming Other Fees	\$28.70 \$3.00 Per electrical permit schedule	Per fixture charge
Mechanical Permit Processing Microfilming Other Fees	\$28.70 \$3.00 Per mechanical permit schedule	Per fixture charge
Plumbing Permit Processing Microfilming Other Fees	\$28.70 \$3.00 Per plumbing permit schedule	Per fixture charge
Swimming Pool or Spa Processing Microfilming	\$28.70 \$3.00	Swimming Pool - \$120.00 each Spa - \$60.00 each
Plan Check Fee	Based on valuation of work	N/A
Grading Plan Check Permit	Hourly rate from consultant Based on valuation	N/A
Solar Panel System	\$500	Flat fee (permit and plan check)
School Facility Fees (applies only to increase in square footage of 500 sq. ft. or more)	\$3.79/sq. ft. for projects over 500 sq. ft.	N/A
Education Fee	3% of building permit cost	N/A
General Plan Maintenance Fee	7% of building permit cost	N/A
<i>Source: City of San Marino, 2021</i>		

**Table 23: Average Plan Check and Permit Fees for a New House**

<b>Fee</b>	<b>Average Fees for a New Single-Family House</b>
Plan Check (Building)	\$4,319
Plan Check (Planning)	\$200
Grading (Plan Check and Permit)	\$757.44
Demo	\$191.69
Building Permit	\$4,280.23
Mechanical Permit	\$298.11
Electrical Permit	\$249.46
Plumbing Permit	\$385.44
Fire Sprinkler (Plan Check and Permit)	\$473.25
Fire Alarm (Plan Check and Permit)	\$531.96
School Fees	\$5286.13
<b>TOTAL</b>	<b>\$16,973.26</b>
<i>Source: City of San Marino, 2021</i>	

Compared to new houses, Accessory Dwelling Units have lower development costs because they take advantage of already-existing infrastructure and can also be created within an existing structure. Instead of calculating average costs, a typical one-bedroom ADU of 600 square feet was considered for the fees in Table 24 below. Junior Accessory Dwelling Units (JADUs) have no development or school fees.

**Table 24: Average Plan Check and Permit Fees for Accessory Dwelling Unit**

<b>Fee</b>	<b>Approximate fees for a new ADU</b>
Plan Check (Building)	\$818.75
Plan Check (Planning)	\$200
Building Permit	\$966.56
Mechanical Permit	\$84.50
Electrical Permit	\$47.00
Plumbing Permit	\$89
Fire Sprinkler (Plan Check and Permit)	\$473.25
Fire Alarm (Plan Check and Permit)	\$531.96
School Fees	\$1,920
<b>TOTAL</b>	<b>\$5,131.02</b>
<i>Source: City of San Marino, 2021</i>	

These appear to be reasonable fees given the scope of work for projects in San Marino. Development fees do not seem to impede development in San Marino. The much larger cost involved in developing homes is the high cost of land in San Marino. Because the land cost is removed from the cost of an ADU or JADU on a parcel with an existing home, these housing types have the best potential to be constructed and rented within an affordable range.

### *Local Processing and Permit Procedures*

The City of San Marino's development approval process is designed to accommodate and not hinder development. Other than legally required public hearing notice and environmental review periods, developers and property owners are not hindered by "down time" in application processing. All new homes require Design Review Committee approval, which is a public hearing process. This helps ensure that new homes are compatible with the neighborhood and do not negatively impact the neighbors. The City has Residential and Commercial Design Guidelines which encourage the use of certain design features and materials. The Guidelines are not requirements but assist applicants in designing a project that will move more quickly through the approval process. The Design Review Committee also holds "open forum" sessions where applicants can get informal, preliminary feedback on a design, which will also help facilitate the approval process.

The design review process consists of the applicant filing an application, processing fee (\$865) and one set of plans. Staff then reviews the proposal and responds with a letter indicating any code issues or design concerns that should be addressed. After the applicant addresses the comment letter, they submit eight sets of plans which are distributed to the Design Review Committee for their review. The applicant must also present their plans to their neighbors as part of this process. The Code dictates that the notified neighbors must include two neighbors on each side of the subject property; all properties adjoining the rear of the subject property and one on either side of those properties; and the properties across from the subject property and one on either side of those properties. This usually comprises about 10-12 neighbors depending on how the lots are arranged. This is primarily to make sure neighbors are aware of the proposed project and to give them an opportunity to ask questions or provide comments. Even if all neighbors approve of or object to the project, it would still proceed to the Design Review Committee for their review. Once the eight sets of revised plans are submitted and the neighbor notification process is completed, staff assigns the project to the next available agenda and notices the project for a public hearing. This process typically takes about 8 weeks (about 2 months) in total. Once the project is approved, the applicant could submit for building plan check after the 15-day appeal period has expired (*Source: City of San Marino, 2021*).

The City has adopted Residential Design Guidelines to guide residents as well as review by the DRC (Design Review Committee). The purpose of these design guidelines is to provide a clear and concise summary of the City's design policies for projects within the City's residential neighborhoods. The guidelines address neighborhood compatibility, site development, physical design components, and landscaping.

Certain projects that exceed Code allowances or otherwise require an additional level of review will require either a Variance or Conditional Use Permit (CUP). These applications are heard by the Planning Commission. If the project also requires Design Review, the Planning Commission will review both actions. City staff tries to work with applicants ahead of time to determine the feasibility of their proposed project. Staff tries to guide applicants toward a solution that has the best chances of approval. Depending on the complexity of the project, initial Community Development Department review for new construction requiring Design Review Committee (DRC)

or Planning Commission review averages approximately three to four weeks. Table 25 illustrates the approximate local processing times for developments in San Marino.

**Table 25: Local Development Processing Time**

<b>Item</b>	<b>Approximate Length of Time from Submittal to Public Hearing</b>
Conditional Use Permit	45-90 days
Design Review	30-90 days
Tentative Tract Map/Parcel Map/Subdivision	45-90 days
Variance	45-90 days
Zoning Amendments or Zone Change	45-90 days
General Plan Amendment	45-90 days
Environmental Initial Study	60 days
<i>Source: City of San Marino, 2021</i>	

Table 25 identifies the approximate time from submittal to the initial public hearing. Since projects may require more than one hearing before the Planning Commission or DRC, it is also important to consider the length of time between submittal and approval or denial. For 2021, City staff reviewed the total amount of time it took for a project to go from the initial submittal by the applicant to an approval or denial from the DRC or Planning Commission. Staff found that the average time to process a variance application was 56 days, the average time to process a CUP application was 61 days, and the average time to process a DRC application was 68 days. These time frames include the time that the applicant spends correcting or changing plans at the direction of staff or the approving body, as well as multiple hearings, if necessary.

Once projects have completed the public hearing process, or once staff determines the project does not require a hearing, the applicant may submit for building plan check. The City of San Marino contracts with an outside plan checker for this service. Once the plans are structurally approved, they are reviewed by both the Planning and Fire Departments. Informal conversations with some architects indicate that the City processes plans within a reasonable time frame; however, other architects and some public input has indicated that the time to get a new home approved is extensive even if the design guidelines are followed. Establishing a set of objective design and development standards will be important to overcome any delays and to allow ministerial processing of residential permits where required by law.

### *Historic Preservation*

The City of San Marino is dedicated to preserving its Historical Resources. The City administers its own designation program for historic landmarks within the City. These resources are governed at the local level by Chapter 23.18 of the San Marino Municipal Code. While designated historic properties have additional requirements for development or redevelopment, these do not pose as a significant constraint because there are only eleven designated historic properties identified within the City. However, in the 2020 Citywide Historic Resources Survey Report, field surveyors

identified a total of 286 resources that appear eligible for listing as a City of San Marino Historic Landmark, and several historic districts were named by the City.

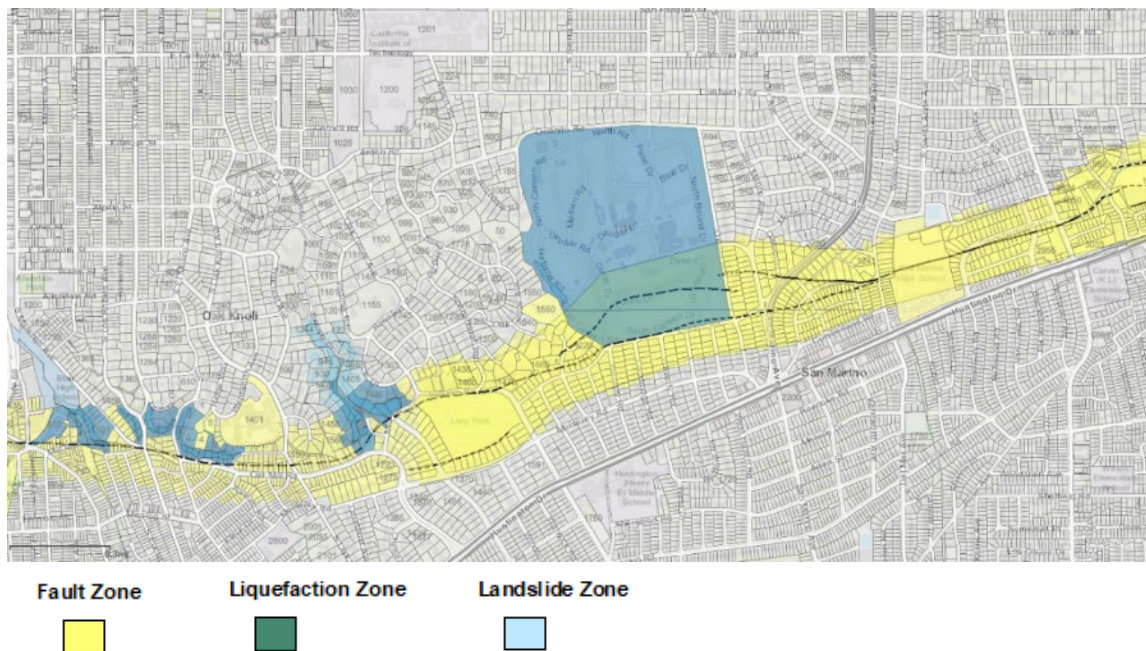
### *Environmental and Infrastructure Constraints*

#### *Environmental Constraints*

Environmental hazards affecting housing units include geologic and seismic conditions that provide the greatest threat to the built environment. The City has identified areas where land development should be carefully controlled. The following hazards may impact future development of residential units in the City:

- Seismic Hazards:** The City regulates the construction of new habitable structures within the identified hazard areas, shown in Figure 18, through the requirement of setbacks and construction standards in accordance with State law. Design and construction requirements related to seismic hazards are based on hazard mapping and Seismic Design Categories. The San Marino Municipal Code provides requirements and regulations for different Seismic Design Categories. These building requirements are likely to increase costs of housing development but are necessary to mitigate risks and minimize loss of life and property associated with these hazards.

**Figure 18: Fault, Liquefaction and Landslide Zones Map**



(Source: CGS Earthquake Zones of Required Investigation Map)

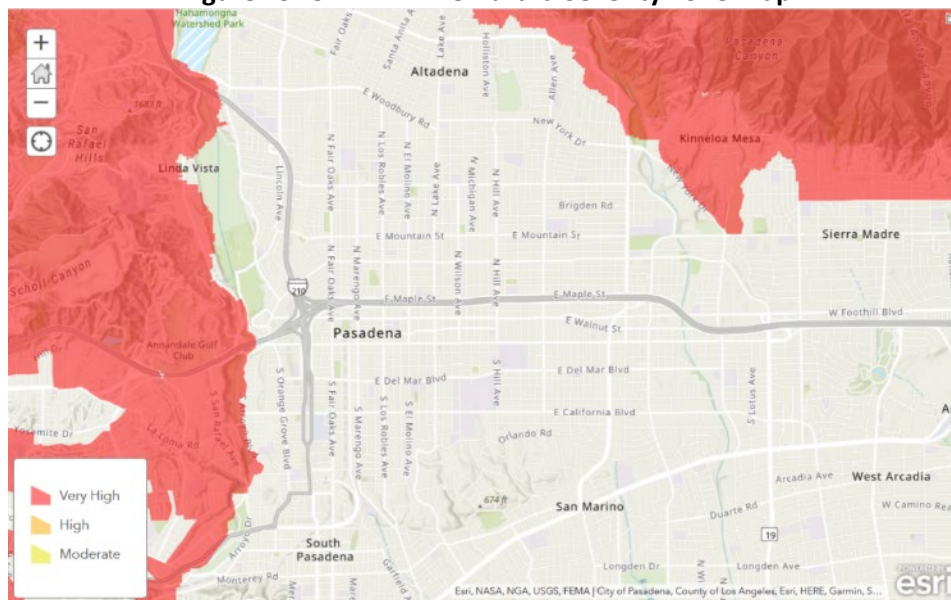
- Flooding:** The City is at minimal risk for flooding; however, three specific flood areas have been identified which are susceptible to localized flooding in an intense storm period.



No major water courses traverse the City. There is no threat of water damage from either a seiche or a tsunami condition.

- **Dust and High Wind Hazards:** This condition results in property damage from high winds, wind tunneling and channeling effects of buildings, soil erosion, and unpleasant living conditions. San Marino has experienced isolated high wind events in the past, prompting the City and homeowners to consider high wind hazards. For example, properly maintained trees are an important factor in reducing property damage during wind events.
- **Toxic and Hazardous Wastes:** In San Marino, air pollution is the main area of concern relative to toxic substances. Major point sources of air pollution come from the variety of industrial uses throughout the region. The primary source, however, is automobile traffic.
- **Fire Hazards:** There are no fire hazard severity zones within San Marino as identified by CAL FIRE. However, the City has established its own locally designated Very High Fire Hazard Severity Zone (VHFHSZ) with more stringent fire-safe building requirements. These requirements affect the Estate Residential zone in the northwest area of the City, shown in Figure 20, which has increased fire risk due to its hilly topography, vegetation, and the presence of wood shake shingle roofs. The City has adopted the 2019 California Fire Code, which addresses requirements for fire sprinklers and fire alarms in residential buildings as well as brush clearance for homes in the locally designated VHFHSZ. These building requirements are likely to increase costs of housing development but are necessary to mitigate risks and minimize loss of life and property associated with these hazards. Furthermore, these hazards should be considered when making changes to residential density in the City, to avoid placing more homes at increased risk due to fire hazards.

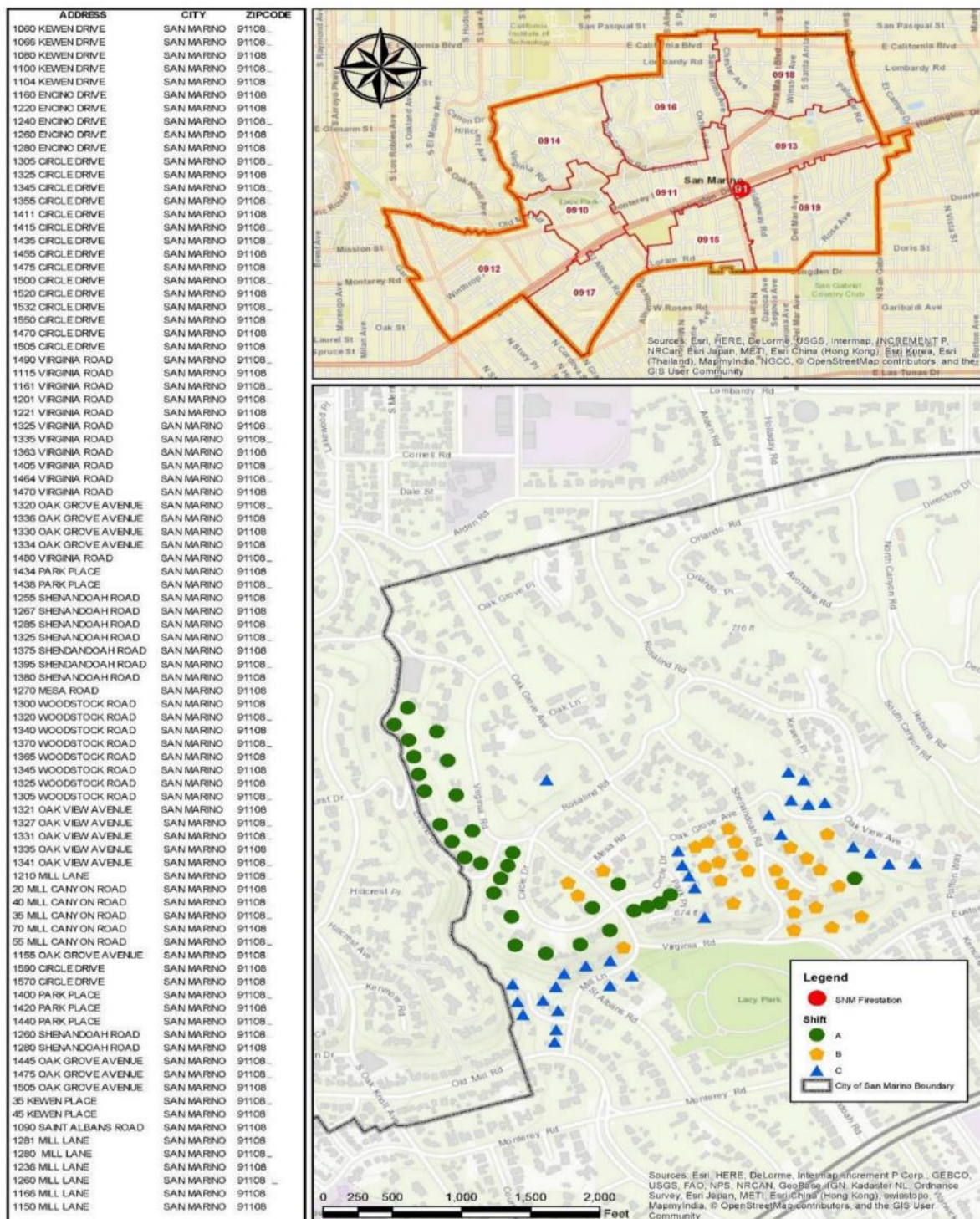
Figure 19: CAL FIRE Fire Hazard Severity Zone Map



Source: CAL FIRE



Figure 20: City of San Marino Enhanced Fire Inspection Zone Map



### San Marino Fire Department Enhanced Fire Zone Inspections



Verdugo Fire GIS, June 2017

*Source: City of San Marino Local Hazard Mitigation Plan, 2019*

- **Noise:** Residential uses are considered a noise-sensitive use rather than a noise-generating use and are the most sensitive to loud noise. The principal noise sources in San Marino generate from local traffic, and noise measurement taken in 2021 indicate that traffic noise levels have not increased over the last ten years. Noise is not considered a significant problem in the City. Title 24 of the California Code of Regulations establishes an interior noise standard of 45 dB(A) as suitable for residential spaces; this can typically be achieved through standard construction methods.

#### *Infrastructure Constraints*

San Marino is a fully developed city and there are very few on or off-site improvements that are required as part of the development of housing. Most housing construction involves the demolition of an existing housing unit and the construction of a replacement unit, meaning all infrastructure is already in place. As part of the building permit process, the City will occasionally require the provision of on-site and off-site improvements necessitated by the development, such as improvements to curbs and gutters, alleys, streets, sidewalks, streetlights, and utility undergrounding. The cost of such improvements may increase the cost of development, which would ultimately be passed through to future tenants or owners. While these costs may not render a project infeasible, they contribute to the range of factors that affect the affordability of a project.

- **Energy:** Compliance with Title 24 of the California Administrative Code on the use of energy efficient appliances and insulation has reduced energy demand stemming from new residential development. Title 24, Part 6, California Energy Efficiency Standards, is a set of requirements for energy conservation, green design, construction maintenance, safety, and accessibility. Title 24 was published by the California Building Standards Code and applies to all buildings in California, not just state-owned buildings and requires all residential construction to meet minimum energy conservation standards through either a prescriptive or performance-based approach. The former approach requires each individual component of a building to meet an identified minimum energy requirement. The performance approach, on the other hand, allows developers to choose a range of measures which, in total, meet specified energy conservation targets. Title 24 regulations and requirements are enforced when an applicant pulls a building permit for a proposed project and have plans reviewed or a building inspected.

In addition to Title 24, all residential projects are required to meet state building codes, which also include energy conservation standards. The California Building Standards Commission adopted the California Building Codes based on model codes produced by various professional organizations.

Promoting energy conservation has become a consistent theme in regulations, green building practices, and general business operations. For San Marino, opportunities flourish to promote energy-efficient practices in the siting, design, construction, and renovation of housing stock. These practices not only respond to regulatory requirements, but also can

generate significant community, environmental, and economic benefits and do not constitute constraints on housing development.

- **Water:** The California America Water Company provides water services for the City of San Marino. Adequate water is available to serve existing and projected residences through 2021 and do not pose a constraint to development. See Section 3.6.1 for additional discussion regarding infrastructure available to support residential development.

## 4.5 FAIR HOUSING ANALYSIS

### 4.5.1 Summary of Fair Housing Issues

Assembly Bill 686 (Affirmatively Furthering Fair Housing, or AFFH) was adopted into law in 2018 and became effective on January 1, 2019. The law requires state and local agencies to take proactive measures to correct any housing inequalities related to race, national origin, color, ancestry, sex, marital status, disability, religion, or other protected characteristics. Agencies must ensure that their laws and programs affirmatively further fair housing, and that they take no actions that do not do so.

Under State law, affirmatively furthering fair housing, or AFFH, means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Agencies must include in their Housing Elements a program that promotes fair housing opportunities for all persons. In the context of a community’s housing needs, AFFH is not just about the *number* of units needed, but also about *where* the units are located and *who* has access to them. AB 686 makes certain requirements for the analysis of fair housing issues; this analysis is contained in **Section 4** along with a history of San Marino and its past practices of allowing only single-family homes.

As HCD guidance for fair housing assessments was released after the first administrative draft of the Housing Element Update was complete, this section of the housing element was updated and distributed separately for stakeholder input and public outreach. At the time of this draft, HCD guidance was to provide analysis in five different subsections: enforcement and outreach capacity, segregation and integration patterns and trends, disparities in access to opportunity, disproportionate housing needs, and areas of concentration in poverty and affluence across racial and ethnic groups. This analysis and the related data are provided in **Section 4** and summarized here.

San Marino is more racially diverse than the average U.S. city. While there is a somewhat greater White population in the northwestern part of the City and a slightly greater Asian population in the southeastern part of the City, there are no areas of ethnic or economic concentration. Median incomes are high and fairly stable throughout the City, as is the racial mix of its citizens. While there are a considerable number of lower-income senior households in San Marino, most (89.2%) own their homes and are not concentrated in any area or neighborhood. It is a well-integrated community, and the entire City is designated as an Area of Opportunity. This designation is based



on the consideration of factors affecting the quality of life and health outcomes including educational enrollment and attainment; employment rates; lack of overcrowding in housing or overpayment for housing costs; transportation costs; and environmental health. However, the City is notably more expensive than the surrounding areas, with median gross rents above \$3000 per month and most mortgages above \$4000 per month. Although median household incomes in San Marino are high compared to the surrounding areas, even moderate- and middle-income households cannot afford a home in San Marino where the median sales price exceeds \$2 million. San Marino currently lacks homes for these households, which include young families and first-time homebuyers, which perpetuates exclusivity and can lead to inequity.

San Marino's rich and varied past spans multiple eras of California history and is associated with cultural and social themes that were definitive in the history of Los Angeles County and Southern California. Since its 1913 incorporation, "the City envisioned itself as a residential enclave for people of means, with zoning that ensured minimal commercial development and no industry or multi-family residences" (*Source: San Marino Historic Resources Survey Report, October 2020*).

To ensure that property valuation would remain high, developers established expensive minimum home building costs, and racially restrictive covenants were incorporated into home deed sales – a practice that was common throughout Southern California and much of the country in the 1920s. These practices, coupled with the formation of the national Homeowner's Loan Corporation (HOLC) in 1933 and passage of the National Housing Act (NHA), established systemic redlining practices throughout the Los Angeles region, including in San Marino, leading to the physical development pattern and single-family feel that is still experienced throughout the City today. Although redlining classifications practices were made illegal by the Fair Housing Act of 1968, single-family zoning is still considered exclusionary as it prohibits the development of the kind of housing that is typically more affordable to lower-income households.

San Marino is almost entirely residential, with its built environment dominated by detached single-family homes constructed primarily between the 1920s and the 1960s. As of 2021, there were no areas zoned for multi-family residences, or for industry/manufacturing. Small areas on Huntington Drive and Mission Street are zoned for commercial use, and the City has recently approved a mixed-use project on a commercial street. While not intending to be exclusionary, San Marino's past prohibition of anything but single-family homes has had the effect of excluding persons who do not have incomes high enough to live in the City. Because poverty occurs most often with person of color, these practices have resulted in the exclusion of protected classes even though they were not intended to.

AB 686 requires that the City adopt programs to overcome and reverse this pattern of exclusion, and to identify locations for affordable housing through the AFFH lens. To do this, programs are included that change the zoning to allow for all types of housing, including the multi-family apartments and duplexes that have previously been banned in the City. Additionally, the location of potential housing sites to meet the City's lower-income RHNA is considered through an equity lens, not only by choosing locations in areas throughout the City but also by including to promote the development of duplexes, ADUs, and affordable JADUs in all the City's exclusive residential neighborhoods. **Section 2** includes the policies and programs to reverse exclusionary zoning and to affirmatively further fair housing; **Section 3** contains the sites location information and maps.

## 4.5.2 Fair Housing Enforcement and Public Outreach

### *Federal and State Regulations and Enforcement*

Federal, state, and local laws make it illegal to discriminate based on a person's protected class. At the federal level, the Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, national origin, familial status, and disability. In California, the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act also make it illegal to discriminate based on marital status, ancestry, sexual orientation, source of income, or any other arbitrary forms of discrimination. Federal and state fair housing law both prohibit intentional housing discrimination and prohibit any actions or policies which may have a discriminatory effect on a protected group of people. Examples of policies or practices with discriminatory effects include exclusionary zoning and land use policies, mortgage lending and insurance practices, and residential rules that may indirectly inhibit religious or cultural expression. Both the state and the federal government have structures in place to process and investigate fair housing complaints. In California, the Department of Fair Employment and Housing (DFEH) maintains the authority to investigate complaints of discrimination related to employment, housing, public accommodations and hate violence. The agency processes complaints online, over the phone and by mail. At a federal level, HUD also processes, investigates, and enforces any complaints in violation of the Federal Fair Housing Act.

### *Fair Housing Education and Enforcement at a Local Level*

The City has a robust Code Enforcement policy, but it is not relevant to Fair Housing as it is mainly focused on Code violations pertaining to the erection, construction, reconstruction, moving, conversion, and alteration of buildings.

### *Fair Housing Complaints*

According to data from HUD, there have been zero Fair Housing and Equal Opportunity complaints in the City.

### *Public Housing*

The City of San Marino does not currently have any public housing buildings in the City limits. Likewise, there are no residents receiving housing choice vouchers.

### *Public Outreach*

The 6th cycle Housing Element Update has been undertaken during the COVID-19 global pandemic. Public outreach, which is the cornerstone of the preparation process, had to be adjusted to allow and encourage meaningful public participation and input without the ability to meet or gather in-person. Staff and consultants made use of multiple digital platforms to facilitate the public input. Through community opinion surveys, stakeholder interviews, public workshops, and continued correspondence with advocacy groups, service providers, and developers the City

has consistently put forth efforts to engage the public during the update process. A complete outline of public outreach efforts can be found in Section 1.4.

Specific public outreach was done around the Fair Housing Analysis, including the distribution of the Draft Fair Housing Analysis to housing service providers and other stakeholders in the region, to ensure the data used accurately represents fair housing issues and integrates local knowledge. Stakeholder input was considered in the preparation of the Fair Housing Analysis, as well as integrating principles of Affirmatively Furthering Fair Housing (AFFH) into housing policies and programs (found in **Section 2**) and housing sites (see Section 3), ensuring local concerns are addressed.

Stakeholders participating in AFFH outreach included:

- Abundant Housing Los Angeles;
- Union Station Homeless Services;
- Sycamores Child and Family Service;
- Friends in Deed; and
- Pomona Homeless Outreach.

### 4.5.3 Local and Regional Patterns and Trends in Segregation and Integration

#### *Racial and Ethnic Groups in San Marino*

San Marino is racially integrated and becoming more so. As Table 26 shows, its White population is decreasing while the Asian population is increasing. The Black population also increased slightly over the last ten years, while the Hispanic or Latino population and those who identify as two or more races remained stable. This racial and ethnic composition is unusual for communities within Los Angeles County, where the population overall is about 49% Hispanic or Latino, 26% Non-Hispanic White, about 8% Black and about 15% Asian. San Marino also differs significantly in racial and ethnic composition from nearby communities, as shown in Table 27.

**Table 26: Change in Racial and Ethnic Composition (2010 - 2019)**

Racial/Ethnic Group	2010	2019
White	41.3%	31.5%
Black	0.4%	1.9%
Asian	53.5%	60.5%
Native Hawaiian or Pacific Islander	0.02%	0.20%
American Indian and Alaska Native	0.04%	0.00%
Hispanic or Latino	6.3%	6.3%
Two or More Races	3.1%	3.1%
Totals exceed 100% because all races can include Hispanic or Latino origin. Source: 2010 Census; 2019 U.S. Census Bureau Quick Facts		



**Table 27: Comparison of Racial and Ethnic Composition with Nearby Communities**

Racial/Ethnic Group	San Marino	Pasadena	El Monte	Los Angeles County
White	31.5%	49.5%	38.8%	52.1%
Black	1.9%	5.8%	0.6%	8.1%
Asian	60.5%	17.4%	28.8%	14.7%
Native Hawaiian or Pacific Islander	0.20%	0.00%	0.8%	0.3%
American Indian and Alaska Native	0.00%	0.2%	0.9%	0.8%
Hispanic or Latino	6.3%	6.3%	65.7%	48.6%
Two or More Races	3.1%	5.7%	3.3%	4.1%
Some other Race	2.9%	21.3%	26.9%	19.9%
Totals exceed 100% because all races can include Hispanic or Latino origin.				
Source: 2019 U.S. Census Bureau Quick Facts				

To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing 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 taskforce has created Opportunity Maps to identify resource levels across the state to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with Low Income Housing Tax Credits.

The Opportunity Maps measure the level of opportunity of a region, broken down by census tract, by considering levels of poverty or wealth, and degree of segregation. The model identifies indicators which are research based and represent neighborhood conditions and develops measures which can transform data to represent opportunity. These indicators are assigned to a set of domains (Table 28), such as Education, Economics and Health, which capture the extent of an individual’s life outcomes, quality of life, and capabilities (*Source: Othering and Belonging Institute at UC Berkeley*)

According to the Opportunity maps, there are no census tracts or areas of high racial segregation and poverty in San Marino. Regionally, areas with high segregation and poverty are concentrated in the City of Los Angeles, Burbank, San Fernando, and Pasadena.

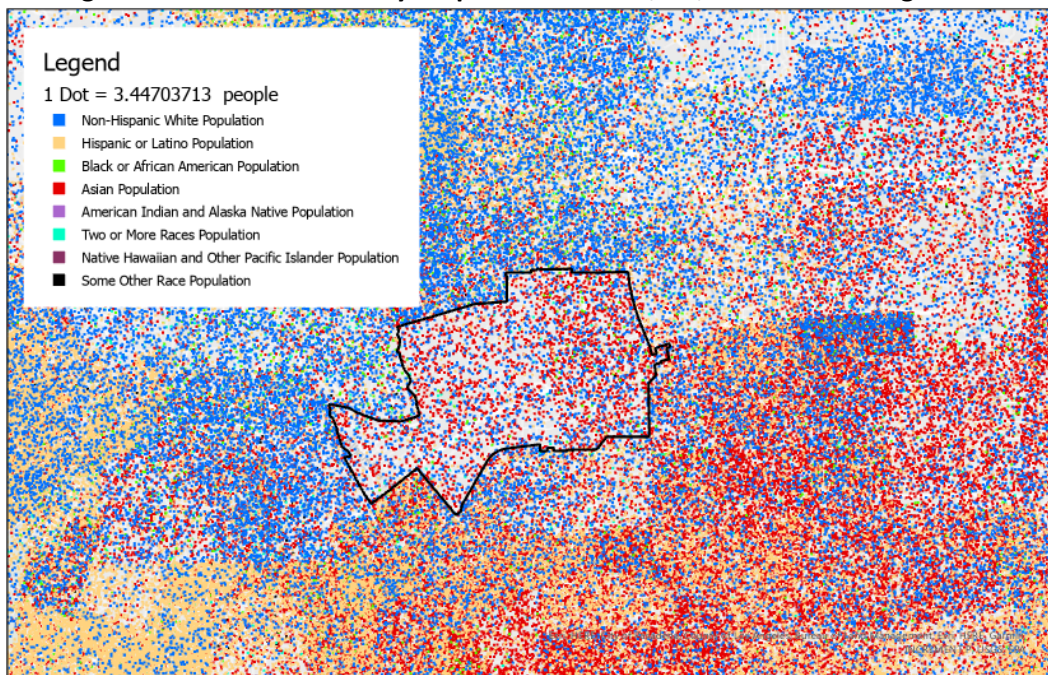
**Table 28: Opportunity Map Domains and Indicators**

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
<i>Source: TCAC, 2020</i>	

As reflected in Figure 21, there are no concentrated areas of racial or ethnic segregation in San Marino. The area within City limits has a lower population density than most of the surrounding areas; however, this reflects the absence of any density in the 207-acre Huntington Gardens and Library, which comprises almost 10% of the City’s area. San Marino also has relatively little Hispanic or Latino population in comparison with some of the surrounding areas.

**Figure 21: Racial Dot Density Map of San Marino, CA, and Surrounding Areas**



*Source: ACS 5-Year Estimates (2014-2019)*

*Dissimilarity Index*

The “Dissimilarity Index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding

the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., county), then the dissimilarity index score for that entire area will be 0. By contrast, and again using Census tracts as an example, if one population is clustered entirely within one Census tract, the dissimilarity index score for that entire area will be 100. The higher the dissimilarity index value, the higher the level of segregation in an area. Table 29 below demonstrates how HUD views various levels of the index. Table 30 is the dissimilarity Index for San Marino and LA County (2010).

**Table 29: Dissimilarity Index Definitions**

Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-52	Moderate Segregation
	>55	High Segregation

*Source: Brown University, Diversity and Disparities 2010*

**Table 30: Ethnic and Racial Composition Dissimilarity Index for San Marino and LA County**

Ethnic/Racial Composition	San Marino Dissimilarity Index	LA County Dissimilarity Index
Non-Hispanic White	37.1%	27.8%
Non-Hispanic Black	0.7%	8.9%
Hispanic	6.5%	47.7%
Asian	55.4%	14.9%
Other Races	0.3%	0.7%

*Source: Brown University, Diversity and Disparities 2010*

The 2010 Dissimilarity Index for San Marino shows higher rates of segregation for the Asian and Non-Hispanic White populations compared to other ethnic/racial populations. Given the small size and the ethnic/racial makeup of the City, this does not reveal any unexpected findings.

### *Familial Status*

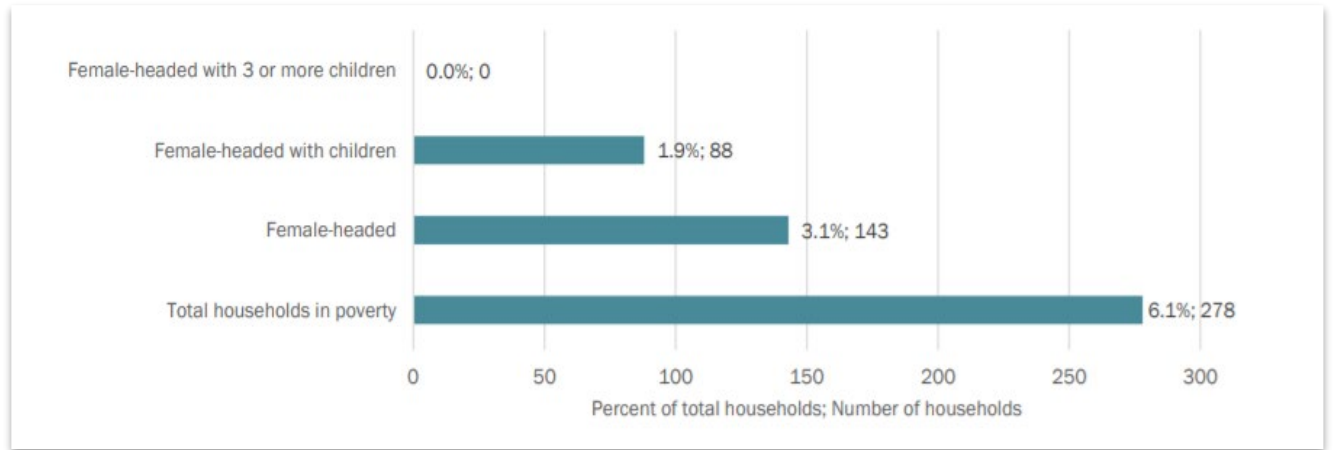
It is important to analyze familial status to identify areas where a City might need to focus resources (i.e., single-parent households, female-headed, large families, and/or elderly persons living alone).

According to the 2019 ACS 5 -Year Estimates, there are no single-parent households with children under 6 years old in San Marino. 67.4% of San Marino's households consist of married couples and the most commonly occurring household size is of two people (40.4%). More than 80% of children in the City live in households with married parents.

Of San Marino's 4,566 households, only 8.8% were female-headed (compared to 14.3% in the SCAG region); of those, just 3.9% had children at home and none had children under age six.

Notably, over half of the households experiencing poverty in San Marino are female-headed (Figure 22).

**Figure 22: Households by Poverty Status**



Source: ACS 5-Year Estimates (2014-2019)

At 0.5% the City has a lower share of 7+ person households than the SCAG region overall. The City also has a lower share of single-person households than the SCAG region overall. Of the City’s 12.3% of single-person households, 8.1% are persons aged 65 or older.

*Persons with Disabilities*

As seen in Table 31, there are fewer people living with disabilities in San Marino than in the County, State, or surrounding communities. There are no areas of concentration of disabled individuals in the City.

**Table 31: Percentage of Population with a Disability**

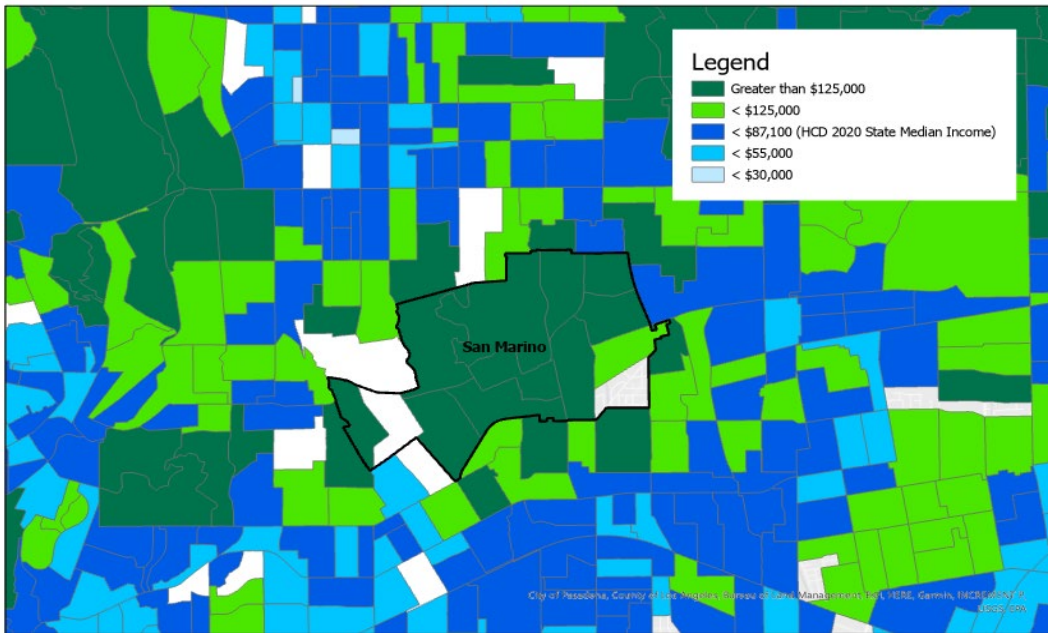
San Marino	5.5%
Pasadena	7.9%
El Monte	9.9%
Los Angeles	9.9%
California	10.6%
Source: 2019 ACS 5-Year Estimates, U.S Census Bureau	

*Income*

Median incomes are high and well dispersed throughout the City, as shown in Figure 23.

San Marino lacks areas of economic concentration. The median incomes are well above the HCD 2020 State Median Income and are also higher than much of the surrounding area.

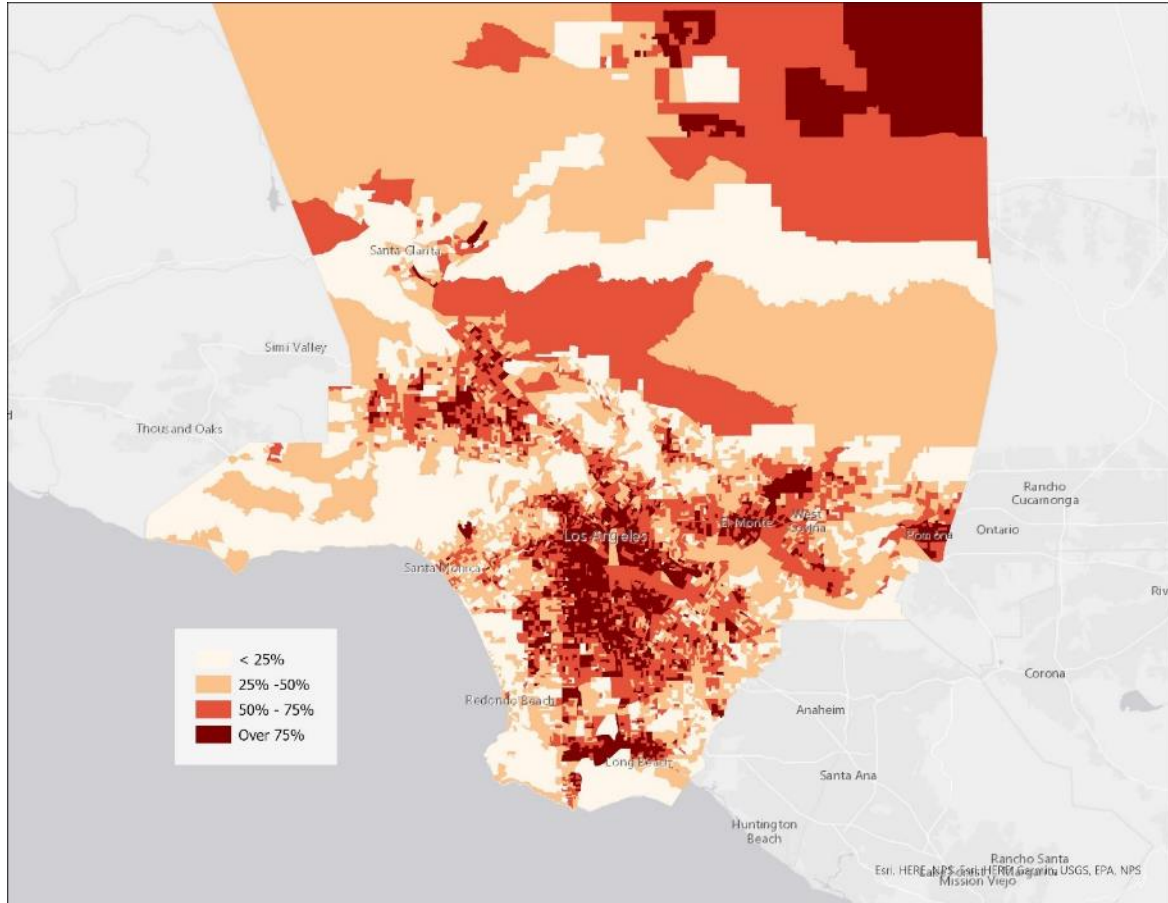
**Figure 23: Median Income Based on ACS 5-Year Estimates 2014-2019**



*Source: HCD, 2021 (Please note tracts in white have no available data)*

Comparatively, Low to moderate incomes in Los Angeles County are concentrated in the Central and South regions, as well as in the San Fernando Valley and the San Gabriel Valley (Figure 24). In these areas, 75-100% of populations earn a low- to- moderate income. Further west of LA and along the coast, in the Santa Monica Mountains and the Westside, less than 25% of the population is low income.



**Figure 24: Percent of Low- to Moderate-Income Residents by Block Groups in Los Angeles County**

Source: HCD AFFH Data Viewer 2021, HUD 2020

### Poverty

6.1 percent of San Marino's households are experiencing poverty, compared to 7.9 percent of households in the SCAG region. Poverty thresholds, as defined by the ACS, vary by household type. In 2018, a single individual under 65 was considered in poverty with a money income below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year. Both San Marino tracts have the highest median incomes, while the tracts in the surrounding subregion reflect incomes ranging from highest to median.

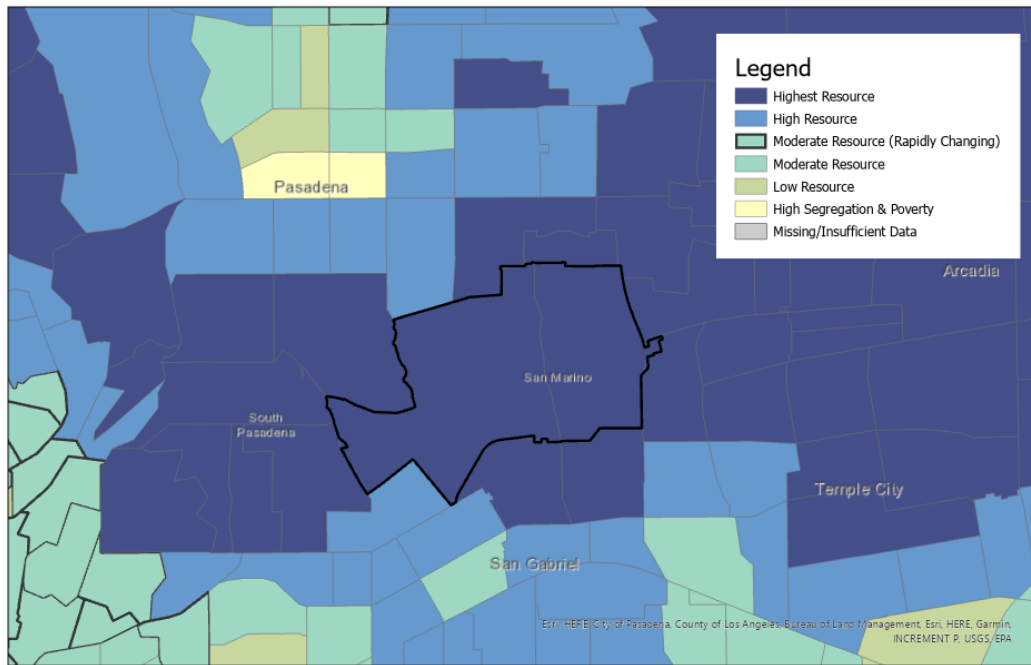
#### 4.5.4 Disparities in Access to Opportunities

The City has been given the designation of "Highest Resource Area of Opportunity" which is based on the consideration of factors affecting quality of life and health outcomes including educational enrollment and attainment, employment rates, lack of overcrowding in housing or overpayment for housing costs, transportation costs, and environmental health. The Tax Credit Allocation Committee (TCAC) Opportunity Area Index map is provided as Figure 25; the City of San Marino



is outlined in black within a larger dark blue area; dark blue denotes the areas of highest resources. Adjacent cities are also areas of high or highest resources, and only one area (in nearby Pasadena) has high segregation and poverty. All housing sites identified within the City are in an Area of Opportunity.

**Figure 25: TCAC Opportunity Area Index Map**



Source: HCD, 2021

*Education*

The San Marino Unified School District is well known for its students’ high levels of academic performance. In the 2018-2019 reporting year the district outperformed both the Los Angeles Unified District and the State in the California Assessment of Student Performance and Progress (Table 32).

**Table 32: California Assessment of Student Performance and Progress**

Achievement Level	State of California	Los Angeles Unified District	San Marino Unified District
Level 4: Standard Exceeded	22.48%	17.93%	64.41%
Level 3: Standard Met	28.62%	26.18%	24.82%
Level 2: Standard Nearly Met	22.28%	23.36%	6.83%
Level 1: Standard Not Met	26.63%	32.53%	3.94%

Source: [caaspp-elpac.cde.ca.gov](http://caaspp-elpac.cde.ca.gov), 2021

There are slight disparities in performance between students of different races. It should be noted that White and Asian students slightly outperformed their Hispanic and Black peers, although this

gap appears to be closing in recent years. These gaps in performance could be an indicator of educational disparities (Figure 26), but the small and irregular sample size for these minority groups does not allow for this conclusion to be drawn with a high level of accuracy.

**Figure 26: Achievement Gap Results Racial/Demographic Breakdown**



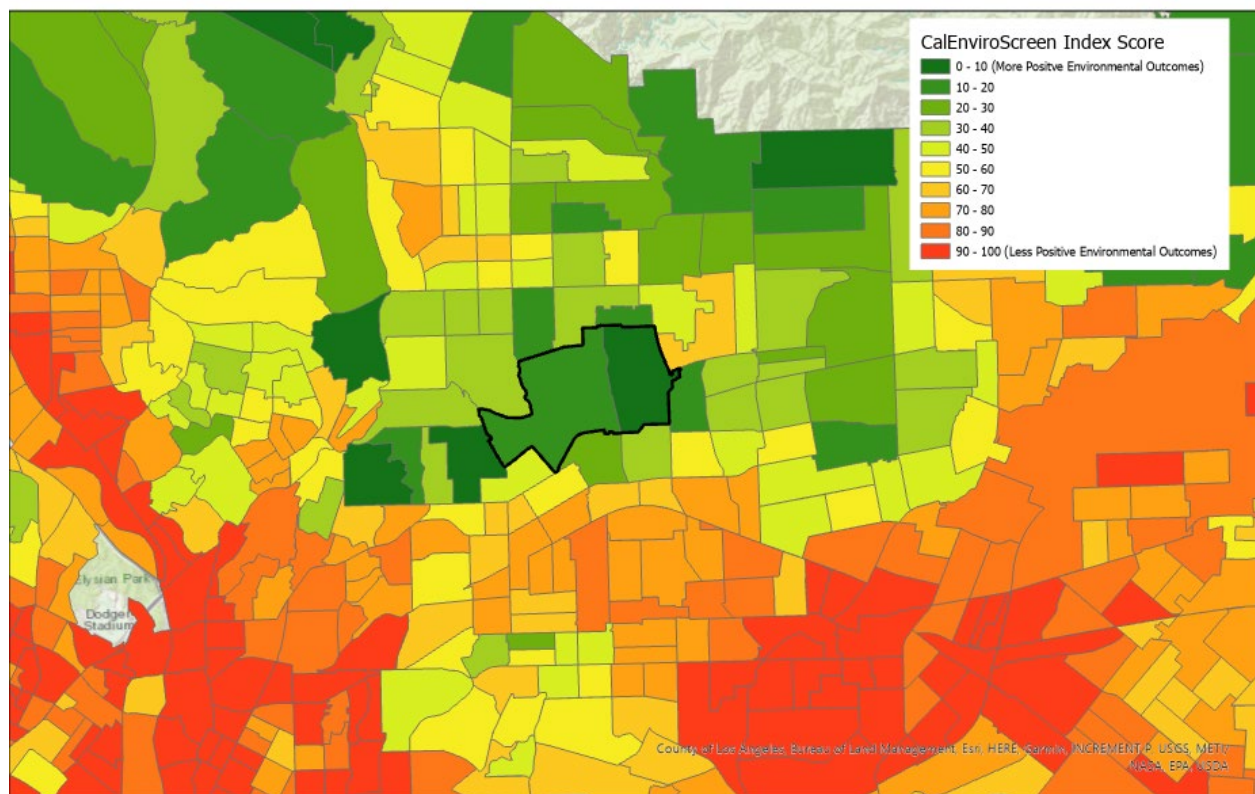
Source: Edsource.org, 2021

### Environment

San Marino has low scores on the CalEnviroScreen Index, which means that San Marino is likely to have more positive environment outcomes based upon aggregate measurements of the following indicators:

- Exposure: Air Quality, Lead Risk in Housing, Diesel Particulate Matter, Drinking Water Contaminants, Pesticide Use, Toxic Releases from Facilities, Traffic Density
- Environmental Effects: Cleanup Sites, Groundwater Threats, Hazardous Waste Generators and Facilities, Impaired Water Bodies, Solid Waste Sites and Facilities
- Sensitive Populations: Asthma, Cardiovascular Disease, Low Birth Weight Infants
- Socioeconomic Factors: Educational Attainment, Housing Burden, Linguistic Isolation, Poverty, Unemployment

San Marino has two census tracts. The Western census tract scored in the top 12<sup>th</sup> percentile, and the Eastern census tract scored in the top 10<sup>th</sup> percentile for overall environmental health, meaning only 12 and 10 percent of other census tracts in the state had better overall composite scores. Of the individual indicators analyzed, the biggest factors for potential adverse environmental health outcomes in San Marino are pollution exposure, lead risk in housing, and contaminated drinking water.

**Figure 27: CalEnviroScreen Index Map of San Marino and Surrounding Areas**

Source: California Office of Environmental Health Hazard Assessment, 2021

The Western San Marino census tract (seen in lighter green in Figure 27) scored in the 65<sup>th</sup> percentile for pollution burden, meaning that the tract had a higher pollution burden than 65% of other tracts in the state. This tract was also in the 64<sup>th</sup> percentile for lead risk in housing, largely due to the age of San Marino's housing stock, and in the 93<sup>rd</sup> percentile for drinking water contaminants.

In comparison, the Eastern San Marino census tract (seen in dark green in Figure 27) scored in the 39<sup>th</sup> percentile, 66<sup>th</sup> percentile, and 79<sup>th</sup> percentile for pollution burden, lead risk, and drinking water contaminants, respectively.

Taken together, these specific outcomes are slightly above average for the Los Angeles region, but are fairly consistent with adjacent cities. Drinking water contamination and pollution burden continue to be issues for most census tracts in the State. There were not significant differences within San Marino City limits and the City regularly monitors and reports conditions to remain in compliance with the U.S. Environmental Protection Agency and the State's Water Board Regulations.

Compared to the LA County region, San Marino has better environmental outcomes overall. Most of the San Fernando Valley and areas of Downtown Los Angeles contain disadvantaged communities, while San Marino does not.

### *Transportation*

San Marino is serviced by the LA Metro Bus Lines 78 Local and 487 Express. According to walkscore.com, the City has a Walk Score of 61 (out of 100) and is considered somewhat walkable with some errands able to be carried out on foot. The City has a Bike Score of 50, which means that there is some existing bike infrastructure. The City was not rated for transit. In comparison, the neighboring City of Pasadena was given Walk Score of 69, Bike Score of 70, and Transit Score of 71.

The City is part of a low-cost membership program for curb-to-curb ride services for seniors over 60 and for those under 60 with a disability. The service is available for residents who live in Pasadena, San Marino, Altadena, and unincorporated Los Angeles County areas within the service area.

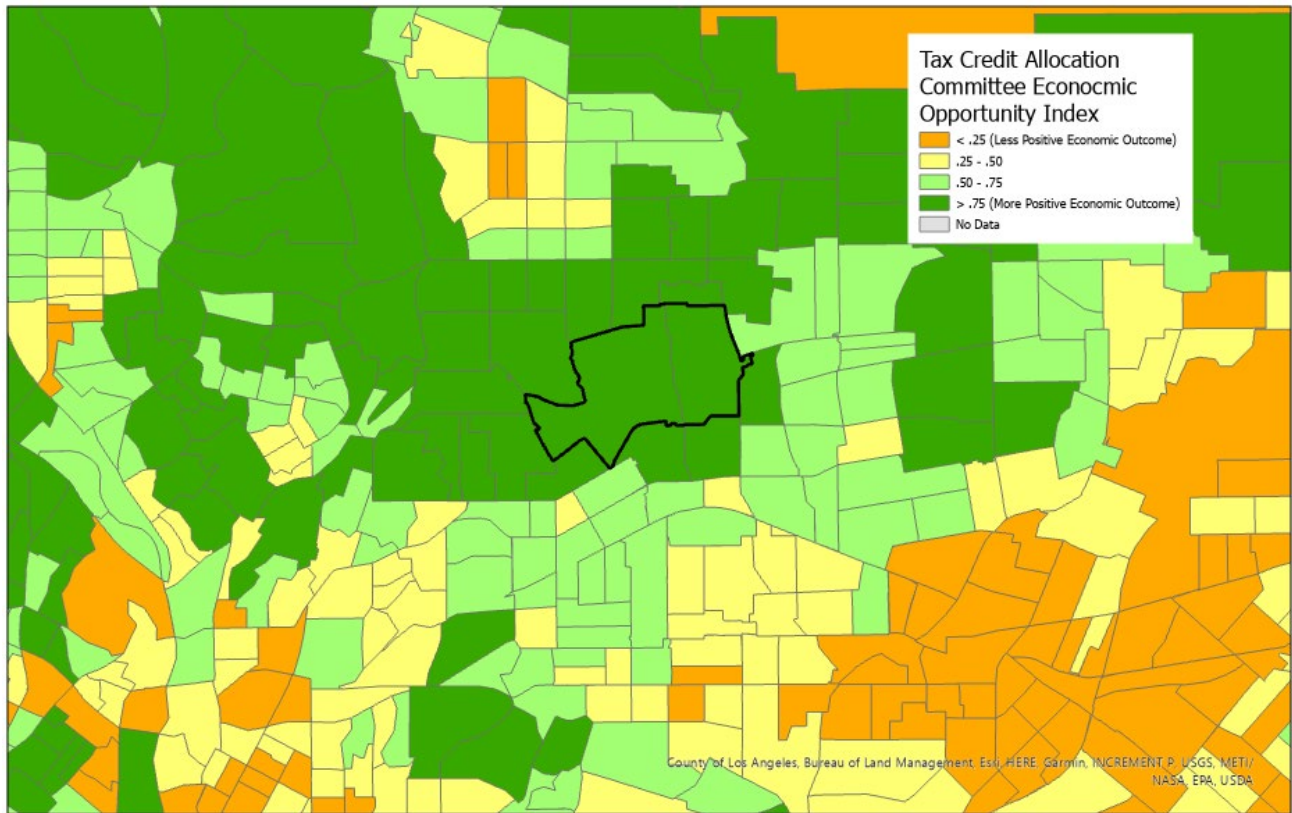
### *Economic Development and Access to Jobs*

The City is rated highly in terms of economic outcomes. The index is based on measurements of the following indicators:

- Poverty
- Adult Education
- Employment
- Job Proximity

San Marino's neighboring cities have similar positive outcome ratings on the index, while others in the region are rated considerably lower (Figure 28).

**Figure 28: Economic Index Map of San Marino and Surrounding Areas**



Source: HCD, 2021

Data from the U.S. Census “OnTheMap” tool identifies the City as both an economic source and resource with a similar number of people coming into the City to work who live elsewhere, as residents of the City who leave to work in other places (Figure 29).

Ninety-five percent of the working population in San Marino is employed in white collar industries. The top three professional sectors in the City are in management, health practices, and business/financial. As of 2021, the top three sectors of the labor force in LA County are in management, office administration, and sales



**Figure 29: Inflow/ Outflow Analysis of San Marino**



Source: *OntheMap.ces.census.gov*, 2021

Adults are well educated in San Marino and have better educational attainment outcomes than the County, State, and surrounding communities (Table 33).

**Table 33: Educational Attainment for Adults 25 and Over**

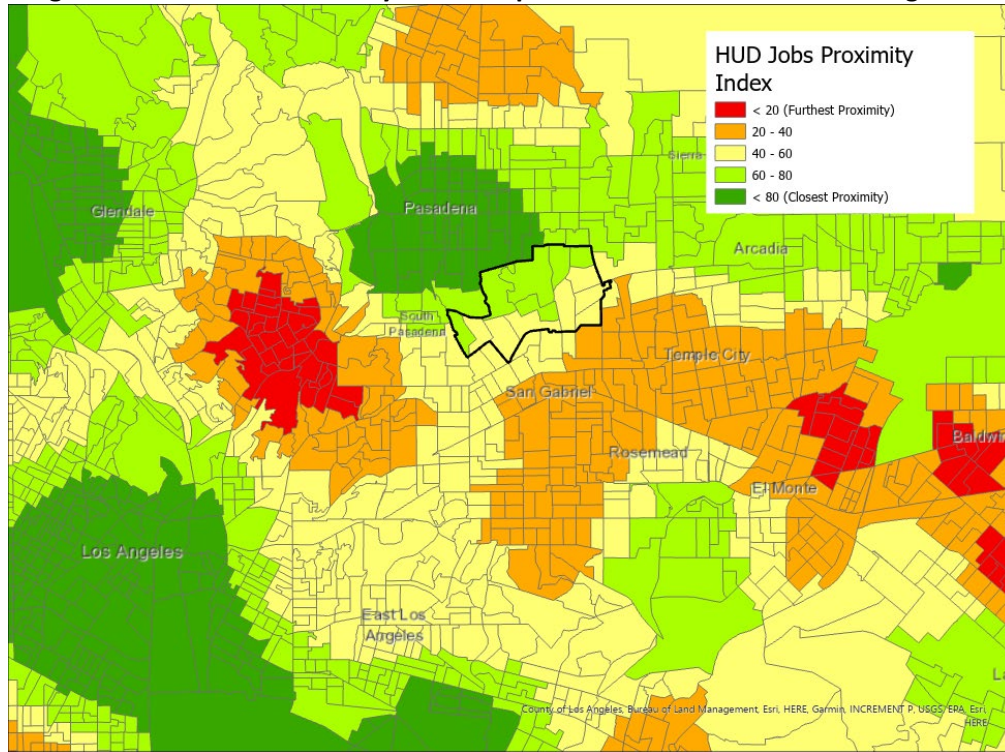
Area	Highschool Graduate or Higher	Bachelor’s Degree or Higher	Graduate or Professional Degree
San Marino	97.8%	78.1%	39.7%
Pasadena	88.3%	52.3%	24.0%
El Monte	63.3%	12.2%	2.4%
Los Angeles	79.1%	21.2%	11.3%
California	83.3%	33.9%	12.8%

Source: *ACS 5-Year Estimates (2014-2019)*

San Marino has a mid- to high-level rating on the HUD Jobs Proximity Index, which quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a statistical area. The scores in the region vary greatly.



**Figure 30: HUD Jobs Proximity Index Map of San Marino and Surrounding Areas**



Source: HCD, 2021

### 4.5.5 Disproportionate Housing Needs Including Displacement

#### Cost Burden and Severe Cost Burden

Housing cost burden is most commonly measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for 'severe cost burden.' However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience a truer 'cost burden.' The data in Table 34 indicates the number of households in San Marino by their income relative to the surrounding area and their share of income spent on housing.

**Table 34: Households by Income Level and Share of Income spent on Housing**

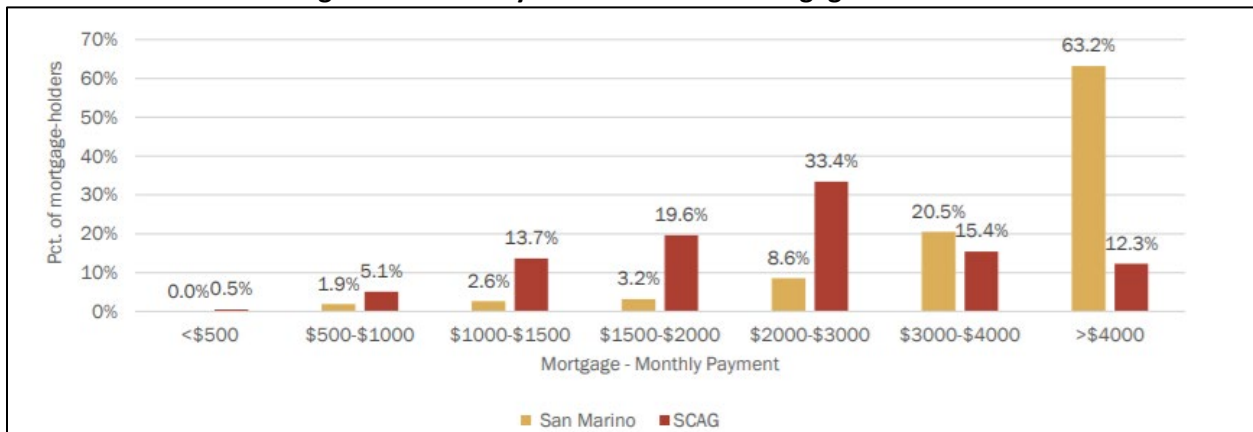
Income Level	<30%	30-50% (Cost Burdened)	>50% (Severely Cost Burdened)	Total Households by Income Level
<30% HAMFI	25	0	290	315
30-50% HAMFI	50	60	165	275
50-80% HAMFI	120	48	105	273
80-100% HAMFI	180	65	195	440
>100% HAMFI	2,375	520	249	3,114
Total Households	2,750	693	1,004	4,447

Source: HUD CHAS 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Additionally, across San Marino's 620 renter households, 158 (25.5%) spend thirty percent or more of gross income on housing cost, compared to 55.3% in the SCAG region. Another 101 renter households in San Marino (16.3%) spend fifty percent or more of gross income on housing cost, compared to 28.9% in the SCAG region.

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 86.4% of San Marino and 52.5% of the SCAG region. The most commonly occurring mortgage payment in San Marino is >\$4000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/month (Figure 31).

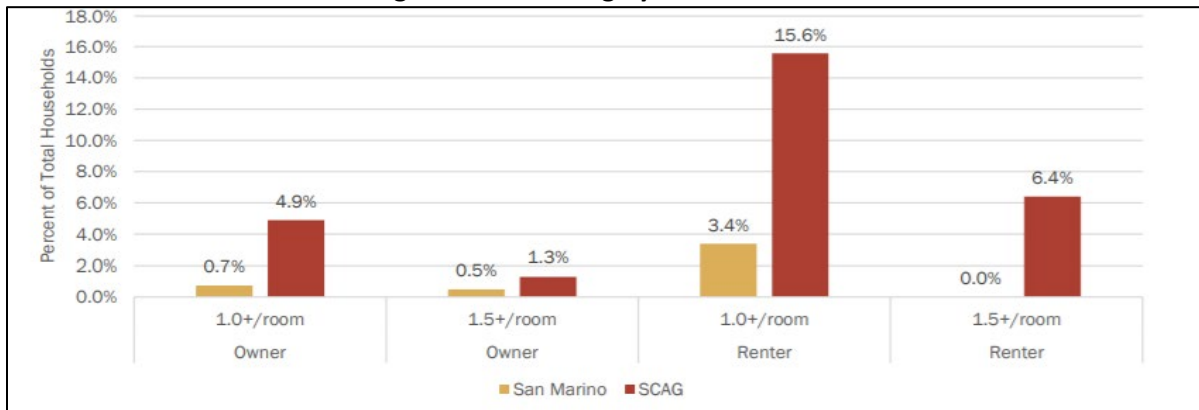
**Figure 31: Monthly Owner Costs for Mortgage Holders**



*Overcrowding*

In San Marino, 29 owner-occupied and 21 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. 19 owner-occupied households and renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding. Overcrowding rates are much lower in San Marino than in the larger region.

**Figure 32: Crowding by Extent and Tenure**



*Substandard Housing*

The ACS includes surveys about three factors of what may be considered substandard housing. In San Marino, 31 units lack telephone service, 20 units lack plumbing facilities, and 20 units lack complete kitchen facilities. While this is lower than the regional rates for substandard housing, rehabilitation programs should be utilized to maintain the housing stock.

**Figure 33: Substandard Housing**



Source: ACS 5-Year Estimates (2014-2019)

*Homelessness*

The Los Angeles County Community Development Commission conducts bi-annual point-in-time surveys of homeless populations. San Marino is occasionally reported to have 1 unhoused person, but typically is reported to have zero unhoused persons. Services for homeless individuals are available in neighboring Pasadena. San Marino allows emergency shelters to be established in any commercially zoned property as a permitted use; however, no interest has been shown on the part of homeless service providers in initiating homeless services in San Marino.

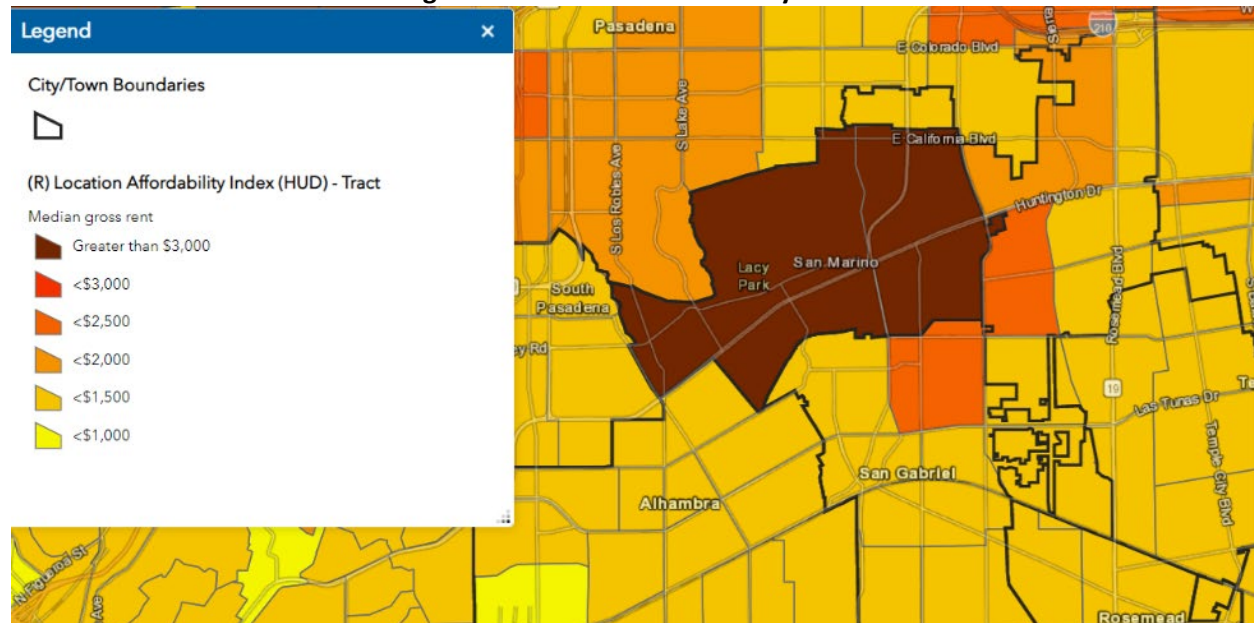
*Displacement*

According to the Urban Displacement Project, there are no sensitive populations subject to displacement in San Marino. However, there are approximately 225 very low-income, elderly households in the City. Special attention should be given to these households, as aging in place may become difficult for people with fixed incomes given the high cost of living in San Marino.

**4.5.6 Areas of Concentration in Poverty and Affluence Across Racial/ Ethnic Groups**

The City of San Marino does not contain any areas of racial or ethnically areas of poverty (R/CAPs); in fact, the entire City is an Area of Opportunity. However, the City is notably more expensive than the surrounding areas, with median gross rents above \$3000 per month and the majority of mortgages above \$4000 per month (Figure 31, Figure 34). There are no concentrated areas of affluence given the equal distribution of wealth within City limits.

Figure 34: Location Affordability Index



Source: HCD, 2021

While median household incomes in San Marino are high, even moderate- and middle-income households cannot afford a home in San Marino where the median sales price exceeds \$2 million, and the median rental price exceeds \$3000 per month (ACS). A moderate-income family of three could afford a home with a sales price of \$385,859 or a monthly rent of \$1,818. San Marino currently lacks homes for these households, which include young families and first-time homebuyers, which perpetuates exclusivity and can lead to inequity.

#### *History of Exclusive Single-Family Zoning in San Marino*

San Marino is an almost exclusively residential community, with its built environment dominated by detached single-family houses in a range of scales, constructed primarily between the 1920s and the 1960s. As of 2021, there were no areas zoned for multi-family residences, or for industry/manufacturing. Small areas on Huntington Drive and Mission Street are zoned for commercial use, and the City has recently approved a mixed-use project on a commercial street.

San Marino's rich and varied past that spans multiple eras of California history and is associated with cultural and social themes that were definitive in the history of Los Angeles County and Southern California. Since its 1913 incorporation, "the City envisioned itself as a residential enclave for people of means, with zoning that ensured minimal commercial development and no industry or multi-family residences" (Source: *San Marino Historic Resources Survey Report, October 2020*). This exclusive designation has played out in the City's zoning since its establishment.

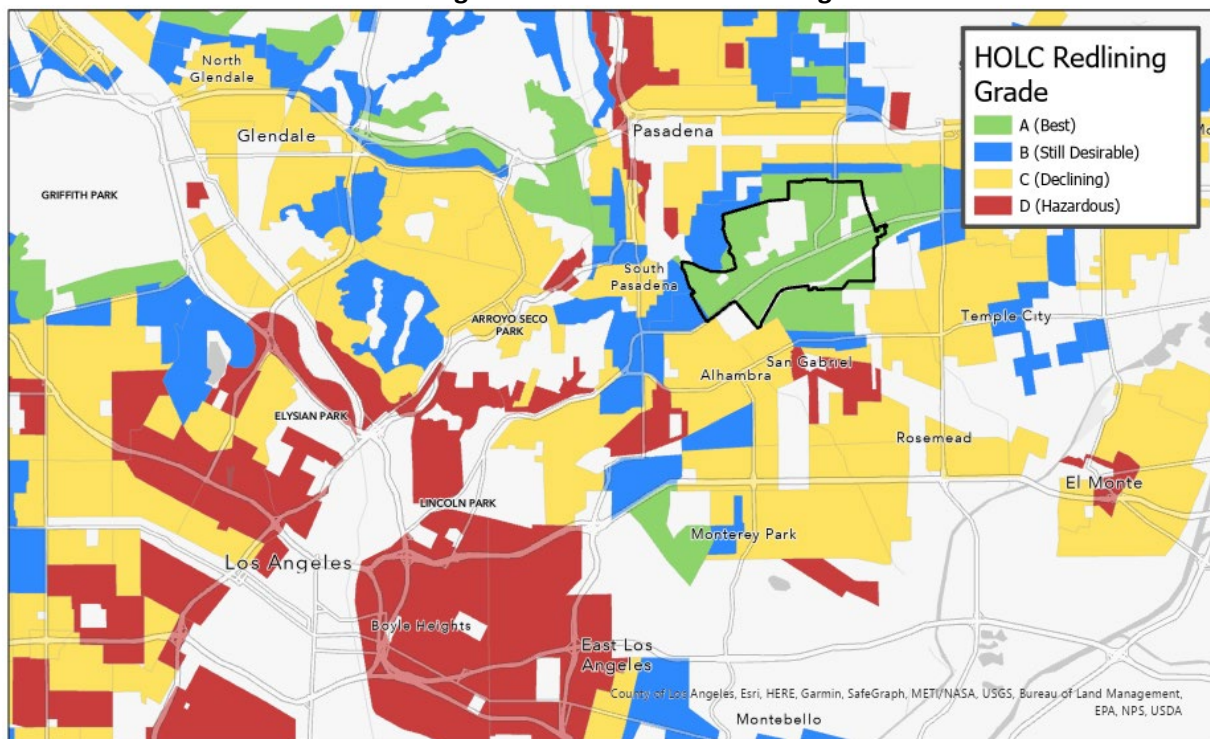
In its earliest days of development, zoning in San Marino was so strict that most commercial uses and even churches were restricted. To ensure that property valuation would remain high, developers established expensive minimum home building costs, and racially restrictive covenants



were incorporated into home deed sales – a practice that was common throughout Southern California and much of the country in the 1920s. These practices, coupled with the formation of the national Home Owner’s Loan Corporation (HOLC) in 1933 and passage of the National Housing Act (NHA), established systemic redlining practices throughout the Los Angeles region, including in San Marino. This practice led to the physical development pattern and exclusive single-family feel that is still experienced throughout the City today.

Figure 35 illustrates how San Marino was graded “Best” by the Home Owner’s Loan Corporation. This grade was given to upper- or upper-middle-class White neighborhoods that HOLC defined as posing minimal risk for banks and other mortgage lenders, as they were “ethnically homogeneous” and had room to be further developed. Banks received federal backing to lend money for mortgages based on these grades. Many banks simply refused to lend to areas with the lowest grade, making it impossible for people in many areas to become homeowners. While this type of neighborhood classification is no longer legal thanks to the Fair Housing Act of 1968, the effects of disinvestment due to redlining are still clearly observable today (*Source: University of Richmond’s Digital Scholarship Lab, 2021*).

**Figure 35: 1930’s HOLC Redlining Grade**



(*Source: University of Richmond’s Digital Scholarship Lab, 2021*)

Throughout the City’s development, it has prided itself on its exclusively single-family, affluent neighborhoods, with well-kept yards and beautiful parks. Apartments and duplexes had never been allowed. As recently as 2003, the City’s General Plan included goals to protect its single-family neighborhoods and to discourage the division of lots. While the 2003 General Plan promoted a well-integrated community, it failed to promote or allow the variety of housing types to enable that integration. A 2006 City handout for new San Marino residents notes:

“The principles upon which the first City Council established San Marino in 1913 have been followed through the ensuing ninety-three years. The founders of this city wished it to be uniquely residential - single-family homes on large lots surrounded by beautiful gardens, with wide streets and well-maintained parkways. There were to be no manufacturing districts, heavy business areas or any apartment houses or duplexes. To maintain these standards, the City Council has continued to pass and enforce strict zoning regulations.”

These strict zoning standards have been unintentionally discriminatory. A land use practice has a discriminatory effect if:

- It actually or predictably results in a disparate impact on a group of individuals, or
- It creates, increases, reinforces, or perpetuates segregated housing patterns, based on membership in a protected class.

By definition, single-family zoning is exclusionary when it occurs to the exclusion of other types of residential use. Whether intended or not, San Marino’s past prohibition of anything but single-family homes had the effect of excluding persons who do not have incomes high enough to live in the City. Because poverty occurs most often with person of color, these practices have resulted in the exclusion of protected classes even though they were never intended to. AB 686 requires that the City adopt programs to overcome and reverse this pattern of exclusion, and to identify housing sites through the Affirmatively Furthering Fair Housing lens.

#### *Reversing Exclusionary Zoning Practices*

The approach taken within this Housing Element update to address past exclusionary zoning practices and to affirmatively further fair housing are two-fold: First, programs are included that change the zoning to allow for all types of housing, including the multi-family apartments and duplexes that have previously been banned in the City; and secondly, the location of potential housing sites to meet the City’s lower-income RHNA is considered through an equity lens, not only by choosing locations in areas throughout the City but also by including to promote the development of duplexes, ADUs, and affordable JADUs in all of the City’s exclusive residential neighborhoods. **Section 2** includes the policies and programs to reverse exclusionary zoning and to affirmatively further fair housing; **Section 3** contains the sites location information and maps.



APPENDIX A: SCAG LOCAL HOUSING DATA





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- VI. OVERPAYMENT AND OVERCROWDING
- VII. ASSISTED UNITS AT RISK OF CONVERSION
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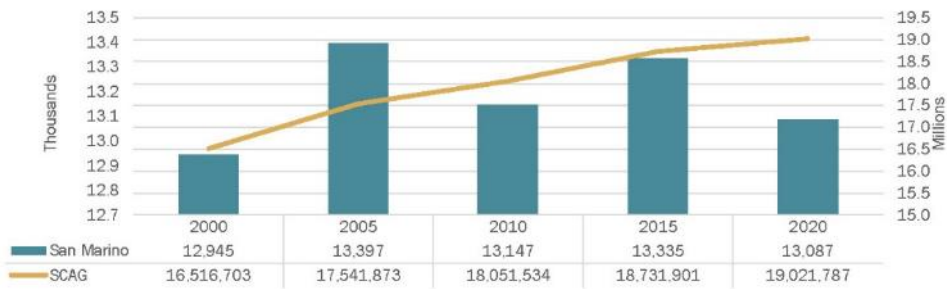
### Pre-Certified Local Housing Data for San Marino

Developed by SCAG and pre-certified by the California Department of Housing and Community Development (HCD) for use in 6th cycle housing elements.

This report contains a wide range of jurisdiction-level data elements intended to provide an understanding housing need experienced in San Marino as a part of its 6th cycle housing element update. Data sources are noted below each table or figure.

## I. POPULATION, EMPLOYMENT, AND HOUSEHOLDS

### Population Trend, 2000-2020

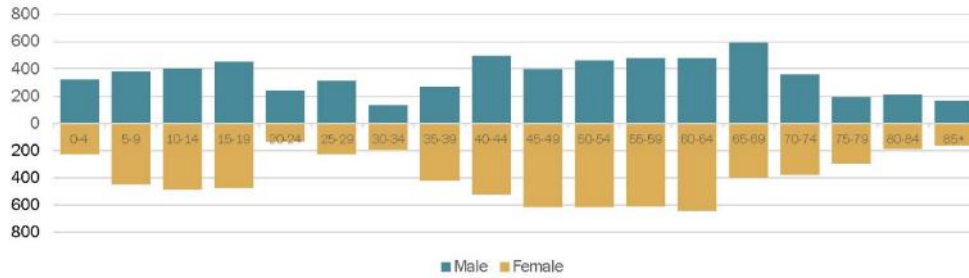


CA DOF E-5 Population and Housing Unit Estimates

San Marino has a 2020 total population of 13,087 including 81 living in group quarters according to the California Department of Finance. The chart above describes the population trend in San Marino from 2000 to 2020. Over this period San Marino had an annual growth rate of 0.1% compared to 0.7% for the region.

LOCAL HOUSING DATA, 2020

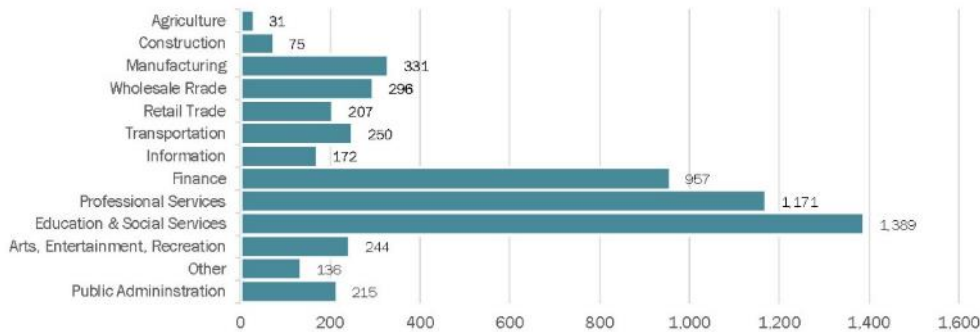
**Current Population by Age and Sex**



American Community Survey 2014-2018 5-year estimates

The population of San Marino is 47.4% male and 52.6% female. The share of the population of San Marino which is under 18 years of age is 22.9%, which is lower than the regional share of 23.4%. San Marino's seniors (65 and above) make up 22% of the population, which is higher than the regional share of 13%.

**Employment by Industry**

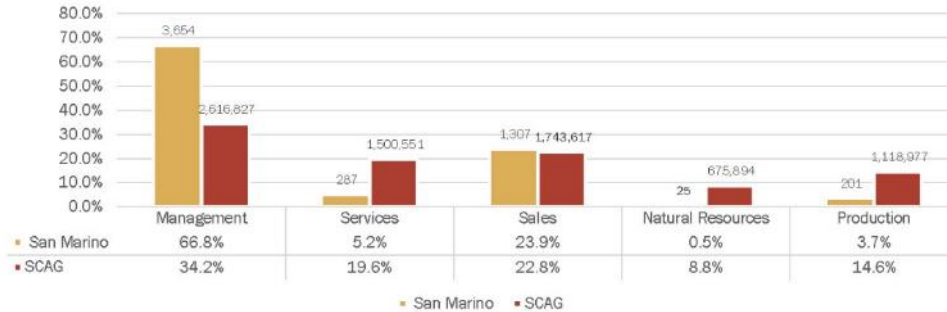


American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

San Marino has 5,474 workers living within its borders who work across 13 major industrial sectors. The chart above provides detailed employment information. The most prevalent industry is Education & Social Services with 1,389 employees (25.4% of total) and the second most prevalent industry is Professional Svcs. with 1,171 employees (21.4% of total).

LOCAL HOUSING DATA, 2020

Employment by Occupation



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

In addition to understanding the industries in which the residents of San Marino work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category in San Marino is Management, in which 3,654 (66.8% of total) employees work. The second-most prevalent type of work is in Sales, which employs 1,307 (23.9% of total) in San Marino.

Farmworkers

Farmworkers by Occupation:

San Marino	Percent of total San Marino workers:	SCAG Total	
0	0.00%	57,741	Total jobs: Farming, fishing, and forestry occupations
0	0.00%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

Employment in the Agricultural Industry:

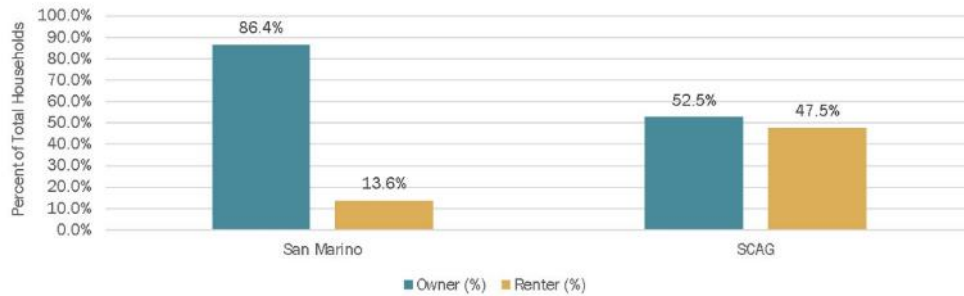
San Marino	Percent of total San Marino workers:	SCAG Total	
0	0.00%	73,778	Total in agriculture, forestry, fishing, and hunting
31	0.76%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions have farmworkers living in them, they are essential to the region's economy and food supply.

LOCAL HOUSING DATA, 2020

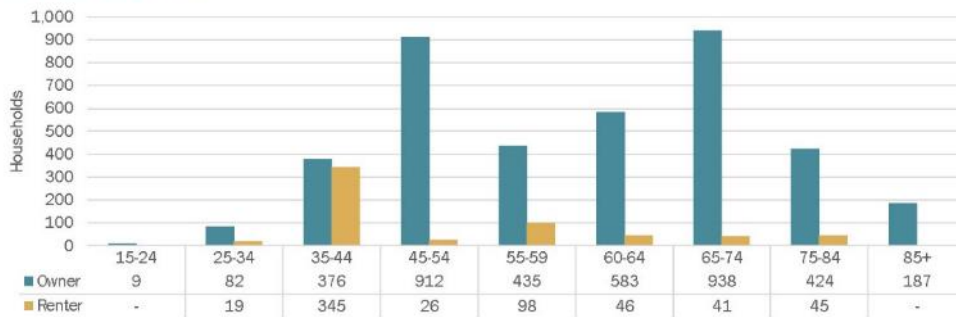
**Housing Tenure**



American Community Survey 2014-2018 5-year estimates.

Housing security can depend heavily on housing tenure, i.e. whether homes are owned or rented. San Marino's housing stock consists of 4,566 total units, 3,946 of which are owner-occupied and 620 of which are renter-occupied. The share of renters in San Marino is lower than in the SCAG region overall.

**Housing Tenure By Age**



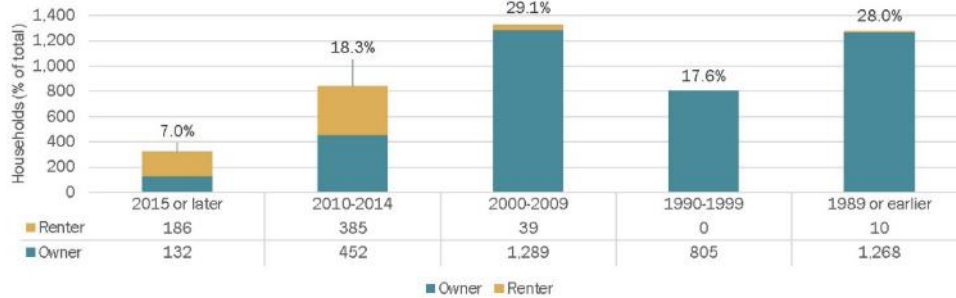
American Community Survey 2014-2018 5-year estimates.

In many places, housing tenure varies substantially based on the age of the householder. In San Marino, the age group where renters outnumber owners the most is 35-44 (by 4.3%). The age group where owners outnumber renters the most is 15-24 (by 100%).



LOCAL HOUSING DATA, 2020

**Housing Tenure by Year Moved to Current Residence**

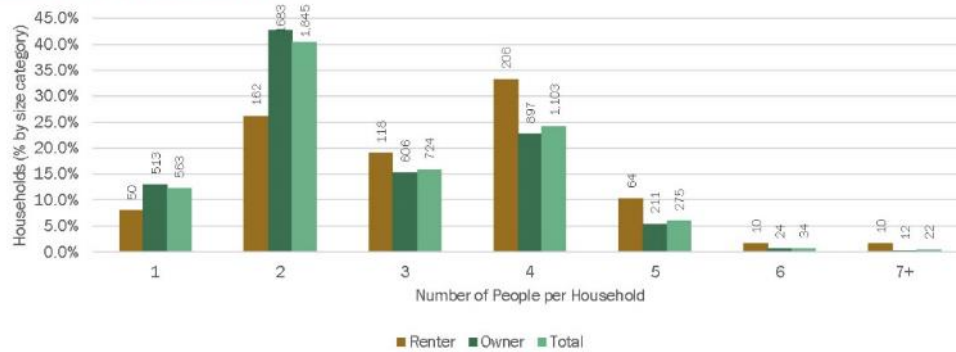


American Community Survey 2014-2018 5-year estimates.

Across the SCAG region, the most common move-in period was 2010-2014 (31.9%) followed by 2000-2009 (26.1%). In San Marino, the period during which most people started living in their current residence was 2000-2009 (29.1%) followed by 1989 or earlier (28%).

**II. SPECIALIZED HOUSEHOLD NEEDS: LARGE FAMILIES, SENIORS, AND FEMALE-HEADED**

**Households by Household Size**

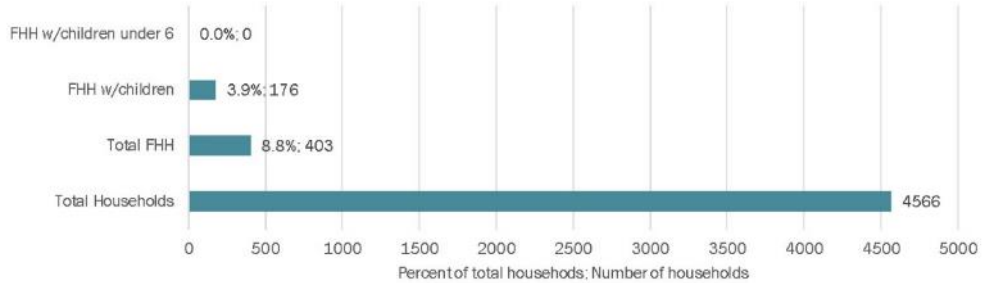


American Community Survey 2014-2018 5-year estimates.

This chart illustrates the range of household sizes in San Marino for owners, renters, and overall. The most commonly occurring household size is of two people (40.4%) and the second-most commonly occurring household is of four people (24.2%). San Marino has a lower share of single-person households than the SCAG region overall (12.3% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (0.5% vs. 3.1%).

LOCAL HOUSING DATA, 2020

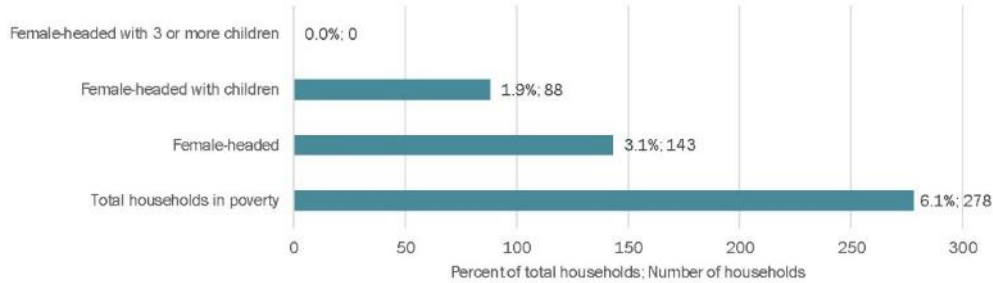
**Female Headed Households (FHH)**



American Community Survey 2014-2018 5-year estimates.

Statute requires analysis of specialized housing needs, including female-headed households in an effort to ensure adequate childcare or job training services. Of San Marino's 4,566 total households, 8.8% are female-headed (compared to 14.3% in the SCAG region), 3.9% are female-headed and with children (compared to 6.6% in the SCAG region), and 0% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

**Households by Poverty Status**



American Community Survey 2014-2018 5-year estimates.

6.1 percent of San Marino's households are experiencing poverty, compared to 7.9 percent of households in the SCAG region. Poverty thresholds, as defined by the ACS, vary by household type. More information can be found at M256. In 2018, a single individual under 65 was considered in poverty with a money income below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year.

LOCAL HOUSING DATA, 2020

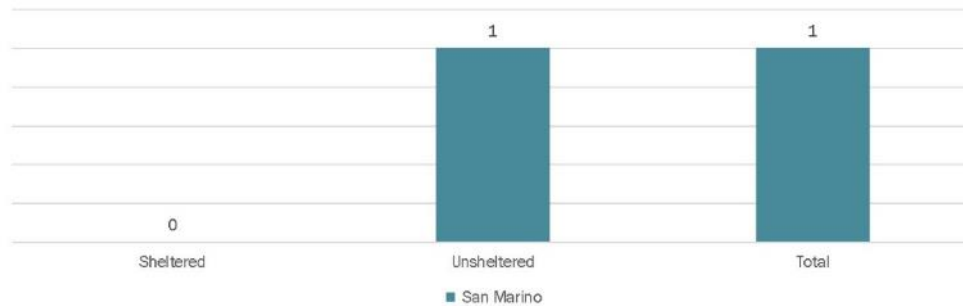
**Elderly Households by Income and Tenure**

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	185	40	225	13.8%
	30-50% HAMFI	145	0	145	8.9%
	50-80% HAMFI	175	20	195	12.0%
	80-100% HAMFI	185	10	195	12.0%
	> 100% HAMFI	860	10	870	53.4%
<b>TOTAL</b>		<b>1,550</b>	<b>80</b>	<b>1,630</b>	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Statute requires analysis of specialized housing needs, including housing needs for seniors. Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. Of San Marino's 1,630 such households, 13.8% earn less than 30% of the surrounding area income, (compared to 24.2% in the SCAG region), 22.7% earn less than 50% of the surrounding area income (compared to 30.9% in the SCAG region).

**III. PEOPLE EXPERIENCING HOMELESSNESS**



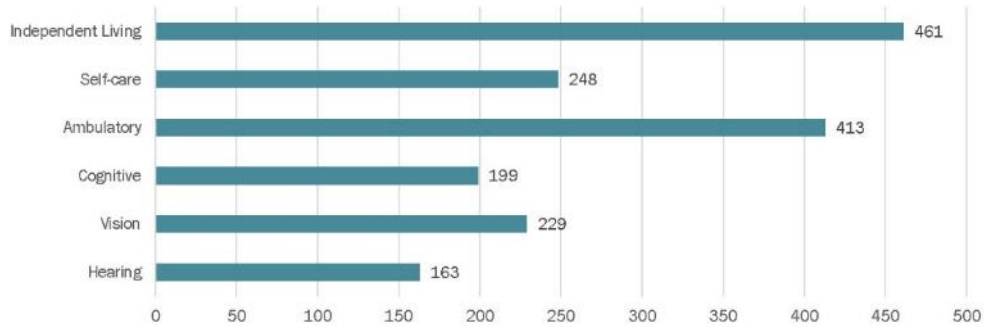
2019 city and county homelessness point-in-time counts processed by SCAG. Jurisdiction-level counts were not available in Imperial County and sheltered population (and thus total) counts were not available in Riverside County. As a result, SCAG region totals from this compilation of data sources likely undercount true totals.

#N/A

LOCAL HOUSING DATA, 2020

**IV. PEOPLE WITH DISABILITIES, INCLUDING DEVELOPMENTAL DISABILITIES**

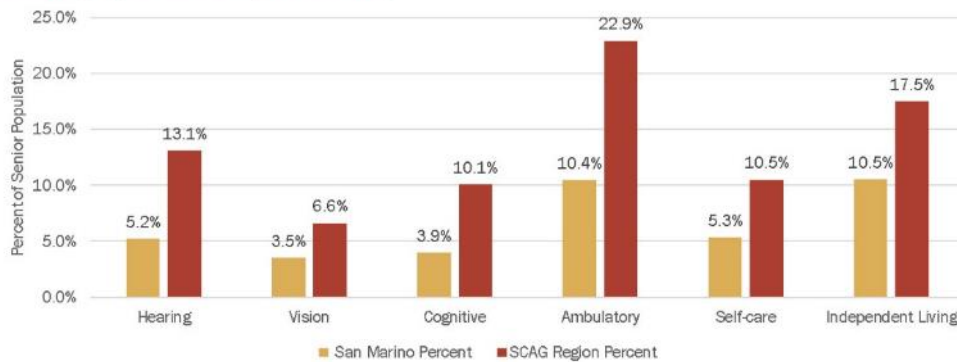
**Disability by Type**



American Community Survey 2014-2018 5-year estimates.

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate.

**Disability by Type - Seniors (65 and over)**



American Community Survey 2014-2018 5-year estimates.

In San Marino, the most commonly occurring disability amongst seniors 65 and older was an independent living disability, experienced by 10.5% of San Marino's seniors (and 17.5% of seniors in the SCAG region).

LOCAL HOUSING DATA, 2020

**Disability by Employment Status**

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	57	19%	4,541	65%
Unemployed	9	3%	139	2%
Not in Labor Force	239	78%	2,339	33%
<b>TOTAL</b>	<b>305</b>		<b>7,019</b>	

American Community Survey 2014-2018 5-year estimates.

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In San Marino, 18.7% of the population with a disability is employed, compared to 64.7% of the non-disabled population.

**Developmental Disabilities**

		San Marino
<b>By Residence:</b>	Home of Parent/Family/Guardian	65
	Independent/Supported Living	5
	Community Care Facility	0
	Intermediate Care Facility	0
	Foster/Family Home	0
	Other	5
<b>By Age:</b>	0 - 17 Years	95
	18+ Years	45
<b>TOTAL</b>		<b>235</b>

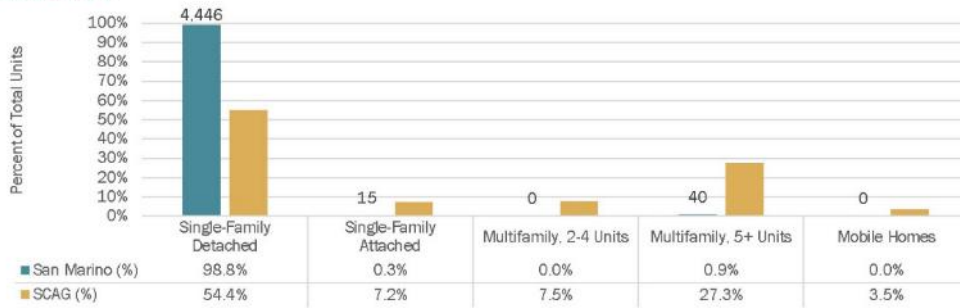
CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019. Data available in 161/197 SCAG jurisdictions.

The California Department of Developmental Services also provides data on developmental disabilities by age and type of residence. These data are collected at the ZIP-code level and were joined to the jurisdiction-level by SCAG. Totals may not match as counts below 11 individuals are unavailable and some entries were not matched to a ZIP code necessitating approximation.

LOCAL HOUSING DATA, 2020

V. HOUSING STOCK CHARACTERISTICS

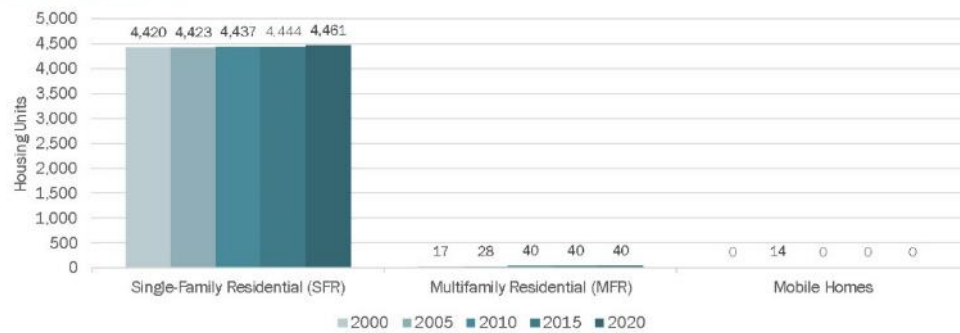
Housing Type



CA DOF E-5 Population and Housing Unit Estimates

The chart above provides detailed information on the housing stock in San Marino, which has a total of 4,501 housing units. The most prevalent housing type in San Marino is single-family detached with 4,446 units. The share of all single-family units in San Marino is 99.1%, which is higher than the 61.7% share in the SCAG region. Out of the total housing units in San Marino, there are 4,294 occupied-units, which equates to a 4.6% total vacancy rate. The average household size (as expressed by the population to housing unit ratio) is 3.029.

Housing Type Trend



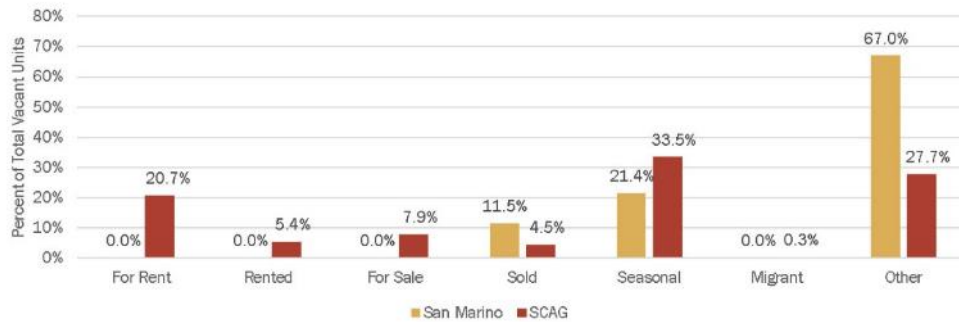
CA DOF E-5 Population and Housing Unit Estimates

Over the past two decades (2000-2020), there has been more construction of single-family residential units than multi-family residential units in San Marino. When comparing 2000 to 2020, SFR units increased by 41, MFR units increased by 23, and mobile homes decreased by .



LOCAL HOUSING DATA, 2020

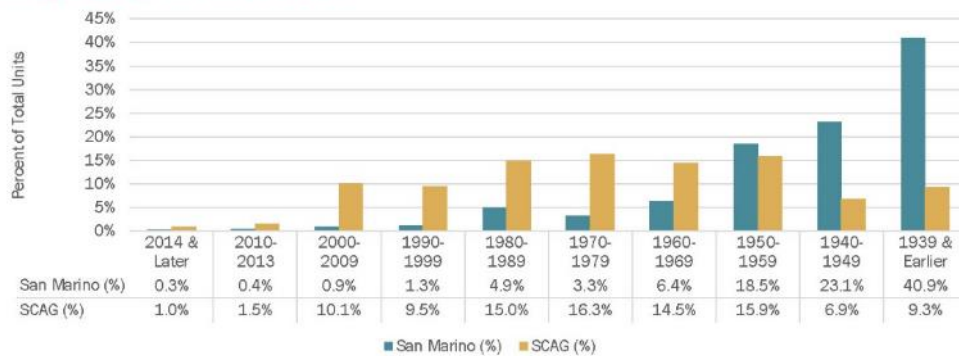
Vacant Units by Type



American Community Survey 2014-2018 5-year estimates.

The ACS provides additional detail on vacant housing units by category.

Housing Units by Year Structure Built



American Community Survey 2014-2018 5-year estimates.

Examining the age of the current housing stock is one way to understand how historical development patterns have contributed to a city's form. The time period where the highest share of San Marino's housing units were built is 1939 & Earlier, while in the SCAG region more units were built during 1970-1979 than any other period.

LOCAL HOUSING DATA, 2020

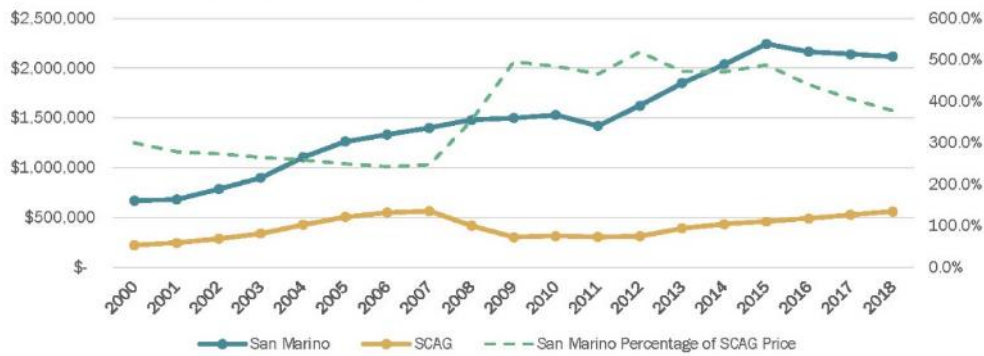
**Substandard Housing**



American Community Survey 2014-2018 5-year estimates.

The ACS includes surveys about three factors of what may be considered substandard housing. In San Marino, 31 units lack telephone service, 20 units lack plumbing facilities, and 20 units lack complete kitchen facilities.

**Median Home Sales Price for Existing Homes**

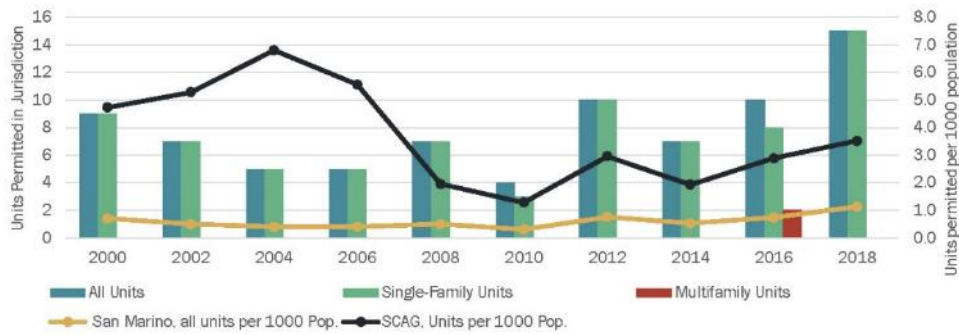


SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

Between 2000 and 2018, median home sales prices in San Marino increased 216% while prices in the SCAG region increased 151%. 2018 median home sales prices in San Marino were \$2,117,500 and the highest experienced since 2000 was \$2,244,000 in 2015. Prices in San Marino have ranged from a low of 242.9% of the SCAG region median in 2006 and a high of 518.9% in 2012.

LOCAL HOUSING DATA, 2020

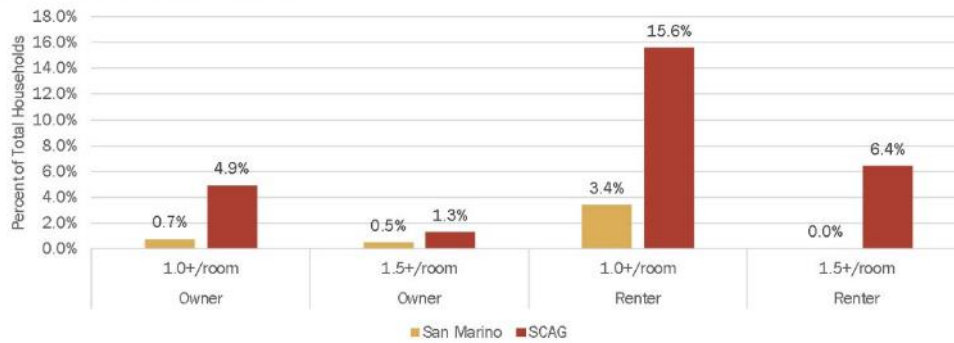
Housing Units Permitted



Core Logic/Data Quick. Additional detail available in SCAG 2019 Local Profiles. SCAG median home sales price calculated as household-weighted average of county medians.

VI. OVERPAYMENT AND OVERCROWDING

Crowding by Extent and Tenure



American Community Survey 2014-2018 5-year estimates.

In San Marino, 29 owner-occupied and 21 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. 19 owner-occupied households and 1 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

LOCAL HOUSING DATA, 2020

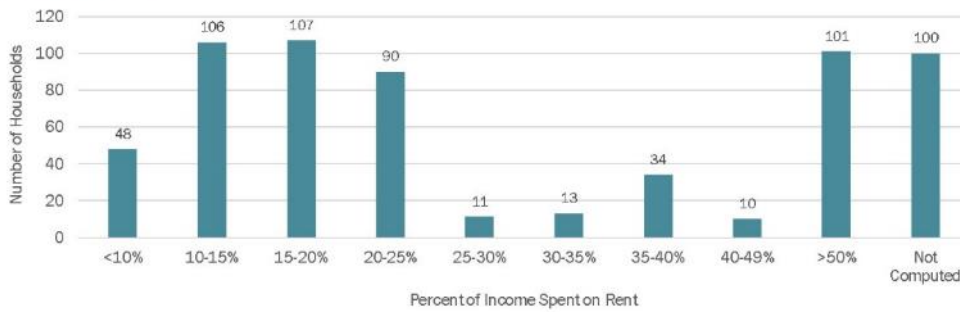
**Cost Burden by Income**

Households by Share of Income Spent on Housing Cost:			
Income	< 30%	30-50%	> 50%
< 30% HAMFI	25	0	290
30-50% HAMFI	50	60	165
50-80% HAMFI	120	48	105
80-100% HAMFI	180	65	195
> 100% HAMFI	2,375	520	249
<b>Total Households</b>	<b>2,750</b>	<b>693</b>	<b>1,004</b>

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Housing cost burden is most commonly measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for 'severe cost burden.' However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience more true 'cost burden.' These data indicate the number of households in San Marino by their income relative to the surrounding area and their share of income spent on housing.

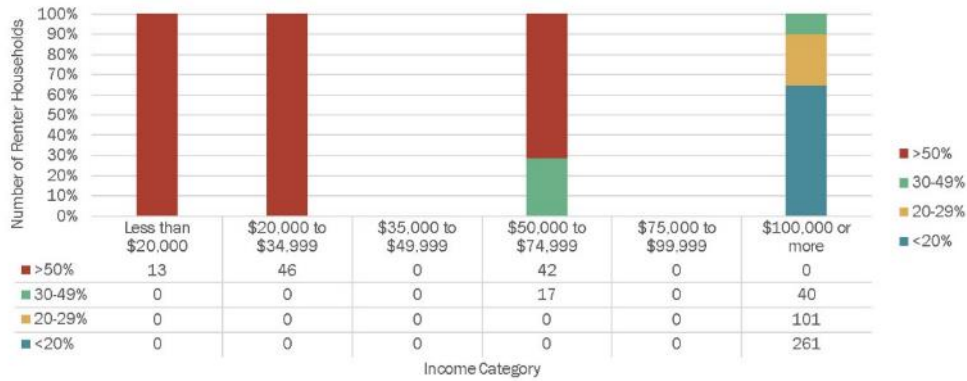
**Spending on Rent**



Across San Marino's 620 renter households, 158 (25.5%) spend thirty percent or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 101 renter households in San Marino (16.3%) spend fifty percent or more of gross income on housing cost, compared to 28.9% in the SCAG region.

LOCAL HOUSING DATA, 2020

**Spending on Rent by Income**



American Community Survey 2014-2018 5-year estimates.

While the previous table breaks down cost burden by area-relative income, the ACS also allows for the analysis of San Marino's 520 renter households (for which income data are available) by spending on rent by income bracket (dollar amounts). As one might expect, the general trend is that low-income households spend a higher share of income on housing (e.g. over 50%) while high-income households are more likely to spend under 20% of income on housing.

**Household Income by (Cash) Rent**



American Community Survey 2014-2018 5-year estimates.

San Marino renter households' cash rent paid can be broken down by household incomes. As one might expect, the general trend is that lower-income households spend less on rent while higher-income households spend more on rent, though this may not be universally true. Rent categories range from <\$500/month (0% of San Marino renters) to >\$2000/month (72.4% of San Marino renters). The most common rent category in San Marino is >\$2000/month with 72.4% of renters.

LOCAL HOUSING DATA, 2020

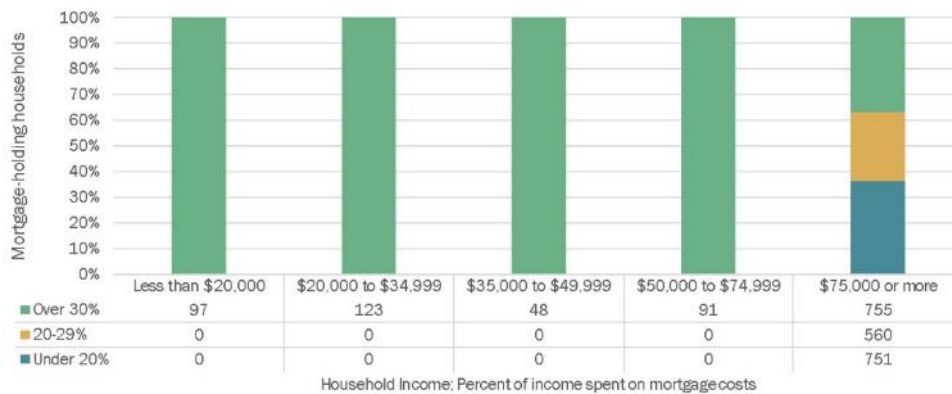
Monthly Owner Costs for Mortgage Holders



American Community Survey 2014-2018 5-year estimates.

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 86.4% of San Marino and 52.5% of the SCAG region. The most commonly occurring mortgage payment in San Marino is >\$4000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/mo.

Costs for Mortgage Holders by Income

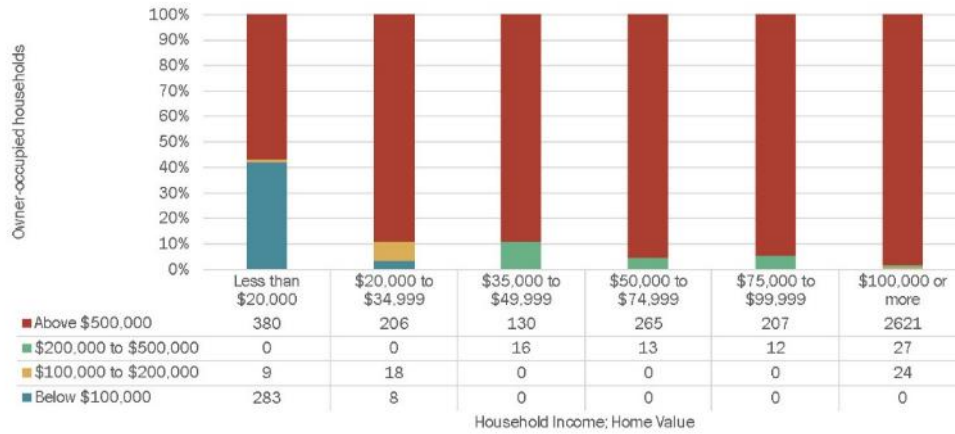


Mortgage-holding households in San Marino can be broken down by income and the percentage of income spent on mortgage costs. As one might expect, the general trend is that lower-income households spend a higher share of income on housing costs, while high-income households may spend a lower share of income on housing. The income category most prevalent amongst San Marino mortgage-holding households is \$75,000 or more (2,066 households) and the most prevalent share of income spent on mortgage costs is over 30% (1,114 households).



LOCAL HOUSING DATA, 2020

Household Income by Home Value (for owned units)



Another approach to evaluating the relationship between housing and income is to compare incomes and home values in San Marino. The most commonly-occurring income category amongst owner households in San Marino is \$100,000 or more (2,672 households) and the most commonly-occurring home value category is Above \$500,000 (3,809 households).

Extremely Low Income Housing Needs

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	1,760	255	14.5%
Black, non-Hispanic	25	0	0.0%
Asian and other, non-Hispanic	2,629	265	10.1%
Hispanic	250	10	4.0%
<b>TOTAL</b>	<b>4,664</b>	<b>530</b>	<b>11.4%</b>
Renter-occupied	620	195	31.5%
Owner-occupied	4,040	340	8.4%
<b>TOTAL</b>	<b>4,660</b>	<b>535</b>	<b>11.5%</b>

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Housing the extremely-low income population (below 30% of area median income) can be especially challenging. HUD's CHAS dataset provides a wealth of information on such households in San Marino. The above table provides a breakdown of extremely low income households by race and ethnicity. The race/ethnicity with the highest share of extremely-low income households in San Marino is White, non-Hispanic (14.5% compared to 11.4% of total population). In the SCAG region, the highest share of extremely-low income households is Black, non-Hispanic (27.1% compared to 17.7% of total households).

LOCAL HOUSING DATA, 2020

**VII. ASSISTED UNITS AT RISK OF CONVERSION**

**Assisted Units at Risk of Conversion**

Risk Level	Definition:	Low-income units in jurisdiction	Percent of county's low-income units
Very High	At-risk of converting to market rate within the next year	0	#DIV/0!
High	At-risk of converting to market rate in the next 1-5 years	0	#DIV/0!
Moderate	At-risk of converting to market rate in the next 5-10 years	0	#DIV/0!
Low	At-risk of converting to market rate in the next 10 or more years and/or are owned by a large/stable non-profit, mission-driven developer.	0	#DIV/0!
<b>TOTAL</b>		<b>0</b>	<b>#DIV/0!</b>

*California Housing Partnership, July 2020. Includes HUD, Low-income Housing Tax Credit (LIHTC), USDA, and CalHFA projects. Subsidized or assisted developments that do not have one of the aforementioned financing sources may not be included.*

The California Housing Partnership (CHP) provides data on assisted housing units and assesses the level of risk to converting to market rate. These data identify homes without a known overlapping subsidy that would extend affordability beyond the indicated timeframe and unless otherwise noted are not owned by a large/stable non-profit, mission-driven developer. Detailed 2019 data can be found in SCAG's RHNA data appendix at <http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Data-Appendix-030520.pdf>. Complete, updated data can be requested from CHP through Danielle Mazzella, Preservation & Data Manager (dmazzella@chpc.net)

**VIII. REGIONAL HOUSING NEEDS ALLOCATION**

**6th Cycle Regional Housing Needs Allocation for San Marino:**

	Units
Very-Low Income (<50% of AMI)	149
Low Income (50-80% of AMI)	91
Moderate Income (80-120% of AMI)	91
Above Moderate Income (>120% of AMI)	68
<b>TOTAL</b>	<b>399</b>

*SCAG, 2020. Estimate based on final adopted RHNA methodology (3/5/20). Final RHNA allocation will be issued following the conclusion of the RHNA appeals process in early 2021. Please note that for the housing element update, local jurisdictions will have to consider extremely low income (ELI) households as well. ELI housing needs may be calculated either by using Census data or simply assuming that 50 percent of the very low income households qualify as extremely low income households.*

## MAJOR DATA SOURCES USED

	DESCRIPTION	FOR MORE INFORMATION, PLEASE SEE
ACS	American Community Survey 2014-2018 5-year estimates	<a href="http://www.data.census.gov">www.data.census.gov</a>
DOF	CA DOF E-5 Population and Housing Unit Estimates	<a href="http://www.dof.ca.gov/forecasting/demographics/">www.dof.ca.gov/forecasting/demographics/</a>
CHAS	HUD CHAS, 2012-2016	<a href="http://www.huduser.gov/portal/datasets/cp.html">www.huduser.gov/portal/datasets/cp.html</a>
CA DDS	California Department of Developmental Services	<a href="http://www.dds.ca.gov/transparency/">www.dds.ca.gov/transparency/</a>
SCAG LOCAL PROFILES	Including Construction Industry Research Board (CIRB) and Core Logic/DataQuick	<a href="http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx">www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx</a>



**MAIN OFFICE**  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017  
Tel: (213) 236-1800  
[www.scag.ca.gov](http://www.scag.ca.gov)

**REGIONAL OFFICES**

**IMPERIAL COUNTY**  
1503 North Imperial Ave., Ste. 104  
El Centro, CA 92243  
Tel: (213) 236-1967

**ORANGE COUNTY**  
OCTA Building  
600 South Main St., Ste. 741  
Orange, CA 92868  
Tel: (213) 236-1997

**RIVERSIDE COUNTY**  
3403 10th St., Ste. 805  
Riverside, CA 92501  
Tel: (951) 784-1513

**SAN BERNARDINO COUNTY**  
1170 West 3rd St., Ste. 140  
San Bernardino, CA 92410  
Tel: (213) 236-1925

**VENTURA COUNTY**  
4001 Mission Oaks Blvd., Ste. L  
Camarillo, CA 93012  
Tel: (213) 236-1960

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## APPENDIX B: COMMUNITY ENGAGEMENT

Government Code §65583 (c)(7) requires local government to “Include a diligent effort by the local government 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 federal Affirmatively Further Fair Housing Final Rule also requires community participation in the City’s Assessment of Fair Housing (AFH). Community engagement efforts undertaken for the 2021 Housing Element are summarized in **Section 1**.

### Public Outreach Summary

Housing issues affect the entire community and can be confusing and contentious. State requirements about what Housing Elements must allow often seem at odds with long-standing community values. The public participation requirement of Housing Element law presents an opportunity to engage constituents in defining housing issues, and in creating solutions that both meet the needs of the community and the requirements of state law.

The ongoing restrictions on gatherings due to the COVID-19 pandemic have forced community outreach

and engagement into a virtual world. While in some cases this has made it possible for more people to be engaged in the process, a digital divide often exists in cases where households may lack internet connections or may be unable to attend virtual meetings due to work obligations.

To ensure that community outreach during the pandemic has been as equitable as possible, the community outreach program was designed to provide participation opportunities via cell phone and at the convenience of the resident. San Marino’s Housing Element Update has included the following public outreach efforts:

- **December 7, 2020:** City Council held a virtual Town Hall to introduce the Housing Element update and to present an overview of the Housing Element Update process and new laws.
- **December 29, 2020:** City developed and launched a webpage at <http://cityofsanmarino.org/housingelement> dedicated to the update of the Housing Element. The website includes a dedicated e-mail address for the Housing Element Update, a background on the Housing Element and its purpose; opportunities for participation; and links to meeting materials, presentations, and document drafts for public review. An outreach and notification list were developed and used throughout the update process.
- **November 2020- January 2021:** Community opinion surveys were conducted in English, Spanish, and Chinese. The surveys were structured to allow full participation via cell phone to overcome any digital divide. Survey results are provided in Section 4.
- **January-April 2021:** Stakeholder interviews conducted with responsive contacts representing for- and not-for-profit developers, advocacy groups, and

service providers, including Southern California Non-profit Housing Association; Milestone Housing Development Corporation; the Chinese Club of San Marino; the Los Angeles County Economic Development Corporation; and the Pasadena-Foothills Association of Realtors.

- **February 24, 2021:** Planning Commission held a publicly noticed workshop on the Housing Element Update. The Commission discussed the challenges faced by the City, took public input, and provided policy direction to staff in formulating strategies for meeting the State Housing Element mandates and identifying adequate sites to meet the City's RHNA.
- **April 16, 2021:** City Council held a publicly noticed workshop on the Housing Element Update and reviewed the Draft Housing Strategy (Policies and Programs for the Housing Element) and a preliminary rezoning program to address the City's RHNA shortfall. The City Council reviewed the draft set of policies and discussed options to meet the Housing Element requirements and community housing needs. The City Council provided feedback and direction on the preparation of a draft for review by the public and by the State Department of Housing and Community Development (HCD). Notices for this workshop were sent to the outreach and notification list, as well as to those who had provided contact information on the community surveys and those that had spoken at previous meetings.
- **July 17, 2021:** City Council held a publicly noticed workshop to review the Draft Housing Element for possible transmittal to the State.
- **July 21, 2021:** Public Review Draft Housing Element was released and made available on the established website. Notices of the release of the draft document were sent to the outreach and notification list, including those who had spoken at previous meetings.
- **August 3, 2021:** City Council held a publicly noticed meeting to receive public input regarding the Housing Element Update and provided further direction to staff and consultants regarding sites to include on the inventory lists to be considered for rezoning.
- **August 25, 2021:** City held a Town Hall to continue to receive public input on the Draft Housing Element and advise the community of future opportunities to comments on the HE update document or meet with a planner individually to discuss the update process. Announcements for this Town Hall were included in two weekly community newsletters, advertised on social media, and mailed to tenants and property owners of the sites added to the updated Sites Inventory list.
- **September 24, 2021:** The City Council held a duly noticed public meeting to take public comment and requested additional changes to be made to the Draft Housing Element.



- **October 29, 2021:** The City Council held a public meeting and authorized staff to transmit the Draft to HCD to begin their review.
- **November 1, 2021:** The Draft Housing Element and all public comments received to date were transmitted to HCD to begin their mandatory 60-day review period, during which time all interested parties were invited and encouraged to submit comments directly to HCD.
- **December xx, 2021:** HCD responded with several changes needed for the Draft Housing Element to be compliant with State law. These changes were subsequently incorporated into the Planning Commission Draft.
- **December xx, 2021:** Mitigated Negative Declaration released.
- **January xx 2022:** Planning Commission hearing on MND and Draft Housing Element;
- **January xx 2022:** City Council hearing to adopt MND and Housing Element.

### Community Opinion Survey Results

Community opinion surveys were developed in three languages and have been distributed to residents in several ways: through the City website; through weekly community newsletter from the City Manager's office; through direct emails to the updated interested persons list from the 2014 Housing Element; to the seniors mailing list; by posting to the City's social media pages; and through distribution to the Chinese Club and local Realtors. The surveys are designed to elicit residents' opinions about housing needs and opportunities, both now and in the future, as well as their ideas about new housing types that might help to meet identified needs.

Survey results demonstrate that residents have given housing issues a lot of thought and have some good ideas for meeting housing needs while preserving the City's single-family neighborhoods and character. While some survey respondents indicated that all of San Marino's housing needs are being met, many also listed the need for less expensive housing choices including homes affordable to first-time buyers as a pressing need. About half of respondents agreed that San Marino had grown too expensive for their children to be able to afford a home here, and over 60 percent acknowledged that people who work in San Marino cannot afford to live here. Many respondents provided thoughtful ideas for different types of housing including studios, more ADUs, and both small apartment complexes and mixed-use development in the commercial zones.

Some indicated that existing homes could be divided to allow more than one household or generation to live in the same home. At the same time, most survey respondents agreed that it was important to preserve San Marino's existing neighborhoods and its beautiful architecture.

Complete survey results are provided as Attachment A. Some questions provided participants the opportunity to share their unique input; these questions and additional write-in comments are provided below in Table 35.

**Table 35: Public Comments and Incorporation into Housing Element**

Written Comments	Incorporation in Housing Element
<p>Question:  <i>The biggest housing needs facing San Marino today are:</i></p>	
<p>“Homes without homeowners living in the country, rented or empty causing many homes lack of maintenance and lack of laws for city to take serious action”</p>	<p>Discussion and program to consider vacancy tax or other measures</p>
<p>“Do not need housing that sits empty because of LLC ownership. Don’t allow LLC ownership &amp; add a tax”</p>	<p>Discussion and program to consider vacancy tax or other measures</p>
<p>“Vacant homes have to be pulled into market. Vacant Homes have a lot of negative impact to our city. Crime, less property tax income, fewer families with school-aged kids, etc”</p>	<p>Discussion and program to consider vacancy tax or other measures</p>
<p>“need more housing - staying with an edict of only single-family house is unrealistic and bourgeoisie. We have commercial spaces that are vacant and make the City downtown area look destitute. Mixed use will help bring vibrancy to our community, increase walkable retail spaces and open housing to people who work in our communities: educators, public safety, public service workers”</p>	<p>Programs included to allow all forms of housing, including multi-family</p>
<p>“With-140 homes that are vacant, there is scant need for additionally housing”</p>	<p>Program to address vacant housing, otherwise comment not consistent with RHNA or statutory requirements</p>
<p>“No mixed-use commercial properties. The cost of housing in San Marino is due to our schools’ academic standards. We need to make sure those standards are maintained. that makes homeowners participate in positive city participation”</p>	<p>Noted.</p>
<p>“San Marino needs to not just zone for the RHNA allocation but also zone enough capacity so it will be built. Since very new units have been built in recent years I request a zoning buffer of 50% above the allocation”</p>	<p>City will strive to zone for 120% of its RHNA shortfall</p>
<p>Question:  <i>San Marino’s housing needs in the coming 10 years will include:</i></p>	
<p>“City can ease the building requirement for building under 100 sqft, because now there are many children moving back into their parents' homes”</p>	<p>Assuming commenter meant 1,000 SF, the Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“ADUs are the appropriate way to provide less expensive housing”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“Adopt advanced zoning and planning concepts”</p>	<p>Comment not specific</p>

<p>“Updating and renovation will continue and meet future housing needs”</p>	<p>Comment is inconsistent with RHNA requirements for new units</p>
<p>“Our city attracts homeowners who want their children to be a part of our schools and that will always mean a better city and school system. Our housing prices are based on that”</p>	<p>Comment noted</p>
<p>“More ADUs for family members to live close by”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“Rental housing for young people and seniors. The rental to owner divide is not balanced”</p>	<p>New provisions and zoning will now allow multi-family rentals in San Marino.</p>
<p>Question:  <i>What are some unique features of San Marino that can be housing opportunities for the community? For example: unused office spaces that can be used as artist studio or work/live spaces; carriage houses that can be converted to caretaker facilities; large homes modified to accommodate more family members or multigenerational home;s large lots perfect for tiny homes or cottages to be developed, etc. Your idea(s):</i></p>	
<p>“Large homes can be renovated to accommodate more family members or become multi-generation homes.”</p>	<p>Policy and program are included to allow these homes to be divided into duplexes and triplexes</p>
<p>“Please quickly approve building of a second unit that is less than 1000 sq ft on existing home property, which would allow family members to come back and live there.”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“Large lots can be developed into smaller single family homes, but the original appearance of San Marino should be the priority and not be affected”</p>	<p>Policies and Programs strive to protect the character and architecture of the City’s existing single-family neighborhoods while allowing additional housing units.</p>
<p>“Provide more convenient public facilities for seniors, such as caretaker facilities, and more public facilities for young adults and children”</p>	<p>Comment noted.</p>
<p>“Maintain the current situation”</p>	<p>Noted. Comment is inconsistent with the City’s RHNA obligation and state law.</p>
<p>“Carriage houses that can be converted to caretaker facilities”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“The first item (ADUs)”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“Smaller houses at lower rent”</p>	<p>Housing Element contains multiple programs to encourage smaller units such as ADUs, JADUs, and missing middle housing</p>

<p>“Agree with the creative repurposing ideas listed” (ADUs, conversions)</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs, as well as to allow conversion of large homes into duplexes and triplexes</p>
<p>“Downtown commercial facilities that can be converted to residential as well as commercial.”</p>	<p>Mixed occupancy along the Huntington Drive corridor will be considered provided conformance with objective design standards.</p>
<p>“Allow for multi family properties”</p>	<p>New provisions and zoning will now allow multi-family rentals in San Marino.</p>
<p>“Turn commercial space into low income housing opportunities”</p>	<p>Policies and Programs are included to adopt an overlay zone applicable to commercial properties and allowing higher-density residential uses</p>
<p>“Guest houses able to be occupied, developing areas belonging to SM that are by Carver School”</p>	<p>New provisions and zoning will now allow multi-family rentals in San Marino. Areas near Carver to be considered for Housing Overlay.</p>
<p>“Carriage houses”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs.</p>
<p>“None of these are a good idea”</p>	<p>Comment noted</p>
<p>“More multi-family/multi-unit housing”</p>	<p>New provisions and zoning will now allow multi-family rentals in San Marino.</p>
<p>“Like the idea of office spaces being used as artist studio or work/live spaces. This is appealing because it would not change the residential look of San Marino”</p>	<p>Opportunities exist for these spaces; objective design standards will be developed and adopted in 2022</p>
<p>“There is no mixed use in our code and it should stay that way. Right now the code does not address the required separation for living space and other occupancies. That requires an entire separate section in the code (overlay zone). It would be very expensive to try to convert office space to living space; the only exception would be conversion of the whole building to residential, with fire sprinklers, exits, etc. and *limit it to one story*.”</p>	<p>Comment noted.</p>
<p>“Parking lots should be converted to housing. Allow people to park their cars on the street overnight which would free up driveway and garage space. Change the zoning from commercial/retail to residential. There do not need to be that many businesses in San Marino when there are plenty of commercial and retail spaces in larger, nearby cities.”</p>	<p>Some underutilized parking lots are proposed to be considered for rezoning to high-density residential. Additionally, policies and Programs are included to adopt an overlay zone applicable to commercial properties</p>

	and allowing higher-density residential uses
“Whatever produces the least amount of density”	Comment noted; San Marino’s default density is 20 units per acre, much greater than the 4-6 units per acre of the City’s residential areas.
“Easing up current restriction on home expansion and allowing homeowners to expand their house to meet their family needs”	Current ADU and JADU ordinance allows expansion and addition of living area without discretionary approval.
“High density homes, townhouses, duplex, multi-family condo or apartments, allow to convert empty commercial buildings to live/work studios along Huntington Dr.”	New provisions and zoning will now allow multi-family rentals in San Marino. Opportunities for live-work spaces exist and objective design standards will be developed and adopted in 2022.
“I would not like any of the suggestions in 4. to be considered. San Marino is not suited for things such as tiny homes. It is a city of single family residences and should remain that way.”	Noted. Comment inconsistent with state housing element law.
“Multiple units on lots”	Policy and Program to promote missing middle, including up to 3 units on single-family lots.
“Bungalow courts. Live/work above existing commercial units. Un/underutilized city properties that could be developed as affordable, multi unit workforce housing for city and school district staff (to reduce their commutes to San Marino, make it easier for their kids to attend local schools and be active in the community, and make city/district jobs more competitive with other cities )”	Policies and Programs are included to encourage missing middle housing. Another programs adopts a Housing Overlay for placement over commercial and institutional properties to allow residential uses in addition to commercial and institutional uses (churches, schools, civic uses)
“To meet our affordable housing assessment we should continue to pursue ADU development. Mixed use construction in the Huntington Dr business district could also be explored but ONLY if the state would allow the city to determine it's own standards for development. If the state continues to limit local control then the city should explore prohibiting any mixed use in the business districts.”	Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs. Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards.
“Large homes modified to accommodate more family members or multigenerational homes”	Policy and Program included to allow the division of these homes into duplexes or triplexes
“Large lots for smaller cluster houses in gated community”	Policy and Program included to allow missing middle housing, may extend to this type

<p>“all of above, including mixed use for our commercial areas”</p>	<p>Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards</p>
<p>“Allow mixed-use development in the commercial areas along Huntington Dr. and Mission St., and allowing housing above the ground retail/commercial spaces.”</p>	<p>Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards</p>
<p>“San Marino is an upscale housing option. Converting it to allow for greater density is abhorrent. What we need is to oust the idiots in Sacramento.”</p>	<p>Noted.</p>
<p>“Why cant we let our elected city government decide the situations which the city can comfortably allow?”</p>	<p>Noted.</p>
<p>“Modular or pre-fabricated tiny homes (or container houses) that can be quickly erected and streamlined through permitting process”</p>	<p>Programs included to pre-approve ADU plans, could include smaller factory-built home types.</p>
<p>“Convert Stoneman into condos/townhouses. Blend Carver and Valentine, and use the Carver property to develop more homes”</p>	<p>Stoneman is on sites inventory list. Carver was on inventory list for Overlay program but was subsequently removed due to strong opposition from property owner and the public.</p>
<p>“Granny housing on residential properties”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs</p>
<p>“As Pasadena develops and grows into the city we think it will be become: a major city to the east of downtown drawing people from LA, we can fit the need of those that are looking for a smaller town feet but close proximity to the growing city of Pasadena”</p>	<p>Comment noted</p>
<p>“Reduce or eliminate emotionally and politically motivated restriction of development at the DRC and Planning Commission”</p>	<p>Comment noted</p>
<p>“all of above”</p>	<p>Most of the referenced programs are provided for in the updated housing element</p>
<p>“Lacy Park”</p>	<p>If desired by City, Lacy Park can be considered for rezoning w/in 3 years</p>
<p>“Carriage houses for sublet to singles”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs</p>
<p>“convert larger homes to senior living (maximum 3 people per home”</p>	<p>Housing Element contains policy and program to allow these homes to be divided into duplexes or triplexes.</p>
<p>“like the carriage house idea”</p>	<p>Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs</p>



“Spaces above businesses could be used to construct studios”	Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards
“Allow to reconvert big houses into few smaller houses”	Housing Element contains policy and program to allow these homes to be divided into duplexes or triplexes.
“Our commercial areas on Huntington and Mission should have more mixed use buildings with living units above and retail and restaurants below. Our commercial arteries and dead or dying.”	Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards
“I am concerned that condos, townhouses, and apartments were not in the list of new housing typologies? Re-zoning is needed”	Rezoning and zoning code changes to allow attached and multi-family home types are included
“Mixed use above existing and new Huntington Drive commercial”	Mixed occupancy will be considered along the Huntington Corridor provided conformance with objective design standards
“I don’t think tiny houses are a good idea, especially for this community. It’ll be liken to trailer park homes. However, high-end apartment buildings on large lots might be a great way to expand housing and keep the integrity of San Marino.”	Tiny house comment noted. Rezoning to provide for high-density apartments will be accomplished within 3 years.
“Change nothing. Preserve the home architecture and stop allowing for Orange County-style homes to built in San Marino”	Comment noted. Comment inconsistent with RHNA and zoning obligations
“ADUs and larger lots to accommodate more multigenerational homes”	Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs
“Small Cottages, maybe 2 ADUs on large lots”	Housing Element contains policy and program to allow homes to be divided into duplexes or triplexes. Housing Element contains multiple policies and programs to encourage and promote ADUs and JADUs

**Community Outreach Messaging**

In addition to the community surveys and stakeholder interviews, phone calls were made and emails sent to persons and companies that had participated in the 2014 Housing Element Update. The following sections provides the specific messaging sent to individuals and groups in the specified Tables:

**November 5-9, 2020:** Participants in Table 36 were emailed the following message:

Good evening,

The City of San Marino is updating their Housing Element for 2021-2029 and will correspondingly revise the public outreach list in the appendix of the City’s current Housing Element certified by HCD in 2014. \_\_\_\_\_ is included in this list but is missing a few details. I am reaching out to request the point of contact, email, and telephone number if at all possible. I appreciate the time it took to read this email and look forward to hearing from you.

Thank you,

Aundrea Cruz | Associate Planner | 4LEAF, Inc.  
 Email: acruz@4leafinc.com

**Table 36: Housing Outreach Informational Update Email Contacts**

DATE OF CONTACT	ORGANIZATION	EMAIL ADDRESS
Special Needs		
11/05/2020	IDEPSCA	<a href="mailto:idepsca@idepsca.org">idepsca@idepsca.org</a>
11/05/2020	Hope Through Housing Foundation	<a href="mailto:info@hthf.org">info@hthf.org</a>
11/05/2020	Families Forward	<a href="mailto:info@FamiliesForwardLC.org">info@FamiliesForwardLC.org</a>
11/05/2020	Journey House	<a href="mailto:contact@journeyhouseyouth.org">contact@journeyhouseyouth.org</a>
11/05/2020	Outward Bound Adventures	<a href="mailto:cthomas@obainc.org">cthomas@obainc.org</a>
11/05/2020	Pacific Clinics	<a href="mailto:development@pacificclinics.org">development@pacificclinics.org</a>
11/06/2020	Victor Treatment Centers	<a href="mailto:kim.diep@victor.org">kim.diep@victor.org</a>
11/09/2020	Arthritis Club of San Gabriel Valley	<a href="mailto:info.sca.ocb@arthritis.org">info.sca.ocb@arthritis.org</a>
11/09/2020	GLAD	<a href="mailto:gladboard@gmail.com">gladboard@gmail.com</a>
11/09/2020	Home Care1	<a href="mailto:info@innovativehcare.com">info@innovativehcare.com</a>
11/05/2020	Better Living Homecare Services	<a href="mailto:info@betterlivinghc.com">info@betterlivinghc.com</a>
Developer		

11/05/2020	San Gabriel Valley Habitat for Humanity	mvanlue@sgvhabitat.org <a href="mailto:fhardy@sgvhabitat.org">fhardy@sgvhabitat.org</a>
Realty/ Lending		
11/06/2020	Rate One Financial	<a href="mailto:info@rateonefinancial.com">info@rateonefinancial.com</a>
11/09/2020	Prudential California Realty	<a href="mailto:marilynsimon@bhscal.com">marilynsimon@bhscal.com</a> <a href="mailto:nina@homesbynina.com">nina@homesbynina.com</a>
11/09/2020	REH Real Estate	<a href="mailto:info@REHrealestate.com">info@REHrealestate.com</a>

**November 9, 2020:** Potential stakeholders in Table 37 emailed the following message:

Good afternoon,

The City of San Marino is updating their Housing Element for 2021-2029 and is building the public outreach list to alert interested parties on the progress of addressing the City’s housing needs and mandates. One of the initial steps in this process is gaining input from community groups, non-profits, housing developers, service providers, environmental groups, citizen’s groups, and residents. We are trying to gather as much feedback as possible before updating the Housing Element and would like to know \_\_\_\_\_ would like to participate?

Thank you,

Aundrea Cruz | Associate Planner | 4LEAF, Inc.  
 Email: [acruz@4leafinc.com](mailto:acruz@4leafinc.com)

**Table 37: Potential Land Trust Outreach Contacts**

ORGANIZATION	CONTACT	EMAILS	TELEPHONE
The Trust for Public Land	Robin Mark, Los Angeles Program Director	<a href="mailto:guillermo.rodriguez@tpl.org">guillermo.rodriguez@tpl.org</a>	(415) 495-4014
California Council of Land Trusts	Emailed	<a href="mailto:mail@calandtrusts.org">mail@calandtrusts.org</a>	(916) 497-0272

*Additional Telephone Outreach*

Additional Telephone Outreach was conducted from November 2020- January 2021 to invite the following stakeholders to participate in the Update process and to confirm contact information (Table 38).

\* Replies indicated below

Table 38: Additional Telephone Outreach

<b>Advocacy/ Service</b>
Chinese Club of San Marino
*January 14, 2021 – February 1, 2021, correspondence between 4LEAF and Joanne Cheng confirmed the City of San Marino Chinese Club would be distributing Housing Element Update and Survey Information to members on their mailing List.
San Marino Chamber of Commerce
East San Gabriel Valley Coalition for the Homeless
Rotary Club of San Marino
South Pasadena-San Marino YMCA
Stepping Stones to Learning
Housing Rights Center
Crowell Public Library
Property Management
ICM Resources, Inc.
Realty/ Lending
Region 1 Realty
Bank of the West
East West Bank
Roycroft Realty/C I Management, Compass Real Estate
Soma Warna Real Estate Services
Dilbeck Realtors Christie's Great Estates
RE/MAX Premier Properties
Utilities
California American Water Company
*Cal Am responded 03/25/2021 with email response and current Urban Water Management Plan
Developers
A Community of Friends
San Gabriel Valley Habitat for Humanity
Special Needs
Care 4 You - In Home Care, Homecare Assistance
Silverado Senior Living
CHAP
Mothers' Club Family Learning Center, Families Forward Learning Center
Pacific Clinics
Peace Over Violence
Shelter Partnership, Inc.
Union Station Homeless Services

**January 5-11, 2021:** Potential stakeholders in Table 39 emailed the following message:

Good afternoon! You are invited to participate in the City of San Marino's Housing Element Update. The City is preparing an update to its General Plan Housing Element to cover the period between 2021-2029. The Housing Element Update will include the following:

- An assessment of the City's housing needs and opportunities;
- A collection of policies and programs that will govern housing development in San Marino over the next 8 years;
- A land inventory to identify specific sites that are suitable for residential development in order for San Marino to meet its regional housing need;
- An assessment of actions needed to affirmatively further fair housing;
- An assessment of any special needs that San Marino residents have, and how those needs are being met; and
- Opportunities for stakeholders and the public to provide input through community engagement and outreach.

You may visit the project website here [San Marino, CA \(cityofsanmarino.org\)](http://San_Marino,_CA_(cityofsanmarino.org)). If you would like to provide comments on the Housing Element update, please email: [housingelement@cityofsanmarino.org](mailto:housingelement@cityofsanmarino.org)

In order to develop a comprehensive housing strategy, we would like to interview housing providers, developers, and other professionals. You are invited to participate in one of the following ways:

- Attend a 1-hour meeting virtually via Zoom; see available times below.
- Schedule a date and time to speak over the phone:
  - Call (707) 309-4775 with your available dates and times.
- Return this email with answers to the following questions:

1. Have you or your firm attempted to develop housing in San Marino? If yes, please answer 2-5 below. If no, please answer 5-7 below:
2. If you have developed or attempted to develop housing in San Marino, please briefly describe the development process and any obstacles or roadblocks that you faced:
3. What were the biggest constraints to development? Please select all that apply:
  - a. High land costs
  - b. Community opposition
  - c. Lack of appropriately zoned land
  - d. High construction costs
  - e. Development fees and charges
  - f. City requirements in general
  - g. Other (please describe)
4. Do you see development opportunities in San Marino that the City is ignoring? If so, what are they?
5. In your professional opinion, are San Marino's housing needs being met? Why or why not?
6. What do you see as the main constraints or roadblocks to development in San Marino?
7. Why do you think there is no affordable rental housing in San Marino?
8. If you are a service provider, please tell us what needs you see in San Marino and whether those needs are being met.

Thank you for lending us your time and expertise. To arrange a phone interview, please contact Principal Planner Jane Riley, AICP at (707) 309-4775 with your available dates and times.

Zoom Sessions: If you would like to join a virtual meeting to discuss housing issues in San Marino, please accept our invitation to join one of the below:

Housing Developers & Real Estate Professionals: Monday, January 11th 1:00 – 2:00

<https://rlink.re/l/9f49ebec/6746/4c91/9097/ce722dd8d61a>

Meeting ID: 871 7637 1531 Passcode: Housing

Non-profits, service providers and housing advocacy groups: Wednesday, January 13th 4:00 – 5:00

<https://rlink.re/l/6fc8eaff/7c35/4f71/8e74/e8ddfb42ce85>

Meeting ID: 875 1151 1125 Passcode: Housing



**Table 39: Housing Development Stakeholder Outreach**

\* Replies indicated in Yellow

DATE OF CONTACT	ORGANIZATION	CONTACT	CITY, ZIP	EMAIL ADDRESS	PHONE
01/05/2021	Universal Home Design Inc.		Sherman Oaks, CA 91401	info@universalhomedesigninc.com	(818) 786-7776
01/05/2021	Accessible Construction	Adam Fine	Los Angeles, CA 90301	adam@accessibleconstruction.com	(310) 215-3332
01/05/2021	Abode Communities	Robin Hughes	Los Angeles, CA 90015	rhhughes@abodecommunities.org	(213) 225-2762
5/5/2021 (via Zoom)	California YIMBY	Jes McBride	Sacramento, CA 95814	info@cayimby.org	209-329-7545
01/05/2021	Frank D. Lanterman Regional Center	Melinda Sullivan	Los Angeles CA, 90010	Msullivan@lanterman.org	(213) 383-1300
01/05/2021	Easterseals	Angela F. Williams	Pasadena, CA 91106	angelawilliams@easterseals.com	(626) 793-7700
01/05/2021	Asians and Pacific Islanders with Disabilities of California (APIDC)	Patricia Kinaga	Los Angeles, CA 90021	pkinaga@kinagalawfirm.com	(213) 207-6838
01/05/2021	Dahl Architects Inc.	Steven P. Dahl	South Pasadena, CA 91030	steve@dahlarchitects.com	(626) 564-0011
01/05/2021	Kelly Sutherlin McLeod Architecture, Inc.	Kelly Sutherlin McLeod	Long Beach, CA 90807	kelly@ksmartarchitecture.com	(562) 427-6697
01/05/2021	Irwin Partners Architects	Greg Irwin	Costa Mesa, CA 92626	irwing@ipaoc.com	(714) 557-2448
01/05/2021	McKently Malak Architects		Pasadena, CA 91103	CONTACTS@MCKENTLY.COM	(626) 583-8348
01/05/2021	Hartman Baldwin Design/Build	Bill Baldwin	Pasadena, CA 91105	info@hartmanbaldwin.com	(626) 486-0510
01/05/2021	Architectural Resource Group	Katie Horak	Los Angeles, CA 90012	info_la@arg.-la.com	(626) 583-1401
01/05/2021	Ellinger Architects and Associates	William W. Ellinger III	Pasadena, CA 91101	ellinger.wm@sbcglobal.net	(626) 792-8539
01/11/2021	Ball Architecture	Stephen Ball	West Covina, CA 91791		(949) 338-2679
01/05/2021	Morley Brothers	Jan Karl	Santa Monica, CA 90405	jkarl@morleybuilders.com	(310) 399-1600
01/05/2021	Bridge Housing Corp	Timothy Van Scott II	Los Angeles, CA 90056	vscott@bridgehousing.com	(310) 422-2561

01/05/2021	Mercy House	Erika Villablanca	Los Angeles CA, 90015	evillablanca@mercyhousing.org	(213) 743-5826
01/05/2021	Pkutzer Edgewood Realty Partners	Pete Kutzer	South Pasadena, CA 91030	pkutzer@edgewoodrealty.com	(626) 403-1469 ext 116
01/05/2021	Mur-Sol Construction Inc	Kevin Cole	Arcadia, CA 91006	kevin@mur-sol.com	(626) 802-8822
01/05/2021	Sunny Construction and Development	Sunny Chan	Arcadia, CA 91006	info@sunnyconstruction.com	(626) 574-8083
01/05/2021	Coldwell Banker	Cordelia Wong		cordeliaw@coldwellbanker.com	(626) 487-0837
01/05/2021	Berkshire Hathaway HomeServices California Properties	Janice Lee	San Marino, CA 91108	janicelee@bhhscale.com	(626) 449-5222
01/05/2021	Redstone Commercial Real Estate	Dan Alle	Pasadena, CA 91101	dalle@redstonecre.com	(626) 795-2255
01/05/2021	Sun Realtors	Eugene Sun	San Marino, CA 91108	esun@earthlink.net	(626) 458-0216
01/05/2021	Pasadena-Foothills Association of Realtors	Laura Olhasso	Pasadena, CA 91106	laura@pfar.org	(626) 795-2455
01/05/2021		Michael Chan		michaelbchan@gmail.com	(626) 625-5595

**January 19, 2021:** The following message was distributed to a City-provided mailing list of 128 seniors:

Good afternoon!

You are invited to participate in the City of San Marino's Housing Element Update. While developing a comprehensive housing strategy, we would like to ensure that the community has the housing that residents want and need. To encompass a variety of opinions, experience, and expertise, we would like to include your input! This can be done one in one of the following ways:

- Taking the Community Survey here:  
<https://www.surveymonkey.com/r/7XGPV6K>.
- Providing comments on the Housing Element or signing up for updates by emailing: [housingelement@cityofsanmarino.org](mailto:housingelement@cityofsanmarino.org)
- 
- This update to the City's General Plan Housing Element will cover the period between 2021-2029. The Housing Element Update will include the following:
  - An assessment of the City's housing needs and opportunities;
  - A collection of policies and programs that will govern housing development in San Marino over the next 8 years;
  - A land inventory to identify specific sites that are suitable for residential development in order for San Marino to meet its regional housing need;
  - An assessment of actions needed to affirmatively further fair housing;
  - An assessment of any special needs that San Marino residents have, and how those needs are being met; and
  - Opportunities for stakeholders and the public to provide input through community engagement and outreach.

Responses to this outreach are as follows:

The above email was sent to 128 contacts on the City's Senior Contact list. Three responses were received:

1. An individual expressed their interest in participating in the update process via the public survey.
2. An individual expressed security concerns regarding the use of a third-party platform to conduct the outreach survey.
3. An individual expressed that they felt the City was compliant with State Law and should not pursue mixed-use to achieve unmet housing needs.

**March 17, 2021**- Educational stakeholders in Table 40 were emailed the following message:

Good evening,

As you may know, the City of San Marino is preparing an update to its General Plan Housing Element to cover the period between 2021-2029. 4LEAF is the consulting firm that has been hired by the City to complete this Housing Element update, and we would very much like to hear from you about the housing needs of your staff and faculty.

One of the things that a Housing Element must include are an assessment of the City's housing needs, including the needs of its workforce – like teachers.

Please assist us by responding to this email to briefly let us know two things:

- 1) Where (generally) do your school's staff and faculty live? Are they able to live in San Marino, or do they need to commute to work?
- 2) If the City permitted it, would you be interested in providing housing for your staff and/or teachers on-site? If no, why not?

Thank you for lending us your time and expertise. We would very much appreciate your response by Wednesday, March 24. If you would prefer to arrange a phone interview, please contact Associate Planner Aundrea Cruz at [acruz@4leafinc.com](mailto:acruz@4leafinc.com) with your available dates and times.

For more information on the Housing Element Update, please visit the project website here: [San Marino, CA \(cityofsanmarino.org\)](http://cityofsanmarino.org).

This email is sent by 4LEAF staff. 4LEAF, Inc. is the consulting team that has been chosen to assist the City in the update of its Housing Element, as well as the City's Public Safety and Health Element. 4LEAF is a full-service firm that has been providing services to numerous public agencies across California for more than 20 years. You may find more information about 4LEAF here: <https://www.4leafinc.com/>

**Table 40: Educational Facilities Outreach**

\* Replies indicated in Yellow

EDUCATIONAL FACILITY	PERSON OF CONTACT	EMAIL ADDRESS
Southwestern Academy	Robin Jarchow, Head of School	rjarchow@southwesternacademy.edu
Saints Felicitas and Perpetua School	Missy O'Neill, Principal	<a href="mailto:moneill@ssfp.org">moneill@ssfp.org</a> missyoneill@la-archdiocese.org
*St F & P School responded 3/17/2021- Indicated that there was no on-site housing for teachers and no room to place such housing. Most staff lived east of the cities in Arcadia, Monrovia, Azusa, Glendora, and La Verne. Several lived in San Gabriel, and only one lived in San Marino		
K.L Carver Elementary School (SMUSD)	Michael Lin, Principal	mclin@smusd.us
Henry E. Huntington Middle School (SMUSD)	Daryl Topalian, Vice Principal	dtopalian@smusd.us
W.L. Valentine Elementary School (SMUSD)	Alana Faure, Principal	afaure@smusd.us
San Marino High School (SMUSD)	Jason Kurtenbach, Principal	jkurtenbach@smusd.us

## Stakeholder Interviews

Various interviews were held with interested parties including those who responded to initial contacts and those who attended the scheduled stakeholder meetings. These stakeholder interviews are summarized below in Table 41.

**Table 41: Stakeholder Interviews**

ORGANIZATION/ INTERVIEWEE/ DATE OF INTERVIEW	INTERVIEW SUMMARY	INCORPORATION IN HOUSING ELEMENT
Frank D. Lanterman Regional Center  Christian Irigoyen- Resource Developer of Community Services  01/08/2021	<ul style="list-style-type: none"> <li>• Homes must be suitable for disabled individuals to be placed in them</li> <li>• Various Levels of Care determine suitability (Level 2 = Lower level of assistance needed, Level 4= Higher level of assistance needed)</li> <li>• Most homes in San Marino would be suitable for Level 2 care needs however, DDS encourages placement in smaller homes</li> </ul>	Continue existing policies and support for community care facilities
Southern California Association of Non-Profit Housing (SCANPH)  Jeanette Brown- Director of Public Affairs & Programs  Alan Greenlee -Executive Director  01/22/2021	<ul style="list-style-type: none"> <li>• Public opposition barrier to Project Roomkey Implementation</li> <li>• Suggested public/private partnerships for students like Orange Coast College</li> <li>• Mentioned Bill being used in City of Pasadena to encourage ADUs</li> <li>• Mentioned Oregon and Minnesota banning single-family zoning</li> </ul>	Comments were regional or examples of national programs and were not directly applicable to San Marino.
Milestone Housing  Marcus Griffin  02/19/2021	San Marino <ul style="list-style-type: none"> <li>• High land values are barriers to development</li> </ul> Suggestions: <ul style="list-style-type: none"> <li>• Lot consolidation program</li> <li>• Public/Private Partnerships</li> <li>• Potential for mixed-income developments</li> <li>• Stoneman site is promising</li> </ul>	Acknowledge high land prices Acknowledge difficulty in consolidating lots with different owners Stoneman Program Mixed-income assumptions made



<p>Abundant Housing LA and Climate Resolve</p> <p>Leonora Camner- Executive Director</p> <p>Anthony Dedousis- Director of Policy and Research</p> <p>Chase Englehart- Climate Planning and Resilience Coordinator</p> <p>02/25/2021</p>	<p>San Marino:</p> <ul style="list-style-type: none"> <li>• Exclusionary Zoning in the City is very similar to Historic Redlining Boundaries</li> <li>• Missing-middle housing is a low-cost solution; see examples of by-right 4-plexing in Sacramento</li> </ul> <p>Suggestions:</p> <ul style="list-style-type: none"> <li>• Land Trusts and Community Ownership</li> <li>• Tax Increment Financing</li> <li>• Use revenue from greenfield land declared a park to fund Affordable Housing development</li> <li>• Real Estate Transfer Tax; see example in Culver City</li> </ul>	<p>Exclusionary history addressed</p> <p>Missing middle program incorporated</p> <p>Formation of a Land Trust incorporated</p> <p>Program included to explore funding mechanisms</p>
<p>Pasadena-Foothills REALTORS (PFAR)</p> <p>Rian Barrett -Government Affairs and Leadership Development Director</p> <p>04/12/2021</p>	<p>San Marino:</p> <ul style="list-style-type: none"> <li>• Low Housing Inventory</li> <li>• High median home values compared to neighboring Pasadena</li> <li>• Specific/niche market</li> <li>• Unaffordable to most 1<sup>st</sup> time homebuyer</li> <li>• Houses are on market ~21 days, previously on market ~41 days</li> <li>•</li> </ul> <p>Suggestions:</p> <ul style="list-style-type: none"> <li>• Increase Density Bonuses to incentivize multi-family housing development</li> <li>• Lessen design requirements to make it easier to build in the City</li> <li>• Use Prop 19 to get more people to move to City</li> </ul>	<p>Program included to expand density bonus program</p> <p>Program included to adopt objective design &amp; development standards to remove discretionary reviews</p>

## Summary of Community Comments of Draft Housing Element

On July 21, 2021, The City of San Marino published the Draft Version of the 6<sup>th</sup> Cycle Housing Element Update. In response, the City received 102 public comment letters and emails; of those, 81 were of similar format and substance: opposition to inclusion of the Carver School property on the list of sites to be considered for rezoning. The Carver School site was subsequently removed from the list.

Additional letters were received objecting to the public outreach not including each individual member of the community. One letter was received in support of multi-family housing, mixed-use zoning, and more practical design review standards.

All public comments received by the City have been provided to HCD upon submission of the Draft Housing Element Proposal.

## Creation of the Initial Community Outreach List

In November of 2020, the City of San Marino provided the list of potential community stakeholders that had been utilized during the 5<sup>th</sup> Cycle Housing Element Update. 4LEAF consultants attempted to contact all individuals and organizations on the list via email and/or phone. Two weeks following attempted contact, including many cases where messages were left for named participants, non-responsive participants were removed from the list. The first edits are reflected as strikeouts in Table 42. The final outreach list is provided in Table 43. Additional outreach lists included the City's senior mailing list; the members of the Chinese Club; and any residents who requested the City to include them in subsequent informational items and notices.

**Table 42: Initial Community Outreach List with First Round of Revisions**

TYPE	ORGANIZATION	CONTACT	EMAILS	PHONE
Developer	A Community of Friends	Dora Leong Gallo, Chief Executive Officer	info@ccsm.org.	(626) 796-5190
Developer	Abode Communities	Robin Hughes, President & CEO	stephen@ballarchitect cture.com	(949) 338-2679
Special Needs	Arthritis Club of San Gabriel Valley, Arthritis Foundation	Krista Conti, Market Relations Coordinator		
Special Needs	Assisted Transition	Frank Cunningham	avgwinn@silverdaosenior.com	(626) 812-9777
Realty/ Lending	Bank of the West	Marlene Sanchez, Robert Wongso	marlene.sanchez@bankofthewest.com robert.wongso@bankofthewest	(626) 568-8300
Special Needs	Better Living Homecare Services		tim.wang@ctbcbankusa.com	(626) 287-0716

Special Needs	Bienvenidos	<i>Ritchie L. Geisel, President and CEO</i>	aaaivazian@cbbank.com	(626) 281-0083
Utilities	California American Water Company	Brian Barreto, Southern California Manager	anita.wong@eastwestbank.com	(626) 457-1333
Special Needs	California Drug Counseling, Inc.	Dr. Carl Rowe, Executive Director	aromero@owb.com	(626) 588-3760
Special Needs	Care 4 You – In Home Care, Homecare Assistance	Mark Barrett, Gaby Romero, Head of Operations	diana.feroyan@wellsfargo.com	(626) 795-3567
Advocacy/ Service	Catholic Big Brothers Big Sisters	Kenneth Martinet, President/CEO	isaac.hung@icmresources.com, info@sanmarinohistoricalandsociety.org	(626) 255-8158 (626) 304-9375
Advocacy/ Service	Center For Community & Family Services			
Special Needs	CHAP	Margaret B. Martinez, CEO	devoncorlew@ymcaLA.org	(626) 799-9119
Realty/ Lending	Chinatrust Bank (U.S.A.)	Tim Wang		
Advocacy/ Service	Chinese Club of San Marino	Calvin Lo, Tony Chou, President	email@steppingstones.net	(626) 449-5986
Realty/ Lending	Citizens Business Bank	Anna Aivazian	gromero@homecareassistance.com	(909) 599-0555 (626) 609-9194
Realty/ Lending	Coldwell Banker	Carson English		
Realty/ Lending	Compass Real Estate Team/Keller Williams	Teri Barton, CEO		
Advocacy/ Service	Crowell Public Library	Ann Dallavalle		
Realty/ Lending	Diamond Point			
Realty/ Lending	Dilbeck Realtors Christie's Great Estates	Ray Hayes	ihung1026@gmail.com	(626) 255-8158
Realty/ Lending	Dilbeck Realtors/The Middleman Team	Meg Middleman		
Realty/ Lending	Dolan & Knight Property Management			
Advocacy/ Service	East San Gabriel Valley Coalition for the Homeless	Olivia, Megan Ryan, Office Manager EAC		(626) 765-4140
Realty/ Lending	East West Bank	Anita Wong, Branch Manager	megmiddleman@gmail.com	
Realty/ Lending	First Capital Mortgage Corporation	Steve Kenilvort	marilysimon@bhhsca.com	

Special Needs	Foothill Family Service	Helen-Morrán-Wolf, Steve Aallen-CEO	esun@earthlink.net	(626) 309-0000
Advocacy/ Service	Friends of The Crowell Public Library	Maryann Seduski, Vice -President		(626) 705-0637
Special Needs	Greater Los Angeles Agency on Deafness, Inc.	Dr. Patricia Hughes, CEO	Swarna@socal.rr.co m	(626) 394-6216
Special Needs	HomeCare 1			(626) 755-8383
Special Needs	Hope Through Housing Foundation	George Searcy, Executive Director	peteloeffler@remax- net	(626) 587-6711
Government	Housing Authority of the County of Los Angeles			
Advocacy/ Service	Housing Rights Center	Chancela Al-Mansour, Executive Director	superintendent@sm usd.us	(626) 299-7000 Ext. 1310
Property Management	ICM Resources, Inc.	Isaac Hung, President		
Special Needs	IDEPSCA	<i>Rebeca Ronquillo, Interim President</i>	brian.barreto@amw ater	(626) 614-2542
Special Needs	Journey House	Fred Wong, Board President	ronald.garcia@sce.c om	(626) 303-8419
Realty/ Lending	Kennedy Capital	K. Kenji Tatsuno, President	esgvch@aol.com	(626) 333-7204
Special Needs	Mothers' Club Family Learning Center, Families Forward Learning Center	HECTOR LAFARGA, JR., Elva D. Sandoval, Executive Director		
Property Management	NMN Enterprises	Bob Nuccio	calmansour@housin grightscenter.org	(213) 387-8400 ext. 1111
Realty/ Lending	One West Bank	Arlene Romero	dgallo@acof.org	(213) 480-0809
Special Needs	Outward Bound Adventures (OBA, Inc.)	Gabrielle Wood, Development Manager	rhughes@abodecom munities.org	
Special Needs	Pacific Clinics	Susan Mandel, James J. Balla, President & CEO	rdelgado@hillsides.o rg	
Realty/ Lending	Pasadena Service Federal Credit Union	Dina Lopez		
Realty/ Lending	Pasadena-Foothills Association of Realtors		mmartinez@chapcar e.org	(626) 993-1227
Special Needs	Peace Over Violence	Patricia Giggans, Executive Director		(951) 243-3837 ext. 231
Realty/ Lending	PNC Mortgage		kmartinet@catholic bigbrothers.org	(213) 251-9800
Realty/ Lending	Prudential California Realty	Nina Kirkendall,		(626) 577-8480

Realty/ Lending	Rate One Financial, Inc.		pasadenapreschoola cademy@gmail.com	
Realty/ Lending	RE/MAX Premier Properties	Pete & Lisa Loeffler		(626) 564-1613
Realty/ Lending	Real Estate Heaven	Paul Argueta, CEO		(951) 764-5827
Realty/ Lending	Region 1 Realty	Eugene Sun	mmcbride@sgvhabit at.org	(626) 387-6899
Special Needs	Rosemary Children's Services, Victor Treatment Centers	Greg Wessels, CEO		
Advocacy/ Service	Rotary Club of San Marino	Isaac Hung, Charities President	contact@journeyho useyouth.org	(626) 798-9478
Realty/ Lending	Roycroft Realty/CI Management, Compass Real Estate	Dave Melford	elva@FamiliesForwa rdLC.org	(626) 792-2687 ext 124
Developer	San Gabriel Valley Habitat for Humanity	Dr. Sonja Yates, Executive Director Marta McBride, Program Manager		(626) 564-0844
Advocacy/ Service	San Marino Chamber of Commerce	Joanna Jimenez, Sandra Troup, President	jballa@pacificclinics. org	(626) 254-5000
Advocacy/ Service	San Marino City Club	Andrew Yip	patti@peaceoverviol ence.org <patti@peaceovervi olence.org>;	(626) 793-3385
Education	San Marino Unified School District	Loren Kleinrock, Dr. Jeff Wilson, Superintendent	rschwartz@shelterp artnership.org	(213) 688-2188
Special Needs	Shelter Partnership, Inc.	Ruth Schwartz, Executive Director		(626) 844-3033
Special Needs	Silverado Senior Living	Vita Gwinn, Regional Administrator	Jcoran@unionstatio nhs.org	(626) 240-4566
Advocacy/ Service	Simple Registration Services	Michael Frias		
Realty/ Lending	Soma-Warna Real Estate Services	Soma-Warna		
Advocacy/ Service	South Pasadena-San Marino YMCA	Susan Marasco, Devon Corlew, Senior Branch Executive Director	Kenji@kennedycorp. com	(626) 440-9430
Utilities	Southern California Edison	Ronald Garcia		
Special Needs	Step by Step			
Advocacy/ Service	Stepping Stones to Learning	Anna & George Hasbun		

Special Needs	The Center for Aging Resources	Vatche Kelartinian, CEO		
Special Needs	Union Station Homeless Services	Rabbi Marvin Gross, Jeremy J. Coran, Executive Assistant to Chief Programs Officer/ Interim Program Manager	kconti@arthritis.org	
Realty/ Lending	W.J. Bradley Mortgage Capital			
Realty/ Lending	Wells Fargo Bank	Diana Feroyan, Branch Manager		

Table 43: Final Revised Community Outreach List

TYPE	ORGANIZATION	CONTACT	EMAILS	TELEPHONE
Architecture		Stephen Ball	stephen@ballarchitecture.com	(949) 338-2679
Developer	A Community of Friends	Dora Leong Gallo, Chief Executive Officer	dgallo@acof.org	(213) 480-0809
Realty/ Lending	Bank of the West	Robert Wongso	<a href="mailto:robert.wongso@bankofthewest">robert.wongso@bankofthewest</a>	(626)568-8300
Utilities	California American Water Company	Brian Barreto, Southern California Manager	brian.barreto@amwater	(626) 614-2542
Advocacy/ Service	Catholic Big Brothers Big Sisters	Kenneth Martinet, President/CEO	kmartinet@catholicbigbrothers.org	(213) 251-9800
Special Needs	CHAP	Margaret B. Martinez, CEO	mmartinez@chapcare.org	(626) 993-1227
Advocacy/ Service	Chinese Club of San Marino	Joanne	<a href="mailto:cssmmanager@gmail.com">cssmmanager@gmail.com</a>	(626) 796-5190
Realty/ Lending	Compass Real Estate	Dave Melford		(626) 705-0637
Advocacy/ Service	East San Gabriel Valley Coalition for the Homeless	Megan Ryan, Office Manager EAC	esgvch@aol.com	(626) 333-7204
Realty/ Lending	East West Bank	Anita Wong, Branch Manager	anita.wong@eastwestbank.com	(626) 457-1333
Special Needs	Families Forward Learning Center	Elva D. Sandoval, Executive Director	elva@FamiliesForwardLC.org	(626-792-2687 ext 124
Educational Facility	Henry E. Huntington Middle School (SMUSD)	Daryl Topalian, Vice Principal	<a href="mailto:dtopalian@smusd.us">dtopalian@smusd.us</a>	(626) 299-7060



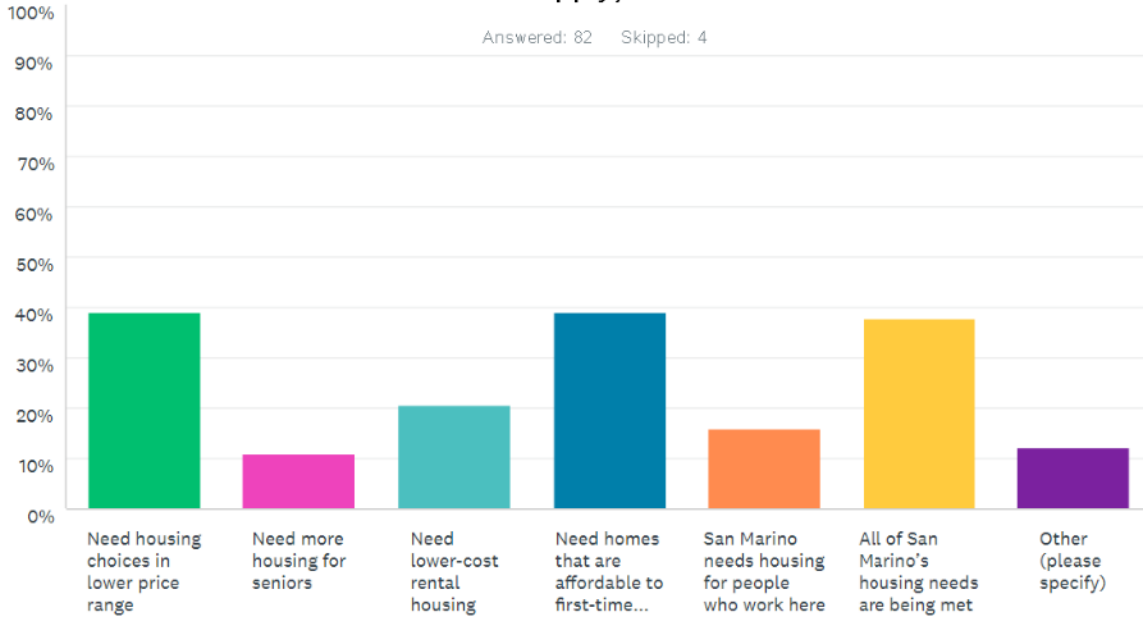
Special Needs	Homecare Assistance	Gaby Romero, Head of Operations	gromero@homecareassistance.com	(909) 599-0555, (626) 609-9194
Advocacy/ Service	Housing Rights Center	Chancela Al-Mansour, Executive Director	calmansour@housingrightscenter.org	(213) 387-8400, ext. 1111
Property Management	ICM Resources, Inc.	Isaac Hung, President	ihung1026@gmail.com	(626) 255-8158
Educational Facility	K.L Carver Elementary School (SMUSD)	Michael Lin, Principal	<a href="mailto:mclin@smusd.us">mclin@smusd.us</a>	(626) 299-7080
Realty/ Lending	One West Bank	Arlene Romero	aromero@owb.com	(626) 588 3760
Special Needs	Pacific Clinics	James J. Balla, President & CEO	jballa@pacificclinics.org	(626) 254-5000
Special Needs	Peace Over Violence	Patricia Giggans, Executive Director	patti@peaceoverviolence.org <patti@peaceoverviolence.org>;	(626) 793-3385
Realty/ Lending	RE/MAX Premier Properties	Pete & Lisa Loeffler	peteloeffler@remax.net	(626) 587-6711
Realty/ Lending	Region 1 Realty	Eugene Sun	esun@earthlink.net	(626) 309-0000
Advocacy/ Service	Rotary Club of San Marino	Isaac Hung, Charities President	isaac.hung@icmresources.com, info@sanmarinohistoricalandsociety.org	(626) 255-8158, (626) 304-9375
Educational Facility	Saints Felicitas and Perpetua School	Missy O'Neill, Principal	missyoneill@la-archdiocese.org	(626) 796-8223
Developer	San Gabriel Valley Habitat for Humanity		mmcbride@sgvhabitat.org	(626) 387-6899
Educational Facility	San Marino High School (SMUSD)	Jason Kurtenbach, Principal	<a href="mailto:jkurtenbach@smusd.us">jkurtenbach@smusd.us</a>	(626) 299-7020
Special Needs	Shelter Partnership, Inc.	Ruth Schwartz, Executive Director	rschwartz@shelterpartnership.org	(213) 688-2188
Special Needs	Silverado Senior Living	Vita Gwinn, Regional Administrator	avgwinn@silveradosenior.com	(626) 812-9777
Realty/ Lending	Soma Warna Real Estate Services	Soma Warna	Swarna@socal.rr.com	(626) 394-6216
Advocacy/ Service	South Pasadena-San Marino YMCA	Devon Corlew, Senior Branch Executive Director	devoncorlew@ymcaLA.org	(626) 799-9119
Utilities	Southern California Edison	Ronald Garcia	ronald.garcia@sce.com	(626) 303-8419
Educational Facility	Southwestern Academy	Robin Jarchow, Head of School	rjarchow@southwesternacademy.edu	(626) 799-5010

Advocacy/ Service	Stepping Stones to Learning	Anna & George Hasbun	email@steppingstones.net	(626) 449-5986
Special Needs	Union Station Homeless Services	Jeremy J. Coran, Executive Asst Interim Program Manager	Jcoran@unionstationhs.org	(626) 240-4566
Educational Facility	W.L.Valentine Elementary School (SMUSD)	Alana Faure, Principal	<a href="mailto:afaure@smusd.us">afaure@smusd.us</a>	(626) 299-7090
Realty/ Lending	Wells Fargo Bank	Diana Feroyan, Branch Manager	diana.feroyan@wellsfargo.com	(626) 795-3567

## ATTACHMENT A: COMMUNITY SURVEY RESULTS

One part of the community outreach and engagement plan included the distribution of community opinion surveys about housing needs and opportunities in San Marino. These surveys were designed to that they could be accessed and completed via cell phone in order to ensure equal access to households without internet connections. The surveys were conducted in the City's three dominant languages (Chinese, English, and Spanish) to ensure that all residents had an opportunity to participate in the language that they felt most comfortable with. Multiple digital and social media platforms were used to facilitate the public input. Fill-in responses to questions are listed above, in Table 35: Public Comments and Incorporation into Housing Element. The remaining results of the community opinion surveys (all languages compiled) are presented here.

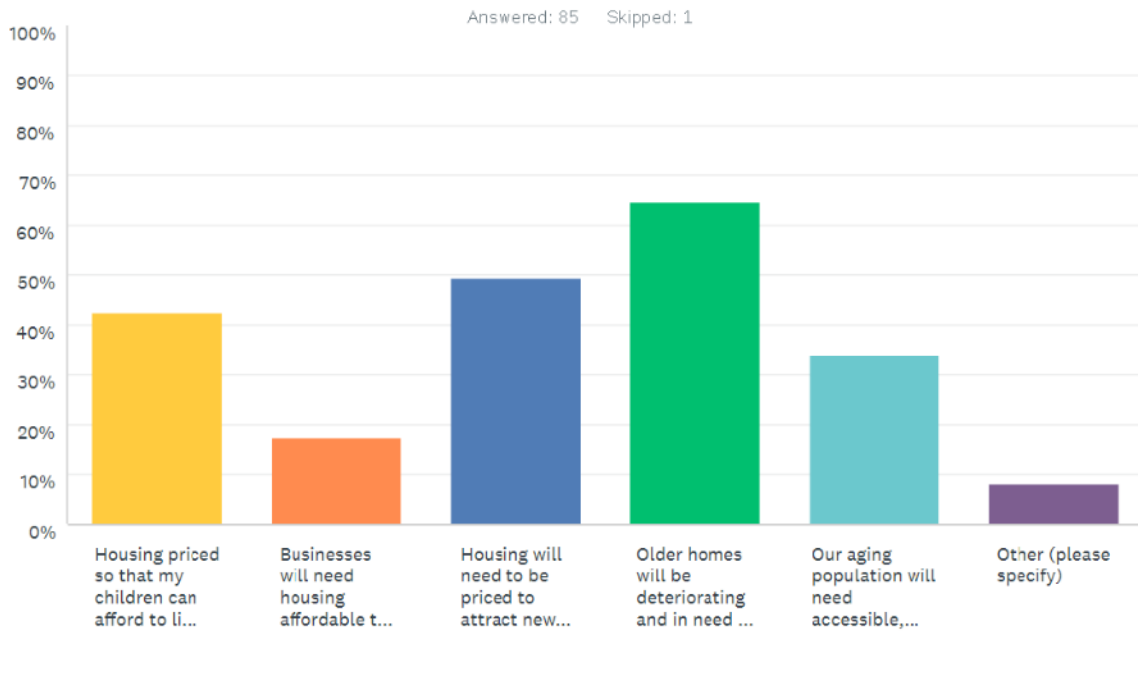
Housing Needs and Opportunities Survey  
**Q1 The biggest housing needs facing San Marino today are (check all that apply):**



**Q1 Answer Choice Responses:**

Need housing choices in lower price range	39.02%	32
Need more housing for seniors	10.98%	9
Need lower-cost rental housing	20.73%	17
Need homes that are affordable to first-time homebuyers	39.02%	32
San Marino needs housing for people who work here	15.85%	13
All of San Marino's housing needs are being met	37.80%	31
Other (please specify)	12.20%	10

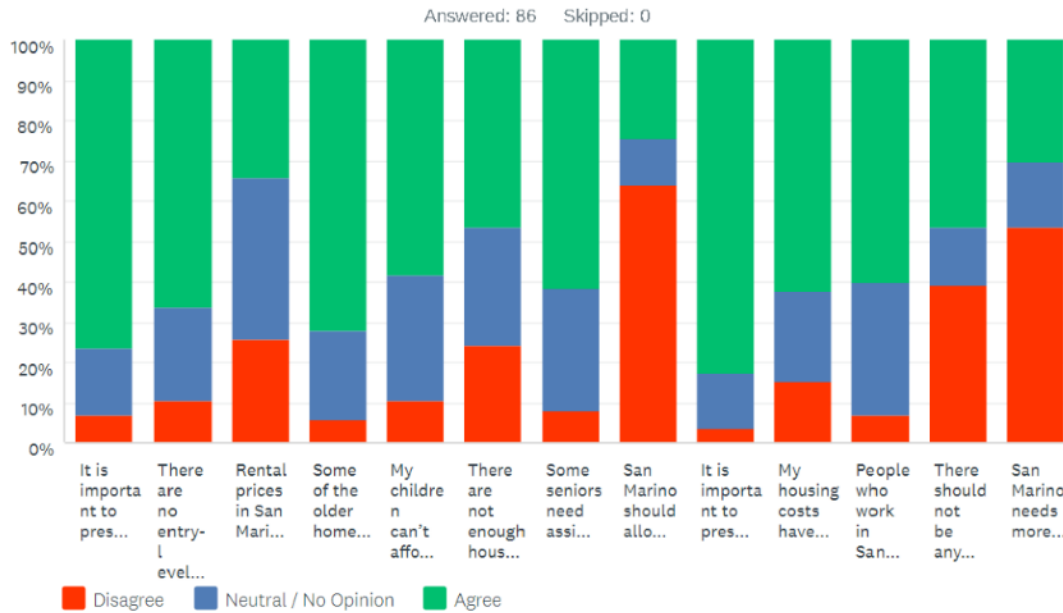
Q2 San Marino's housing needs in the coming 10 years will include (check all that apply):



Q2 Answer Choice Responses:

Housing priced so that my children can afford to live here	42.35%	36
Businesses will need housing affordable to their workers	17.65%	15
Housing will need to be priced to attract new families to San Marino	49.41%	42
Older homes will be deteriorating and in need of repair	64.71%	55
Our aging population will need accessible, well-designed housing options	34.12%	29
Other (please specify)	8.24%	7

Q3 Please rank your level of agreement with each of the following statements:

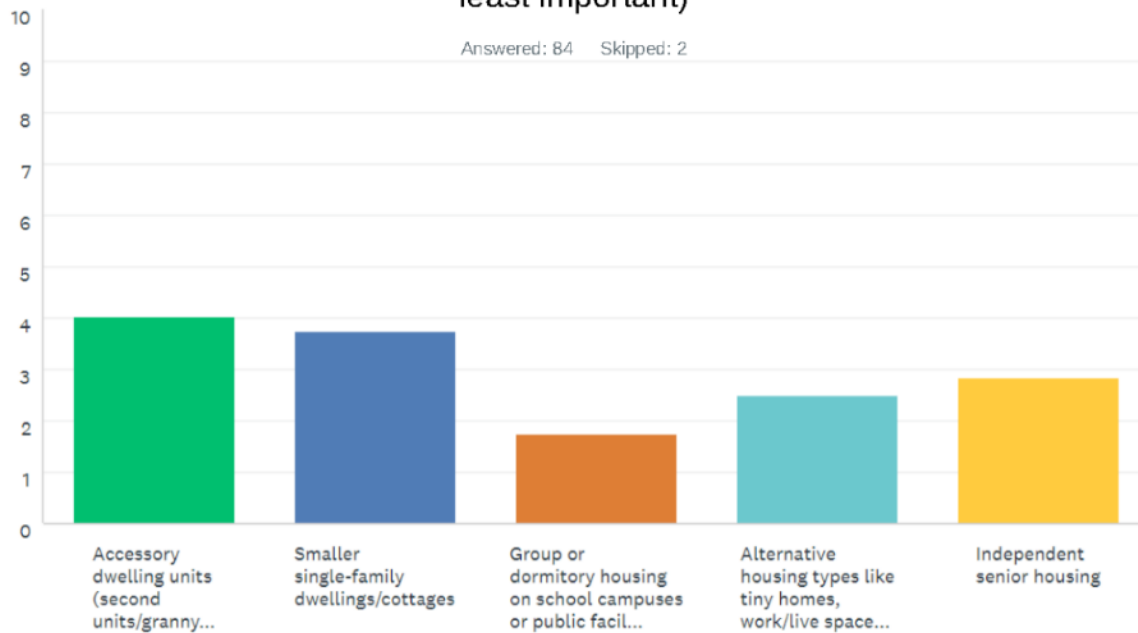


Q3 Answer Choice Responses:

	Disagree	Neutral/ No Opinion	Agree
It is important to preserve San Marino’s historic architecture	10.47% 9	23.26% 20	66.28% 57
There are no entry-level homes to purchase in San Marino	25.88% 22	40.00% 34	34.12% 29
Rental prices in San Marino are too high	25.88% 22	40.00% 34	34.12% 29
Some of the older homes in San Marino need rehabilitation	5.81% 5	22.09% 19	72.09% 62
My children can’t afford to live here in San Marino	10.47% 9	31.40% 27	58.14% 50
There are not enough housing options in San Marino	24.42% 21	29.07% 25	46.51% 40
Some seniors need assistance to remain in their homes	8.14% 7	30.23% 26	61.63% 53
San Marino should allow some apartments to be built	63.95% 55	11.63% 10	24.42% 21
It is important to preserve San Marino’s neighborhoods	3.49% 3	13.95% 12	82.56% 71
My housing costs have increased in the last 5 years	15.29% 13	22.35% 19	62.35% 53

People who work in San Marino can't afford to live here	7.06% 6	32.94% 28	60.00% 51
There should not be any apartments in San Marino unless they look like our existing houses	39.29% 33	14.29% 12	46.43% 39
San Marino needs more housing options for all income levels	53.49% 46	16.28% 14	30.23% 26

Q4 Please rank what you feel are the types of new housing that would be most successful in San Marino today: ( 1 is most important and 5 is least important)



Q4 Answer Choice Responses:

	1	2	3	4	5
Accessory dwelling units (second units/granny units/junior units)	29.41% 20	39.71% 27	16.18% 11	7.35% 5	7.35% 5
Smaller single-family dwellings/cottages	4.62% 3	3.08% 2	13.85% 9	18.46% 12	60.00% 39
Group or dormitory housing on school campuses or public facility properties	5.63% 4	9.86% 7	35.21% 25	26.76% 19	22.54% 16
Alternative housing types like tiny homes, work/live spaces, and intentional communities	15.19% 12	17.72% 14	21.52% 17	27.85% 22	17.72% 14
Independent senior housing	29.41% 20	39.71% 27	16.18% 11	7.35% 5	7.35% 5



Q5 What are some unique features of San Marino that can be housing opportunities for the community? For example: Unused office spaces that can be used as artist studio or work/live spaces Carriage houses that can be converted to caretaker facilities Large homes modified to accommodate more family members or multigenerational homes Large lots perfect for tiny homes or cottages to be developed Your idea(s):

Answered: 51 Skipped: 35

need living buildings idea mixed use Large homes San Marino  
commercial areas commercial units allow residential  
housing Carriage houses city living space homes used  
converted developed smaller properties Large lots space





## **HOUSING ELEMENT COMPLETENESS CHECKLIST**

### **A Quick Reference of Statutory Requirements for Housing Element Updates Updated 1/2021**

The purpose of this completeness checklist is to assist local governments in the preparation of their housing element. It includes the statutory requirements of Government Code section 65580 – 65588. Completion of this checklist is not an indication of statutory compliance but is intended to provide a check to ensure that relevant requirements are included in the housing element prior to submittal to the Department of Housing and Community Development pursuant to Government Code section 65585(b). For purposes of the Checklist the term “analysis” is defined as a description and evaluation of specific needs, characteristics, and resources available to address identified needs.

For technical assistance on each section visit [California Housing and Community Development Building Blocks Technical Assistance](https://www.hcd.ca.gov/community-development/building-blocks/index.shtml) (https://www.hcd.ca.gov/community-development/building-blocks/index.shtml)

## Checklist

### Public Participation

Government Code section 65583, subdivision (c)(8)

Description of Requirement	Page Number
Description of the diligent efforts the jurisdiction made to include all economic segments of the community and/or their representatives in the development and update of the housing element	
Summary of the public input received and a description of how it will be considered and incorporated into the housing element.	

### Review and Revise

Government Code section 65588, subdivision (a)

Description of Requirement	Page Number
<u>Progress in implementation</u> – A description of the actual results or outcomes of the previous element’s goals, objectives, policies, and programs (e.g. what happened).	
<u>Effectiveness of the element</u> – For each program, include an analysis comparing the differences between what was projected or planned in the element and what was achieved.	
<u>Appropriateness of goals, objectives, policies, and programs</u> –A description of how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from the results of the previous element. (e.g. continued, modified, or deleted.)	
<u>Special needs populations</u> – Provide a description of how past programs were effective in addressing the housing needs of the special populations. This analysis can be done as part of describing the effectiveness of the program pursuant to (2) if the jurisdiction has multiple programs to specifically address housing needs of special needs populations or if specific programs were not included, provide a summary of the cumulative results of the programs in addressing the housing need terms of units or services by special need group.	
<u>AB 1233 – Shortfall of sites from the 5<sup>th</sup> cycle planning period</u> – Failure to implement rezoning required due to a shortfall of adequate sites to accommodate the 5th cycle planning period RHNA for lower-income households triggers the provisions of Government Code section 65584.09.	

**Comments:**

**Housing Needs Assessment – Quantification and Analysis of Need**  
**Government Code section 65583, subdivision (a)(1)(2) and section 65583.1,**  
**subdivision (d)**

For information on how to credit reductions to RHNA See “Housing Element Sites Inventory Guidebook” at [HCD’s technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml)

Description of Requirement	Page Number
Population (e.g., by age, size, ethnicity, households by tenure) and employment trends	
Household characteristics including trends, tenure, overcrowdings and severe overcrowding	
Overpayment by income and tenure	
Existing housing need for extremely low-income households	
Projected housing needs: Regional Housing Needs Allocation (RHNA) by income group, including projected extremely low-income households	
Housing stock conditions, including housing type, housing costs, vacancy rate	
Estimate of the number of units in need of replacement and rehabilitation	

**Identification and Analysis of the Housing Needs for Special Needs Populations**  
**Government Code section 65583, subdivision (a)(7)**

Description of Requirement	Page Number
Elderly	
Persons with Disabilities, including Developmental Disabilities	
Large Households	
Farmworkers (seasonal and permanent)	
Female Headed Households	
Homeless (seasonal and annual based on the point in time count)	
Optional: Other (e.g. students, military)	

**Comments:**

**Affirmatively Further Fair Housing - An Assessment of Fair Housing –  
 Required for Housing Element due after 1/1/2021.  
 Government Code section 65583, subdivision (c)(10)(A)**

**Part 1 Outreach**

Description of Requirement	Page Number
Does the element describe and incorporate meaningful engagement that represents all segments of the community into the development of the housing element, including goals and actions?	

**Part 2 Assessment of Fair Housing**

Description of Requirement	Page Number
Does the element include a summary of fair housing enforcement and capacity in the jurisdiction?	
The element must include an analysis of these four areas: Integration and segregation patterns and trends	
Racially or ethnically concentrated areas of poverty	
Disparities in access to opportunity	
Disproportionate housing needs within the jurisdiction, including displacement risk	

Each analysis should include these components:

- Local: Review and analysis of data at a local level
- Regional impact; Analysis of local data as it compares on a regional level
- Trends and patterns: Review of data to identify trends and patterns over time
- Other relevant factors, including other local data and knowledge
- Conclusion and findings with a summary of fair housing issues

**Part 3 Sites Inventory**

Description of Requirement	Page Number
Did the element identify and evaluate (e.g., maps) the number of units, location and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to all components of the assessment of fair housing?	
Did the element analyze and conclude whether the identified sites improve or exacerbate conditions for each of the fair housing areas (integration and segregation, racially and ethnically concentrated areas of poverty, areas of opportunity, disproportionate housing needs including displacement)?	

**Comments:**

**Part 4 Identification of Contributing Factors**

Description of Requirement	Page Number
Did the element identify, evaluate, and prioritize the contributing factors to fair housing issues?	

**Part 5 Goals and Actions Page**

Description of Requirement	Page Number
Did the element identify, goals and actions based on the identified and prioritized contributing factors?	
Do goals and actions address mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for preservation and revitalization, displacement protection and other program areas?	

Programs must include the following components:

- Actions must be significant, meaningful and sufficient to overcome identified patterns of segregation and affirmatively further fair housing.
- Metrics and milestones for evaluating progress on programs/actions and fair housing results.

**Affordable Housing Units At-Risk of Conversion to Market Rate  
Government Code section 65583, subdivision (a)(9)**

See [Preserving Existing Affordable Housing](https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml) (https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml)

Description of Requirement	Page Number
Provide an inventory of units at-risk of conversion from affordable to market-rate rents within 10 years of the beginning of the planning period. The inventory must list each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the locality’s low-income housing stock in each year.	
Provide an estimate and comparison of replacement costs vs. preservation costs	
Identify qualified entities to acquire and manage affordable housing	
Identify potential funding sources to preserve affordable housing	

**Comments:**



**Analysis of Actual and Potential Governmental Constraints**  
**Government Code section, 65583, subdivisions (a)(5), (a)(4), (c)(1), and section 65583.2, subdivision (c)**

See “Accessory Dwelling Unit Handbook” at [HCD’s Accessory Dwelling Unit Assistance page](https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml) (https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml)

Description of Requirement	Page Number
Land use controls (e.g. parking, lot coverage, heights, unit size requirements, open space requirements, Accessory Dwelling Unit (ADU) requirements, floor area ratios, growth controls (e.g., caps on units or population or voter approval requirements, conformance with the requirements of SB 330), inclusionary requirements, consistency with State Density Bonus Law and Housing Accountability Act, and consistency with zoning and development standard website publication and transparency requirements pursuant to Gov. Code § 65940.1 subd. (a)(1)(B)).	
Local processing and permit procedures (e.g., typical processing times, permit types/requirements by housing type and zone, decision making criteria/findings, design/site/architectural review process and findings, description of standards [objective/subjective], planned development process). Element should also describe whether the jurisdiction has a process to accommodate SB 35 streamline applications and by-right applications for permanent supportive housing and navigation centers.	
Building codes and their enforcement (e.g., current application of the California Building Code, any local amendments, and local code enforcement process and programs)	
On and Off-Site improvement requirements (e.g., street widths, curbing requirements)	
Fees and other exactions (e.g., list all fees regardless of entity collecting the fee, analyze all planning and impact fees for both single family and multifamily development, provided typical totals and proration to total development costs per square foot, and consistency with fee website publication and transparency requirements pursuant to Gov. Code § 65940.1 subd. (a)(1)(A)).	
Housing for persons with disabilities (e.g. definition of family, concentrating/siting requirements for group homes, reasonable accommodation procedures, application of building codes and ADA requirements, zoning for group homes and community care facilities)	
Analysis of locally-adopted ordinances that directly impact the cost and supply of housing (e.g. inclusionary ordinance, short-term rental ordinance)	

**Comments:**

**An Analysis of Potential and Actual Nongovernmental Constraints**  
**Government Code section, 65583, subdivision (a)(6)**

Description of Requirement	Page Number
Availability of financing	
Price of land	
Cost of Construction	
Requests to develop housing below identified densities in the sites inventory and analysis	
Typical timeframes between approval for a housing development project and application for building permits	

Does the analysis demonstrate the jurisdiction’s action(s) to mitigate nongovernmental constraints that create a gap between planning for housing to accommodate all income levels and the construction of housing to accommodate all income levels?

**Zoning for a Variety of Housing Types**

**Government Code section, 65583, subdivisions (a)(4), (c)(1), and subdivision 65583.2 subdivision (c)**

Provide an analysis of zoning and availability of sites for a variety of housing types including the following:

Description of Requirement	Page Number
Multifamily Rental Housing	
Housing for Agricultural Employees (permanent and seasonal) (compliance with Health and Safety Code sections 17021.5, 17021.6, and 17021.8	
Emergency Shelters (including compliance with new development/parking standards pursuant to AB 139/Gov. Code § 65583 subd. (a)(4)(A)).	
Low Barrier Navigation Centers	
Transitional Housing	
Supportive Housing (including compliance with AB 2162, statutes of 2019)	
Single-Room Occupancy Units	
Manufactured homes, including compliance with Gov. Code § 65852.3	
Mobile Home Parks	
Accessory Dwelling Units	

**Comments:**

## Site Inventory and Analysis

**Government Code, section 65583, subdivision (a)(3), section 65583.1, subdivision**

See “Housing Element Sites Inventory Guidebook” and “Default Density Standard Option” at [HCD’s technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml)

See [Site Inventory Form](https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_template09022020.xlsm) (https://www.hcd.ca.gov/community-development/housing-element/docs/Site\_inventory\_template09022020.xlsm) and [Site Inventory Form Instructions](https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_instructions.pdf) (https://www.hcd.ca.gov/community-development/housing-element/docs/Site\_inventory\_instructions.pdf)

### **Site Inventory – The site inventory must be prepared using the form adopted by HCD.**

A electronic copy of the site inventory is due at the time the adopted housing element is submitted to HCD for review and can be sent to [siteinventory@hcd.ca.gov](mailto:siteinventory@hcd.ca.gov).

### **Site Inventory**

<b>Description of Requirement</b>	<b>Page Number</b>
<i>Sites Inventory Form Listing:</i> Parcel listing by parcel number, size, general plan and zoning, existing uses on non-vacant sites, realistic capacity, level of affordability by income group, publicly owned sites (optional).	
<i>Prior Identified Sites:</i> Address whether sites are adequate to accommodate lower income needs based on identification in the prior planning period for non-vacant sites or two or more for vacant sites.	
Map of sites	

Did the jurisdiction use the sites inventory form adopted by HCD?

### **Site Inventory Analysis and Methodology**

<b>Description of Requirement</b>	<b>Page Number</b>
<i>RHNA Progress:</i> List the number of pending, approved or permitted units by income group based on actual or anticipated sales prices and rents since the beginning of the projection period	
<i>Environmental Constraints:</i> Address any known environmental or other constraints, conditions or circumstances, including mitigation measures, that impede development in the planning period	
<i>Appropriate density:</i> Identification of zoning to accommodate RHNA for lower-income households: <ul style="list-style-type: none"> <li>Identify zones meeting the “default” density (Gov. Code § 65583.2 subd. (c)(3)(B)) or;</li> <li>Identify and analyze zones with densities less than the “deemed appropriate” (default) density that are appropriate to accommodate lower RHNA.</li> </ul>	

**Comments:**

Description of Requirement	Page Number
<p><i>Capacity:</i> Describe the methodology used in quantifying the number of units that can be accommodated on each APN:</p> <ul style="list-style-type: none"> <li>• If development is required to meet a minimum density, identify the minimum density, or;</li> <li>• Describe the methodology used to determine realistic capacity accounting for land use controls and site improvement requirements, typical density trends for projects of similar affordability, and current or planned infrastructure.</li> <li>• For sites with zones allowing non-residential uses, demonstrate the likelihood of residential development</li> </ul>	
<p><i>Infrastructure:</i> Existing or planned infrastructure to accommodate the regional housing need, including water, sewer and dry utilities</p>	
<p><i>Small and large sites:</i> Sites identified to accommodate lower RHNA that are less than one-half acre or larger than 10 acres require analysis to establish they are adequate to accommodate the development of affordable units.</p>	
<p><i>Affirmatively Furthering Fair Housing:</i> Identified sites throughout the community that affirmatively furthers fair housing (see page 5 of checklist)</p>	
<p><i>Nonvacant Sites Analysis:</i> For nonvacant sites, demonstrate the potential and likelihood of additional development within the planning period based on extent to which existing uses may constitute an impediment to additional residential development, past experience with converting existing uses to higher density residential development, current market demand for the existing use, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites</p>	
<p>If nonvacant sites accommodate 50 percent or more of the lower-income RHNA, demonstrate the existing use is not an impediment to additional development and will likely discontinue in the planning period, including adopted findings based on substantial evidence.</p>	
<p>Nonvacant sites that include residential units (either existing or demolished) that are/were occupied by, or subject to, affordability agreements for lower-income households within 5 years are subject to a housing replacement program. (Gov. Code § 65583.2 subd. (g)(3))</p>	

Please note: This checklist does not include new requirements related to zoning for sites accommodating the moderate and above moderate income pursuant to AB 725, statutes of 2020 as this requirement is not enacted until 2022.

**Comments:**

**Alternative Methods to Accommodate the RHNA: Optional**

Description of Requirement	Page Number
Accessory Dwelling Units: Analyze the number and affordability level of ADU units projected to be built within the planning period, including resources and incentives and other relevant factors such as potential constraints, and the likelihood of availability for rent	
Existing Residential Units: number and affordability level of units rehabilitated, converted or preserved that meet the provisions of alternative adequate sites. In addition, this includes units in a motel, hotel, or hostel that are converted to residential units and made available to persons experiencing homelessness as part of a COVID-19 response and acquisition of mobile home park. If using this option, the adequate site alternative checklist must be provided.	
Other: Jurisdictions are encouraged to consult with HCD regarding other alternative methods options including new manufactured housing park hook-ups, floating homes/live aboard berths, conversion of military housing, adaptive reuse of commercial uses, or other housing opportunities unique to the community to ensure their adequacy to accommodate RHNA.	

**Other Miscellaneous Requirements**

Also see Technical Advisories issued by the Governor’s Office of Planning and Research at: [New state legislation related to General Plans Appendix C](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) ([http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf)) and [Fire Hazard Planning General Plan Technical Advice Series](http://opr.ca.gov/docs/Final_6.26.15.pdf) ([http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf))

Description of Requirement	Page Number
Description of the means by which consistency with the general plan will be achieved and maintained. (Gov. Code § 65583 subd. (c)(8))	
Description of construction, demolition, and conversion of housing for lower- and moderate-income households within the Coastal Zone (if applicable). (Gov. Code § 65588 subds. (c) and (d))	
Description of opportunities for energy conservation in residential development. (Gov. Code § 65583 subd. (a)(8))	
Description of consistency with water and sewer priority requirements pursuant to SB 1087 (Gov. Code § 65589.7)	
Other elements of the general plan triggered by housing element adoption: <ul style="list-style-type: none"> <li>• Disadvantaged Communities (Gov. Code § 65302.10)</li> <li>• Flood Hazard and Management (Gov. Code § 65302 subds. (d)(3) and (g)(2)(B))</li> <li>• Fire Hazard (Gov. Code § 65302 and 65302.5)</li> <li>• Environmental Justice (Gov. Code § 65302 subd. (h))</li> <li>• Climate Adaptation</li> </ul>	

**Comments:**

## Schedule of Actions/Programs

### Government Code, section 65583, subdivisions (c)(1 – 7), and (10)

For adequate site programs See “Housing Element Sites Inventory Guidebook” at [HCD’s technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (<https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>)

Program Description	Program numbers	Page number
<i>Program(s) to provide adequate sites (large/small sites, incentives for mixed use/nonvacant sites, publicly owned sites, annexation, etc)</i>		
If required: Program to accommodate a shortfall of adequate sites to accommodate the lower RHNA. This program must meet the specific criteria identified in Gov. Code § 65583.2 subd. (h) and (i).		
If required: Program to accommodate an unaccommodated need from the previous planning period pursuant to Gov code § 65584.09		
If required: Program when vacant/nonvacant sites to accommodate lower RHNA have been identified in multiple housing elements, if needed. (Gov. Code § 65583.2 subd. (c))		
If required: Program to provide replacement units when occupied by, or deed restricted to lower-income households within the last 5 years, if needed. (Gov. Code § 65583.2 subd. (g)(3))		
<i>Program(s) to assist in the development of housing to accommodate extremely-low, very-low, low or moderate-income households, including special needs populations</i>		
<i>Program to address governmental and nongovernmental constraints to the maintenance, improvement, and development of housing</i>		
<i>Program(s) to conserve and improve the condition of the existing affordable housing stock</i>		

### Comments:



<b>Program Description</b>	<b>Program numbers</b>	<b>Page number</b>
<i>Program(s) to promote and affirmative further fair housing opportunities</i>		
<i>Program(s) to preserve units at-risk of conversion from affordable to market-rate rents.</i>		
<i>Program(s) to incentivize and promote the creation of accessory dwelling units that can be offered at an affordable rent.</i>		

Do programs specify specific clear commitment, meaningful actions, that will have beneficial impact within the planning period?

Do programs identify timing, objectives (quantified where appropriate), and responsible parties, if appropriate for implementation?

### **Quantified Objectives**

#### **Government Code, section 65583, subdivisions (b)**

For an example table addressing this requirement visit [California Housing and Community Development Building Blocks](https://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml) (https://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml)

<b>Description of Requirement</b>	<b>Page Number</b>
Estimate the number of units likely to be constructed, rehabilitated and conserved or preserved by income level, including extremely low-income, during the planning period	

**Comments:**