

October 1, 2008

Via E-Mail & Hand Delivery

The Hon. Bill Bogaard and Councilmembers  
City of Pasadena, 100 North Garfield Avenue  
Pasadena, California 91109

Re: Comments on the Housing Element, General Plan Update

Dear Mayor Bogaard and Councilmembers:

The West Pasadena Residents' Association (WPRA) appreciated attending the workshops and hearings held to date to discuss the Draft Housing Element. We are optimistic that the final document will incorporate the wide spectrum of views and comments that were expressed throughout this process.

All of us with a significant stake in Pasadena's future agree that Pasadena's unparalleled quality of life is worth championing, while acknowledging the delicate balance that this entails with compliance to state mandates and economic prosperity. In view of this, we respectfully request that consideration be given to:

- Provide an up-to-date inventory of existing affordable-housing stock and its location
- Effect no displacement of families/persons currently living in low-density units such as SFRs, duplexes, and bungalow courts
- Carefully define neighborhood "edges" to insure smaller, multi-family and single-family residential areas are protected
- **Sustain** current policy regarding second units on small, single family residential lots
- Discourage increasing density adjacent to landmark/historic districts to maintain integrity and historic fabric
- Proscribe the demolition/removal of existing structures to make room for new development, where existing affordable and workforce housing is lost (assure "**no net loss**" of affordable housing)
- Explore the feasibility of abolishing developer in lieu fees, and the practicality of mandating on-site affordable housing for all new multi-family construction
- Equitably distribute new construction throughout the city's transit areas

Thank you for the opportunity to comment. The WPRA appreciates the good work of the Planning Staff in guiding this complex and rigorous process, and respectfully asks your consideration of the above requests.

Sincerely,

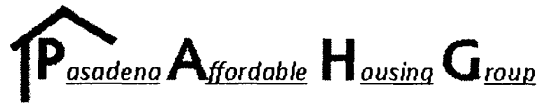
Audrey O'Kelley, President  
West Pasadena Residents' Association

Mic Hansen, Chair  
Land Use and Planning Committee

cc: Mr. Bill Trimble, Senior Planner  
Mr. Richard Bruckner, Director of Planning and Development  
Ms. Takako Suzuki, Field Representative, District 6

WEST PASADENA RESIDENTS' ASSOCIATION  
POST OFFICE BOX 50252 • PASADENA, CA 91115  
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11/24/2008  
5.B.1.



November 24, 2008

Pasadena City Council  
100 N. Garfield Ave  
Pasadena, CA 91109

Dear Mayor Bogaard and Members of the City Council:

In recent months Pasadena Affordable Housing Group (PAHG) has provided you with substantial comments and recommendations regarding the Draft Housing Element. We appreciate the time that you and your staff have given to meet with us and review our analysis, and particularly, the warm response of your Commissioners to our recommendations.

However, after reviewing the November 24 staff report, PAHG cannot support the staff recommendation due to three issues regarding process:

- Failure of the staff to incorporate recommendations provided by the Planning Commission (Commission)
- Lack of clarity regarding upcoming affordable housing planning processes, and
- Overall transparency in developing and utilizing the Housing Element (Element) as the City's primary instrument to establish housing priorities, develop programs, and create accountability.

Due to these significant procedural concerns, PAHG asserts that it is premature to forward the Draft Element to the California Department of Housing and Community Development (HCD).

Upon review of the staff report, PAHG is concerned with the following issues:

- 1) The staff report indicates on pages 2-3 that only proposed changes from HCD would be evaluated and considered for inclusion prior to adoption. Our concern is that once the draft is sent to HCD, there will be no further opportunity or process to collaborate with the staff on necessary changes to improve clarity and accountability, and thus strengthen the Element as the City's guiding housing document. This is contrary to what City staff told the public at various meetings. How will the City Council provide oversight to ensure that the adopted Element reflects input from the community and the recommendations from the Commission?
- 2) The staff report notes on page 4 that legal allocation of sufficient funds for "at risk" units is not feasible during the first two years of the Element planning period. Why not? Project prioritization, selection and funding decisions – as well as the City's housing funds, reserves, and dedicated funding sources – should be transparent. The total amount of available affordable housing funding in the Housing Trust Fund should be made public, and so should the process for allocating those

11/24/2008

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public funds. Transparency in funding prioritization is central to the Commission's recommendations to create a Housing Nonprofit and Community Land Trust.

- 3) Pages 5-6 detail staff's response to the Commission's request to take advantage of historic affordable housing opportunities by moving quickly to create a Housing Nonprofit and Community Land Trust. Staff's response to wait reflects a lack of urgency about the city's severe housing crisis, an attitude we hope that the Council does not share. The staff's response raises a number of issues:
- a) The Commission reviewed the Draft Element and provided its recommendations at their meeting over two months ago, on September 10. Was the Commission unaware of the scope and/or timing of the ULI TAP Report? While the Commission unanimously recommended expediting creation of the nonprofit and land trust, the staff, in contrast, insists on waiting. Given the historic opportunity, shouldn't efforts be initiated immediately, and then refined upon the hiring of the new Director and receipt of the ULI report?
  - b) When does the City anticipate hiring the new Housing Director? Following the staff analysis, if major initiatives should be placed on hold until the position is filled, why the urgency now to submit a potentially very incomplete Element to HCD? Doesn't it make sense to re-evaluate the Element and its assignment of priorities (and departmental resources) after receipt and evaluation of the ULI Report, hiring the new Director, and conducting a housing strategic plan? In addition, the public should have an opportunity to comment on the ULI Report's recommendations.
  - c) How will the housing strategic plan (as referenced twice in the staff report) differ from and complement the Element? If the Element is not the fundamental implementation tool, there must be a public component to provide input on project selection and prioritization, and assignment of funding. PAHG asserts the Element should be the tool for both policy development and program implementation, and concurs that the current draft element is lacking in assignment of resources and priorities.

Thank you for your attention to these questions regarding process. We appreciate the community dialogue that is building regarding the Housing Element and believe it is critical to continue this dialogue and expand the collaborative process between staff, the Commission, and the public.

Respectfully submitted,

Ashley Phillips  
On behalf of Pasadena Affordable Housing Group