

RECEIVED

Sept 14, 2020

2020 SEP 14 PM 12:14

Dear Honorable Mayor and City Council,

ST. CLARK

We can appreciate some of the challenges of trying to figure out how to meet the goal of 9,409 Housing units in the next eight years. It feels not only daunting and even impossible but in this letter we have outlined how that number of units can be produced and fit well into our community.

Today the Council is also considering authorization for a consultant to assist in preparing the 2021-29 Housing Element. Rather than expending time and energy in what is likely a futile effort to alter Pasadena's RHNA allocation, MHCH supports putting emphasis on a broad collaborative effort to shape a realistic Housing Element that both can meet State legal requirements and has inclusive community input and support. This will require more than pro forma community engagement to ensure that communities of color and lower-income residents are fully represented in the process. The current schedule calls for a draft by May 2021, which with upcoming holidays and the constraints of the COVID pandemic means the City would be better served by putting all its energy into a productive effort rather than a simply symbolic one.

During the Public Engagement portion of one of the last Housing Elements, there was time for only one public meeting and only four people showed up. Our organization asked to have more meetings in various churches, which the city graciously did. We are would like to offer our services to continue a collaborative spirit as we seek to imagine together how we can meet the RHNA goals. Here's and idea of how units could be produced:

1. During this past 8-year RHNA cycle we needed to build only 561 market rate units, but Pasadena surpass that by 2,100 units. So, it looks like we should not have too much trouble meeting the above moderate allocation.
2. The challenge is with the lower income units which equals 5,960 additional affordable units in the next eight years. If we divide that by 7 for each councilman district that come to 851 per district. Then if we divide 851 by 8 So that we can determine how many units per year, that comes to 106 per year for each councilman district.
3. If we break down 106 units into the following three categories it starts looking possible:
 - Zoning for 35 inclusionary units per district per year
 - Zoning for 35 affordable ADU per district per year
 - Zoning for only 35 affordable housing units on Church Land per district per year.

The 5,960 additional affordable housing units allocated in this next 8-year cycle actually still reflects only part of the need, so we should not be questioning this number if we love our city and all those struggling to make ends meet—especially now. Approximately half the Pasadena is spending over 50% of their income on housing. We still have 527 homeless neighbors we need to make sure get housed, and that count was done before COVID fully kicked in. We are expecting between a 20-45% increase in homelessness due to COVID and fires. We have jam-packed freeways, most driving a distance to find housing they can afford, in fact many of Pasadena staff members live a distance. If we supplied housing for those who live, work and worship in Pasadena, we would lower traffic and create a more thriving healthy city. That is the premise behind Housing Element law. A healthy city is made up of all income levels.

We love Pasadena's housing vision:

09/14/2020
Item 20

All Pasadena residents have an equal right to live in decent, safe and affordable housing in a suitable living environment for the long-term well-being and stability of themselves, their families, their neighborhoods, and their community. The housing vision for Pasadena is to maintain a socially and economically diverse community of homeowners and renters who are afforded this right.

Each time I read this, it reminds me of the greatest command in the Bible, "You must love the Lord your God with all your heart and with all your soul and with all your strength and with all your mind; and your neighbor as yourself" (Luke 10:27). If we want to live in a nice home in a safe neighborhood, we should want that everyone. I believe it is possible to meet the RHNA if we all show our love for our great city by figuring out how to meet this urgent need and not waist our precious taxes dollars on fighting this, when it's very likely an unwinnable battle. But we must love all members of our community.

Nine in ten Black people say African-Americans have not achieved equality in this country. Four in ten are skeptical that they ever will. Yet thirty-eight percent of white Americans think "our country has made the changes needed to give blacks equal rights with whites." Facts suggest we have a long way to go to achieve economic equality between white and black Americans. Thankfully, the Housing Element now addresses racial disparity with Affirmatively Furthering Fair Housing (AFFH). I will name only three of the many blatant exclusionary practices from Pasadena's history with long shadows still manifest in staggering racial disparities ¹we can and must address:

- With Urban Renewal, the building of Parson's replaced a thriving Black and Brown neighborhood, some say up to 20,000 people. Scott UMC was moved to Orange Grove Blvd, but Friendship Baptist at 80 Dayton is a reminder of once was.
- The 210 built in the early 70's created an easy exit to build in the suburbs, for those who could afford cars and property in adjacent cities. But Lincoln Avenue's thriving Black Business District was destroyed and has never recovered. Thousands of people were displaced in the path of the freeway. South Pasadena, a wealthy community, avoided this nightmare of the freeway destroying their community after years of organizing, which Pasadena supported.
- AB Smith Sold Restrictive Covenants for \$5 and at one point 65% of the Pasadena had racially restrictive covenants on their homes, pushing the home value up and lowering home values in areas where people of color lived. Smith even bought property to prevent "encroachment" In 1939 when he heard rumors that some Black people were "infiltrating" into areas outside of their boundaries. The Pasadena Improvement Foundation was formed to assure that they were kept in place.

When AFFH is applied to Pasadena the city must ask:

- 1) What is the socio-economic and racial breakdown in each district?
- 2) How many people commute to Pasadena each day—and at what distance?
- 3) Hoe much affordable housing is there in each district?

Sincerely,

Jill Suzanne Shook, ED, Making Housing and Community Happen

Anthony Manousos, Co-Founder

Sonja Berndt, Core Group member

Bert Newton, Liaison Coordinator

Ann Marie Molina, ADU Chair

¹ At \$171,000, the net worth of a typical white family is nearly ten times greater than that of a Black family (\$17,150) in 2016. Gaps in wealth between Black and white households reveal the effects of accumulated inequality and discrimination, as well as differences in power and opportunity that can be traced back to this nation's inception. The Black-white wealth gap reflects a society that has not and does not afford equality of opportunity to all its citizens" <https://www.brookings.edu/blog/up-front/2020/02/27/examining-the-black-white-wealth-gap/>.

RECEIVED

2020 SEP 14 PM 12:14

CITY CLERK
CITY OF PASADENA

Linda Vista-Annandale Association
Madison Heights Neighborhood Association
West Pasadena Residents' Association

September 13, 2020

Mayor Tornek and Councilmembers

c/o: correspondence@cityofpasadena.net

Re: Pasadena City Council Meeting 9/14/2020;

Agenda Item 20. RHNA and Housing Element Discussion

Mayor Tornek and Councilmembers:

The Linda Vista-Annandale Association, the Madison Heights Neighborhood Association, and the West Pasadena Residents' Association, representing many of Pasadena's historic single-family neighborhoods, comprised of thousands of single-family homes, are together expressing shared concerns with respect to the 2021-2029 SCAG Regional Housing Needs Assessment (RHNA) Allocations, and with a specific focus on Pasadena **Appealing** Pasadena's Draft Allocation.

WE REQUEST THAT PASADENA OPPOSE THE SCAG DRAFT 2021-2029 RHNA ALLOCATION AND ACT TO APPEAL THE ALLOCATION.

At its last meeting on September 9, 2020, the Planning Commission voted to support appealing Pasadena's 2021-2029 SCAG RHNA Allocation. The staff report to the Council for this agenda item does not include any mention of this important action.

The discussion at the Planning Commission included a comparison of the 2014-2021 Allocation totaling 1,332 housing units with the new Pasadena Draft Allocation totaling **9,409 units**. While the City has produced 2,589 units through 2019, i.e. more than the current RHNA Allocation, the excess is due to a large production of "Above Moderate" units in contrast to Affordable Housing. This result has exacerbated rising community criticism of out-of-scale, out-of-character dense, large buildings with related traffic impacts, undermining what so many of us love about living in Pasadena without producing much in the way of needed Affordable Housing. Also, our Associations join many others in continuing to be concerned about the increasing loss of "Local Control" over land use and related matters.

During the discussion at the Planning Commission and at the recent Legislative Policy Committee, Planning Director Reyes reviewed Pasadena's 2014-2021 "failures" and challenges while noting that Pasadena will face challenges in meeting, i.e. producing, the new total of 9,409 units (of which thousands are allocated to Very Low, Low and Moderate units) including feasibility in the face of market forces. Director Reyes indicated that the new numbers may not be feasible for Pasadena or any other city in California. Plus, very importantly, failing previously to meet a SCAG RHNA Allocation did not result in specific penalties; however, RHNA Allocations are now considered regulatory with specific and serious penalties for failing to meet the new Allocations. At the Planning Commission, staff only advised the Commission of one penalty, yet the Staff Report to the Council includes a detailed discussion of potential penalties beginning on Page 3.

09/14/2020
Item 20

The current RHNA Allocation process includes an expanded Appeal process which is just beginning. The Appeal process is complex and narrow, and will be difficult, but, considering the lack of feasibility of these new RHNA Allocation numbers and the impacts on Pasadena of the new Allocation, including changes to the physical character of Pasadena and possible serious penalties, it seems obvious to our three Associations that Pasadena must appeal the new Allocation.

Many cities in the SCAG jurisdiction, including Los Angeles, Santa Monica, Cerritos, South Pasadena, Alhambra and West Hollywood, have sent detailed letters of criticism and opposition to SCAG and appear ready to formally appeal and resist the new RHNA Allocation numbers. The Los Angeles letter is of particular interest in that it includes a Resolution opposing the Allocation for Los Angeles passed by the Los Angeles City Council. Attachment A to this letter is a summary of a number of these letters of opposition to SCAG. It appears that Pasadena has not sent any such letter. Incidentally, failing to oppose and resist the new Allocations may have unexpected consequences because if any cities are successful in reducing their new Allocations, the reductions will be reallocated to other cities possibly resulting in an increase in Pasadena's already-excessive Allocation.

Even if the argument for appeal is difficult and uncertain, our view is that Pasadena needs to act with other similarly situated cities in asserting our similar rights and concerns. Pasadena needs to act along with other cities in a manner that may make good political sense and change the situation at SCAG and in Sacramento.

Our Associations are in favor of Affordable Housing. But we also advocate maintaining the character and livability of Pasadena.

Thank you for your consideration of and attention to our concerns.

Respectfully,



Nina Chomsky, President
Linda Vista-Annandale Association



John Latta, President
Madison Heights Neighborhood Association



Dan Beal, President
West Pasadena Residents' Association

ATTACHMENT
LVAA, MHNA, WPRA LETTER TO COUNCIL 9/13/2020
CITY RHNA ALLOCATION LETTERS TO SCAG
(PARTIAL LIST)

1. **Los Angeles:** dated November 5, 2019.

The letter indicates that the City of Los Angeles City Council has adopted a Resolution to oppose the draft RHNA Methodology adopted by SCAG unless significantly amended. Los Angeles continues by expressing a number of concerns with the draft RHNA Methodology; and then proposes a number of changes to the draft Methodology. The four suggested changes to the draft Methodology include: deleting the Household Growth Factor, and revisions to the Job Accessibility, Transit and Social Equity factors.

2. **Cerritos:** dated February 20, 2020.

Cerritos, on behalf of itself and other SCAG member cities, requests for a number of reasons that the SCAG RHNA Subcommittee deny the SCAG approved Alternative RHNA Methodology, and seeking direction to SCAG to contest the validity of the “unsupported” housing numbers assigned by the State of California to this SCAG region.

3. **West Hollywood:** dated February 20, 2020.

West Hollywood objected to the proposed Draft Methodologies to determine RHNA and the resulting Allocation. West Hollywood provides a number of arguments for its position, including pointing out that there is no consideration for previously met RHNA goals, and, no consideration for the land area dimensions of a city such as the built out nature of West Hollywood.

4. **Santa Monica:** dated August 20, 2019.

Santa Monica objects to aspects of the RHNA Methodology and makes suggestions for modifications of the draft Methodology.

5. **Alhambra:** dated September 9, 2019.

Alhambra objects to the proposed final RHNA Methodology, suggesting a number of changes, including acknowledging recent housing development, acknowledging existing growth constraints, and acknowledging the limited role of local government in constructing housing.

6. **South Pasadena:** dated September 10, 2019.

South Pasadena stresses that SCAG should work with local jurisdictions to assess and allocate RHNA Allocations based on local conditions and historic development patterns.

**Kenneth McCormick
595 E. Colorado Blvd. Suite 518
Pasadena, California 91101**

RECEIVED
2020 SEP 14 PM 12:14
CITY CLERK
100 N GARFIELD ST
PASADENA, CA 91101

September 14, 2020

Mayor Tornek and City Council Members
City of Pasadena
100 North Garfield Street
Pasadena, California 91101

Dear Honorable Mayor and Council Members:

I am writing in support of the Planning Commission's recommendation that the City Council appeal Pasadena's RHNA allocation for the 2021-2029 Housing Element.

While well-intentioned, the SCAG report has significant limitations in methodology and analysis that need challenging by cities. An appeal may not have any practical results immediately, but Pasadena must continue its quest to bring rationality to statewide housing policies.

SCAG has tailored its allocations on a forecast of a 21% growth in Southern California households in the next eight years and a population growth of 15%. It is based on State data that effectively extrapolates past years of growth, tweaked for possible changes in household size.

Good urban planning needs to be more sophisticated than this, looking at the implications and consequences of assumptions and tailoring accordingly. In this case, SCAG did not look at the realistic absorption capacity of its constituent cities, either in physical capacity or infrastructure. It penalizes older cities with already-taxed infrastructures and already-built neighborhoods, relegating an implied transition for older cities away from largely single family residency to predominantly multi-family homes. Only through apartments and condos could Pasadena possibly build over 9,000 units in the next eight years, and even then, there isn't production capacity or market demand to support that growth - otherwise we would have already been building faster.

Before even asking how Pasadena could subsidize and build 5,961 of affordable units, the 3,447 RHNA allocation of market rate housing units for Pasadena is unrealistic. After 15 years since the major decline in the size California's construction workforce, we are just getting back to 900,000 statewide workers. Without significantly more employees in the industry, for which the State has no program, labor costs will continue to fuel upward pressure in construction costs. Along with rising social costs and municipal fees, the new production cost of market rate housing is already at a breaking point. The average rent for newly produced market-rate apartments in Pasadena requires a qualifying income of twice the County's median income. Market demand for these units has slowed and even reversed in certain parts of Los Angeles County, while we face the continuing

problem of how to subsidize housing to make it affordable for those between 50% and 200% of County median income. That's where we need leadership.

Most cynical about the RHNA exercise is the false signal it gives to affordable housing advocates, as though this allocation process itself will change anything. The State could be taking leadership in offering cities real leadership for helping build affordable housing - like bringing back tax increment financing for municipalities - but this RHNA exercise appear just a political exercise. I hope you appeal it.

Sincerely,

Ken McCormick

Martinez, Ruben

Subject: FW: RHNA Appeals Process

From: richard luczyski <rluczyski@gmail.com>

Sent: Saturday, September 12, 2020 2:39 PM

To: McAustin, Margaret <mmcaustin@cityofpasadena.net>; Madison, Steve <smadison@cityofpasadena.net>; Gordo, Victor <vgordo@cityofpasadena.net>; Hampton, Tyron <THampton@cityofpasadena.net>; Masuda, Gene <gmasuda@cityofpasadena.net>; Kennedy, John <JohnJKennedy@cityofpasadena.net>; Wilson, Andy <awilson@cityofpasadena.net>; Mermell, Steve <smermell@cityofpasadena.net>; Jomsky, Mark <mjomsky@cityofpasadena.net>; Felicia Williams <felicia@feliciaforpasadena.com>; Tornek, Terry <ttornek@cityofpasadena.net>

Subject: RHNA Appeals Process

CAUTION: This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

There is a upcoming hearing that needs to be reconsidered and an appeal filed to take another look at the RHNA allocation plan for our city. The information imputed for the existing plan came before the Corona Virus hit the State as well as all the current fires that have erupted at present. We now all live in a different world and recalculations should now be considered. We don't know what our job market is going to look like in the near or far . There is going to be a lot of time loss when considering transit uses getting back to normal what ever that means? We have existing housing already here not being used because of high rents and job losses. What are those numbers? Why don't we get these numbers out for the public to see and understand our real needs in housing?

I believe there is a slant from the State in how those putting up the numbers keep working for the developers and not the citizens of the city. Our city is becoming unrecognizable and losing the charm of the valley. The appeals process is really set up to be really harsh and should be changed. We live in a Democracy where compromise works better than the dictatorial method the State would like to put us under in this process. I think it's time for SCAG to stand up and make some changes for the benefits of the citizens who live in the cities. I don't know when the people ever had a chance to put forth rules that those State representatives in their districts would and did approve? Maybe it's time to look at those representative voting records and see where they have fit into the process? Why are the people last to know of the changes being made for their benefit and don't?

Richard Luczyski

09/14/2020
Item 20



September 14, 2020

City Council

c/o Mark Jomsky
City Clerk
100 North Garfield Ave.
Pasadena, CA 91101

Re: RHNA Allocation

Dear Mayor Tornek and City Council members:

Livable Pasadena has been following closely the 2021-2029 SCAG Regional Housing Needs Assessment Allocations. We find Pasadena's allocation of 9,409 units alarming, and we urge City Council to take action and appeal the allocation.

As we have consistently maintained, housing solutions need to be found at the local level. Our local leaders are best positioned to find solutions that allow our community to grow while preserving our livability. We should not cede local control to those in Sacramento that seek to apply sweeping changes to our communities without regard to the negative impact those changes may make. Adding 9,409 housing units to our community, without first studying the impact these units would make to our infrastructure (i.e. police, fire, water, sewer, streets) is not good planning.

Yes, an appeal may be difficult and the outcome uncertain. But we believe that Pasadena is worth fighting for. Yes, we need additional housing, particularly low-income and workforce housing. But again those decisions need to be made at the local level, according to our needs, and not arbitrarily dictated to us. We believe that we can work together to find solutions that fit our needs and make our community stronger.

We are looking to you, as our elected representatives, to stand up for Pasadena and to fight to maintain local control. Our neighbor cities are resisting Sacramento's decrees, and Pasadena should resist as well. We ask you to put Pasadena's needs first.

Thank you,

Megan Foker
On behalf of Livable Pasadena

09/14/2020
Item 20

Reese, Latasha

From: Allison Henry <beowulfscot@yahoo.com>
Sent: Monday, September 14, 2020 11:59 AM
To: PublicComment-AutoResponse
Subject: Letter on RHNA for 9-14 Council Agenda, ITEM 20

CAUTION: This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Dear Council,

My name is Allison Henry, and I am a District 3 resident and active in housing and tenant issues. I am submitting this letter as part of the September 14 Regional Housing Needs Assessment discussion on the agenda. We have a housing crisis, we know this. We also know that while some units of affordable housing were created in the last cycle (over 500 units) and we thank the city for these efforts. But even before this new RHNA cycle number, we knew that the city was falling short of goals. And I would also point out that the only housing number that was overproduced was above moderate—well beyond what the current residents of the city actually need. And we know that there are vacancies in that luxury stock. We currently do not have a full and transparent accounting of housing stock in Pasadena. We know there are vacancies in our city in our rental stock, but that is only articulated as anecdotal knowledge because there is no database. Let's look at a local example of vacancy and severe disrepair: 1075 N Los Robles, District 3. A house that had served seniors and those in recovery was sold. The tenants were booted out (8 by the way, highly vulnerable tenants). House had some work on it. But now it is surrounded by a green fence in a state of disrepair because rehab on the house stopped early. Now it sits, with a green fence around it. The best hope is that locals are squatting in it. This is just one example in our city. Those vacancies become costs to everyone else. And how are we to have a fully informed discussion on housing and RHNA numbers if we lack this crucial data?

Can the city commit to not only a comprehensive housing database, but one that includes a rental housing registry? These are not only done by cities with rent control. The City of Fresno has a rental registry because they need a clear picture of rental housing stock, and it has become an important and key tool for code violations and enforcement. We have had four house fires here in Pasadena, and in the last two months fires that were attributed to dangerous electrical issues. One of those fires killed a child off of Washington Blvd. Honestly, the city is not performing their end of inspections (I know this personally—my apartment was not inspected for the first 9 years I lived there, and we have electrical issues that could result in fire).

Will the city commit to getting a full, accurate, and honest count of housing stock, especially housing stock in Pasadena? How are we to have these important planning discussions if we lack data?

It seems that many in our council are willing to fight these new numbers with a costly appeal, and yet no one has committed to the data portion of this discussion or fight. It appears disingenuous to take a fight footing before getting all of the data ducks in order. We cannot address what we don't know—and we DO NOT have a clear and informed line of sight into our housing stock. But with a commitment, we could change that. And in getting better data on current stock, we could make that current stock safer for those that reside here now, and better plan for housing our residents in the future.

Thank you for your consideration.

09/14/2020
Item 20

Sincerely,

Allison Henry

CLAIRE W. BOGAARD

Email: <cwbogaard@icloud.com>

September 14, 2020

Mayor Terry Tornek
and Members of the City Council:

Honorable Members:

This relates to **Item 20** on the Agenda for today's City Council meeting:
Regional Housing Needs Assessment ("RHNA").

I am writing to express my support for the Planning Commission's recommendation that the City of Pasadena appeal its 9,409-unit DRAFT RHNA allocation for Cycle 6 (2021-2029).

I want also to urge the Council to join with other similarly situated Southern California cities not only to challenge the RHNA allocation, but to re-examine the underlying premises of the RHNA process in light of its poor track record over the years to increase housing production in the State of California and in light of the changed circumstances created by the coronavirus pandemic.

There is no question about the need in California to increase the availability of housing and I take pride in Pasadena's record over many years of creating affordable and workforce housing units. One of the defects of the RHNA process is that it does not give recognition to communities like Pasadena that have consistently promoted housing, particularly affordable housing.

I support Pasadena's commitment to increasing affordable and workforce housing and hope that such commitment will be maintained and strengthened.

But the allocation for Cycle 6, being seven times Pasadena's prior RHNA allocation, is clearly unachievable and could have the effect of discouraging, rather than encouraging, the allocation of limited resources to increasing the City's housing stock.

As noted, there is a change of circumstances due to the pandemic that justifies an appeal of the RHNA allocation. The early implications of the pandemic suggest that usage of existing commercial structures, both office and retail, will be substantially reduced in the future. If that turns out to be true, such buildings will provide an unanticipated opportunity for increased housing in coming years.

Pasadena and other cities should have the opportunity to explore the potential of such a trend without the burden of an unreasonable and unachievable allocation.

In addition to challenging this Cycle's allocation, the City's appeal will offer the City protection from the supplemental RHNA allocation that could result from the appeal process pursued by other California cities. If allocations are reduced in other cities, Pasadena could have its present allocation increased. It would be irresponsible for the City not to protect itself from that outcome.

In light of the foregoing, I urge the Council to adopt the Planning Commission's recommendation to appeal the DRAFT RHNA allocation for Cycle 6 (2021-2029).

Very truly yours, Claire Bogaard

09/14/2020
Item 20